

SCORE Rule Change Objections

May 24th, 2022 Hearing

Statement by Jeff Young

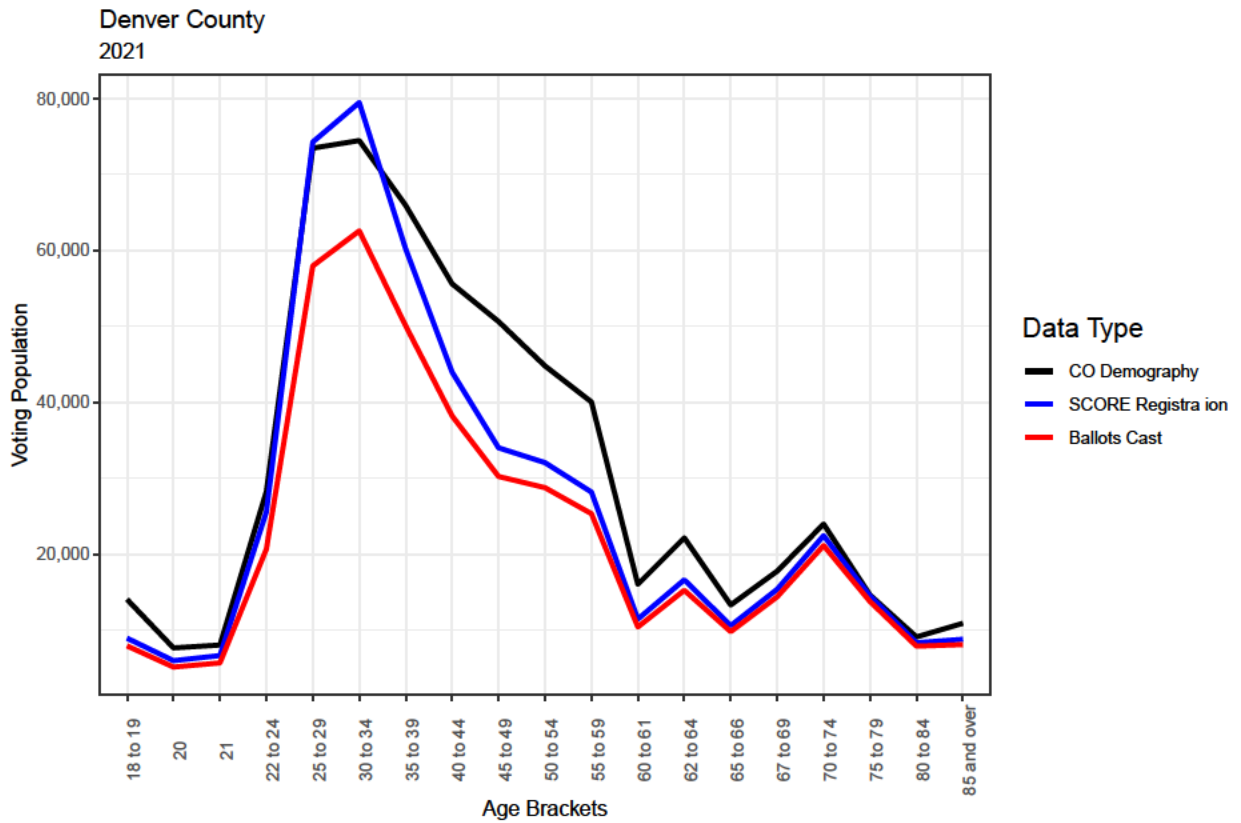
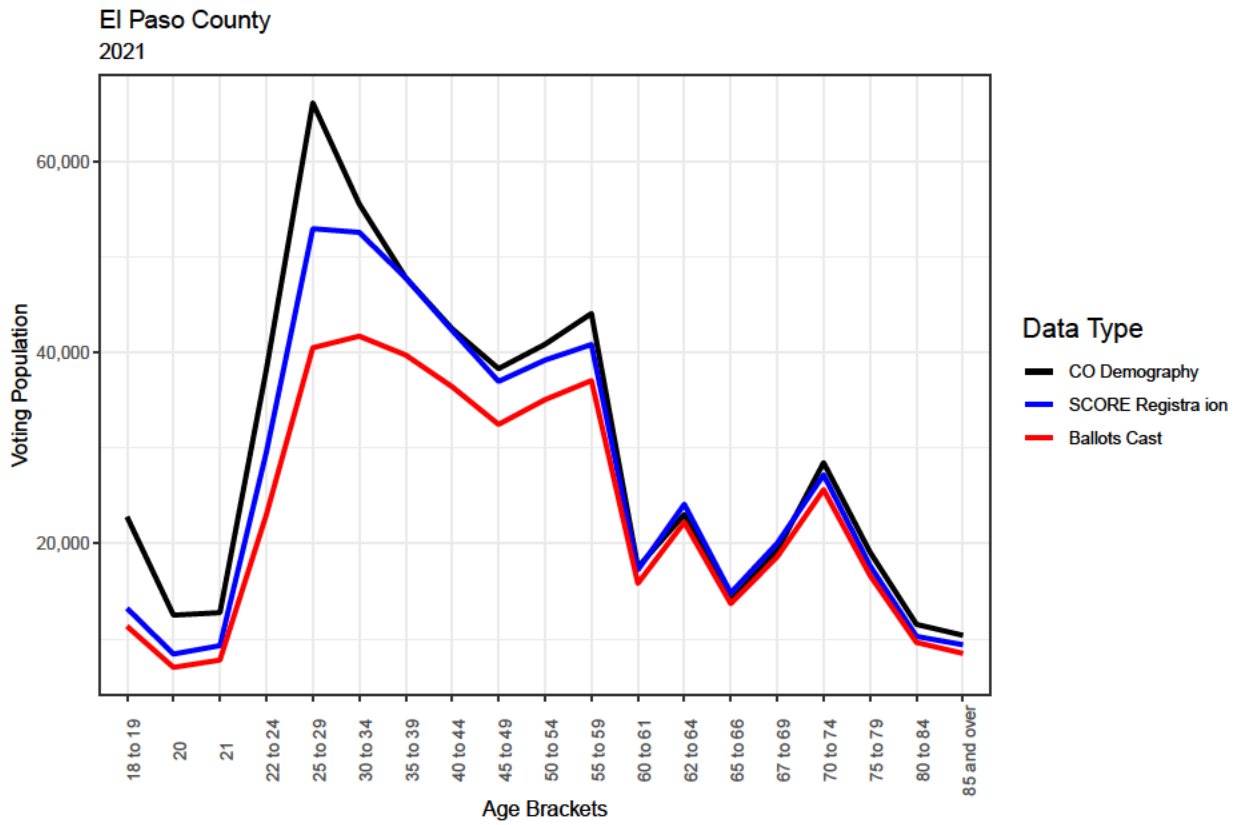
The Secretary of State's office has failed to abide by its voter list maintenance obligations under Section 8 of the National Voter Registration Act of 1993 ("NVRA" or "Act"), 52 U.S.C. § 20507 (in addition to C.R.S. 1-1-107(1)(d)-(e)) and currently has an ongoing lawsuit filed by Judicial Watch and three residents of Colorado claiming such (**Judicial Watch et al V Jena Griswold**). In fact, 11% or 459,678 voters on the rolls as of May 2022 are inactive. As seen in *Exhibit 1* below, from the top 10 counties in Colorado by population (El Paso, Denver, Arapahoe, Jefferson, Adams, Douglas, Larimer, Boulder, Weld, Pueblo), there are several instances where SCORE reflects voter registration rates close to or exceeding 100% of the *voting* population per the Colorado Demography Office. Additionally, *Exhibit 2* shows just how poor list maintenance has been as the majority of the the top 10 counties in Colorado by population (El Paso, Denver, Arapahoe, Jefferson, Adams, Douglas, Larimer, Boulder, Weld, Pueblo) continue to show growth in the voter rolls that doesn't align to growth in the voting population. If the Secretary of State's office can not even abide by basic list maintenance, how will they be able to take control of the administration of all counties' registration lists?

We also know that vulnerabilities in SCORE were verified when Synack conducted an ethical hacker crowd-sourced security program (**Synack SCORE Testing Paper**). Per the report, "the red team network discovered seven vulnerabilities in Colorado's election-related systems as well as the Secretary of State's official website". These discoveries were made after the Chief Information Officer at Colorado Department of State (Trevor Timmons) stated that his office already conducts regular vulnerability scans, as well as periodic audits of county election offices (**Colorado official details plans for penetration testing of election systems**). Additionally, through a Colorado Open Records Request (CORA), all IP addresses that directly accessed SCORE were obtained (**IP Address CORA Request**). The results of this CORA request can be seen in *Exhibit 3*. Another CORA request was made for additional technical information on SCORE, however, the request was denied (**Additional CORA Request Denied**).

