



KEN BENNETT
SECRETARY OF STATE
STATE OF ARIZONA



June 24, 2014

The Honorable Sharon Bronson, Chair
Pima County Board of Supervisors
130 West Congress, 11th Floor
Tucson, AZ 85701

Re: Request for change to the Elections Procedures Manual

Dear Supervisor Bronson:

Thank you for your letter of March 19, 2014, in which you requested that the current requirement for EAC certification be deleted from the Elections Procedures Manual or, in the alternative, be formally waived by my office. It is my understanding that your request was prefaced by a recommendation from the Pima County Election Integrity Commission.

All items in the Elections Procedures Manual are compiled and discussed over a period of months in a series of public meetings that take place every two years. Additionally, the manual is not merely compiled by my office, it is sent out for review and approval by both the Attorney General and the Governor. Violations of the Procedures Manual carry criminal penalties. During the most recent round of public debate on the manual, the issue raised by your letter was not the subject of any inquiry or analysis.

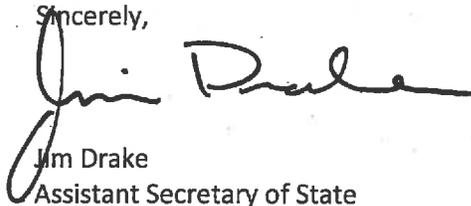
The mission of the Pima County Election Integrity Commission is to "provide independent oversight of the County election process and to review and make recommendations to the Board regarding election information technology systems as well as technical and procedural matters." This goal will, in turn, "improve functioning of and public trust in the Pima County electoral process." I find it difficult to harmonize the Commission's request to eliminate certification and the goal of improving the "public trust" in elections.

Certainly, the EAC has experienced its share of troubles in recent years, but it still is certifying equipment. Additionally, as noted by Pima County Administrator Chuck Huckelberry in his memorandum to the Board, the Presidential Commission on Election Administration was against creating a complete vacuum in certification and recognized that some entity (states or a reformed EAC) must be responsible for approving standards.

I waited to respond to your request until the two pending certifications were completely finalized.
Apologies for the slight delay.

In conclusion, your request to eliminate an important election equipment requirement would infuse unnecessary risk into the elections environment and for this reason we cannot accede to your request.

Sincerely,

A handwritten signature in black ink that reads "Jim Drake". The signature is written in a cursive style with a large initial "J" and "D".

Jim Drake
Assistant Secretary of State

cc: Supervisor Ally Miller, District 1, Pima County Supervisor
Supervisor Ramon Valadez, District 2, Pima County Supervisor
Supervisor Ray Carroll, District 4, Pima County Supervisor
Supervisor Richard Elias, District 5, Pima County Supervisor
• Chuck Huckelberry, Pima County Manager
Brad Nelson, Pima County Elections Director
Tom Ryan, Chair, Pima County Election Integrity Commission