

July 20, 2012

RE: Proposed Rule Changes relating to the Colorado Election Rules

Dear Secretary Gessler,

Among the proposed rules changes before you, Coloradans for Voting Integrity finds glaring problems in those pertaining to Rule 41, Rule 8, and possibly others that we have not reviewed in detail yet.

Re: Rule 41

If part of the function of the Canvass Board is to evaluate the clerk's work, then to grant the county clerk with the power to appoint canvass board members will impede the transparency that a canvass is designed to achieve.

We respectfully remind the Secretary that as Colorado implements a risk-limiting audit, many election errors can be potentially corrected with the engaged participation of canvass board members who are independent of the Clerk and Recorder. More attention will need to be allotted to audit and canvass responsibilities, even as the process becomes more efficient in its use of time.

Please reject proposed changes to Rule 41 that weaken or dilute the activities of the Colorado canvass boards just when they need strengthening and bolstering.

CFVI urges you to reject proposed changes to Rule 8 that weaken or dilute the activities of watchers, just as their activities need strengthening and bolstering.

Attentively,

CFVI Board