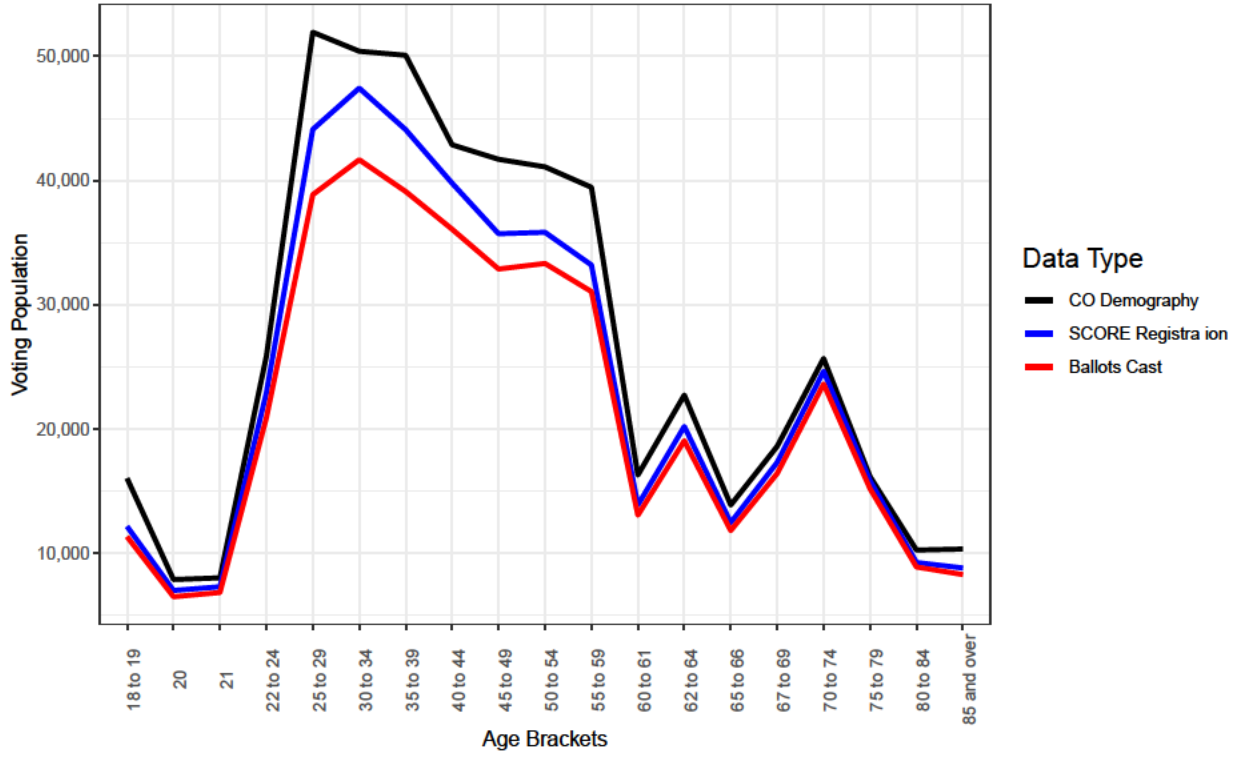
Given the vulnerabilities noted above as well as the apparently numerous violations of law by the Secretary of State (Section 8 of the National Voter Registration Act of 1993 ("NVRA" or "Act"), 52 U.S.C. § 20507, C.R.S. 1-1-107(1)(d)-(e), C.R.S 1-1-107(5), and C.R.S. 24-21-101 to name a few), how can electors feel confident in the continued centralization of administration and power by the said Secretary of State? Specifically C.R.S. 1-1-107(5) states, "The provisions of this section are enacted, pursuant to section 11 of article VII of the state constitution, to *secure the purity of elections and to guard against the abuses of the elective franchise.*" In light of all of the above issues, the Secretary should be proposing rules that fix these known issues and return control and maintenance of the voter registration lists to each county clerk's office. You simply cannot take a process that requires multiple people in multiple counties from the clerks and put it into the hands of the Secretary of State who has far fewer human resources to conduct such a process in a way that maintains the purity of elections. The simplest of economic models will decry such a change and the inevitable consequences of such an action.

WHEREFORE, based on the foregoing accordingly, Petitioner submits this petition to oppose the issuance of Proposed Rule 20.9.1 and requests that this Petition be made part of the rule-making record.

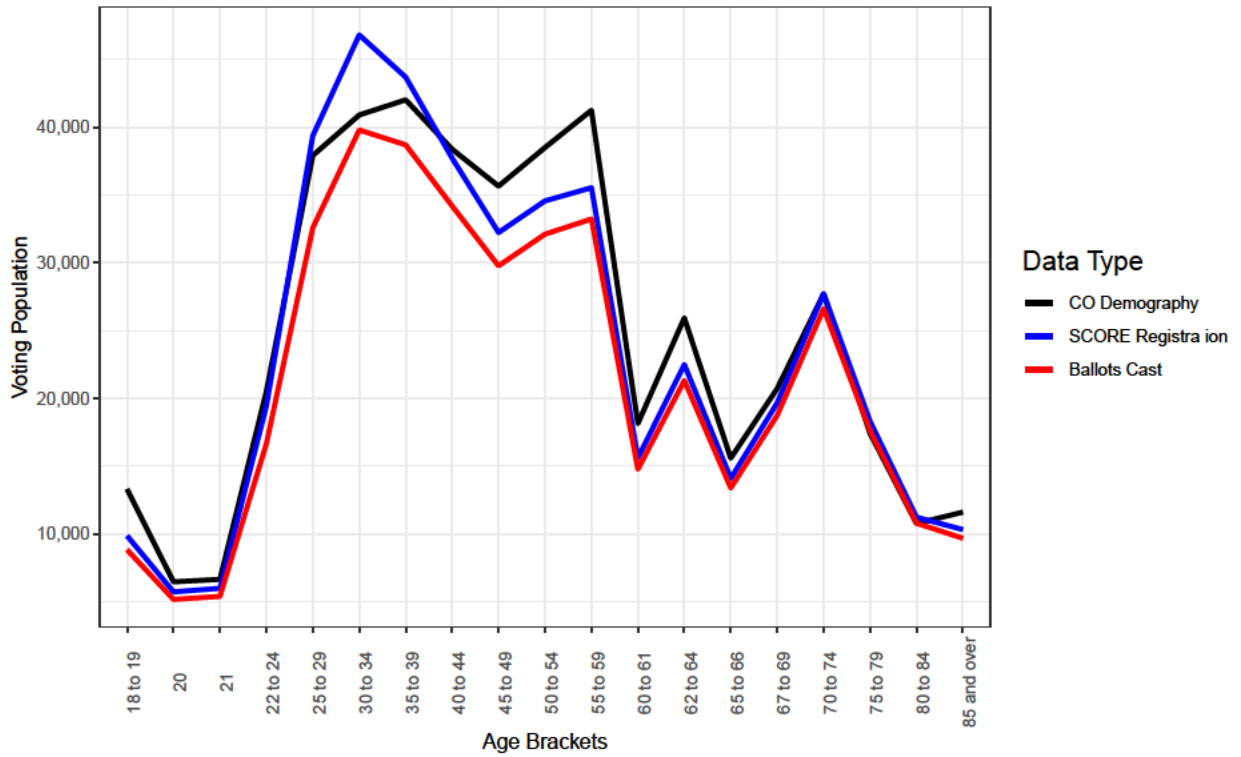
Exhibit 1: SCORE Registration vs CO Demography Office vs Ballots Cast



