



Fighting for transparent, secure, and accountable elections all voters can trust.

September 19, 2024

The State Election Board
2 MLK Jr. Drive
Suite 802 Floyd West Tower
Atlanta, Georgia 30334

Re: Comment in support for proposed rules

Dear Chairman Fervier and members of the Board,

I wanted to put the Election Transparency Initiative on record supporting certain rules that you are considering tomorrow, including:

Rule 183-1-12-.12: Tabulating Results: Reconciliation

Reconciliation of tabulator tape ballot counts with scanner ballot counts is vital for ensuring accuracy. This rule will help identify discrepancies early in the counting process, allowing for immediate corrective action. Such transparency is essential for maintaining public confidence in the electoral system and preventing potential errors from going unaddressed.

Rule 183-1-12-.12: Tabulating Results: Reconciliation Reports

The public availability of Reconciliation Reports will enhance transparency in the electoral process. By allowing citizens to view discrepancies between total ballots cast and the number of voters credited, this rule promotes accountability among election officials and reassures the public that the electoral process is being conducted fairly and lawfully.

Rule 183-1-12-.13: Storage of Returns

This rule ensures the preservation of electronic election data, including ballot images and audit logs. By mandating the retention of this data, we can promote accountability and compliance with legal requirements. Public access to this information is vital for maintaining transparency and trust in the electoral system, as it allows for audits and reviews when necessary.

Rule 183-1-12-.19: Preparation of the Electors List & Use of Electronic Poll Book: Voter Lists

By requiring counties to publicly post time-stamped lists of registered electors, this rule affirms citizens' rights to oversight in the election process. It not only fosters trust among voters but also ensures that any discrepancies in voter registration can be promptly addressed, contributing to the overall integrity of the electoral process.

Rule 183-1-12-.21: County Participation & Totals Reporting - Daily Reporting

Implementing a daily reporting system during advance and absentee voting ensures ongoing transparency. This rule keeps the public informed about voter participation and promotes

accountability among registrars. By sharing this information, we can build trust in the election process and encourage civic engagement.

Rule 183-1-13-.05: Poll Watchers for Tabulating Center

Clarifying the roles of poll watchers enhances transparency in the tabulation process. By designating additional viewing areas, this rule allows for independent observation of election procedures, which can help deter misconduct while supporting access to ensure that election laws are upheld.

Rule 183-1-14-.02: Advanced Voting: Reconciliation

Requiring the reconciliation of ballot counts from various sources is crucial for ensuring the accuracy of election results. This rule will help identify any discrepancies before final results are reported, thus maintaining the integrity of the election process and bolstering public confidence in the outcomes.

Rule 183-1-14-.11: Mailing & Issuance of Ballots: Chain of Custody

Establishing USPS tracking for absentee-by-mail ballots is a significant step toward maintaining the chain of custody. This rule will ensure that ballots are mailed to the correct recipients and returned securely, providing an auditable trail that enhances trust in the voting process.

These essential rules will undoubtedly enhance the security, transparency, and integrity of our elections. We ask you to support these rules.

Sincerely,

A handwritten signature in black ink that reads "Ken Cuccinelli II". The signature is written in a cursive style with a large "K" and "C".

Hon. Kenneth T. Cuccinelli, II
Chairman, Election Transparency Initiative