



MEMORANDUM

Date: August 21, 2019

To: The Honorable Chairman and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator

A handwritten signature in black ink, appearing to read "CH Huckelberry", is written over the typed name and title.

Re: **Pima County Elections Procedures Review Conducted by Republican Members of the Pima County Elections Integrity Commission**

I recently met with all of the individuals listed on the attached document, with the exception of Mr. John Cote, to discuss the attached report. Two of the members are current Elections Integrity Commission (EIC) members and one is a former member. I appreciate the time and effort these members placed in reviewing our Elections systems. They obviously recognized the voting shift over the last decade or longer from Election Day ballot casting to mail-in ballots. Over the years, this trend has simply reversed itself from a majority of votes being cast at the polls to now a significant majority of votes being cast through mail-in ballots. This has provided further complications in our election process, and has extended the time period for when an election can be determined final. The members have made a number of relevant points in their review and analysis.

Their recommendations range from audit of the voter registration database; additional background checks for election workers; an electronic signature verification process to accelerate the signature verification of mail-in ballots; expanding the EIC to have the County Recorder and or/designee as a participating and voting member of the Commission; more strenuous party review of voter signature verification process, and additional ballot control measure for early mail-in ballots. All of these concepts warrant review by those parties responsible for conducting our elections.

I will discuss these findings and recommendations with Pima County Recorder F. Ann Rodriguez, Elections Department Director Brad Nelson and Assistant County Administrator John Voorhees. I will ask for a written analysis and recommendation from Ms. Rodriguez and Mr. Nelson and will include them in the array of Legislative Agenda items that the Board of Supervisors may consider for our upcoming Agenda with the next Session of the Arizona Legislature.

I have also invited our EIC to provide any suggestions they have for legislative amendments to our current election process. It has been stated on numerous occasions that the election laws in Arizona are structured for elections that occurred 20 years ago rather than what is now occurring, particularly regarding early voting and mail-in ballots.

Attachment

c: The Honorable F. Ann Rodriguez, Pima County Recorder
Chris Roads, Chief Deputy Recorder, Pima County Recorder's Office
John Voorhees, Assistant County Administrator
Brad Nelson, Director, Elections Department

Pima County Elections Review & Recommendations

2018 General Election

In connection with the Pima County Republican Party's review of the November 6, 2018, election we, the undersigned, reviewed the election procedures in place and have attached our report and its recommendations for you to consider.

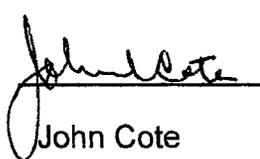
The review consists of three (3) parts:

- ❖ A general discussion of the present elections system in place.*
- ❖ A more specific discussion of concerns observed with the present elections system in place.*
- ❖ Recommendations for improving the Pima County Elections System for consideration by the Pima County Director of Elections and the Pima County Recorder.*

Executed as of this 26th day of June, 2019,



Grady Rhodes



John Cote



Levoy Hurley



Bill Beard

Approval:



David Eppihimer, Chairman Pima County Republican Party

Pima County Election Procedures Review

Background

- Broadly, the election and voting process in Arizona is governed by Federal statutes, Federal regulations, the Arizona Constitution, state statutes, state regulations, and county policies and procedures. In general, statutes and regulations have been adopted when perceived as needed by the state legislature and when required by court challenges. Certain legislation has also been adopted or overturned through initiative and referendum by the voters.
- In all of AZ's counties, voter registration is handled by the County Recorders, who follow certain procedures set forth by statute and by the AZ Secretary of State. However, the statutory and Secretary of State's procedures are not all-encompassing, and thus the processing and counting of the ballots cast on election day differs from county to county.
- Broadly in Pima County the registration of voters is controlled by the County Recorder's Office while counting the votes is performed by the Pima County Director of Elections who reports to the Pima County Manager.
- For reference, as of January 2019 the Recorder's Office reports the following breakdown of registered voters in Pima County:

○ Democrats	213,018	38.5%
○ Republicans	164,741	29.7%
○ Libertarians	4,353	0.8%
○ Greens	1,479	0.3%
○ Other	<u>170,298</u>	<u>30.7%</u>
Totals	553,889	100.0%
- The 2018 General Election was held on November 6, 2018. The final election results were reported by the Pima County Department of Elections as of November 17, 2018. The records indicate that there were **557,532** eligible voters registered for this election. The reported final vote turnout was **70.6%**. The system processed the following number of cast ballots in Pima County:

○ Early/mail in voting	312,400	79.4%
○ Poll voting	64,731	16.5%
○ Poll voting – Cond./Prov.	<u>16,221</u>	<u>4.1%</u>
Total	393,352	100.0%
- Broadly, the Pima County Recorder's Office and its Office are responsible for:
 - The voter registration process and database;
 - Early voter requests and its database;
 - The issuance and receipt of early ballots cast at early voting locations until transmitted to the Director of Elections;
 - The issuance and mailing of all Early Mail-In (EMI) ballots to/from voters who have requested voting by mail;

Pima County Election Procedures Review

Background

- The verification of all EMI ballots returned whether returned by mail or delivered directly to the polls by the voter on election day;
 - The review and verification of each voter request for a conditional or provisional ballot received at the polls on election day; and,
 - All communication with voters concerning their registration and voting.
- Broadly, the Pima County Director of Elections and its Election Department are responsible for:
 - Organizing, staffing and manning the polls on election day;
 - The issuance, receipt and possession of regular ballots cast at the polls on election day;
 - The issuance, receipt and possession of conditional & provisional ballots cast at the polls on election day;
 - The collection of EMI ballots delivered to the polls on election day;
 - The processing, tabulation and count of regular-cast ballots at the polls;
 - The processing, tabulation and count of early ballots, EMI ballots and conditional & provisional ballots after verification by the Recorder's Office and as received from the Recorder's Office;
 - The ultimate possession and storage of all ballots cast and election documents.
- Voters at the polls go through an identification process that requires photo ID or other acceptable identification as well as signature in the Registrar's Election Book. Voters without acceptable identification, who changed their address, or who have other concerns are directed to other poll locations, if applicable, or, depending upon their reasons, required to vote with a conditional or provisional ballot.
- Regular-cast ballots on election day are not folded and are placed by the voter in a sealed grey metal ballot box at the polling location. After the close of the polls the grey metal ballot box is unsealed, opened, and the number of regular-cast ballots is reconciled by the Poll Inspector and Marshal. Through this process, the seal to the ballot box is broken, the number of regular-cast ballots is counted, and the count is reconciled with the Registrar's election record, the count of unused ballots, and the total ballots received for use at the poll. The regular-cast ballots are then replaced into the grey metal ballot box. The box is transported to the Elections Department's collection center and then to the central warehouse where the Election Department's distribution, processing, tabulation and counting takes place.
- Provisional and conditional ballot requests (multi-part form) and their associated regular ballots are maintained separately, accounted and reconciled with poll record, and transmitted to the Elections Department's collection center, and then to the central warehouse where the Elections Department begins receiving processing per their procedures. The original provisional and conditional ballot request forms are counted and delivered to the Recorder's Office for processing and verification. The ballots associated with the provisional and conditional requests and a copy of the voter's

Pima County Election Procedures Review *Background*

provisional or conditional request form are retained by the Elections Department. Retained provisional and conditional ballots and their forms are accumulated by precinct or voting location in a locked vault for later processing, tabulation and counting pending the review and approval or rejection of the voter's request by the Recorder's Office.