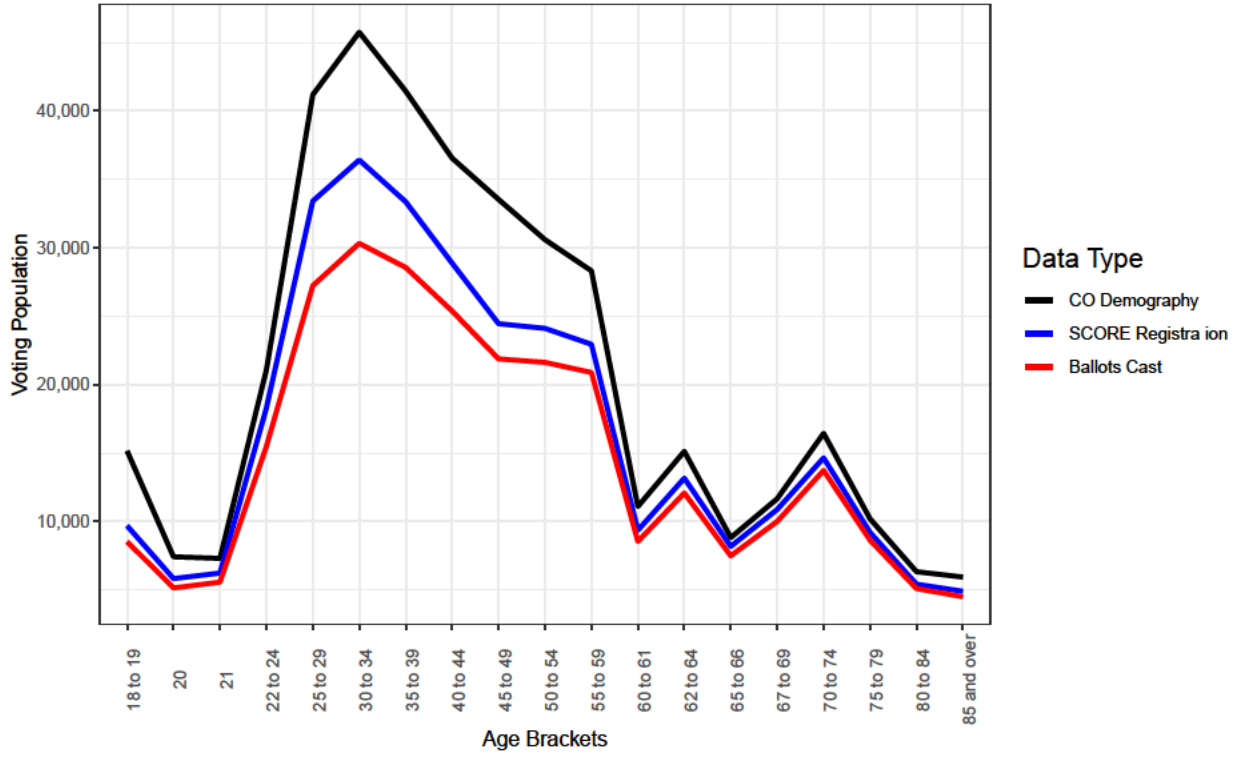
**Arapahoe County
2021**



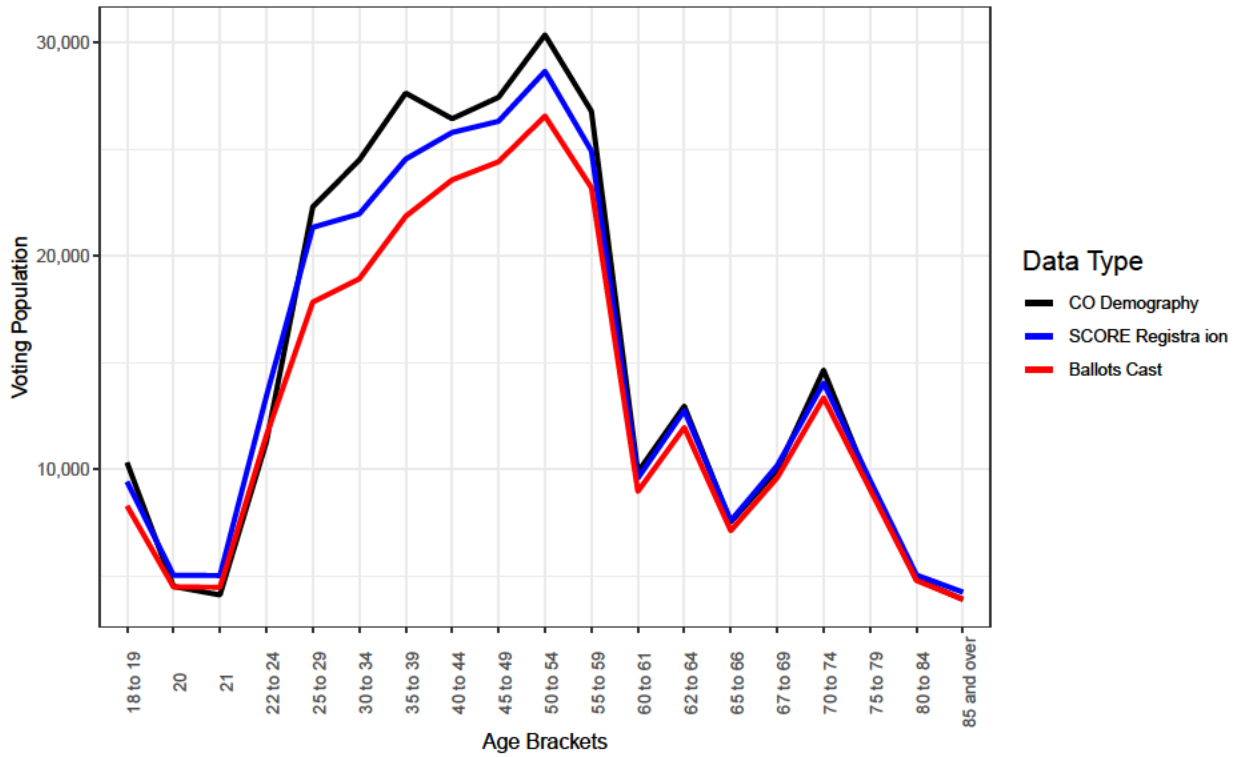
**Jefferson County
2021**



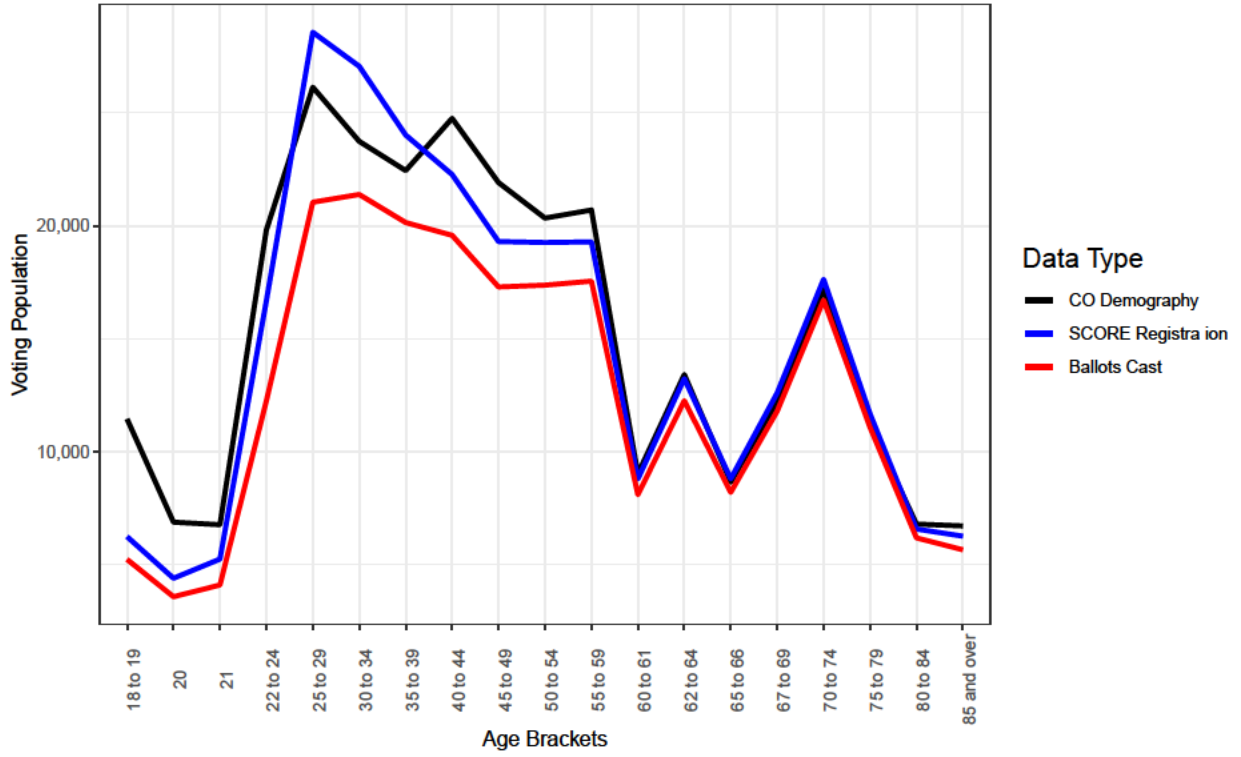
