



LISA CAMPBELL
Representative, District 35
2001 Duncan Drive, Unit 2281
Kennesaw, Ga 30156
lisa.campbell@house.ga.gov

HOUSE OF REPRESENTATIVES
COVERDELL LEGISLATIVE OFFICE BUILDING
ROOM #507 F
ATLANTA, GEORGIA 30334
(404) 656-0202
(404) 463-6381 FAX

STANDING COMMITTEES
Budget and Fiscal Affairs Oversight
Human Relations and Aging
Interstate Cooperation

August 5, 2024

SENT VIA EMAIL: Members of the Georgia State Election Board

SUBJECT: Oppose Proposed Election Rules Change Making County Election Certification Discretionary

Dear Members of the Georgia State Election Board,

As the Georgia House Representative for District 35, I represent the people of Kennesaw, Acworth, and Cobb County. Today, I am writing to urge you to oppose proposed election rules that would make county election certification discretionary. I oppose the unreasonable certification proposals by Mr. Michael Heekin and Ms. Salleigh Grubb because they are vague, lack sufficient and uniform detail for implementation, prohibit public transparency, and may undermine Georgia's proven record of election integrity.

I oppose these proposed rule changes for several reasons. First, the vague descriptions proposed in these certification petitions include the words, "after reasonable inquiry," without a definition of the phrase. It is unclear what kind of inquiry could be initiated and the time frame for inquiry resolution. At a minimum, "reasonable inquiry" should be specifically defined in both substance, circumstance, and time frame.

Also, the Grubbs' proposal specifies that "all election-related documentation" be available for review in the certification process. This request is open ended and has the potential to overwhelm election workers without specific parameters, formats, confidentiality or security protections, or timeframe for adherence.

As the Georgia code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has ruled, makes certification a ministerial process, rather than a discretionary one. The current code ensures that if the Board does not choose to certify an election they must have a legitimate and evidence-based reason for doing so. An election should not be



LISA CAMPBELL
Representative, District 35
2001 Duncan Drive, Unit 2281
Kennesaw, Ga 30156
lisa.campbell@house.ga.gov

HOUSE OF REPRESENTATIVES
COVERDELL LEGISLATIVE OFFICE BUILDING
ROOM #507 F
ATLANTA, GEORGIA 30334
(404) 656-0202
(404) 463-6381 FAX

STANDING COMMITTEES
Budget and Fiscal Affairs Oversight
Human Relations and Aging
Interstate Cooperation

certified based on speculation or undisclosed criteria. The proposed changes have the potential to sow fear and distrust in our proven, and trusted democratic process. Further, these proposed changes have the potential to create more harassment towards our election officials and possibly cause counties to miss election certification deadlines.

Allowing the Board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one Board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of election certification across Georgia.

These two certification proposal rules impose burdensome requirements on county Boards by mandating the reporting of detailed ballot and voter information and demanding investigations into any discrepancies found. This could overwhelm local election officials and ultimately delay the certification process. These rules, as proposed, create avenues for malicious actors to disrupt the election process under the guise of addressing alleged discrepancies and could be exploited to sow doubt and distrust in election outcomes. Implementing such vague rules risks eroding public confidence in elections.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, I request that it issue a concise statement of the primary reasons for and against its adoption and incorporate therein the reason for overruling the consideration urged against its adoption.

Sincerely,

Lisa Campbell,
Representative for Georgia State House District 35

GEORGIA DEMOCRACY TASK FORCE

August 5, 2024

VIA ELECTRONIC MAIL

Chairman John Fervier
Georgia State Election Board
2 Martin Luther King Jr. Drive
Suite 802, Floyd West Tower
Atlanta, GA 30334
sebpubliccomments@sos.ga.gov

Re: Proposed Amendments to SEB Rules 183-1-2-.02 and 183-1-14-.02

Dear Chairman Fervier and State Election Board Members:

The Georgia Democracy Task Force is a group of mostly lawyers that aims to support the rule of law in the context of elections, bolster voter confidence by safeguarding the integrity and non-partisan administration of elections, and to support election workers and officials. We write to express our opposition and concern to the proposed amendments to SEB Rule 183-1-2-.02 and SEB Rule 183-1-14-.02. If enacted, especially so close to the November general election, both proposed amendments would introduce significant confusion into the election process, make administering the election more difficult for election officials, almost certainly lead to litigation, increase voter confusion, and decrease voter confidence in whatever the result of the November election turns out to be. In short, neither of these proposed amendments help ensure the integrity of elections in Georgia, and they should be rejected or at the very least tabled until after the November election.

I. Proposed Amendment to SEB Rule 183-1-12-.02 re. Definition of Certification

The proposed amendment to SEB Rule 183-1-12-.02 seeks to add a definition of certification that, while it may sound innocuous, represents a fundamental misunderstanding of what certification of election results actually is. The proposed amendment contradicts settled law and the plain words of the statutorily imposed, mandatory duty in Georgia law to certify election results. It also ignores the extensive verification measures that currently exist. The importance of timely, consistent, and lawful certification of election results by county election boards across Georgia cannot be overstated, and we fear that this proposed rule amendment will lead to county election boards not completing their mandatory legal duty to certify election results.

County boards of elections have numerous substantive duties in administering Georgia's elections. *See* O.C.G.A. § 21-2-40 (stating that the General Assembly may create county boards of elections and empower them with duties of election superintendents) and O.C.G.A. § 21-2-70 (setting forth the numerous duties of election superintendents). A county election board does not simply appear

at the time of election certification; they have numerous important duties throughout the election process. Like most government officials, a county elections board has both discretionary and mandatory duties. Georgia law is clear that certification of election results is a mandatory duty, and the proposed definition is contrary to that statutory requirement. O.C.G.A. § 21-2-493(k) states:

Such returns ***shall be certified*** by the superintendent not later than 5:00 P.M. on the Monday following the date on which such election was held and such returns shall be immediately transmitted to the Secretary of State.

(emphasis added). That same code section tells county boards what to do if they are concerned about the accuracy of their results even after all the post-election verifications are complete. In that instance, Georgia law tells the election board that if they do discover any fraud or error in the extensive post-election verification procedures they are required to undertake, “they shall compute and certify the votes justly, regardless of any fraudulent or erroneous returns presented, and shall report the facts to the appropriate district attorney for action.” O.C.G.A. § 21-2-493(i). The General Assembly has spoken clearly on this—election boards are required to certify *even if* fraud or error is discovered.

The fact that certification of elections is a mandatory duty in Georgia law is further supported by Georgia law regarding election contests. *See* O.C.G.A. § 21-2-520 *et seq.* Election contests are the vehicle to correct an election result if in fact there was any misconduct, fraud, or irregularity that puts the outcome of the election in question. *See* O.C.G.A. § 21-2-522. For an election contest to occur, election boards have to complete their mandatory duty of certifying the election first. *See* O.C.G.A. § 21-2-524 (petition to contest the election shall be filed within five days after certification). Paradoxically, refusal of an election board to complete their mandatory duty of certifying election results actually makes it more difficult to correct an election result if such a remedy is appropriate. Election contests are the legally established process for adjudicating elections where facts put the result in question. The judicial process offers distinct advantages in resolving election disputes over county election boards trying to step into this role. Courts have the authority and procedural mechanisms to thoroughly examine evidence, subpoena relevant documents, compel witness testimony under oath, and apply rigorous legal standards in evaluating claims of irregularities or fraud. Judges, as impartial arbiters, can weigh competing claims and evidence in an adversarial setting, ensuring a fair and thorough examination of any election challenges. This process provides a level of scrutiny and due process that cannot be replicated in the certification phase by local election officials, and in any case, county election boards have to complete their mandatory duty of certifying results to allow that process to begin.

This proposed redefinition of certification goes beyond the authority of the State Election Board as it seeks to alter the statutorily-imposed structure of elections in Georgia. The amendment threatens to fragment the uniform application of election laws across Georgia, potentially leading to a patchwork of inconsistent practices that could erode public trust and invite legal challenges.

Georgia’s certification process already marks the culmination of a rigorous computation and canvassing process designed to prevent fraud and ensure fair, legal, and orderly elections. The role

of certification, accordingly, is not to re-verify the vote count but to acknowledge the completion of the comprehensive process that has taken place.

In conclusion, the proposed amendments defy existing state statutes, inject unnecessary delay and individual subjectivity into the election process, attempt to usurp the role of courts in adjudicating election contests, and will almost certainly invite litigation.

II. Proposed Amendments to Rule 183-1-14-.02 re. Return of Absentee Ballots and Drop Box Surveillance

The proposed amendments to Rule 183-1-14-.02 are similarly flawed. Both likely exceed the authority of the State Election Board, will create voter confusion, and will likely not survive judicial scrutiny.

A. Proposed Additional Requirements re. the Return of Absentee Ballots

Georgia law provides for no-excuse absentee voting and allows voters multiple ways to return their ballots, including by mail using USPS or other common carriers,¹ personal return, or by allowing an authorized relative or caregiver to personally return. *See* O.C.G.A. § 21-2-385(a). The proposed amendment requires the creation and use of an “absentee ballot form” that collects the name of the absentee voter, the name of the person delivering the ballot, the relation to the voter, the signature of the person delivering the ballot, and the type of ID of the person delivering the ballot. Failure to abide by the requirement by the person receiving the ballot at the county or by the person delivering the ballot automatically turns the voter’s ballot into a provisional ballot that will not be counted unless it is cured.

Creating a new form for counties and voters to fill out so close to an election does not account for the difficulty of actually designing a clear, accurate form. That is a process that takes time and multiple iterations, especially when failure (even failure by a county official) to properly complete such a form could lead to voter’s ballot not being counted.

Enacting the proposed amendment so close to the election does not allow the Secretary of State or counties to adequately train counties and then for counties to adequately train every person who may receive an absentee ballot at the county.

The proposed amendments place an additional requirement on voters who choose to let an authorized relative or caregiver return their ballot for them. While Georgia law strictly limits who can return an absentee ballot for another voter, it does not place additional requirements on voters who exercise that choice. Attempting to do so via State Election Board rule exceeds the authority of the SEB.

¹ By only exempting United States Postal Service from the absentee ballot form requirement, the rule as drafted would require other common carriers such as UPS and FedEx to complete the proposed absentee form or risk their ballot not being counted. That requirement is clearly ridiculous and should be fixed.

B. Surveillance of Drop Boxes

Placing a new requirement on counties to put in place extensive video recording devices so close to an election will lead to scrambling by county election officials who already have plenty on their plate. Further, Georgia's Election Integrity Act of 2021 expressly moved away from video surveillance of drop boxes to a requirement of direct human surveillance. *See* O.C.G.A. § 21-2-382(c).

CONCLUSION

In conclusion, none of the proposed amendments are necessary to ensure the integrity of Georgia's upcoming elections. In fact, all are seriously flawed and would simply be inviting legal challenges. The SEB should reject the proposed amendments or at the very least table them until after November's election for further refining.

Thank you for consideration.

CONTACT:

Kathleen Hamill



OFFICE:
303B Coverdell Legislative Office
Building
18 Capitol Square, SW
Atlanta, Georgia 30334
(404) 656-9644
sonya.halpern@senate.ga.gov



COMMITTEES:
Appropriations
Banking and Financial Institutions
Education and Youth
Health and Human Services
Urban Affairs, Vice Chair

SENATOR SONYA HALPERN
Vice Chair, Senate Democratic Caucus
Chair, Fulton County Senate Delegation

August 5, 2024

Dear Members of the Georgia State Election Board,

My name is Sonya Halpern and I am an elected official in District 39 and represent the people of Fulton County.

