

**From:** [Ingrid Grueter](#)  
**To:** [SoS Rulemaking](#)  
**Subject:** [EXTERNAL] Comments on proposed Rulemaking changes  
**Date:** Friday, September 12, 2025 3:10:56 PM

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Regarding the proposed Rulemaking changes, I have the following comments:

Amendments to Rule 7.7.8 updating the process auditing signature verification decisions made by election judges:

- Three percent of decisions is excessive, especially due to the time demands of ballot processing.
- The audit as proposed by this rule will also create a “Stop” between signature verification and deconstruction (opening of the ballots to disassociate ballots from envelopes/voter name). This will create a huge delay in getting ballots tabulated.
  - On election night, it will not be possible to stop the processes between signature verification and deconstruction and have meaningful results by 7PM. Even a county our size would be looking at two days of processing and counting.
- A county clerk or staff individually overriding a bipartisan team of elections judges would set a bad precedent and increase conspiracy theories and potentially putting clerks in jeopardy.
  - This should again be a bipartisan team – county clerk **and** a staff member or an election judge.
- For counties who have an Agilis Duo, if there is proper training, election judges are instructed to approve obvious matches and challenge any signatures that need further review in “Round 2”, matching to all signatures on file in SCORE.
- County Clerks should already be auditing their signature verification judges to catch trends that require retraining or removal. In our county it appears to be overzealous judges rejecting signatures that are definite matches, that is our issue.
- None of these changes to Rule will protect us from mal-intent forgeries, it only shows distrust in our election judges.

Amendments to Rule 7.7.14 concerning technical revisions:

- For counties to comply with this, there should be SCORE development to generate a report showing all electors with fewer than two reference signatures and a Secretary of State approved letter that would auto-generate out of batch management for those electors. This should be a script that runs when an elector registers or updates their registration.

Thank you for considering these comments.

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