- The poll Inspector and the poll Marshall are required to be from separate political parties, and jointly account for all ballots issued and other activities at the poll. The quantity of ballots provided by the Elections Department for use at the poll are reconciled with the number of ballots cast, voided, or issued for provisional and conditional use.
- All ballots (regular, provisional, conditional, and EMI) and the Registrar's Election Book are transported jointly by the Poll Inspector and Poll Marshall to the Elections Department's collection center where they are processed and delivered for tabulation or additional action by the Recorder. Unused ballots, forms and equipment are placed in a wire cage and remain at the poll site for pick up by an Elections Department employee the following morning. Transfer documents are executed at each new possession. The number of blank regular ballots sent to a polling location for use on election day equals the number of expected voters at that polling location. A significant number of unused regular ballots remained at the polling locations at the end of election day.
- EMI ballots may be delivered by the voter to the Recorder's Office prior to election day, or delivered to any polling location on election day. **Election officials estimated that over 30,000 EMI ballots were dropped off at the polls by voters on election day.** Pima County poll procedures call for the voter to place EMI ballots in a separate drop box (a plastic storage bin with a slot and the lid taped closed), with few other check-in or review procedures (voters may be asked if they placed their ballot inside the outer envelope). Persons dropping off EMI ballots are not asked to go thru the regular check-in and identification process. EMI ballots are not counted by the poll Inspector or accounted for in the poll accounting / transmittal procedures, but they are bagged and sealed in the large plastic bag used to transmit conditional and provisional ballots to the Elections Department's collection center, and then transferred to the central warehouse where they are forwarded/delivered to the Recorder's Office on election night.
- The Recorder's Office sweeps the main Cherry Bell Post Office for EMI ballots at 7:00 PM on election day. EMI ballots mailed to the Recorder's Office, but received after that time, are diverted from the Recorder's Office processing center on Country Club Road to the main office downtown and are not processed in the final vote tally.

Pima County Election Procedures Review

Background

- The processing, verification, and tabulation required by EMI ballots take time. All EMI ballots are first accumulated, processed and verified by the Recorder's Office and then accumulated, flattened, processed and tabulated by the Elections Department. Every EMI ballot has 2 envelopes to be opened and 2 separate review processes:
 - The outer envelope is opened by the Recorder's Office for verification; and;
 - The inner envelope (the Voter's Affidavit) containing the EMI ballot, is opened by the Elections Department for tabulation and counting.

- For EMI ballots without signature verification or other issues there is generally a time lag of approximately one day between the work and verification performed by the Recorder's Office and the work and tabulation performed by the Elections Department. There is extensive processing (batching and hand counting) performed (required) to keep track of (control) the transfer of EMI ballots within each work station within the Recorder's Office and within each work station of the Elections Department. Given the number of such ballots processed, the present system is probably working as quickly and efficiently as possible.

- The Recorder's Office acknowledges each EMI ballot's receipt on its website, a process that allows each voter to see the status of his or her ballot. The Recorder's Office then verifies its Affidavit of Signature found on the inner ballot envelope. For each of these ballots the yellow outer envelope is opened, the inner envelope is scanned, and the signature is verified manually by matching it with signatures on file in the Recorder's database. Generally, the inner envelope containing the EMI ballot is not opened by the Recorder's Office. It is opened in unusual cases such as when it is obvious there is something other than the ballot in the envelope, when an older election envelope or bogus envelope has been used, or when a husband and wife have returned their ballots in each other's envelopes. Except for automated envelope opening equipment and scanning, each EMI ballot is hand-held and hand-processed in the Recorder's Office.

- Each EMI ballot that is rejected in the initial signature review process by the Recorder's Office is passed to a supervisor for manual review. If it is still challenged, there are further processes to determine their validity. The Recorder's Office makes every effort it can to cure a "challenged" ballot signature. Voters are contacted by phone, text message, or email; and failing that by mail. By policy, the Recorder's Office allows up to 5 days to verify each challenged ballot. If the Recorder's Office is unable to verify the EMI ballot within such allowable time, it is rejected. Once a voter is contacted their identity is ascertained by confirmation of their address, birth date, or other information found in the voter registration database. Questions asked are limited to information available in the voter registration database.