I am writing to urge you to not accept proposed rules that would make county certification discretionary. I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals because they are far too vague and overbroad.

The definitions proposed in these petitions include "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum "reasonable inquiry" should be more specifically defined in both substance and time frame.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

These two certification proposal rules impose burdensome requirements on county boards by mandating the reporting of detailed ballot and voter information and demanding investigations into any discrepancies found. This could overwhelm local election officials and ultimately delay the certification process. These rules, as proposed, create avenues for malicious actors to disrupt the election process under the guise of addressing discrepancies and could be exploited to sow doubt and distrust in election outcomes. Implementing such rules risks eroding public confidence in elections. By magnifying discrepancies and delaying results from precincts under investigation, it amplifies opportunities for misinformation and accusations of fraud, regardless of how safe and secure our elections are. That is why I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.

Regards,

A handwritten signature in blue ink that reads "Sonya Halpern".

Senator Sonya M. Halpern
Georgia State Senate, District 39



House of Representatives

SAM PARK

REPRESENTATIVE, DISTRICT 107
4850 Sugarloaf Pkwy Ste. 209-188
LAWRENCEVILLE, GA 30044
sam.park@house.ga.gov
Sam@samforgeorgia.com

COVERDELL LEGISLATIVE OFFICE BUILDING
18 CAPITOL SQUARE, 611-F
ATLANTA, GEORGIA 30334
(404) 656-0314 (O)
(678) 559-7272 (C)

MINORITY WHIP

STANDING COMMITTEES:
RULES | ETHICS
INDUSTRY & LABOR | HIGHER EDUCATION
SMALL BUSINESS DEVELOPMENT
TECHNOLOGY & INFRASTRUCTURE
INNOVATION

August 5, 2024

Dear Members of the Georgia State Election Board,

My name is Samuel Park and I am an elected official in Georgia House District 107 and represent the people of Gwinnett County. I also serve as Minority Whip in the Georgia General Assembly.

I am writing to urge you to not accept proposed rules that would make county certification discretionary. I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals because they are far too vague and overbroad.

The definitions proposed in these petitions include “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum “reasonable inquiry” should be more specifically defined in both substance and time frame.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

These two certification proposal rules impose burdensome requirements on county boards by mandating the reporting of detailed ballot and voter information and demanding investigations into any discrepancies found. This could overwhelm local election officials and ultimately delay the certification process. These rules, as proposed, create avenues for malicious actors to disrupt the election process under the guise of addressing discrepancies and could be exploited to sow doubt and distrust in election outcomes. Implementing such rules risks eroding public confidence in elections. By magnifying discrepancies and delaying results from precincts under investigation, it amplifies opportunities for misinformation and accusations of fraud, regardless of how



House of Representatives

SAM PARK

REPRESENTATIVE, DISTRICT 107
4850 Sugarloaf Pkwy Ste. 209-188
LAWRENCEVILLE, GA 30044
sam.park@house.ga.gov
Sam@samforgeorgia.com

COVERDELL LEGISLATIVE OFFICE BUILDING
18 CAPITOL SQUARE, 611-F
ATLANTA, GEORGIA 30334
(404) 656-0314 (O)
(678) 559-7272 (C)

MINORITY WHIP

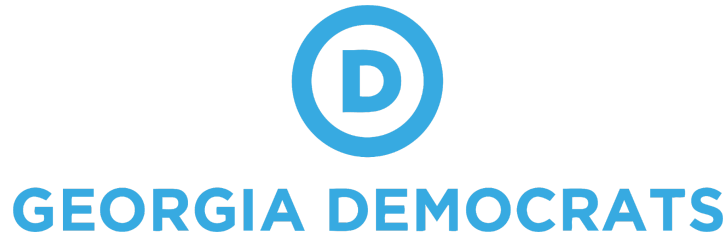
STANDING COMMITTEES:
RULES | ETHICS
INDUSTRY & LABOR | HIGHER EDUCATION
SMALL BUSINESS DEVELOPMENT
TECHNOLOGY & INFRASTRUCTURE
INNOVATION

safe and secure our elections are. That is why I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.

Yours in service,

Rep. Sam Park
Whip, Georgia House Democratic Caucus
Georgia State Representative, District 107



August 5, 2024

State Election Board
2 Martin Luther King Jr. Drive, S.E.
8th Floor West Tower Suite 802
Atlanta, Georgia 30334

Via Email only to SEBPublicComments@sos.ga.gov

**Re: Comment Regarding Notice of Rulemaking to Amend Subject 183-1-12-.12
(defining “Election Certification”)**

Chairman Fervier and State Election Board Members,

The Democratic Party of Georgia respectfully submits the following comment regarding the proposed revision to State Election Board Rule 183-1-12-.02 (Definitions), defining election certification as “mean[ing] to attest, after reasonable inquiry that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.” *See* Exhibit A, State Election Board Notice of Proposed Rulemaking, July 3, 2024 (the “Proposed Rule”).

The Board should reject the Proposed Rule. As several Board members have publicly worried, and as other commenters have explained exhaustively, the Proposed Rule violates Georgia’s election statute and exceeds the Board’s authority in violation of its enabling statute, which requires it “[t]o formulate, adopt, and promulgate . . . rules and regulations, *consistent with law*.” O.C.G.A. § 21-2-31(2) (emphasis added).

Moreover, the Proposed Rule is bad policy. It clarifies nothing and instead serves only as a pretext to sow seeds of doubt about the election certification process, all but guaranteeing chaos in Georgia elections in the coming weeks and months. This is not a theoretical exercise; the Board’s approval of this Proposed Rule—and its advancement of several related proposals due to be considered later this month—runs the all-too-real risk of subjecting elections officials across the state to threats of violence by those seeking to subvert the orderly administration of election results this fall.

We request that the Board include this comment in the rulemaking record. O.C.G.A. § 50-13-4(a)(2). If the Board votes to adopt the proposed rule, we request that it “issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.” *Id.*

I. Background

The Proposed Rule follows the exact language proposed by Fulton County Board of Registration and Elections (“BRE”) member Michael Heekin in his March 26, 2024 petition to the Board. *See* Exhibit B, M. Heekin Petition to Amend SEB Rule 183-1-12-.02 (Mar. 26, 2024) (the “Heekin Petition”), available at https://sos.ga.gov/sites/default/files/forms/Rule%20Petition%20-%20Heekin_redacted.pdf. On July 3, 2024, the Board noticed the Proposed Rule for rulemaking and hearing on August 6, 2024.

The Proposed Rule would amend SEB Rule 183-1-12-.02, *Definitions*, to add the following definition of “‘Certify the results of a primary, election, or runoff,’ or words to that effect” to mean:

to attest, after reasonable inquiry that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.

Proposed Rule at 2. The Synopsis of the Proposed Rule states that “[t]he purpose of the rule is to explicitly define certification, and to establish clear, standardized criteria for officially confirming the results of an election,” and claims that “[t]he main features of the amendments to this rule are that it adopts the U.S. Election Assistance Commission’s definition of certification, while stating explicitly that certifying officials should properly conduct a reasonable inquiry in arriving at the certification decision.” *Id.*

II. Georgia law forecloses the Board from expanding Superintendents’ certification duties beyond the non-discretionary ministerial certification role required by the election statute and Georgia Supreme Court precedent.

As several commenters have exhaustively outlined, the Proposed Rule clearly exceeds the Board’s authority and is contrary to Georgia law because the legislature has not conferred election superintendents with any discretionary power to conduct a nebulous “reasonable inquiry” prior to certification. *See* Exhibit C, *Comment on Proposed Amendment to Rule 183-1-12-.02*, American Civil Liberties Union et al., July 15, 2024 at 5-8 (the “ACLU Comment”) (discussing Georgia election statute’s plain language and history, and citing a long line of Georgia Supreme Court precedent that clearly proscribes the Board’s ability to turn superintendents’ statutory ministerial and non-discretionary election certification role into a subjective and free-ranging duty to make a “reasonable inquiry” into the election results prior to certification).

Several Board members have acknowledged with respect to similar proposed rules that the Board’s authority is limited by the Georgia state election statute, but neither the Proposed Rule itself nor any Board Members have addressed the clear statutory language or legal precedent head on. *See* Transcript of May 8, 2024 State Election Board Meeting, available at <https://sos.ga.gov/sites/default/files/forms/24-05.08.2024%20SEB%20307%20final.pdf> (the “May 8 Board Meeting”) at 71-72 (Chairman Fervier expressing concern about “whether this exceeds what the statute allows”), 73-74 (Chairman Fervier reiterating that the “[B]oard should never get in front of the legislature and do more than what the legislature has put in the statute.

And I just want to make sure that before we adopt rules that they are within our – the guidelines with the statute that allows for.”).

Instead, the Heekin Petition and Proposed Rule rely solely on a misleading characterization of the Proposed Rule as “adopt[ing] the U.S. Election Assistance Commission’s definition of certification.” Proposed Rule at 2. *See also* Heekin Petition at 2. However, the critical words in the Proposed Rule – “reasonable inquiry” – are *nowhere* to be found in the referenced U.S. Election Assistance Commission Guide. See Exhibit D, U.S. Election Assistance Commission, *Election Certification*, February 2022 (the “EAC Guide”). The EAC Guide is thus false cover for the Proposed Rule. Moreover, the EAC Guide does not set out to define “election certification” as a legal standard for every U.S. State. In fact, the EAC Guide is clear that individual “[s]tate laws guide the certification process at the local level,” highlighting a host of differences between state laws regarding the “method, scope, and timing of post-election activities,” and noting that “officials certify election results using a variety of methods, as outlined in state law.” EAC Guide at 1-2.

At the end of the day, Georgia law, and in particular the Georgia Election Code, O.C.G.A. § 21-1-1, *et seq.* (“Election Code”), governs the Board’s authority to delineate local election superintendents’ powers and duties with respect to election certification. The Election Code and Georgia Supreme Court precedent plainly prohibit the Board from granting superintendents the powers or duties of “reasonable inquiry” set forth in the Proposed Rule.

III. The Proposed Rule is a plain attempt to give local superintendents the ability to sow seeds of doubt about the election certification process, which would all but guarantee chaos in Georgia elections.

The Proposed Rule and its proponents are unmistakably intent on sowing distrust and chaos in the election certification process. Efforts to overturn elections or refuse to certify elections based on false claims of fraud have repeatedly and universally failed in the proper venue – the courts¹ – over the past three years.

The Proposed Rule attempts to circumvent the judicial process by requiring every superintendent to determine, in each superintendent’s “professional judgment”, what a “reasonable inquiry” is. The vague, undefined terms “reasonable inquiry” in the Proposed Rule practically invite rogue superintendents to refuse to certify election results – contrary to state law – based on a subjective belief that they have not been able to conduct a reasonable inquiry by the

¹ The Election Code already provides a direct route to contesting elections based on suspected fraud or errors in returns; the proper venue to adjudicate those contests is in the courts, not through the election superintendents. *See id.* § 21-2-522(1), (3), (4) (authorizing grounds for contesting an election based on alleged misconduct, fraud, irregularities, illegal votes, and counting errors). If “the results of an election contest change the returns so certified, a corrected return shall be certified and filed by the superintendent which makes such corrections as the court orders.” *Id.* § 21-2-493(1). “The determination of the judicial question affecting the result in such county elections is confined to the remedy of contest as provided by law.” *Bacon v. Black*, 162 Ga. 222, 133 S.E. 251, 253 (1926). Elections “superintendents [are] not selected for their knowledge of the law” and lack authority to render legal judgments on the validity of election returns. *Tanner v. Deen*, 108 Ga. 95, 33 S.E. 832, 835 (1899)

statutory deadline for certification which *must* occur less than one week after an election. O.C.G.A. § 21-2-493(k) (“returns shall be certified by the superintendent not later than 5:00 P.M. on the Monday following the date on which such election was held”).