Adams County
2021



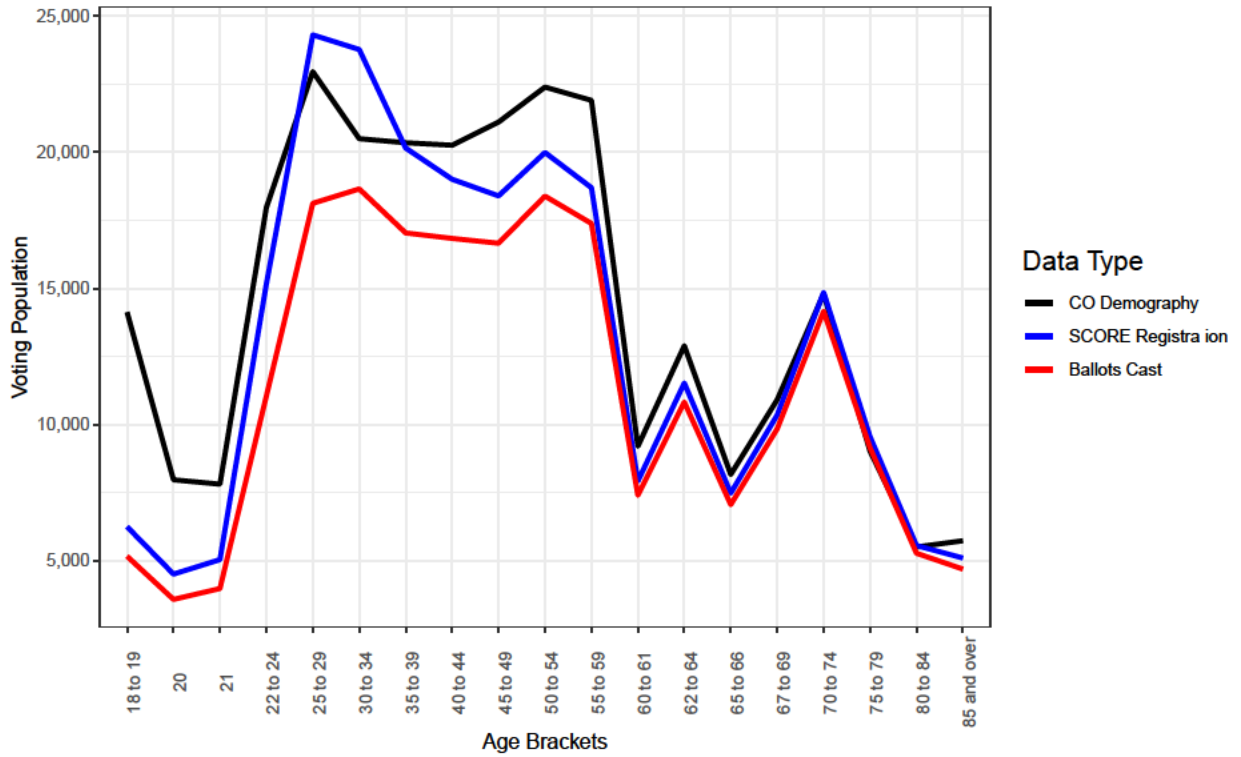
Douglas County
2021



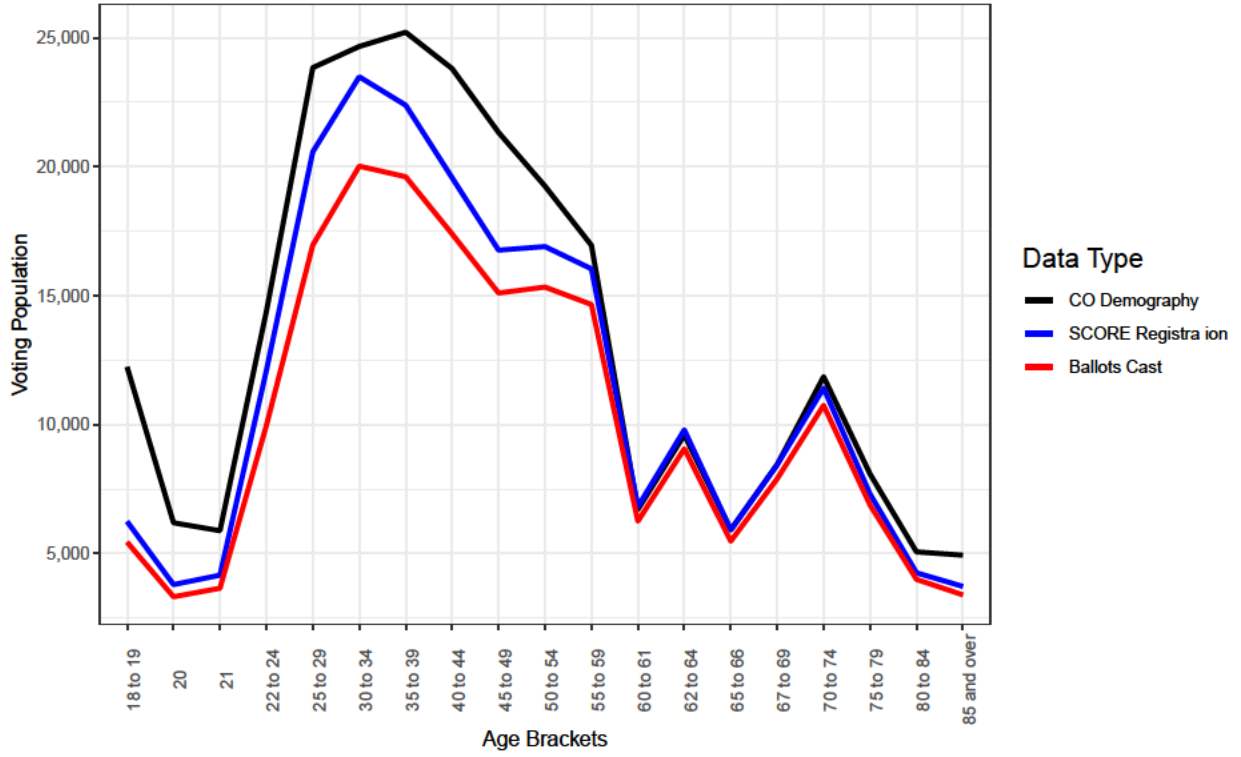
Larimer County
2021



Boulder County
2021



Weld County
2021