Pima County Election Procedures Review

Background

- The unopened but verified EMI ballots in their inner envelopes are forwarded to the Elections Department in batches, where they are then counted to make sure that the batch counts of envelopes matches those forwarded by the Recorder's Office. The envelopes are then machine opened and the ballots are flattened, processed, reviewed, and again batch counted for forwarding to the machine room. Except for automated envelope-opening equipment and the machine room tabulation during the count process, each EMI ballot is hand-held and hand-processed through an elaborate batch process. A significant amount of time is taken to process these ballots, including making duplicates ("Dupes") of those ballots that are rejected or spoiled in the initial manual review process, or rejected in the automated counting process. Unlike ballots cast at the polls, these EMI ballots have been folded, and a significant number have been passed around the kitchen table and spoiled, inadvertently dog-eared, or sliced when opened by the voter or the machine-opening process. Machine operators estimate that it takes twice as long to count EMI ballots compared to a similar number of regular cast ballots from the polls.
- On election day, November 6, 2018, all but one precinct of the ballots cast at the polls (64,731 +/-) were tabulated and reported as cast by the Department of Elections. By the end of election day, the Recorder's Office had received and processed to the Elections Department **274,044 or 87.7%** of the total EMI ballots. And, as would be expected, none of the conditional and provisional ballots were verified, and thus none were counted. By the end of election day, the Elections Department had received, tabulated, and counted **239,665 or 76.7%** of the EMI ballots that were verified by and received from the Recorder's Office. The difference in the number of ballots received versus the number of ballots counted were the ballots still in process at the Elections Department. Both the Recorder's Office and the Elections Department were working with "All hands on Deck."
- By the end of election day, approximately **304,396 or 77.4%** of the total ballots cast were counted, and approximately **88,956 or 22.6% of all the total ballots cast were uncounted**. The remainder of the ballots (72,735 uncounted EMI ballots) plus the conditional/provisional ballots (16,221) were received by the Department of Elections, processed, tabulated, and counted after election day. **EMI ballots constituted 81.8% of all ballots that were not counted on election day.**

Pima County Election Procedures Review *Concerns*

- The election system is governed by a patch work quilt of statutes, regulations, policies, and court rulings made over time. It was designed to accommodate voting at the polls with limited early voting and limited absentee voting by mail. Knowledgeable observers of the process believe that the number of early mail-in (EMI) ballots processed in the past for those who were ill, incapacitated, or unable to vote due to health and other reasons was 5 to 10% of the total votes. **The sheer number of EMI ballots cast during the 2018 election, and the time it takes to review, validate, and process them, is overwhelming the system.**
- **Final election results were delayed 7 to 10 days after the election date. Even if this delay is justifiable under the existing policies, such delay creates questions about the integrity of the vote.**
- The voter database at the Recorder's Office represents information and signatures received from ADOT, individuals, and other sources. Under the National Voter Registration Act (NVRA), when you apply for your driver license you can also register to vote. There are cross purposes at odds here. While ADOT is primarily interested in safety and speed of vehicle registration, the voter registration process is primarily concerned with eligibility to vote. For example, while the voter registration process (for Arizona elections) requires evidence of citizenship, citizenship is not a requirement to obtain a driver license (only "authorized presence"). It is unclear whether ADOT consistently obtains proof of citizenship when it registers individuals to vote through their driver license applications. Thus, there is a perception -- possibly a belief -- that anyone who can get a driver license can register to vote. Further, the motor-voter law requires a periodic update of the list of registered voters. It is not known when this update was last performed and at what level. All of this needs more follow up and understanding, but it is possible that the voter registration list includes registration errors.
- ADOT collects signatures on an electronic pad, similar to that used when making a payment with a credit card in certain stores. In some cases, with voters that have registered with ADOT, this is the signature that is on file with the Recorder's Office. To remedy this the Registrar's Office has gained access to other data bases in an attempt to obtain copies of voter's signatures. Too, consider what your own signature looks like on paper versus when you sign on an electronic card device for your credit card purchases. The Recorder is required, by statute, to have a so called "wet signature" -- a signature on paper -- in its registration file, but such "wet signatures" are not always received for motor-voter registrants. Thus, there appears to be a compliance issue with ADOT.
- The Recorder's process for signature verification of EMI ballots is to conduct one manual review by one employee, who, based upon the fact that they must verify many ballots, has limited time to verify each signature. In fairness to the Recorder, we are told that the employees have received training, and there is no time limit to review each

Pima County Election Procedures Review *Concerns*

signature. However, the signature verification process still appears to boil down to a judgment call by individual employees that are subject to human error from fatigue, possible bias, and other human factors.