Again, this is not a theoretical problem. One member of the Fulton County Board of Elections refused to vote to certify recent election results on the basis that she could not make a reasonable inquiry into the results before the deadline for certification. *See Adams v. Fulton Co. Bd. Of Elections and Registration*, Fulton County Superior Court, Case No. 24-CV-006566. The Democratic Party of Georgia, along with the Democratic National Committee, has sought to intervene as a defendant in the *Adams* lawsuit. Our goal in presenting certain issues from the *Adams* case here is not to litigate that dispute in this forum, but merely to illustrate the practical effect of placing the “reasonable inquiry” tool in the hands of election superintendent members. The absurdity of Ms. Adams’s position in that lawsuit – and the Proposed Rule’s amorphous “reasonable inquiry” standard – is highlighted by Ms. Adams’s complaint that she did not have sufficient time to review precinct-by-precinct results prior to the certification deadline:

According to [Adams’s] motion, she was permitted a “very limited review” and “less than seven (7) hours” to review the election records she had been provided. Renewed Motion at 1. In [Adams’s] brief in support of her motion, she explains that “Defendants afforded [Adams] six and a half hours . . . to review the requested election materials and processes,” and in “this truncated time,” [Adams] was only “able to review documents and records from the Primary for 10 of Fulton County’s 481 voting precincts.” Plaintiff Br. at 2.

[Adams] insists that she “worked diligently throughout the 6.5 hours” but still “was able to review only a tiny sliver of the data and information” that she claims needed review. [Adams’s] Letter to BRE Chair (Plaintiff Br. Ex. 1) at 1.

Given that it took [Adams] 6.5 hours to review the data for just ten of Fulton County’s precincts, [Adams] would need more than 300 hours to review the data for all 481 precincts. If [Adams] committed to reviewing this information nonstop, 24 hours a day, it would take [Adams] *thirteen* full days to review the data of all precincts. Certification must occur less than one week after an election. *See* O.C.G.A. § 21-2-493(k).

Exhibit E, Defendants’ Motion to Dismiss and Response in Opposition to Plaintiff’s Renewed Motion for Interlocutory Injunction, *Adams v. Fulton Co. Bd. of Elections and Registration et al.*, Fulton County Superior Court, Case No. 24CV0006566 at 12-13. The Proposed Rule’s ambiguity is likely not a mistake, but rather the defining intended feature: to allow individual county election board members to bring certification for that county to a grinding halt.

We now know that certification refusals are a key part of the legal strategy for sowing distrust in elections and attempting to overturn legal and valid elections results. Indeed, Coffee County’s refusal to certify results in November 2020 was one of the bases included in the Trump Administration’s never-issued draft executive order that would have directed the Secretary of Defense to seize voting machines. *See* Exhibit F, Draft Executive Order, December 16, 2020, at 2.

In this light, the intent and likely outcome of the Proposed Rule, if enacted, would be the Orwellian opposite of “promot[ing] public understanding and confidence in the election process and results,” as the proponents claim. *See* Heekin Petition at 2. To the contrary, the Proposed Rule, if enacted, will cause rogue elections officials across the state to arbitrarily refuse to certify elections. Such inevitable refusals based on the Proposed Rule would in turn be used by election deniers as evidence of election improprieties – just as the Trump Administration outlined in its draft Executive Order – and provide a pretense to challenge the Secretary of State’s ability to certify the votes cast for all candidates, including each slate of presidential electors, on or before the statutory deadline of November 22, 2024, O.C.G.A. § 21-2-499(b), potentially throwing state and federal election results into chaos and threatening the consideration of Georgia’s electoral votes by Congress on January 6, 2025.

The public servants on this Board should not act as a political arm of the Republican Party, former President Trump, or any other candidate. The Board should instead honor its duty to “formulate, adopt, and promulgate such rules and regulations, consistent with law, as will be conducive to the fair, legal, and orderly conduct of primaries and elections.” O.C.G.A. § 21-2-31(2). The Proposed Rule is plainly inconsistent with Georgia law, and would certainly not be conducive to the fair, legal, or orderly conduct of Georgia elections.

IV. The Proposed Rule would invite increased threats of violence directed at already embattled and unfairly maligned local elections officials.

Finally, the Board should consider the impact of its rulemaking on the physical safety of the elections officials who will be required to carry out this year’s elections. The threat to elections and election workers isn’t hypothetical, as many in Georgia know firsthand. Fueled by the same false and discredited election subversion rhetoric that undergirds the Proposed Rule, activists – and even the former President himself – would undoubtedly use the Proposed Rule, if enacted, to ratchet up the already dangerously heated rhetoric surrounding the certification of elections. *See* Exhibit G, Local Election Officials Survey, Brennan Center for Justice, May 2024 at 3 (more than half of all elections officials nationwide are concerned about the safety of their colleagues and staff, and more than a quarter are concerned about their family or loved ones being threatened or harassed, and 13 percent are “concerned about facing pressure to certify results in favor of a specific candidate or party”); Exhibit H, Matt Vasilogambros, *Racist slurs and death threats: The dangerous life of a Georgia elections official*, Stateline, Jun. 24, 2024, available at <https://stateline.org/2024/06/24/racist-slurs-and-death-threats-the-dangerous-life-of-a-georgia-elections-official/>; Exhibit I, Pete Simi and Seamus Hughes, *The Slow Burn Threatening Our Democracy*, The Lawfare Institute, October 5, 2023, available at <https://www.lawfaremedia.org/article/the-slow-burn-threatening-our-democracy> (counterterrorism researchers finding that the threats to elections officials “represent something much more insidious [than one-off threats]. This type of extremist culture seems to be growing just as civic culture continues to weaken and confidence in major social institutions declines.”).

The Proposed Rule would make every election superintendent in the state a potential target for undue pressure campaigns and inevitable threats to their safety. Instead of throwing gasoline on the real and increasing threats to our elections officials’ safety by adopting the

Proposed Rule's vague language, the Board should focus on providing clear and detailed canvassing procedures, consistent with the election statute, for superintendents to follow.

Conclusion

We respectfully urge the Georgia State Elections Board to reject the proposed amendment to Rule 183-1-12-.02.

Sincerely,

/s/ Tolulope Kevin Olasanoye

Tolulope Kevin Olasanoye
Executive Director
Democratic Party of Georgia

CC:

Sachin Varghese, General Counsel, Democratic Party of Georgia ([REDACTED])
Matthew M. Weiss, Deputy General Counsel, Democratic Party of Georgia ([REDACTED])
Cecilia Ugarte Baldwin, Director of Voter Protection, Democratic Party of Georgia
([REDACTED])



August 5, 2024
Sent via email

Chairman John Fervier
Georgia State Election Board
2 Martin Luther King Jr. Drive
Suite 802, Floyd West Tower
Atlanta, GA 30334

Re: Opposition to Proposed Rule 183-1-12-.02

Dear Chairman Fervier:

We write the Georgia State Election Board (the “Board”) opposing proposed rule 183-1-12-.02. This rule will unjustly delay the election certification process to the detriment of local election officials and voters, particularly voters of color. Simultaneously, the rule mischaracterizes the statutorily prescribed ministerial duty of election officials to certify elections as a discretionary duty. These concerns require the Board to reject proposed rule 183-1-12-.02.

Proposed rule 183-1-12-.02 defines “Certify the results of a primary, election, or runoff,” to mean “to attest, after *reasonable inquiry* that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.”¹ In short, the rule adds an undefined “reasonable inquiry” requirement into the certification process that could be understood to permit free-ranging speculation about whether the results of an election are valid.

Rule 183-1-12-.02’s “reasonable inquiry” requirement is fundamentally flawed in at least three respects.

First, the proposed rule violates Georgia law because it injects discretion into a statutorily required ministerial task. The Georgia Code prescribes specific limited procedures and

¹ Petition to Amend Rule 183-1-2-.02, presented by Michael Heekin, at 3 (Mar. 26, 2024)(emphasis added), available at https://sos.ga.gov/sites/default/files/forms/Rule%20Petition%20-%20Heekin_redacted.pdf.

actions for election officials to take to investigate and rectify discrepancies.² Importantly, it requires that “[i]f any error or fraud is discovered, the superintendent shall compute and certify the votes justly, regardless of any fraudulent or erroneous returns presented to him or her and shall report the facts to the appropriate district attorney for action.”³ In other words, Georgia law requires election officials to certify the election even if there are discrepancies and provides for alternative means after certification to resolve those discrepancies.

Further, in 1926, the Georgia Supreme Court described the duties of the managers and superintendents of election, who are required by law to assemble and count votes, i.e. certify an election, as *purely ministerial*.⁴ Years later, the Georgia Supreme Court reiterated its position that this process is ministerial:

To our minds there is no escape from the conclusion that in publishing the returns and declaring the results [, officials] were performing a strict and precise duty. . . . They were not, while performing that duty, exercising or authorized to exercise any *discretion*, but were simply performing the *ministerial* act of disclosing to the public the official election returns that had been prepared by the election managers.⁵

Proposed rule 103-12-1-.02 contravenes the Georgia Code and the state high court’s interpretation of election official’s duties in the election certification process by purporting to permit election officials to use their discretion to decide whether to certify an election. ⁶

Second, the proposed rule lacks definitions and guardrails to ensure the reasonable inquiry process will not unduly delay certifying elections. Election officials, or third parties attempting to pressure election officials, could understand the “reasonable inquiry” requirement to permit delays to certification which are premised on unsubstantiated claims of fraud or other irregularities, even if the claims have no likelihood of affecting the outcome of the election.⁷ In either instance, it would be unnecessary to delay certification, for rarely does reconciling minor cases affect the outcome of an election.⁸

² See Ga. Code Ann § 21-2-493.

³ Ga. Code Ann § 21-2-493(i).

⁴ See, Bacon v. Black, 133 S.E. 251, 253 (Ga. 1926).

⁵ See, *Thompson v. Talmadge*, 41 S.E.2d 883, 892-93 (Ga. 1947) (emphasis added).

⁶ *Supra* note 1.

⁷ See Amy Gardner, et al., *Trump Allies Test a New Strategy For Blocking Election Results*, The Washington Post, (June 26, 2004)

<https://www.washingtonpost.com/politics/2024/06/26/certification-2024-election-results/>.

⁸ See *Id.*

Moreover, there are risks in delaying the outcome of elections—including spread of fear and distrust, and the potential to incite political violence.⁹

Third, the proposed rule could be employed to delay or deny certifying election results in counties and precincts serving Black voters. Its vagueness risks enabling the personal views and priorities of election officials to distort the democratic process and invites inconsistent interpretation and application across jurisdictions. Vague and open-ended standards like this one can create opportunities for bias and discrimination to influence decision-making, either unconsciously or in some cases invidiously. That is particularly true in the voting context. For example, subjective and discretionary literacy test requirements notoriously gave rise to disenfranchisement and discrimination against Black voters before the passage of the Voting Rights Act—still-recent history that Black Georgians remember all too well, some from personal experience. We are gravely concerned that the proposed rule would be used to delay or deny certifying election results in ways that would disproportionately affect—and perhaps even intentionally target—Black voters.