Pueblo County
2021

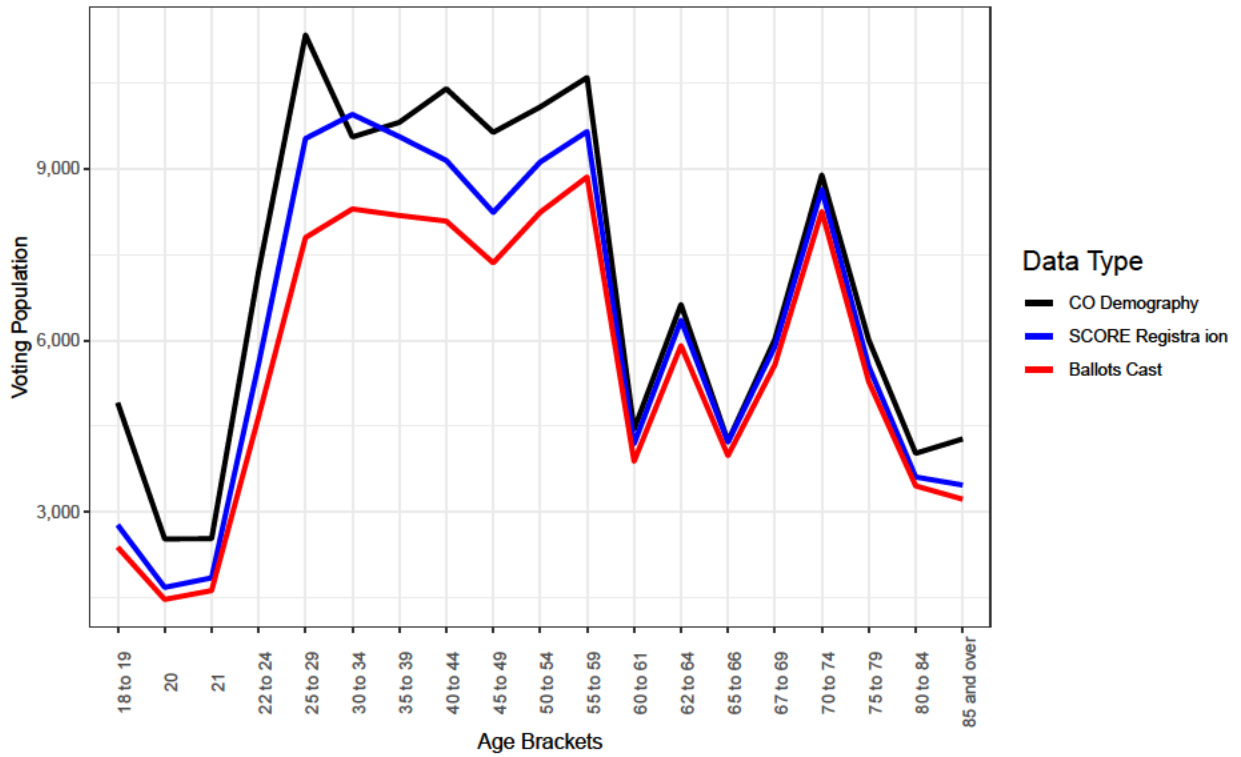
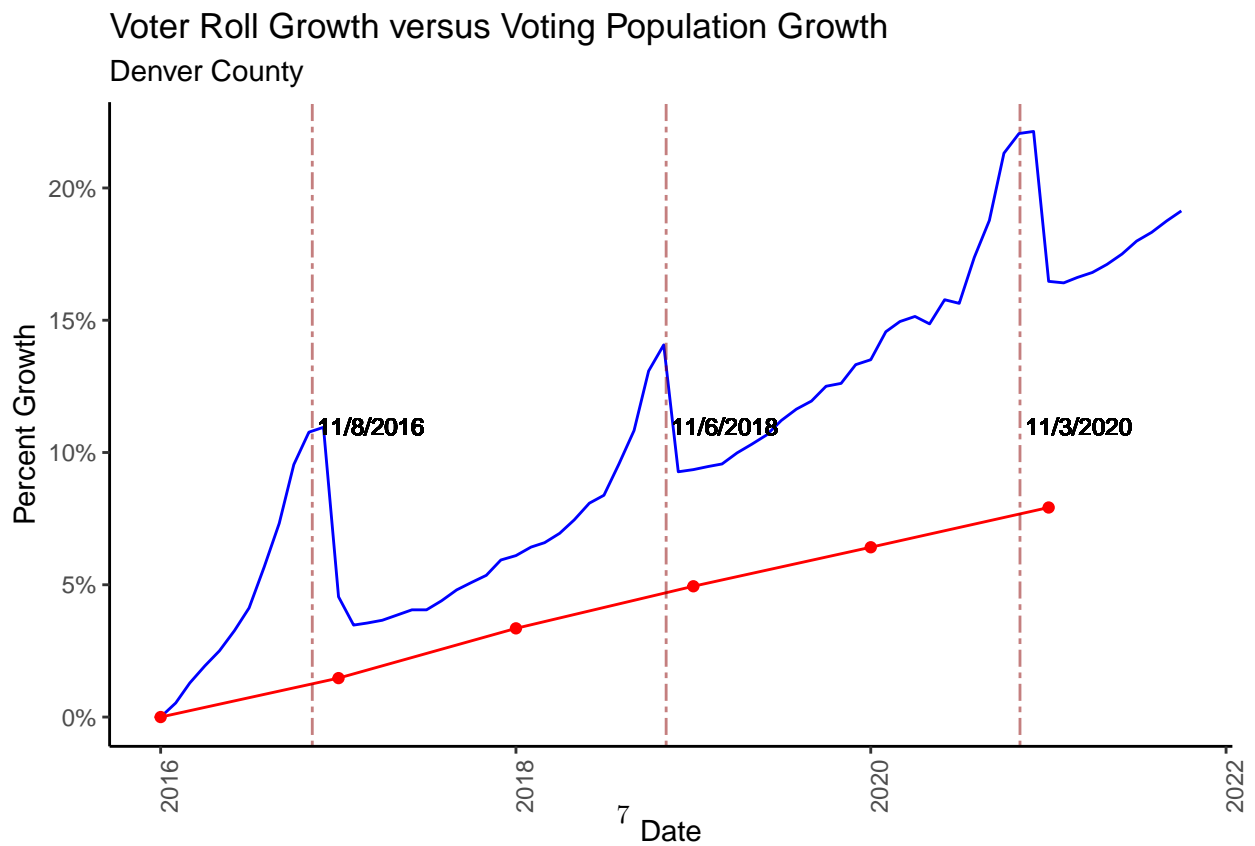
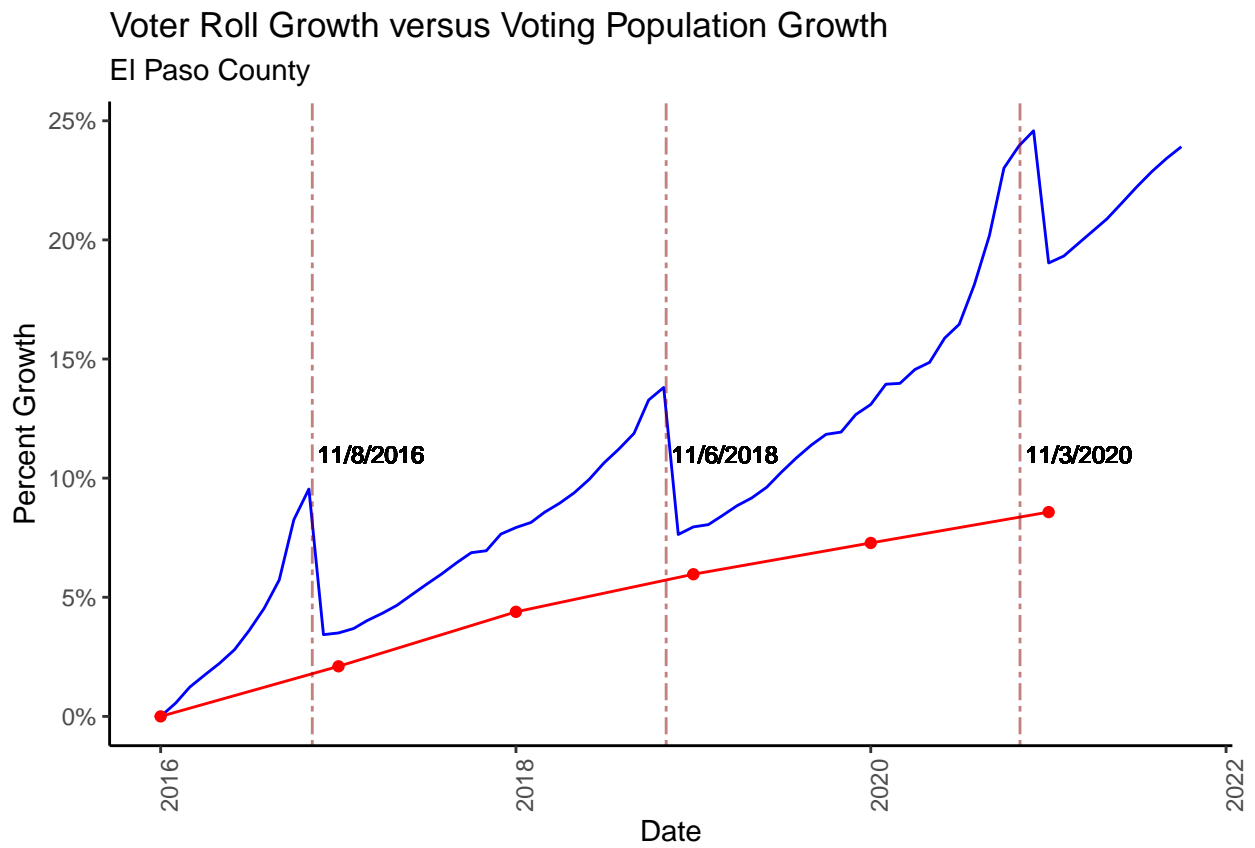
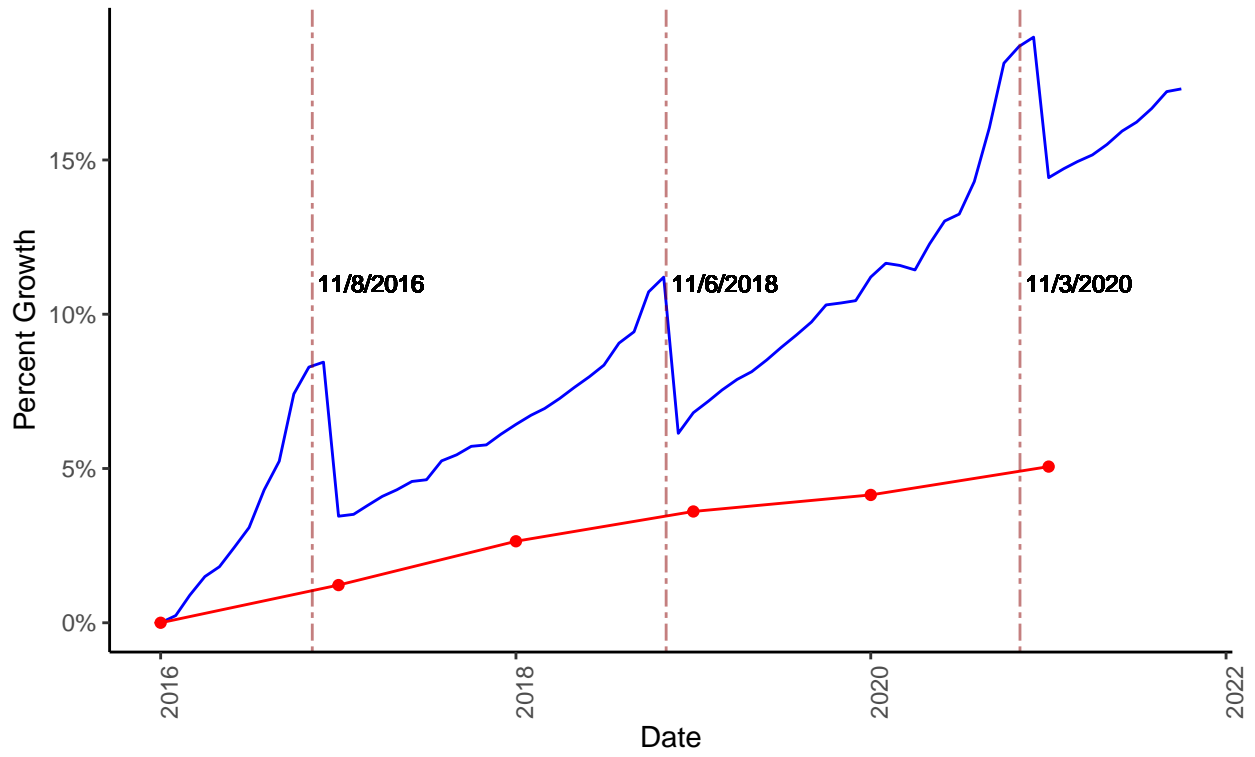