- The Recorder's Office signature review and verification process for EMI ballots allows the reviewing employee access to the voter's registration form. The "wet signature" on this document is not too far from the line that states the voter's party affiliation. This fact raises the possibility of party bias entering the signature verification process.
- The Recorder's process of calling a voter to confirm the voter's signature in the case of challenged signatures or other issues is not consistent with modern security practices, because the questions asked to confirm voter identity are based upon non-private information. Most modern verification processes require individuals to answer questions, the answers to which only the individual could know.
- The goal of the Recorder's Office is that every vote counts. When signatures are challenged they are followed up with a supervisory process that includes calling, texting and emailing the voter to verify the vote was cast. This is an admirable goal and one to which we subscribe, presuming the vote cast was legal in every aspect.
- The sheer number of EMI ballots is overwhelming the system. **Approximately 80% of the votes (312,400) were cast by the Early Ballot/Mail In system. Approximately 10% of these votes were dropped off at the polls on election day.**
- Recent studies consistently show that while early voting has little to no impact on voter turnout, by its very nature it tends to engage an uninformed voter and thus an uninformed vote. Early balloting restricts the information (the so-called last-minute information) the voter has to determine his/her vote. The very process of mailing a ballot does not mean that it is counted. Mailing a ballot means that the voter is relying on the Post Office to deliver it by election day. Post Offices, themselves, have procedures that allow them to process mail in more centralized locations when overloaded with the emphasis being on the delivery of mail, not necessarily the delivery of mail in a timely manner. EMI Ballots are not date stamped as to the date of receipt by the Recorder's Office. Further, when EMI ballots are as widely used as they are now, the cost of political campaigns is increased to address issues raised during an extended voting period.
- While ballot harvesting is now illegal in Arizona, poll workers lack an enforcement mechanism, and are told to accept EMI ballots without question (as if they were dropped in the US Mail). Thus, EMI ballots dropped off on election day are generally accepted at the polls. As a practical matter, it is impossible to enforce ballot harvesting for EMI ballots placed in the mail and received on or before the election date. There have been no known enforcement actions for voter fraud related to ballot harvesting.

Pima County Election Procedures Review Concerns

- Broadly speaking EMI ballots are essentially “conditional ballots” – ballots cast with the understanding that “conditions” must be satisfied before the vote can be counted. With EMI ballots the voter’s signature must be verified for the vote to be counted. Internal control of conditional ballots processed at the polls is established with separation of powers and responsibilities. This does not appear to be the case with EMI ballots. To better explain and understand the complexities of the election processes involved a discussion of the election process for each follows:
 - With conditional ballots the voters request, receive and complete a conditional ballot at the polls. The Election Department is responsible for the polls. The original of the conditional ballot request is transmitted by the Election Department to the Recorder’s Office on election eve. The conditional ballot and a copy of the Conditional Request are retained by the Election Department and filed by poll in their vault. Once the condition is satisfied by the Recorder’s Office an approved Conditional Request is sent to the Elections Department for processing. The conditional ballot is then retrieved, tabulated and counted. This process is consistent with sound internal control including a system of checks and balances, separation of responsibilities and is as generally consistent with the Arizona Constitution.
 - With EMI ballots the process is different and almost exclusively in the control of the Recorder’s Office. Voter requests for EMI ballots are received and validated by the Recorder’s Office. EMI ballots are mailed to appropriate voters by the Recorder’s Office. The return address is to the Recorder’s Office. Except for those delivered to the polls on election day EMI ballots are returned by mail directly to the Recorder’s Office. The signatures of all are verified for processing by the Recorder’s Office. Also, the voter’s affidavit (the so called “conditional request”) remains with the ballot in possession of the Recorder’s Office until the signature is verified. Upon verification the unopened inner envelopes are forwarded to the Election Department for processing and tabulation. Even though the EMI ballot is inside an envelope, this presents a potential violation of internal control, separation of responsibilities and a violation of the system of checks and balances as generally contemplated by the Arizona Constitution.
 - A more acceptable manner of processing EMI ballots would be to mirror, as much as possible, the possession and internal control of conditional ballots.
 - Given the sheer volume of EMI ballots there appears to be excessive handling and counting of these ballots. This is due in part to the inter office work station transfers and in part to the transfers from the Recorder’s Office to the Elections Department.