To be clear, racial targeting or race-based suspicion is not “reasonable,” and the rule cannot be understood to legalize discrimination. For instance, an inquiry premised upon the race of voters in a county or precinct, or any proxy for race, would be a far cry from reasonable. Similarly, selective inquiries into the tabulation and canvassing process in jurisdictions or voting precincts with significant Black voting age populations would create opportunities for discrimination. Likewise, inquiries that target methods of voting disproportionately used by Black voters, like vote by mail or Sunday voting, would raise the specter of discrimination as well. Clearly, such conduct does not meet the standard of reasonableness.

The proposed rule therefore conflicts with governing law and any delay or denial of certification that would result from it is unlikely to withstand legal challenge. That illegality only underscores our grave concerns about the proposed rule’s vagueness and potential for misuse against Black voters, whose rights to vote could be delayed and disparaged unlawfully if the proposed rule is adopted.

* * * * *

⁹ See Justin Glawe, *Potential 2024 ‘Chaos’: Election Deniers Refusing to Certify Results*, Rolling Stone, (March 17, 2024) <https://www.rollingstone.com/politics/politics-features/election-deniers-refuse-certify-chaos-2024-1234988747/>).

Proposed rule 183-1-12-.02 creates more problems than it purports to resolve. By granting opportunity to delay the certification process, and by giving authority to wield reasonable inquiries as tools to subvert this ministerial duty, potentially to the detriment of Black voters, the rule only perpetuates risks associated with undermining the democratic process. Thus, for the reasons presented above, the Board should reject this proposed rule.

Sincerely,

s/ A. DeMetris Causer

A. DeMetris Causer
Legal Defense Fund
700 14th St. N.W., Ste. 600
Washington, D.C. 20005

NAACP Legal Defense and Educational Fund, Inc. (“LDF”)

Since its founding in 1940, the NAACP Legal Defense and Educational Fund, Inc. (“LDF”) has used litigation, policy advocacy, public education, and community organizing strategies to achieve racial justice and equity in education, economic justice, political participation, and criminal justice. Throughout its history, LDF has worked to enforce and promote laws and policies that increase access to the electoral process and prohibit voter discrimination, intimidation, and suppression.

NAN GROGAN ORROCK

District 36
206 Washington Street, SW
420-B State Capitol
Atlanta, Georgia 30334
Phone: (404) 463-8054
Fax: (404) 657-9728



COMMITTEES:

Appropriations
Finance
Health and Human Services
Higher Education

E-mail: Nan.Orrock@senate.ga.gov
Twitter: @SenNanOrrock
Facebook: SenatorNanOrrock

The State Senate
Atlanta, Georgia 30334

Dear Members of the Georgia State Election Board,

My name is Nan and I am an elected official in district 36 and represent the people of Fulton county.

I am writing to urge you to not accept proposed rules that would make county certification discretionary. I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals because they are far too vague and overbroad.

The definitions proposed in these petitions include "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum "reasonable inquiry" should be more specifically defined in both substance and time frame.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification it a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

These two certification proposal rules impose burdensome requirements on county boards by mandating the reporting of detailed ballot and voter information and demanding investigations into any discrepancies found. This could overwhelm local election officials and ultimately delay the certification process. These rules, as proposed, create avenues for malicious actors to disrupt the election process under the guise of addressing discrepancies and could be exploited to sow doubt and distrust in election outcomes. Implementing such rules risks eroding public confidence in elections. By magnifying discrepancies and delaying results from precincts under investigation, it amplifies opportunities for misinformation and accusations of fraud, regardless of how safe and secure our elections are. That is why I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.

A handwritten signature in black ink that reads "Nan Orrock".

Nan G. Orrock
State Senator, District 36

GLORIA S. BUTLER
District 55
Suite 420-C State Capitol
Atlanta, Georgia 30334
(O) 404-656-0075
(Fax) 404-657-9728
Gloria.Butler@senate.ga.gov



COMMITTEES:

Ethics, Ex-Officio
Health and Human Services
MARTOC
Reapportionment and Redistricting
Regulated Industries and Utilities
Rules
State and Local Governmental

SENATE MINORITY LEADER

The State Senate

Atlanta, Georgia 30334

August 5, 2024

Dear Members of the Georgia State Election Board,

My name is Gloria Butler and I am an elected official in district 55 and represent the people of Dekalb county.

I am writing to urge you to not accept proposed rules that would make county certification discretionary. I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals because they are far too vague and overbroad.

The definitions proposed in these petitions include "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum "reasonable inquiry" should be more specifically defined in both substance and time frame.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

These two certification proposal rules impose burdensome requirements on county boards by mandating the reporting of detailed ballot and voter information and demanding investigations into any discrepancies found. This could overwhelm local election officials and ultimately delay the certification process. These rules, as proposed, create avenues for malicious actors to disrupt the election process under the guise of addressing discrepancies and could be exploited to sow doubt and distrust in election outcomes. Implementing such rules risks eroding public confidence in elections. By magnifying discrepancies and delaying results from precincts under investigation, it amplifies opportunities for misinformation and accusations of fraud, regardless of how safe and secure our elections are. That is why I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption

Sincerely yours,

A handwritten signature in cursive script that reads "Gloria Butler". The ink is dark and the signature is fluid, with a large initial 'G' and a long, sweeping underline.

Senator Gloria Butler
Minority Leader
District 55

ELENA C. PARENT
District 42
Senate Democratic Caucus, Chair
121-A State Capitol
Atlanta, Georgia 30334
Phone: (404) 656-5109



COMMITTEES:
Education & Youth
Judiciary
Government Oversight
Appropriations

E-mail: Elena.Parent@senate.ga.gov

The State Senate

Atlanta, Georgia 30334

Dear Members of the Georgia State Election Board,

My name is Elena Parent and I am an elected official in district 42 and represent the people of DeKalb County.

I am writing to urge you to not accept proposed rules that would make county certification discretionary. I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals because they are far too vague and overbroad.

The definitions proposed in these petitions include "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum "reasonable inquiry" should be more specifically defined in both substance and time frame.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

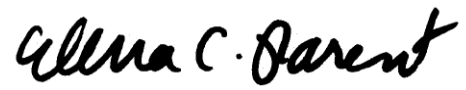
Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

These two certification proposal rules impose burdensome requirements on county boards by mandating the reporting of detailed ballot and voter information and demanding investigations into any discrepancies found. This could overwhelm local election officials and ultimately delay the certification process. These rules, as proposed, create avenues for malicious actors to disrupt the election process under the guise of addressing discrepancies and could be exploited to sow doubt and distrust in election outcomes. Implementing such rules risks eroding public confidence in elections. By magnifying discrepancies and delaying results from precincts under investigation, it amplifies opportunities for misinformation and accusations of fraud, regardless of how safe and secure our elections are. That is why I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue

a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.

Sincerely,

A handwritten signature in black ink that reads "Elena C. Parent". The script is cursive and fluid, with the first name "Elena" being the most prominent part of the signature.

Elena Parent
Georgia State Senator

KIMBERLY S. JACKSON

District 41
P.O. Box 1411
Pine Lake, Georgia 30072

321-B Coverdell Legislative Office Building
18 Capitol Square, S.W.
Atlanta, Georgia 30334
(404) 656-6882

Email: Kim.Jackson@senate.ga.gov



COMMITTEES:

Agriculture and Consumer Affairs
Children and Families
Health and Human Services
Public Safety

The State Senate
Atlanta, Georgia 30334

August 2, 2024
Georgia State Elections Board

Dear Members of the Elections Board,

As state Senator for Georgia Senate District 41, I am writing to urge you *not* to accept proposed rules that would make county certification discretionary. I oppose the unreasonable Michael Heekin and Salleigh Grubbs certification proposals, as they are far too vague and overbroad.

The definitions proposed in these petitions include "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum "reasonable inquiry" should be more specifically defined in both substance and time frame.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has confirmed makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

These two certification proposal rules impose burdensome requirements on county boards by mandating the reporting of detailed ballot and voter information and demanding investigations into any discrepancies found. This could overwhelm local election officials and ultimately delay the certification process. These rules, as proposed, create avenues for malicious actors to disrupt the election process under the guise of addressing discrepancies and could be exploited to sow doubt and distrust in election outcomes. Implementing such rules risks eroding public confidence in elections. By magnifying discrepancies and delaying results from precincts under investigation, it amplifies opportunities for misinformation and accusations of fraud, regardless of how safe and secure our elections are.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.

Regards,

A handwritten signature in black ink, appearing to read "Kim S. Jackson", with a small star or asterisk at the end.

Kimberly S. Jackson
Senator, District 41



P.O. Box 570738, Atlanta, GA 30357
770.303.8111|info@acluga.org

August 2, 2024

Dear Members of the State Election Board,

The ACLU of Georgia's Voter Access Project works to ensure voting is easy and accessible for all Georgians. We are writing to urge you to reject the petition to amend rule 183-1-12-.02 addressing the definition of certifying election results and the petition to amend rule 183-1-14-.02 addressing advance voting.

The proposed amendment to Rule 183-1-12-.02 is unreasonable and has the potential for great harm to our democratic process. The newly proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and what time frame, if any, that inquiry has to happen within. As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated is a "mandatory" duty, rather than a discretionary one. *Hall County Bd. of Tax Assessors v. Westrec Properties, Inc.*, 303 Ga. 69, 75 (2018). The Georgia Court of Appeals relatedly found that the predecessor certification statute with similar language was ministerial. *Bacon v. Black*, 162 Ga. 222 (1926). And the Georgia Supreme Court found that that statute included no discretion for canvassers. *Thompson v. Talmadge*, 201 Ga. 867, 876 (1947). There needs to be a legitimate, numerical reason for a board not to certify an election. Any suspicion of fraud should be referred to the county's district attorney. O.C.G.A. § 21-2-493(i).

When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials. Furthermore, allowing county board members this level of discretion beyond the limits of their statutory authority could lead to concerning inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

As the State Election Board, you have the critical role of overseeing the county level boards, ensuring their duties remain consistent with state statutes. Having an unclear definition of the certification process that does not require them to fulfill actions by a certain date runs the risk of allowing county board members to use their position to make their own politically motivated decisions.

The Petition to Adopt new Rule 183-1-14-.02 on the increased requirements for DropBoxes and absentee ballots creates requirements above and beyond what is required by statute to vote using these programs. The rule would create in effect a third check of ID when a voter chooses to submit their absentee ballot by drop box. This rule change could easily disenfranchise absentee voters because of administrative error and create unnecessary burdens on voters who need to cure their ballots by proving their identity for the third time in order to vote.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

We ask that you continue to put the rights of Georgia voters first.

Sincerely,

Rachel Lastinger
Associate Director, Voter Access Project, ACLU of Georgia



August 2, 2024

By Email

John Fervier, Chairman (jfervier.seb@gmail.com)
Sara Tindall Ghazal, Member (saraghazal.seb@gmail.com)
Janice W. Johnston, Member (jjohnstonmd.seb@gmail.com)
Rick Jeffares, Member (rjeffares.seb@gmail.com)
Janelle King, Member (jking.seb@gmail.com)
Georgia State Election Board
C/O Alexandra Hardin (SEBPublicComments@sos.ga.gov)
2 Martin Luther King Jr. Drive, S.E.
8th Floor West Tower Suite 802
Atlanta, GA 30334

Re: Comment on Proposed Amendment to SEB Rule 183-1-2-.02 *Definitions*

Dear Chairman Fervier and State Election Board Members:

On behalf of the SPLC Action Fund,¹ we write in response to the notice of proposed rulemaking issued by the State Election Board (“SEB” or “Board”) on July 3, 2024. We respectfully submit this comment to the proposed rule which seeks to amend SEB Rule 183-1-2-.02 *Definitions* (“Proposed Rule”) by altering the definition of election certification. We urge the SEB to reject the Proposed Rule because its suggested language is in conflict with the letter of Georgia law as well as longstanding Georgia caselaw such that the Board’s adoption of the Proposed Rule would exceed the SEB’s statutory authority. The Proposed Rule’s vague language would also lead to inconsistent applications and is ripe for abuse. The resulting electoral confusion and disorder stand to negatively impact voter and public confidence in Georgia’s elections. The Proposed Rule is therefore unreasonable in light of these undesirable effects.