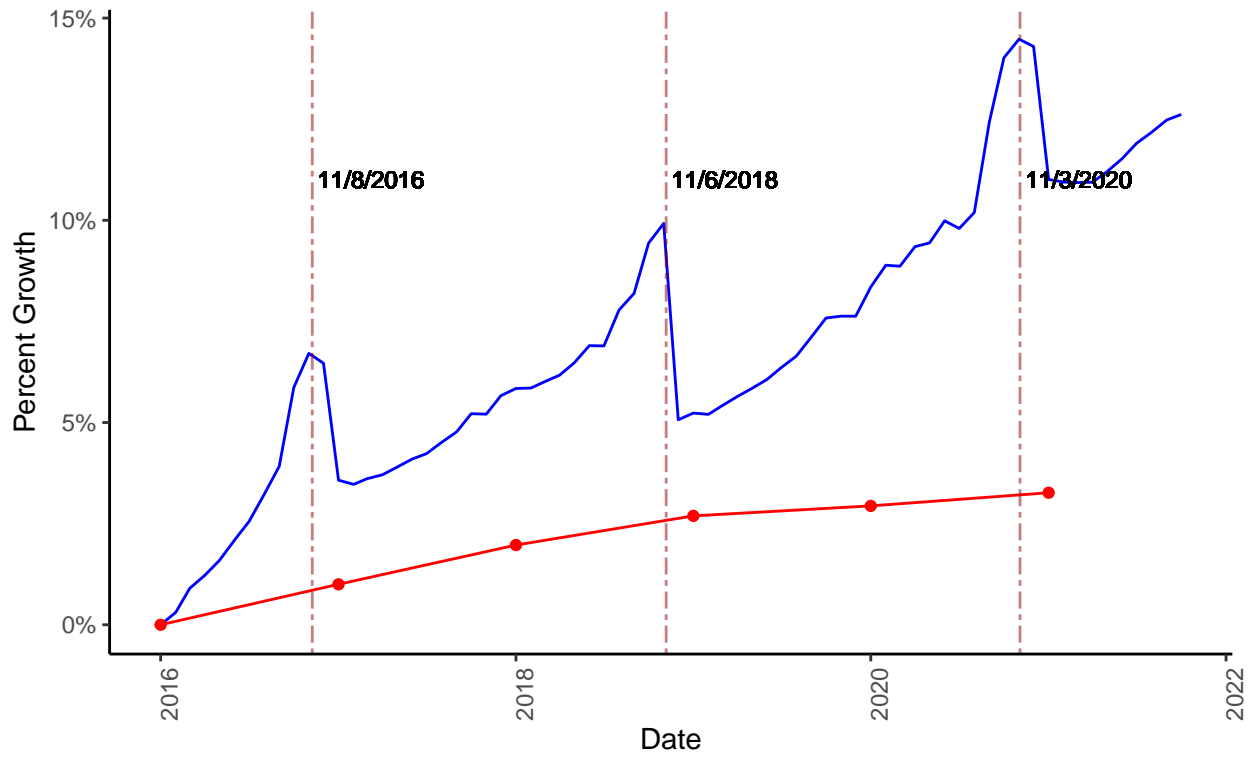
Exhibit 2: SCORE Registration Growth vs Voting Population Growth



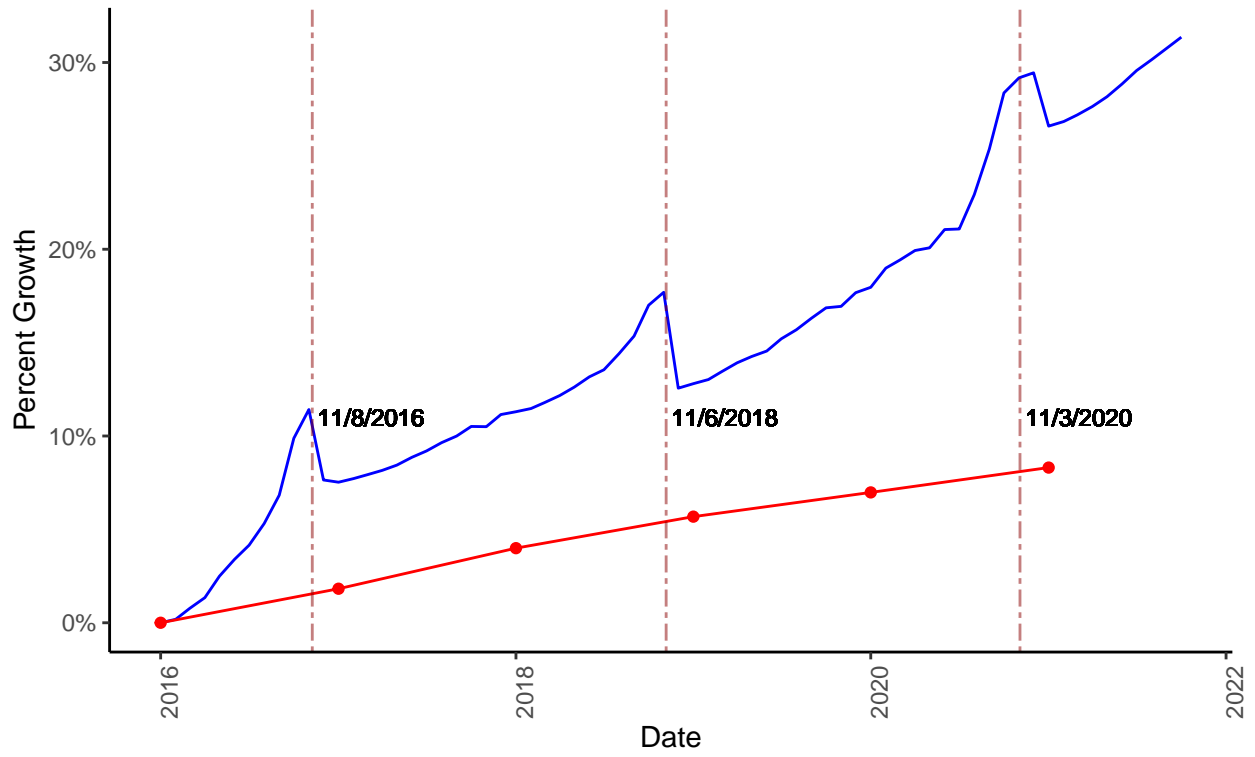
Voter Roll Growth versus Voting Population Growth Arapahoe County