Pima County Election Procedures Review Concerns

- It was stated by the Recorder and the Elections Department that the internal procedures for ballot processing have built-in bias control requiring employees of the Recorder's Office, the Elections Department, and the volunteers at the polls to be of opposing political parties. There is no verification of these individuals' affiliations by the political parties. Further, political observers cannot always visually identify the political party of individuals due to clothing or missing wrist or neck bands. Election observers are asked to monitor for bias, but without disruption of the counting process are unable to ascertain this requirement.
- There is no third-party check of the Recorder's database of registered voters for possible errors. It appears possible that someone with access could register a person to vote, place the person on the permanent early voter list, send out an EMI ballot, review its signature for accuracy, and approve the EMI ballot affidavit to forward the vote to the Elections Department for tabulation. While this would likely constitute a crime, it is unclear whether there are any fail-safes in place to prevent this type of conduct. Likewise, it appears that there is no third-party check for removal of voter's names due to death, relocation, or other change in legal status.

Arizona does not have term limits for county elected offices. Term limits would provide a periodic review of procedures and employee performance.

- The Pima County Election Integrity Commission has no oversight or jurisdiction over the Recorder's Office. As a result, its name and purpose are in question. In fact, its name may mislead the public when it has little real authority over the "Integrity" of elections.

Pima County Election Procedures Review *Recommendations*

We respectfully propose the following recommendations as a starting point to remedy the concerns previously outlined:

- Revise the procedures for Early Mail-In (EMI) ballots:
 - Change the procedure for processing and maintaining possession of EMI ballots. Employ separation of powers and checks and balances so that the Recorder's Office is not solely in possession of EMI ballots;

Note: *No change to current statutes is required.*

- Change the addressee for postal receipt of EMI ballots. By intergovernmental agreement or contract, EMI ballots could be addressed to a third-party not involved in the issuing of ballots or counting the vote. The Clerk of the Pima County Superior Court, a similarly elected third-party officer, or a private entity employed by the Elections Department for this purpose could be used. The entity selected for this purpose would not open the envelopes or be responsible for any election processing – their only responsibility would be to receive the mail, date stamp the delivery date of the envelope and deliver the unopened envelopes as received to the Election Department. EMI ballots received after the election polls are closed would be held by the third-party and delivered to the Recorder's Office for processing after the election has been certified.

Note: *No change to current statutes is required.*

- Revise the signature identification process for EMI ballots so that the outer yellow envelopes are opened by the Elections Department and the inner envelopes/affidavits are scanned by a so called "military grade" electronic signature recognition system. The system would post notice of receipt and status to the Recorder's web page as well as provide a military-grade scan and electronic verification of the signatures on the inner envelope affidavit. EMI ballot envelopes/affidavits which pass the electronic signature scan would be tabulated and counted through the normal procedure by the Elections Department. Copies of EMI ballot affidavits which do not pass the electronic signature scan would be sent to the Recorder's Office for verification of the signature. EMI ballots rejected through this process would be processed by the Recorder's Office and the Elections Department in procedures similar to conditional and provisional ballots.

Note: *No change to current statutes is required.*

Pima County Election Procedures Review Recommendations

- Revise the manual signature identification process in the Recorder's Office by blocking access to a voter's political party affiliation when verifying ballot signatures and processing all other matters related to all classes of ballots.

Note: *No change to current statutes is required.*

- Employ a system of secret questions and answers to/from voters similar to those used by banks and credit card companies when seeking verification of voter information and verification of signatures.

Note: *No change to current statutes is required.*

- Change the procedure for dropping off EMI ballots on election day at the polls. Drop off of EMI ballots at the polls should be limited to delivery of the voter's ballot only, subject to verification of identity as with regular-cast ballots.

Note: *A change to current statutes may be required.*

- Further change the procedure for dropping of EMI ballots at the polls on election day. Individuals wishing to do so shall be required to go through the process of verification of voter and signature identity in a manner similar to those who wish to cast a regular ballot at the poll. With those voters properly identified at the polling place, such EMI ballots could be immediately processed by the Election Department. Adopting this process would create a third class of ballots being cast at the polls. Further, this would also provide an enforcement mechanism to aid in the prevention of ballot harvesting.