Pursuant to O.C.G.A. § 50-13-4(a)(2), we request that the SEB include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it “issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.”

¹ The SPLC Action Fund is a catalyst for racial justice in the South and beyond, working in partnership with communities to dismantle white supremacy, strengthen intersectional movements, and advance the human rights of all people. SPLC Action Fund is the 501(c)4 affiliate organization to the Southern Poverty Law Center. For more information, visit www.splcactionfund.org.

I. Background

The Proposed Rule seeks to amend SEB Rule 183-1-12-.02 to include the following definition:

(c.2) “Certify the results of a primary, election, or runoff,” or words to that effect, means to attest, after reasonable inquiry, that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.²

Notice of the Proposed Rule states that the purpose of the rule is “to explicitly define certification, and to establish clear, standardized criteria for officially confirming the results of an election.”³

II. The Board Should Reject the Proposed Rule Because it Exceeds the Board’s Statutory Authority and it is Unreasonable

We urge the Board to reject the Proposed Rule because it would conflict with Georgia law and, as such, the Board’s adoption of the Proposed Rule would exceed the Board’s statutory authority. The Proposed Rule’s vague language also risks inconsistent application between counties and creates opportunities for abuse, all of which risks election chaos that negatively impacts public perception of Georgia’s elections. Such effects would run afoul of the purported purpose of the Proposed Rule and the SEB’s statutorily authorized charge and render the Board’s adoption of the Proposed Rule unreasonable.

a. The Proposed Rule Conflicts with Georgia Law

The Proposed Rule, which seeks to define election certification to mean to “attest, after reasonable inquiry, that the tabulation and canvassing of the election are complete and accurate and that the election results area true and accurate accounting of all votes cast in that election,” is contrary to Georgia law and therefore exceeds the Board’s statutory authority.

For the reasons detailed in the comment submitted by our colleagues at the Brennan Center for Justice and Protect Democracy on July 2, 2024,⁴ and the comment submitted by our colleagues at the American Civil Liberties Union of Georgia, Common Cause Georgia, Citizens for responsibility and Ethics in Washington, and the Public Rights Project on July 15, 2024,⁵ Georgia law provides no discretion to county election supervisors or election boards to reject or delay the certification of actual vote totals.⁶ This is further supported by nearly a century of Georgia caselaw that confirms the county election superintendent’s role in the certification process is “purely ministerial.”⁷ The Proposed Rule’s option for county election supervisors and election boards to certify election results only following a “reasonable inquiry” therefore runs contrary to the letter of Georgia law as well as longstanding Georgia caselaw,

² Notice of Proposed Rulemaking at 2.

³ *Id.*

⁴ See Brennan Center for Justice at NYU Law & Protect Democracy, *Comment to the Georgia State Election Board: Reject a rule re-defining election certification*, <https://www.brennancenter.org/our-work/research-reports/comment-georgia-state-election-board-reject-rule-re-defining-election> (July 2, 2024).

⁵ See ACLU of Georgia, Common Cause Georgia, Citizens for Responsibility and Ethics in Washington & Public Rights Project, *Comment on Proposed Amendment to Rule 183-1-12-02*, <https://www.citizensforethics.org/wp-content/uploads/2024/07/Comment-on-Proposed-Rule-Defining-Election-Certification-2024.07.11.pdf> (July 15, 2024).

⁶ O.C.G.A. §§ 21-2-493(a), (k); 21-2-497(b).

⁷ *Bacon v. Black*, 133 S.E.2d 883, 893 (Ga. 1947); *Darvis v. Warde*, 118 S.E. 378, 391 (Ga. 1923); *Tanner v. Deen*, 33 S.E. 832, 835-36 (Ga. 1899); *Brockett v. Maxwell*, 38 S.E.2d 176, 179 (Ga. Ct. App. 1946).

which does not grant county election superintendents discretion to reject or delay certification and compels county election certification of vote totals.

The Georgia election code also completely prescribes the procedures county election superintendents must follow to ensure ballots are lawfully cast and accurately counted, all of which reasonably precede the county election superintendent's duty to certify election results.⁸ The Proposed Rule would improperly add a new legal requirement to "confirm the results of an election."⁹

The Georgia General Assembly has empowered the SEB to "formulate, adopt, and promulgate such rule and regulations, *consistent with law*."¹⁰ Because Georgia law makes clear that county election certification is ministerial, non-discretionary, and mandatory and Georgia law already completely prescribes the procedures county election superintendents must take to confirm the accuracy of election results, the Proposed Rule's additional "reasonable inquiry" requirement for election certification runs afoul of Georgia law. Adoption of the Proposed Rule would therefore exceed the SEB's statutory authority.

b. The Proposed Rule Would Produce Deleterious Effects to Georgia's Elections, including Negative Impacts to Voter Confidence

The Proposed Rule's vague requirements increase the risk of election disorder, which would produce harmful effects on public perception of Georgia elections. While the Proposed Rule purportedly seeks to "establish clear, standardized criteria" for confirming election results, the vague "reasonable inquiry" language does the opposite.¹¹ Because the Proposed Rule provides no definition for what a "reasonable inquiry" means, the Proposed Rule creates opportunities for bad actors to abuse the rule for nefarious goals. This concern is not unfounded. Election denial movements encourage "supporters to infiltrate local election infrastructure to increase . . . control over electoral processes and outcomes."¹² This includes efforts to seat local election board members to deny or delay election certification.¹³ States are beginning to see the results of those efforts. In Arizona's Cochise County, for instance, members of the county election board were recently charged with conspiring to delay election certification based on disproven concerns about voting machines.¹⁴ In Pennsylvania, local actors abused an arcane law in 2022 to demand recounts for unfounded reasons, all to "delay the certification of elections."¹⁵

Leaving "reasonable inquiry" to interpretation could also result in different interpretations and applications from county to county or even between individual board members within a particular county. Rather than "establish clear, standardized criteria" for confirming election results as the

⁸ See also §§ 21-2-70; 21-2-493; 21-2-495(a)-(b); 21-2-497(b); 21-2-498.

⁹ Notice of Proposed Rulemaking at 2. See *Dep't of Human Resources v. Anderson*, 462 S.E.2d 439, 441 (Ga. Ct. App. 1995) (finding a rule requiring the filing of an administrative adjustment inappropriately adds a procedure where the statute was read to flatly state the entire procedure for "adjusting the child support award").

¹⁰ O.C.G.A. § 21-2-31(2) (emphasis added).

¹¹ Notice of Proposed Rulemaking at 2.

¹² Human Rights First, *Election Denialists Recruit Veterans and Threaten 2024 Election*, at 4, https://humanrightsfirst.org/wp-content/uploads/2023/11/Election-Denial-report_November-2023_Final.pdf.

¹³ *Id.*

¹⁴ American Oversight, *The Election Denial Movement's Misguided Push to Hand-Count Ballots*, <https://www.americanoversight.org/investigation/the-election-denial-movements-misguided-push-to-hand-count-ballots> (July 3, 2024).

¹⁵ Carter Walker, SpotlightPA, *Century-old law let voters file baseless recount petitions and delay Pa.'s election certification*, <https://www.spotlightpa.org/news/2022/12/pa-midterm-election-2022-recount-petitions-certification-history/> (Dec. 29, 2022).



Proposed Rule purports to do, the Proposed Rule could result in the unequal treatment of ballots in different counties.¹⁶ The legal violations of ballots being treated differently between counties alone are far-reaching.¹⁷

Importantly, both the potential for abuse and inconsistent applications would generate voter confusion and sow disorder. This, in turn, negatively impacts public confidence of Georgia's elections. Because the Proposed Rule would result in deleterious effects to Georgia's elections, the Proposed Rule is unreasonable.

III. Conclusion

Time and again, Georgia has proven that our elections are safe and secure. The Proposed Rule is unnecessary. But it is also in conflict with Georgia law, in excess of the SEB's statutory authority, risks inconsistent application, is subject to abuse, and is unreasonable in light of these deleterious effects. For these reasons, we urge the Board to reject the Proposed Rule.

Sincerely,

SPLC ACTION FUND

Pichaya Poy Winichakul, Senior Staff Attorney

Isabel Otero, Georgia Policy Director

Brian Nuñez, Georgia Senior Policy Associate

¹⁶ Notice of Proposed Rulemaking at 2. *See also* O.C.G.A. § 21-2-31 (describing the duties of the SEB to include promulgating rules and regulations to establish the "uniformity in practices and proceedings . . . as well as legality . . . in all primaries and elections" for election officials).

¹⁷ *See, e.g., Bush v. Gore*, 531 U.S. 98, 106-07 (2000).

July 15, 2024

By Email

John Fervier, Chairman (jfervier.seb@gmail.com)
Sara Tindall Ghazal, Member (saraghazal.seb@gmail.com)
Janice W. Johnston, Member (jjohnstonmd.seb@gmail.com)
Rick Jeffares, Member (rjeffares.seb@gmail.com)
Janelle King, Member (jking.seb@gmail.com)
Georgia State Election Board
2 Martin Luther King Jr. Drive
Suite 802, Floyd West Tower
Atlanta, GA 30334

Re: Comment on Proposed Amendment to Rule 183-1-12-.02

Dear Chairman Fervier and State Election Board Members:

The American Civil Liberties Union of Georgia, Common Cause Georgia, Citizens for Responsibility and Ethics in Washington, and Public Rights Project respectfully submit this comment on the proposed rule issued on July 3, 2024 by the State Election Board (“SEB” or “Board”),¹ which would amend the Board’s rules to define “election certification.” We urge the Board not to adopt the Proposed Rule because it is contrary to Georgia law, exceeds the Board’s statutory authority, and would increase the risk of certification abuse and electoral chaos in Georgia.