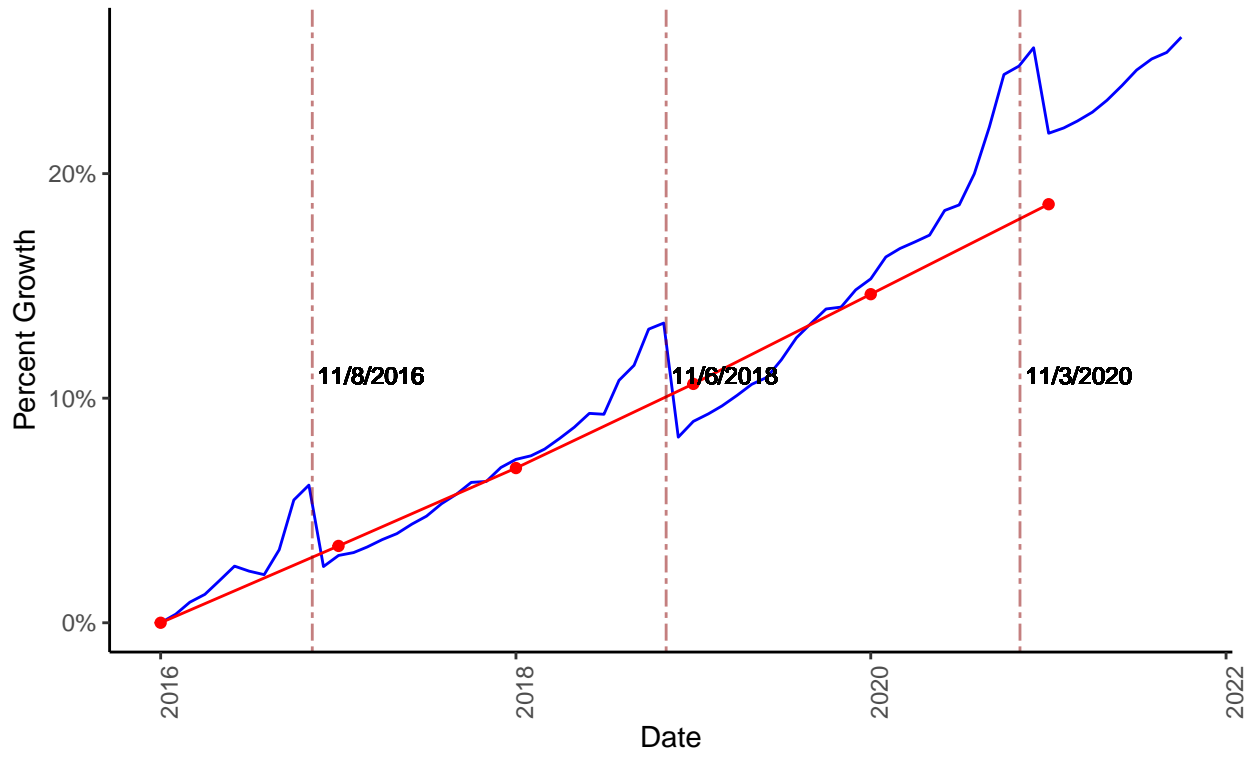
Voter Roll Growth versus Voting Population Growth Jefferson County



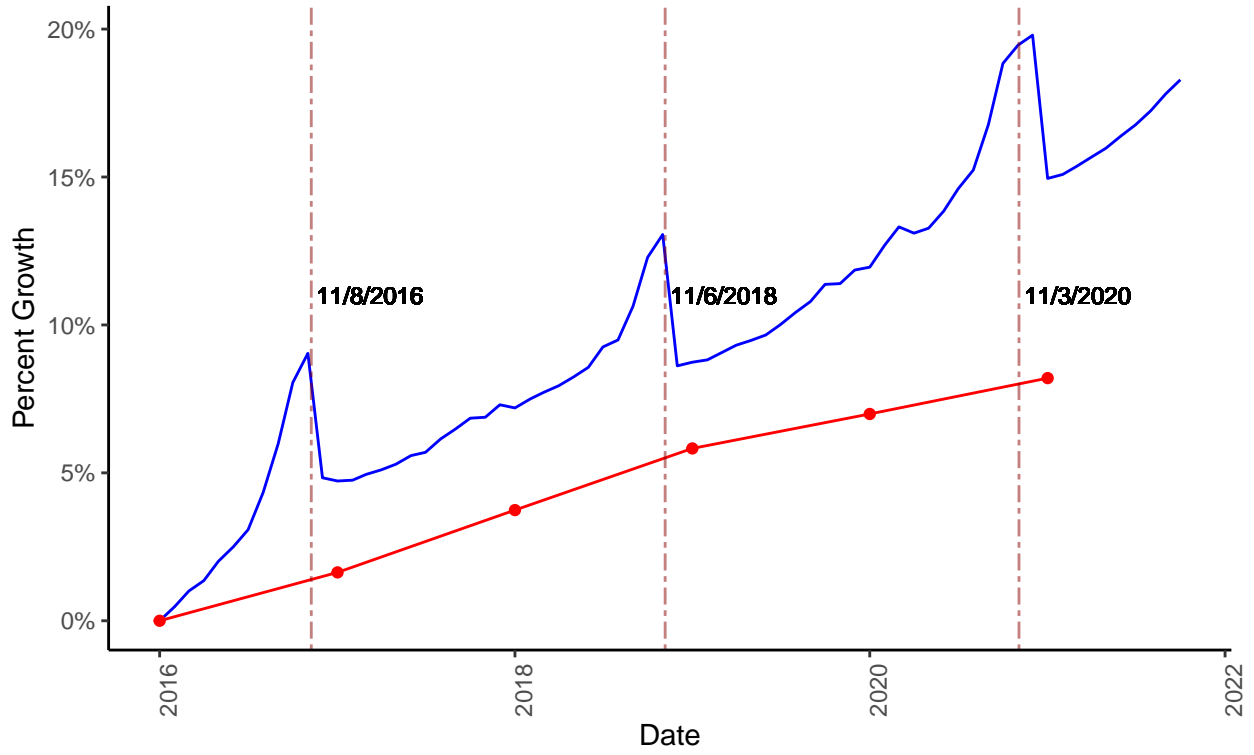
Voter Roll Growth versus Voting Population Growth Adams County