Note: *A change to current statutes may be required.*

- Drop off of EMI ballots at the polls should be limited to delivery of the voter's ballot only, subject to verification of identity as with regular cast ballots.

Note A: *No change to current statutes is required.*

Note B: *We considered and **rejected** three (3) other alternatives which we believe could be used, but recommend the more sophisticated electronic signature review and processing of EMI ballots as discussed above. The alternatives we rejected are as follows:*

- *Limiting the availability of EMI ballots by returning to the prior system of allowing vote by mail for only those who are unable to get to the polls and have an acceptable and verifiable reason as was originally envisioned (medical, emergency or travel);*
- *Allow anyone to vote by mail as is now the case, except that any such Ballot received after 5 days before election day will be considered a late*

Pima County Election Procedures Review Recommendations

ballot and not counted. The Recorder's Office could then be notified and post to the Recorder's website that the voter would have to go to vote a provisional ballot at the polls. The voter would be held responsible for determining the status of the EMI ballot;

- *Consider a verification process that requires the EMI ballot's signature to be verified by an independent third party, such as a bank notary, prior to being mailed.*

We rejected the above solutions in favor of the recommendation that military-grade automated signature scanning devices be used with manual processing employed only in exceptional cases.

- Review and substantially revise the Voter Registration process. Update the Roll of Registered Voters to match the requirements of the Arizona Travel ID and federal identification process (i.e., RealID). Refer to the ADOT form "Arizona Voluntary Travel ID Identification Process." Correct the Roll of Registered Voters as necessary.

Note: *A change to current statutes is required.*

- Implement a password system similar to those employed by banks and credit companies, where the voter provides answers to personal history questions or special passwords that are on file with the Recorder's Office and are known only to the individual voter.

Note: *No change to current statutes is required.*

- For political bias control, review and revise internal employment and procedure guides to allow review and possible challenge of the political party affiliation of election employees and volunteers by applicable officials of the political parties. Require that identification of these employees and volunteers be visible at all times. Of particular concern are the persons who self-identify as "independents" as there is currently no process for vetting.

Note: *No change to current statutes is required.*

- Require finality of the election process closer to election day.

Note: *No change to current statutes is required.*

- Revise the local and state Elections Manual to include these and other improvements as determined by a state-appointed commission. Require agreement between the political parties on the provisions of the Elections Manual.

Note: *A change to current statutes may be required.*

Pima County Election Procedures Review Recommendations

- Lobby for changes that to Arizona election laws as applicable. Require that the entire voter registration and election process be reviewed, changed, and updated top to bottom.

Note: *No change to current statutes is required.*

- Implement term limits to elected county officers' positions, to encourage periodic review and updating of county-level elections policies and procedures.

Note: *A change to current statutes is required.*

- The Pima County Election Integrity Commission has no authority over the "Integrity" of elections. If it is to continue solely in an advisory role to the Pima County Board of Supervisors, without any oversight of the Pima County Recorder's Office, its name should be changed to something more consistent with this role, such as the "Pima County Elections Advisory Commission", or such other name as may be agreed upon. If, on the other hand its role was expanded by inter-governmental agreement between the Board of Supervisors and the County Recorder, its name could remain the same. We believe it would be to everyone's benefit if the relationship between the County Recorder and the PCEIC was more cooperative and interactive in nature. One option might to be include a Commissioner(s) to represent the County Recorder on the PCEIC, as well attendance by a member of the Recorder's staff.

Note: *The Pima County Board of Supervisors will have to approve any name change, as well as any charter changes to accommodate future Recorder representation as suggested herein.*

Pima County Elections Review & Recommendations

2018 General Election

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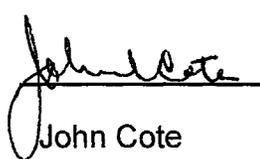
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- ❖ A more specific discussion of concerns observed with the present elections system in place.*
- ❖ Recommendations for improving the Pima County Elections System for consideration by the Pima County Director of Elections and the Pima County Recorder.*

Executed as of this 26th day of June, 2019,



Grady Rhodes



John Cote



Levoy Hurley



Bill Beard

Approval:



David Eppihimer, Chairman Pima County Republican Party