This comment supplements the preliminary comment we submitted on June 24, 2024, prior to the Board’s release of the Proposed Rule. Pursuant to O.C.G.A. § 50-13-4(a)(2), we request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it “issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.” *Id.*

I. Background

A. Rulemaking to Amend SEB Rule 183-1-12-.02

On March 26, 2024, Fulton County Board of Registration and Elections (“BRE”) member Michael Heekin petitioned the Board, pursuant to SEB Rule 183-1-1.0.1 and the Georgia Administrative Procedure Act, to amend SEB Rule 183-1-12-.02 to include a definition of the

¹ See State Election Board, Notice of Proposed Rulemaking, Revisions to Subject 183-1-12-.02 (July 3, 2024) [hereinafter Proposed Rule], <https://sos.ga.gov/sites/default/files/2024-07/Notice%20of%20Proposed%20Rulemaking%20-%20183-1-12-.02.pdf>.

term “Certify the results of a primary, election or runoff.”² The Petition asserts that Georgia law entrusts election officials to “properly tabulate, certify, and report” election results, but does not define “what it means to certify an election.”³ The Petition claims that, without a “standard for certification,” it is unclear whether election “superintendents [are] performing a simple bureaucratic act of certifying the tabulated results of an election even if those results are suspect” or are instead “entrusted to use their professional judgment in the certification process.”⁴ The Petition thus proposes a definition of election certification purportedly based on “several authorities including the United States Election Assistance Commission” which “suggest[] that certifying the results of an election requires election officials to pass judgment on the election as a whole, including making sure that every valid vote is included in the final results.”⁵

Specifically, the Petition proposes amending SEB Rule 183-1-12-.02 to include the following definition:

(c.2) “Certify the results of a primary, election, or runoff,” or words to that effect, means to attest, after reasonable inquiry, that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.⁶

The Board considered the Petition at its May 8, 2024 meeting and voted 2-1 to initiate rulemaking. Members Johnston and Jeffares voted yes, and former Member Lindsey voted no.⁷ Mr. Lindsey noted that the Board had already voted unanimously at the same meeting to designate two Board members to work on a separate proposed rule regarding the types of information superintendents would be entitled to receive prior to certifying elections, and that he preferred to “do this all together” in a single rule.⁸ Mr. Lindsey also expressed concern that adopting the “reasonable inquiry” language could allow county boards to “unfairly” or “unduly delay certification.”⁹

On July 3, 2024, the Board released the Proposed Rule. Its text mirrors the language proposed in Mr. Heekin’s Petition, quoted above. The Board explains that “[t]he purpose of the rule is to explicitly define certification, and to establish clear, standardized criteria for officially

² Letter from Michael Heekin to John Fervier, Petition to Amend SEB Rule 183-1-12-.02, at 1 (Mar. 26, 2024) [hereinafter Heekin Petition], https://sos.ga.gov/sites/default/files/forms/Rule%20Petition%20-%20Heekin_redacted.pdf.

³ *Id.*

⁴ *Id.*

⁵ *Id.* at 2.

⁶ *Id.*

⁷ See Transcript of May 8, 2024 State Election Board Meeting, at 301-04 [hereinafter May 8 Board Meeting], <https://sos.ga.gov/sites/default/files/forms/24-05.08.2024%20SEB%20307%20final.pdf>.

⁸ *Id.* at 113, 289-90, 293-94, 301-02 (Statement of Member Lindsey).

⁹ *Id.* at 298-99.

confirming the results of an election.”¹⁰ It adds that the “main features of the amendments to this rule are that it adopts the U.S. Election Assistance Commission’s definition of certification, while stating explicitly that certifying officials should properly conduct a reasonable inquiry in arriving at the certification decision.”¹¹

B. Legal Framework for County-Level Election Certification

Under Georgia law, the “elections superintendent” is the election administrator in charge of certification at the county level. O.C.G.A. § 21-2-70(9). Although the person or entity who fills this role varies by county, the legislature has created BREs in most counties that have “the powers and duties of the election superintendent relating to the conduct of primaries and elections.” *Id.* § 21-2-40(b). In such counties, the BRE itself is the superintendent, not its individual members. *See id.*; SEB Rule 183-1-12.02(1)(g).

Georgia law imposes clearly defined duties on election superintendents. The election superintendent “shall ... receive from poll officers the returns of all primaries and elections, ... canvass and compute the same, and ... certify the results thereof to such authorities as may be prescribed by law.” *Id.* § 21-2-70(9). The superintendent oversees the computation, canvassing, tabulation, and ultimate certification of the returns, *see id.* § 21-2-493, as well as a mandatory pre-certification audit process, *see id.* § 21-2-498. The superintendent may order a pre-certification recount or recanvass in precincts in the county where there appears to be a “discrepancy” or “error, although not apparent on the face of the returns.” *Id.* § 21-2-495(a), (b). Each of these processes are governed by a detailed set of rules established by statute and regulation, *see* SEB Rules 183-1-12.01-.20, none of which give superintendents the discretion to throw out votes or substitute their own judgment for the actual vote totals.

“Upon the completion of ... computation and canvassing, the superintendent *shall* tabulate the figures for the entire county or municipality and sign, announce, and attest the same, as required by this Code section.” *Id.* § 21-2-493(a) (emphasis added). “The consolidated returns *shall then be certified* by the superintendent in the manner required by this chapter. Such returns *shall be certified* by the superintendent not later than 5:00 P.M. on the Monday following the date on which such election was held and such returns *shall* be immediately transmitted to the Secretary of State.” *Id.* § 21-2-493(k) (emphasis added). “Each county and municipal superintendent shall, upon certification, furnish to the Secretary of State in a manner determined by the Secretary of State a final copy of each ballot used for such election.” *Id.* § 21-2-497(b).

The legislature’s repeated use of the word “shall” means that certification by the statutory deadline is mandatory and non-discretionary. *See Hall Cnty. Bd. of Tax Assessors v. Westrec Props., Inc.*, 809 S.E.2d 780, 786 (Ga. 2018) (“The word ‘shall’ is generally construed as a word of command. The import of the language is mandatory.”); *Mead v. Sheffield*, 601 S.E.2d 99, 100 (Ga. 2004) (applying principle in construing the Election Code); 1978 Ga. Op. Att’y Gen. 246 (No. U78-44) (Oct. 27, 1978) (“[T]he use of the word ‘shall’ ... with respect to the duties imposed upon a ... superintendent of elections ... indicates the imposition by the General

¹⁰ Proposed Rule at 2.

¹¹ *Id.*

Assembly ... of a mandatory duty to perform certain enumerated functions,” and “an action for mandamus ... may lie to require performance ... of [these] duties.”).

Moreover, longstanding Georgia Supreme Court precedent holds that election certification and similar acts are non-discretionary or “ministerial.” *See, e.g., Thompson v. Talmadge*, 41 S.E.2d 883, 893 (Ga. 1947) (recognizing the “general, if not indeed the universal, rule of law applicable to election canvassers” that “they are given no discretionary power except to determine if the returns are in proper form and executed by the proper officials and to pronounce the mathematical result, unless additional authority is expressed”); *Bacon v. Black*, 133 S.E. 251, 253 (Ga. 1926) (“The duties of the managers or superintendents of election who are required by law to assemble at the courthouse and consolidate the vote of the county are purely ministerial.”); *Davis v. Warde*, 118 S.E. 378, 391 (Ga. 1923) (“The duties of canvassers are purely ministerial; they perform the mathematical act of tabulating the votes of the different precincts as the returns come to them.”); *Tanner v. Deen*, 33 S.E. 832, 835-36 (Ga. 1899) (issuing writ of mandamus requiring superintendents to consolidate election returns because their duties were “regulated by statute, and not left to the discretion of the party performing” them); *Brockett v. Maxwell*, 38 S.E.2d 176, 179 (Ga. Ct. App. 1946) (“ascertaining and declaring the result of the election” is “ministerial”).

Election superintendents cannot withhold certification based on suspected fraud or errors in returns; such issues are instead resolved in the courts. The Election Code requires that “[i]f any error or fraud is discovered, the superintendent shall compute and certify the votes justly, regardless of any fraudulent or erroneous returns presented to him or her, and shall report the facts to the appropriate district attorney for action.” O.C.G.A. § 21-2-493(i); *see also id.* § 21-2-522(1), (3), (4) (authorizing election contests based on alleged misconduct, fraud, irregularities, illegal votes, and counting errors). If “the results of an election contest change the returns so certified, a corrected return shall be certified and filed by the superintendent which makes such corrections as the court orders.” *Id.* § 21-2-493(l). “The determination of the judicial question affecting the result in such county elections is confined to the remedy of contest as provided by law.” *Bacon*, 133 S.E. at 253. This longstanding rule reflects that election “superintendents [are] not selected for their knowledge of the law” and lack authority to render legal judgments on the validity of election returns. *Tanner*, 33 S.E. at 835.

This is not just the law in Georgia: “The doctrine that canvassing boards and return judges are ministerial officers possessing no discretionary or judicial power,” has been “settled in nearly or quite all the states” since the late nineteenth century. George W. McCrary, *A Treatise on the American Law of Elections*, at 200, § 264 & n.1 (4th ed. 1897); *see also* Lauren Miller & Will Wilder, *Certification and Non-Discretion: A Guide to Protecting the 2024 Election*, 35 *Stan. L. & Pol’y Rev.* 1, 26-31 (2024) (discussing cases).¹²

¹² *See, e.g., Stearns v. State ex rel. Biggers*, 100 P. 909, 911 (Okla. 1909) (“To permit canvassing boards who are generally without training in the law . . . to look elsewhere than to the returns for a reason or excuse to refuse to canvass the same and adjudicate and determine questions that may be presented aliunde, often involving close legal questions, would afford temptation and great opportunity for the commission of fraud.”); *Lewis v. Marshall Cty. Comm’rs*, 16 Kan. 102, 108 (1876) (“[I]t is a common error for a canvassing board to overestimate its powers. . . . Its duty is almost wholly ministerial. It is to

II. The Board Should Not Adopt the Proposed Rule

Insofar as the Proposed Rule purports to give county officials discretionary power to conduct a “reasonable inquiry” of election results prior to certification, it is contrary to Georgia law and exceeds the Board’s statutory authority. Nor would the Proposed Rule achieve the Board’s stated goal “to establish clear, standardized criteria for officially confirming the results of an election.”¹³ To the contrary, its open-ended language would invite certification abuse and electoral chaos. It should not be adopted.

The Board is no doubt empowered to adopt reasonably detailed canvassing rules consistent with the Election Code. Indeed, the Board unanimously voted at its May 8 meeting to designate two Board Members to work with interested parties in crafting such rules.¹⁴ That is a sensible path for addressing any legitimate concerns with the canvassing process, not this rulemaking.

A. The Proposed Rule is Contrary to Georgia Law

At the May 8 Board meeting, Chairman Fervier repeatedly expressed caution at adopting rules that might “exceed what the legislature has put in the statute.”¹⁵ He stressed: “This Board should never get in front of the legislature, and do more than what the legislature has put into statute and I just want to make sure that before we adopt rules that they are within our . . . guidelines of what the statute allows for.”¹⁶

The legislature has spelled out in painstaking detail election superintendents’ duties and powers. *See supra* Part I.B. Nowhere has the legislature authorized superintendents to conduct a free-roaming “reasonable inquiry” of the election results prior to certifying consolidated returns under O.C.G.A. § 21-2-493(k). That omission matters, because where the legislature has desired to give superintendents discretionary power, it has done so expressly. *See, e.g.*, O.C.G.A. § 21-2-493(c) (“In precincts in which paper ballots have been used, the superintendent *may* require the production of the ballot box and the recount of the ballots contained in such ballot box . . . *in the discretion of the superintendent*”) (emphasis added). Thus, “we must presume that if the General Assembly had wished to” give election superintendents discretionary authority over the certification process, “the legislature would have done so expressly” and that its “failure to do so . . . was a matter of considered choice.” *In re Est. of T. M. N.*, 892 S.E.2d 819, 825 (Ga. Ct. App.

take the returns as made to them from the different voting precincts, add them up, and declare the result. Questions of illegal voting, and fraudulent practices, are to be passed upon by another tribunal.”).

¹³ Proposed Rule at 2.

¹⁴ *See* May 8 Board Meeting at 113 (Board voting unanimously not to proceed with rulemaking on petition proposed by Bridget Thorne and instead “to appoint two Members to work with the petitioner to come up with an alternate rule to be presented at the next [Board] meeting”).

¹⁵ *Id.* at 71-72 (Statement of Chairman Fervier).

¹⁶ *Id.*

2023); *accord Lyman v. Cellchem Int'l, Inc.*, 796 S.E.2d 255, 257 (Ga. 2017); *Kemp v. Kemp*, 788 S.E.2d 517, 524 (Ga. Ct. App. 2016).