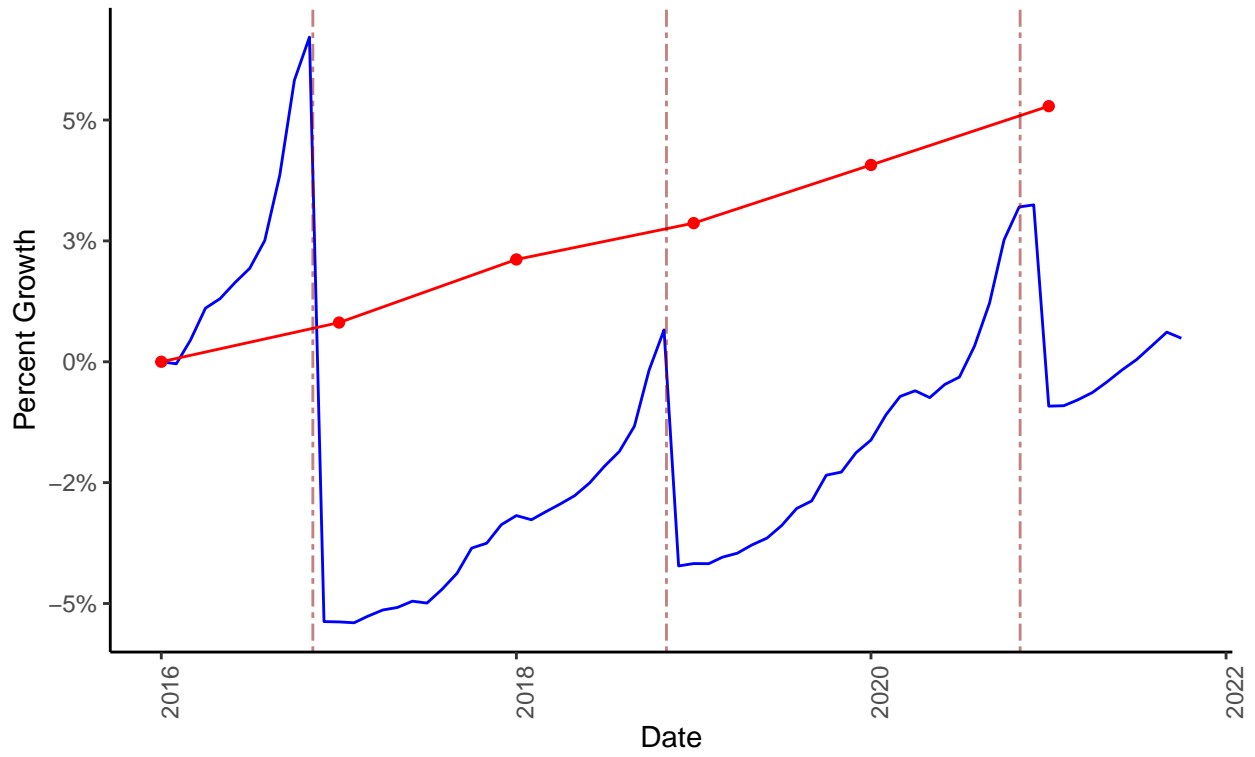
Voter Roll Growth versus Voting Population Growth Douglas County



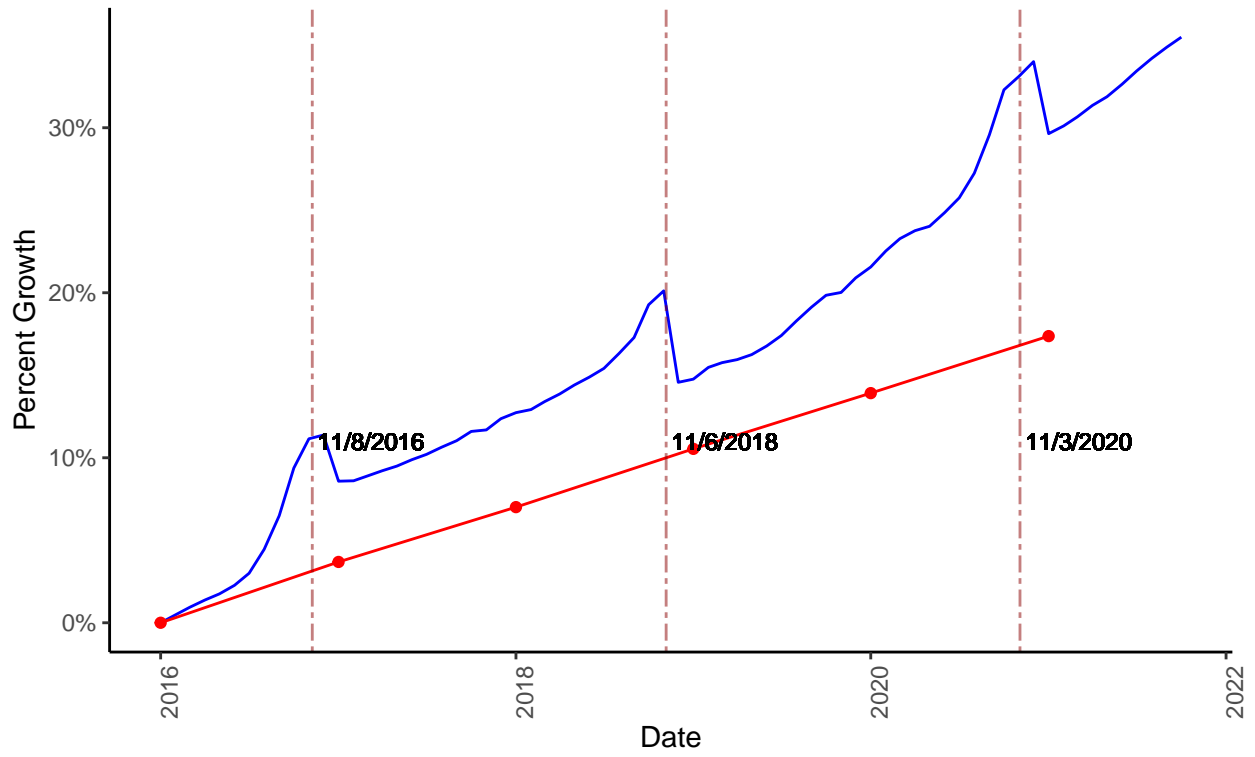
Voter Roll Growth versus Voting Population Growth Larimer County



Voter Roll Growth versus Voting Population Growth
Boulder County



Voter Roll Growth versus Voting Population Growth Weld County



Voter Roll Growth versus Voting Population Growth Pueblo County

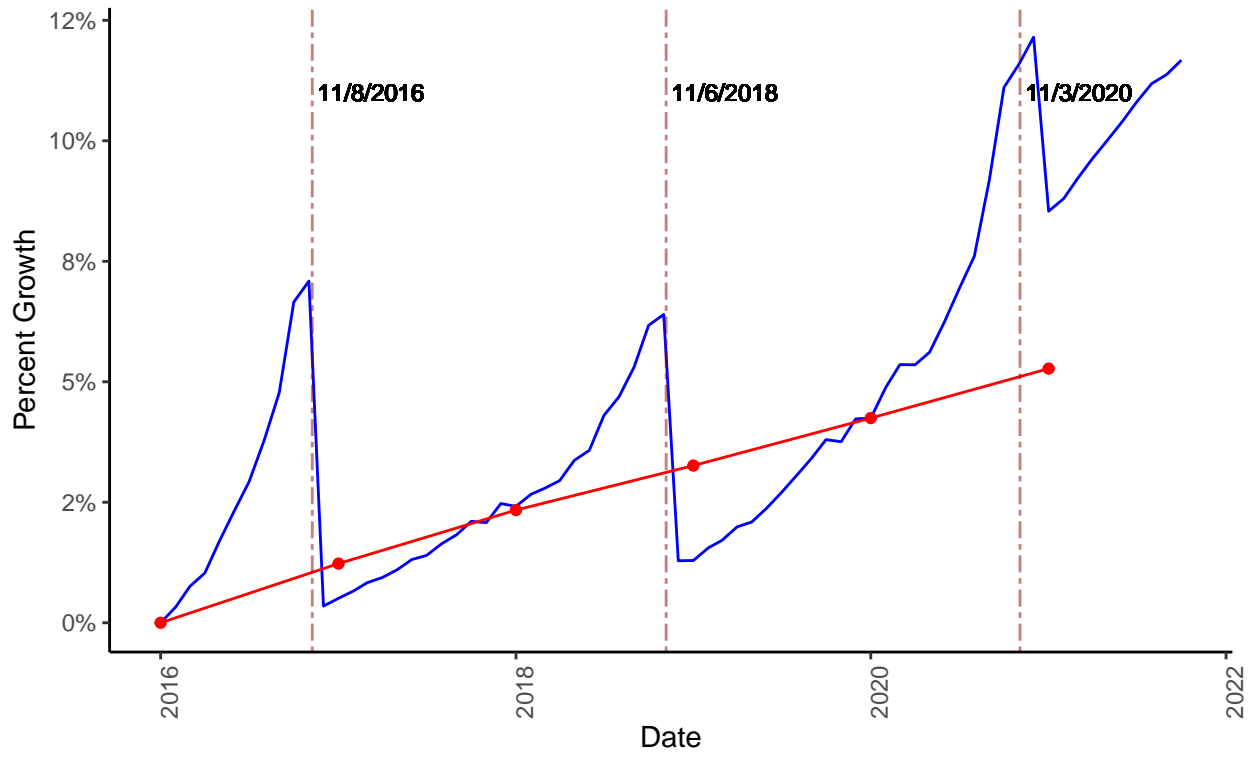


Exhibit 3: IP Addresses Accessing SCORE

IP Locations That Have Accessed SCORE (Not WebSCORE)

