

From: [Angela Vincent](#)
To: [SoS Rulemaking](#)
Subject: [EXTERNAL] Election Rules 8 CCR 1505-1 - Comments
Date: Tuesday, May 24, 2022 11:03:30 AM

I am hereby submitting my comments regarding the proposed restrictive rulemaking by the Secretary of State.

1. The proposed rules do not comply with the Federal Election Commission's 2002 Voting System Standards (VSS). Indeed, most of them are in conflict with it.
2. Election officials are under a duty to preserve election records for specified periods under Colorado and federal law, but the definition in the rule proposed in 1.1.29 includes only the files necessary to "restore the voting system to a previous state." For example, the "trusted build" implemented previously "reset" all prior election records and discarded them. This is an illegal action. We should NOT implement new rules to circumvent saving any and all voting records, and we must comply with maintaining records throughout the statutory periods. All should be available for an audit. Alternatively, the Secretary of State should be requiring all counties to create and preserve images of voting system hard drives!
3. Proposed rule 11.2.4 requires a county to notify the Secretary of State if a license with a voting system vendor is terminated. The Secretary of State has the duty to certify electronic voting systems if they have passed testing by a federal accredited voting system testing laboratory and if they otherwise comply with state law. It is the responsibility of the counties to use the system or not, as long as the system complies with state law. If such a system appears to be malfunctioning, the Secretary of State already required the county to notify said SoS. This is an overreach by the Secretary of State's office and attempt to centralize this and all processes. Counties have elected personnel who are responsible in their own counties and are accountable to those who chose them. The attempts at overreach at a state level are unacceptable and imply lack of trust.
4. Regarding the rule proposed for ballot boxes to have "one watcher," this is NOT an adequate solution to ballot box fraud. Ballot boxes are available for several weeks before an election and are accessible in public places for 24 hours a day. This "one watcher" rule violates common sense. Even in the collection of these ballots on election night after the last hour of voting, Arapahoe County requires TWO people to pick up the ballots and for each to verify the other's actions with a full and complete record and their signature. "One watcher" could be one who desires to perpetrate fraud to obtain an election result! Do these ballot drop boxes have electronic video surveillance for 24 hours a day? If so, who views the footage and looks for signs of suspicious illegal activity? Who will monitor or supervise this effort? This rule is clearly a token nod to acknowledge people who are aware of how fraud can be perpetrated, but nothing else.

Outside of my specific comments above, I object to ALL proposed rules within the document and demand transparency from the Secretary of State's office.

I would also like the Secretary of State, Jena Griswold, to allow an audit, listen to the people, and to stop persecuting and prosecuting honest elected officials in Colorado who care about the state and only seek to perform their job properly and be accountable to the people.

In addition, Colorado must comply with the Help America Vote Act (HAVA) of 2002 (42 USC §15371(b)). Furthermore, I propose a rule...discard ALL electronic voting machines with access to the internet. Let's go back to paper ballots with watermarks.

Regards,

Angela Vincent
Arapahoe County