This conclusion is reinforced by a long line of Georgia Supreme Court precedent. For more than a century, that court has made clear that election certification is ministerial and non-discretionary—not an opportunity to conduct a roving “inquiry” of election results to determine whether they are “suspect” or “true” based on the superintendents’ “professional judgment.”¹⁷ *See, e.g., Thompson*, 41 S.E.2d at 893; *Bacon*, 133 S.E. at 253; *Davis*, 118 S.E. at 391; *Tanner*, 33 S.E. at 835-36; *Brockett*, 38 S.E.2d at 178-79. The Georgia Attorney General has likewise long embraced the view that the Election Code imposes “mandatory dut[ies]” on “superintendent[s] of elections.” 1978 Ga. Op. Att’y Gen. 246. Although these authorities predate the current version of the Election Code, “the legislature is presumed to know the condition of the law and to enact statutes with reference to it,” and “the legal backdrop against which a statute is enacted is often a key indicator of a statute’s meaning.” *Ford Motor Co. v. Cospers*, 893 S.E.2d 106, 115 (Ga. 2023); *see also Dove v. Dove*, 680 S.E.2d 839, 842 (Ga. 2009) (“[O]ur legislature is presumed to enact statutes with full knowledge of existing law, including court decisions.”).

With the current Election Code, the legislature has kept in place the “general, if not indeed the universal, rule of law applicable to election canvassers” that “they are given no discretionary power except to determine if the returns are in proper form and executed by the proper officials and to pronounce the mathematical result, unless additional authority is expressed.” *Thompson*, 41 S.E.2d at 877. Insofar as the proposed amendment would grant election superintendents “discretionary power” beyond that expressly conferred by statute, it is contrary to settled Georgia law.

The Board has not acknowledged this judicial precedent and, indeed, fails to cite any Georgia authority supporting its proposed definition of “certification.” The Board instead cites non-binding guidance by the U.S. Elections Assistance Commission.¹⁸ But even that guidance is taken out of context. The guidance does not purport to offer a universal definition of election certification for all 50 states. To the contrary, it recognizes that “[s]tate laws guide the certification process at the local level”; that “[t]he method, scope, and timing of post-election activities vary by state”; and that “[l]ocal election officials certify election results using a variety of methods, as outlined in state law.”¹⁹ Nor does the guidance contain the problematic “reasonable inquiry” language included in the Proposed Rule.²⁰

¹⁷ Heekin Petition at 1.

¹⁸ Proposed Rule at 2; *see also* Heekin Petition at 2.

¹⁹ U.S. Election Assistance Comm’n, *Election Certification*, at 1-2 (Feb. 2022), https://www.eac.gov/sites/default/files/electionofficials/postelection/Guide_to_Election_Certification_EAC.pdf.

²⁰ *See id.*

Ultimately, this Board must follow Georgia law. And Georgia “law” includes not just statutes passed by the legislature, but also precedential decisions of the Georgia Supreme Court. The Board is bound by that precedent and must consider it in conducting this rulemaking.

B. The Proposed Rule Exceeds the Board’s Statutory Authority

The legislature has empowered the Board “[t]o formulate, adopt, and promulgate such rules and regulations, *consistent with law*, as will be conducive to the fair, *legal*, and orderly conduct of primaries and elections.” O.C.G.A. § 21-2-31(2) (emphasis added). As outlined above, the Proposed Rule is not “consistent with law.” The Board plainly lacks authority to grant election superintendents any discretionary power of “reasonable inquiry” where the legislature has not conferred such power and where the “legal backdrop against which [the Election Code] was enacted,” *Ford Motor Co.*, 893 S.E.2d at 115, makes clear that certification is a ministerial, non-discretionary function.

C. The Proposed Rule’s Vague Language Would Invite Certification Abuse and Electoral Chaos

The Board must also consider the context of the Proposed Rule. County election certification generated little controversy prior to 2020. But in recent years, dozens of county officials across the country have improperly refused to certify election results—sometimes in open defiance of state law and court orders.²¹ In one extreme case, New Mexico county commissioner Couy Griffin voted not to certify a primary election in 2022 based on distrust of voting systems and defied a writ of mandamus by the New Mexico Supreme Court directing him to certify, stating: “My vote to remain a ‘no’ isn’t based on any evidence. It’s not based on any facts . . . It’s only based on my gut feeling and my own intuition.”²² Griffin was later criminally convicted and removed from office for his participation in the January 6, 2021 attack on the U.S. Capitol.²³

This troubling pattern of county-level election subversion has unfortunately spread to Georgia.²⁴ Indeed, several BRE members who appeared at the May 8 Board meeting have

²¹ See Miller & Wilder, *supra*, at 14-22 (discussing cases in Michigan, New Mexico, Nevada, Arizona, and Pennsylvania); Protect Democracy, *Election Certification is Not Optional* (Mar. 2024) (discussing cases in Georgia, North Carolina, and Colorado), https://protectdemocracy.org/wp-content/uploads/2024/03/PD_County-Cert-WP_v03.1.pdf.

²² Susan Montoya Bryan & Morgan Lee, *Screams, threats as New Mexico counties certify vote*, Associated Press (June 17, 2022), <https://apnews.com/article/2022-midterm-elections-new-mexico-government-and-politics-donald-trump-fa26178d77b421ff7317d1a6ae83e0c4>.

²³ Morgan Lee, Nicholas Riccardi, & Mark Sherman, *Supreme Court rejects appeal by former New Mexico county commissioner banned for Jan. 6 insurrection*, Associated Press (Mar. 18, 2024), <https://apnews.com/article/supreme-court-insurrection-capitol-attack-new-mexico-cc69572ec4a4404c69947d7d91b3960a>.

²⁴ Mark Niese, *Several Republican officials vote against certifying Georgia elections*, Atlanta J. Const. (Nov. 22, 2023), <https://www.ajc.com/politics/several-republican-officials-vote-against-certifying-georgia-elections/XRALMPAOZFHABLVH7756GILWD4/>.

recently voted against certifying election results.²⁵ Even if these officials have legitimate complaints about the canvassing process, they must act within the confines of the law. And as explained above, Georgia law does not empower election superintendents to refuse or delay certification because they think in “their professional judgment” that the election results are “suspect.”²⁶

While the Board understandably seeks “to establish clear, standardized criteria for officially confirming the results of an election,”²⁷ the Proposed Rule is anything but “clear” and it lacks any “standardized criteria.” If adopted, it will likely make matters worse. As former Member Lindsey noted at the May 8 meeting, the term “reasonable inquiry” is amorphous and susceptible to abuses that could “unfairly” or “unduly delay certification.” The same is true of the phrase “true and accurate.” Rogue county officials seeking to subvert the will of the people could try to exploit this vague language in refusing to certify election results they dislike, potentially throwing the state and even the nation into electoral chaos. And if county officials delay certification in violation of their mandatory duties, the Secretary of State might still proceed with his reporting of results without counting ballots from that county—thereby disenfranchising the county’s voters. *See* O.C.G.A. § 21-2-499(b).

Such a widespread denial of Georgians’ fundamental right to vote would be unconscionable. *See* Ga. Const. art. 2, § 1, ¶ II. As the Georgia Supreme Court presciently wrote more than a century ago:

In a republican government, where the exercise of official power is but a derivative from the people, through the medium of the ballot box, it would be a monstrous doctrine that would subject the public will and the public voice, thus expressed, to be defeated by either the ignorance or the corruption of any board of canvassers. The duties of these boards are simply ministerial.

Houser v. Hartley, 120 S.E. 622, 625-26 (Ga. 1923) (quoting *People ex rel. Att’y Gen. v. Van Cleve*, 1 Mich. 362, 366 (1850)).

Suggesting that election superintendents have discretionary power over certification could also make them targets for threats of violence by those seeking to subvert election results—just as election officials, Congress, and the Vice President were targeted after the 2020 election. In light of the increasingly volatile threat environment facing election workers in Georgia,²⁸ the Board must stay vigilant of such risks.

²⁵ *See* Mark Niesse, *Georgia election board proposes an ‘inquiry’ before certifying results*, Atlanta J. Const. (May 9, 2024), <https://www.ajc.com/politics/georgia-election-board-proposes-a-new-rule-before-certifying-results/TW3BLX7EQFAQ7I4OD43IF6SSZ4/>.

²⁶ Heekin Petition at 1.

²⁷ Proposed Rule at 2.

²⁸ Mark Niesse, *Preparing for the worst, Georgia election officials and police plan ahead*, Atlanta J. Const. (Apr. 23, 2024), <https://www.ajc.com/politics/georgia-election-officials-and-police-prepare-for-voting-dangers/TFJXE7AS6NFGVLLMJ25DEYEIF4/>.

Georgia courts have a long history of protecting against certification abuse. In 1899, Democratic superintendents in Coffee County refused to certify election returns, citing minor procedural flaws that they claimed invalidated returns from the McDonald precinct (without counting the votes from that precinct, the Democrats’ candidates for representative and sheriff would have narrowly won the election). *See Tanner*, 33 S.E. at 833. The Georgia Supreme Court appropriately shut down this effort, issuing a writ of mandamus “requiring the superintendents to reassemble . . . and consolidate the vote of the county, including the returns from the McDonald precinct.” *Id.* at 836.

Tanner is a powerful example of Georgia courts standing as a bulwark against abuse of the certification process. But courts are only a backstop. In the first instance, this Board should not adopt vague rules that invite such abuse. The Proposed Rule would do just that and thus should not be adopted.

D. The Board Should Consider Adopting Clear Canvassing Procedures Instead of Vague and Abusable Certification Rules

Instead of the Proposed Rule, we urge the Board to consider adopting reasonably detailed canvassing procedures—potentially as part of the rulemaking initiative the Board unanimously approved at the May 8 meeting.²⁹ The Board doubtless has the authority to adopt such rules, so long as they are consistent with state and federal law.

In crafting such rules, the Board must provide sufficient clarity and detail to help election officials do their jobs within statutory confines. A checklist of discrete requirements has far more utility—and creates far less opportunities for abuse—than open-ended grants of discretion. Other states have successfully adopted and implemented such rules.³⁰ Adopting similar rules in Georgia could help ensure, in Member Johnston’s words, “basic ballot accounting.”³¹

At all times, the Board must keep in mind its charge “[t]o formulate, adopt, and promulgate such rules and regulations, *consistent with law*, as will be conducive to the fair, legal, and orderly conduct of primaries and elections.” O.C.G.A. § 21-2-31(2) (emphasis added).

²⁹ May 8 Board Meeting at 113.

³⁰ *See, e.g.*, Colo. Election R. 10 (Canvassing and Recount), 8 Colo. Code Regs. § 1505-1 (2023), https://www.sos.state.co.us/pubs/rule_making/CurrentRules/8CCR1505-1/Rule10.pdf.

³¹ May 8 Board Meeting at 80-82.

July 15, 2024

Page 10

III. Conclusion

We respectfully urge the Board not to adopt the proposed amendment to SEB Rule 183-1-12.02.

Sincerely,

AMERICAN CIVIL LIBERTIES
UNION OF GEORGIA

Rachel Lastinger
[REDACTED]

Caitlin May
[REDACTED]

CITIZENS FOR RESPONSIBILITY
AND ETHICS IN WASHINGTON

Donald Sherman
[REDACTED]

Nikhel Sus
[REDACTED]

COMMON CAUSE GEORGIA

Aunna Dennis
[REDACTED]

PUBLIC RIGHTS PROJECT

Sophie House
[REDACTED]

CC:

Alexandra Hardin (ahardin@sos.ga.gov)

GEORGIA ASSOCIATION OF VOTER REGISTRATION AND ELECTION OFFICIALS

July 7, 2024



Members of the State Election Board,

The Georgia Association of Voter Registration and Election Officials has reviewed the proposed rules available on your website and offers the following comments for your review.

