

From: [Amy Kelly](#)
To: [SoS Rulemaking](#)
Subject: [EXTERNAL] comments on Election Rules 8 CCR 1505-1
Date: Friday, July 23, 2021 9:20:38 AM

Dear Secretary Griswold:

I am strongly opposed to your rule not allowing third-parties to access Colorado voting equipment and related logs, files, etc. Auditing 101 in the business world and government is that a third-party must do the audit, because self-auditing is, by definition, biased and, therefore, not trustworthy.

Additionally, I oppose the proposed rule changes listed below by number, **all** of which will making voting less secure and cheating much easier. I'm including my comments on why I oppose them.

2.13.2 – In which the Secretary of State would handle inactive voter registration cancelations instead of County Clerks.

7.3.2 through 7.3.5 - Significant reduction of electronic voting/ballot standards, elimination of ballot logs, tracking, etc.

7.6 – The gutting of checks and balances which prevent abuse of online electronic balloting voters with disabilities. No ballots should be allowed to be printed at home on any printer and then mailed in via any envelope. Using state-issued and state-printed ballots is a security measure they must not be bypassed. An application with an affirmation statement verifying a qualifying disability must still be required, as well as keeping a Voter ID submission requirement in place.

7.7.1 – Counties must still be allowed to use bipartisan judges for first level of signature verification of mail-in ballot signatures to determine voter eligibility. It cannot be only a person of one political party, because that is inherently biased.

7.7.13(a) – Automatic signature verification software **MUST** still

be tested prior to each election.

8.10.2 – Poll watchers must be allowed to challenge mail ballots based on discrepant signatures.

8.13 – Signature escalation cards must not be eliminated. Review of a set number of ballots signatures at a second level by a second team before acceptance is a critical election security step.

9.2.2 - There must be **clear** rules around election judges' handling of mail-in ballots of voters determined to be dead by bipartisan election judge teams.

10.1.5 - The canvass board role I must remain as is. If canvass board members or the county clerk find an issue, they need a rule allowing them to contact election judges to resolve it or for an explanation or correction. This is another critical election security step.

10.3.2 - The canvass board must still be the body that certifies the official abstract of votes by reconciling the number of ballots cast to the number of voters who voted through review of detailed logs and statements of ballots. This review creates an important layer of election integrity.

10.3.3 - If the canvass board identifies a discrepancy in a Statement of Ballots form, it must be able to still review the particular ballots at issue to identify, correct, and account for the error.

20.11.2 - Seals, chain of custody logs, transfer logs of voting equipment used in vote centers cannot be eliminated if Coloradans are to be able to trust in their elections. You need to do everything possible to increase, not decrease, the ability to catch acts of tampering with machines stored overnight in voting

centers.

20.19.5 – Secrecy envelopes must still be required in voting centers, as well as the ability to track serial numbers of voting equipment or log those who are using admin functions to allow election judges to change counting of overvotes.

At a time when much of America has lost faith in the integrity of our elections, the Secretary of State's office should be doing all it can to increase security and traceability of Colorado's elections. The proposed rule changes do the opposite of that.

Sincerely,

Amy Kelly