

## Dwight Shellman

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**From:** Andrea Gyger  
**Sent:** Tuesday, October 08, 2013 2:23 PM  
**To:** Dwight Shellman  
**Subject:** Fwd: Comments re Proposed Election Rules 8 CCR 1501-1

Sent from my iPhone

Begin forwarded message:

**Resent-From:** <[SOS.Rulemaking@sos.state.co.us](mailto:SOS.Rulemaking@sos.state.co.us)>  
**From:** Florence Sebern [REDACTED]  
**Date:** October 8, 2013 at 2:10:27 PM MDT  
**To:** SoS Rulemaking <[SoS.Rulemaking@SOS.STATE.CO.US](mailto:SoS.Rulemaking@SOS.STATE.CO.US)>  
**Subject: Comments re Proposed Election Rules 8 CCR 1501-1**

Secretary Gessler and Deputy Secretary Staiert,

Thank you for soliciting public comment for the proposed Election Rules under 8 CCR 1505-1. As a 130year election judge in Denver, and specifically as one who has served as a supervisor at voter service centers, I submit the following comments:

Rule 8.4 Poll Watchers

8.4.2 Watchers are permitted to witness and verify the conduct of elections and recount activities. Witness and verify means to personally observe actions of election judges in each step of the conduct of an election.

The practical application of this rule means that poll watchers will be able to stand behind the registration judge and the laptop and observe SCORE data. Much of the voter registration information is confidential. This rule is at odds with statute. If a CORA request redacts certain information, a poll watcher should not be able to view it.

In the practical application of this rule, a voter would potentially be facing the registration judge and a possible line of poll watchers (one from each party, issue committee, etc.). Put yourself in the voter's shoes: is visual intimidation of the voter really appropriate? Put yourselves in the registration judge's shoes: would you be able to work effectively and efficiently with someone standing over your shoulder?

I do not find anywhere in Rule 8.4 that a poll watcher is required to actually know the process they are observing. Uninformed watching is not effective; in fact, it's counter-productive.

I spent more time, as a supervisor at a voter service center in the last election, educating poll watchers than processing complaints. In fact, there were **zero complaints lodged by poll watchers in Denver.**

As a 34-year voter in Denver, I remember the history of poll watchers. Their primary focus was get-out-the vote -- assessing who had voted in a precinct so that remaining voters could be called and encouraged to get to the polls. The shift to somehow ensuring election integrity is misplaced. Election integrity is best ensured by solid election processes and trained, educated, election judges.

The proposed rules aid in the misconception that watching elections is somehow preferable to working elections.

I offer the following anecdotal example from the November 2012 election in Denver.

We needed approximately 900 Republican-affiliated election judges to properly staff the election. Due to the emphasis on watchers, this was the result

442 actual GOP-affiliated election judges  
397 GOP-affiliated poll watchers certified  
839 total Republicans involved in the election

If the watchers had been workers, we would have met our goal.

There were no formal complaints, so the question must be asked: what was the end result effectiveness of this group?

Thank you for your careful consideration of the above comments.

Respectfully,  
Florence Sebern