Sincerely,

GAVREO Executive Board

1. 183-1-6-.07 and 183-1-6-.08 – Submitted by United to Protect Democracy

Establishes and clarifies procedures relating to voter challenges.

GAVREO supports this rule as written.

2. 183-1-14-.11 – Submitted by David Cross

Requires that Absentee by Mail (ABM) ballots be only sent to voters using “USPS Restricted and Tracked” mail.

GAVREO opposes this rule as it would potentially prevent voters from receiving their ballots in a timely manner, would prevent election administrators from using other common carriers in addition to the USPS, and would represent a significant drain on resources with very little gain.

GAVREO continues to firmly agree that strong chain of custody procedures are critical to the election process, and agree with the EAC that certain steps in the ballot’s lifecycle should be documented. But, we are much more concerned with ensuring that the voter who applied for the ballot is the person that voted and cast that ballot than we are with who received the envelope the ballot came in. Also, the voters who most need this service may be the very voters who have the hardest time personally accepting delivery of their ABM ballot.

Also, there are times that it makes more sense to send an ABM ballot to voters using other common carriers such as FedEx or UPS. This rule would prevent the use of any carriers besides the USPS.

Lastly, the additional postage required for these services would represent an enormous drain on election office budgets. Based on the USPS website the cheapest option that includes restricted delivery costs over \$10 more than counties currently pay to send a ballot.

3. 183-1-12-.12(a)(5) – Submitted by Sharlene Alexander

Requires that the total number of ballots in each ballot box be hand counted at the polling place on Election Night.

GAVREO opposes this rule, but believes that counties have the authority follow the procedures described in the proposed rule at their discretion.

These procedures were attempted during the pilot of our current voting system in 2019 and they delayed results without adding any additional security to the process. We agree with the Secretary of State’s Office that the best practice is to very publicly remove all the ballots from the ballot box and immediately place them in a sealed container to be transported to the election office. This ensures that any necessary investigation can be conducted in a controlled setting to minimize any mistakes.

We suggest that poll watchers be allowed to verify the box is empty and to also allow them to record the seal number from the sealed container to ensure that chain of custody is not broken. We also acknowledge that counties may conduct a hand count of ballot if a situation necessitates it on Election Night, but strongly disagree that this should be a required step for every polling place during every election.

4. 183-1-12-.12(1) – Submitted by Salleigh Grubbs

Requires that boards follow specific precertification procedures starting no later than 3:00 on the Friday after the Election.

GAVREO generally supports the need for a rule on how boards prepare for certification, but opposes this specific proposed rule.

Ballots can be cured and counted up to 5:00 on the Friday following the election, but this rule requires the board to have a complete list of who voted by 3:00 that day.

Consolidation and canvassing are the process of verifying that the results from different methods of voting were aggregated accurately and that the reported results are statistically possible. At no point can a board choose simply not to report votes in the final results because of a statistical discrepancy as the rule seems to allow for. Board members have no way to determine whose ballot is whose in order to remove ballots from the results if they were cast improperly and refusing to report results from entire precincts will disenfranchise every voter in that precinct.

Also, individual board members should not be able to exercise the authority of the Election Superintendent. Only the full board should have that authority. Yes, the law requires board members to “make a true and perfect return of such primaries and elections,” but that means that they report the numbers that were reported to them accurately – not that the entire election was true and perfect.

5. 183-1-1-.01(3) – Submitted by Gail Lee

Requires that counties post their 30 Day Reconciliation Reports to their websites at the time they submit them to the Secretary of State’s Office.

GAVREO would support this rule if the Secretary of State’s Office was required to post the reports on their website rather than forcing the counties to do so.

Our members are already required to transmit this information to the Secretary of State’s Office within 30 days of certification, and this change will ensure that all the reports are available in a common format at a central location.

6. 183-1-15-.03 – Submitted by the Coalition for Good Governance

Requires that all recounts be conducted manually.

GAVREO opposes this rule because hand counts are less accurate than machine counts.

Hand audits are a great tool to ensure the accuracy of the machine counts (and we appreciate the Coalition recognizing the great strides many of our members have taken in discretionary audits), but also allow for a margin of error that routinely occurs during that hand counting process. Our current recount rules and statutes include steps to ensure that the machines are counting accurately, and we believe that we should use the more accurate method of tabulating ballots in the event of a recount.

7. **183-1-12-.01, 183-1-12-.02, 183-1-12-.05, 183-2-12-.11, and 183-1-15-.04 – Submitted by the Coalition for Good Governance**

Creates procedures for cybersecurity incidents.

GAVREO agrees with the need for a rule on this topic, but opposes this specific rule.

GAVREO agrees in principle with the reporting requirements enumerated in the rule, and generally agrees that clear reporting requirements for any security incident is a good idea. However, this rule seems to be only focused on moving toward hand marked paper ballots rather than addressing the needs of unique cybersecurity incidents.

This is a complicated issue. The timelines and definitions described in the proposed rule could easily conflict with existing state and federal laws and policies. We would be happy to work with both the State Election Board and Secretary of State's Office to create a rule to properly address these issues.

8. **183-1-12-.12 – Submitted by John Fervier**

Establishes guidelines for the computation of votes prior to certification.

GAVREO supports this rule as written.

9. **183-1-14-.02 – Posted by State Election Board**

Creates new procedures for accepting Absentee by Mail (ABM) Ballots outside of ballots delivered through a common carrier or through a drop box, and creates new retention requirements for surveillance videos of drop boxes.

GAVREO asks for the following changes to this rule:

1. We are concerned that Paragraph 18 needs to be clarified to ensure that it properly aligns with state law and does not create additional burdens to counties.

Many counties have already put local processes in place to address this issue that work well for them. For example, some counties use labels to track this information while others use forms or logs. We would appreciate clear language that that allows voters to use other common carriers or to deliver ballots to our offices without further documentation. We are also concerned that the creation of a new type of provisional ballot may conflict with state law, but we would be happy to work with the State Election Board to ensure that rule that is eventually adopted will accomplish its stated goal.

2. Paragraph 19 is confusing and we ask that it be clarified.

It seems to require video surveillance on any drop box at an Advance Voting Site after the site closes, and that the video includes the drop box if there is one available at that site. Is the intention to have Advance Voting sites under surveillance whether or not there is a drop box located at that site? Also, the legislature specifically did not include a video surveillance requirement for drop boxes because they have to be under the constant

supervision of sworn officials while they are open, those officials have to empty the box every night, and ensure that it is still empty the following morning.

Also, a 24 month retention period is much too high when you stop and consider that the box we are already required to ensure that the box is empty every morning. We will know whether or not the video is needed when the box is opened the next morning, so why are we keeping it for 24 months? The legislature addressed this issue by not requiring video surveillance of an empty box, but we ask that the retention period be shortened to 2 weeks unless something is found in the box that requires an investigation in which case the 24 month retention period would be more appropriate.

10. 183-1-12-.02 – Posted by the State Election Board

Establishes a definition for election certification.

GAVREO would support this rule if the phrase “after reasonable inquiry” is removed.

We agree that board members should be able to make a reasonable inquiry prior to voting to certify an election, but are concerned that this caveat could be used to attempt to delay certification if it is included in the definition.

Hardin, Alexandra (SEB)

From: Karen Kaplan [REDACTED]
Sent: Monday, August 5, 2024 11:48 AM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Karen Kaplan and I am a registered voter, and resident in Cherokee County, Ga.

I am writing to urge you to **not accept** the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because :

- **It promotes partisanship and interference by potentially partisan poll workers.**

I find it curious that these rules were never suggested or put in place when

Republicans were always the party previously winning by large numbers, especially unopposed,

The State Election Board never proposed these changes until Democrats began to run and win elections in Georgia.

- **The proposed definition is far too vague and over broad.** The definition proposed in this petition

includes “after reasonable inquiry,” without a definition of that phrase. **It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. “Reasonable” can be interpreted differently and very subjectively by different parties. At a minimum “reasonable inquiry” should be more specifically defined in both substance and time frame.**

- As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. **The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification is a ministerial process, rather than a discretionary one.** There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

● Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

● This rule directly harms me as a voter by creating a possibility where my county board members could choose to delay election certification due to a suspicion or perceived need for more inquiry to be done.

Our poll workers are volunteers who spend long hours already in service to the community & adding stress with increased hours and fatigue incurred in this pursuit of an inquiry, as well as a high potential cost to the running of elections, including potential unlawful access to equipment that the State of Arizona has recently incurred, a \$2.8 Million added expense, is a financial risk to all Georgians.



Maricopa County will spend millions to replace voting machines turned over to the Arizona Senate for audit
azcentral.com

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Please vote **NO** on the acceptance of this petition to revise Rule 183-1-12-02

Sincerely,
Karen Kaplan
Cherokee County GA

Hardin, Alexandra (SEB)

From: Jennifer Pazdzior [REDACTED]
Sent: Thursday, August 15, 2024 8:57 PM
To: SEB Public Comments
Subject: Election board rule revision

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02 (Definitions), which creates a definition for certifying the results of a primary, election or runoff.

I am a registered voter in Forsyth County and have several concerns and the intent and consequences of the proposed change:

Reasonable inquiry is overly broad and undefined. This creates an alarming opportunity for unending speculation about election results, thus delaying the election certification.

At a minimum, the term "reasonable inquiry" must be defined in the new rule.

There is no timetable given for the "reasonable Inquiry." Which potentially conflicts with the election certification law that requires that an election be certified no later than the Monday following the election day.

Allowing county elections board members this much discretion will cause multiple interpretations, cause more litigation, distrust in the election process and cost county taxpayers untold costs in legal expenses for a potentially needless exercise.

This proposed rule revision will directly impact the reliability and uniformity of elections in Georgia. Clearly that should never be the intent of any State Election Board rule.

Sincerely

Jennifer Pazdzior

1.

Hardin, Alexandra (SEB)

From: Lauren Randolph [REDACTED]
Sent: Tuesday, August 6, 2024 7:07 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Lauren Randolph and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

1. The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.
2. As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.
3. Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,

Lauren Randolph

Hardin, Alexandra (SEB)

From: biedermann@everyactioncustom.com on behalf of Tom Biederma
<biedermann@everyactioncustom.com>
Sent: Tuesday, August 6, 2024 1:32 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Tom Biederman and I am a registered voter, in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Tom Biederma

Hardin, Alexandra (SEB)

From: Laura R [REDACTED]
Sent: Monday, August 5, 2024 11:05 PM
To: SEB Public Comments
Subject: 183-1-12-.02: Certification

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

My name is Laura Raiman, a forty-year citizen of Gwinnett County and retired teacher. I attend most BORE meetings here, work as an issuing clerk at the polls and in ballot adjudication.

I write to urge you to reject the petition to revise Rule 183-1-12-02, which creates a definition for certifying the results of a primary, election or runoff.

1. The definition is vague. It includes "after reasonable inquiry" without a clear definition of that phrase.
2. According to the Brennan Center for Justice, "The petition claims this rule will clarify ambiguity about an election official's duty to certify results. The Georgia Supreme Court has consistently interpreted that duty as a ministerial one, rather than discretionary."
3. Allowing the Board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one Board considers reasonable inquiry might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

I request that the State Board of Elections include this comment in the rulemaking record.

Thank you,
Laura Raiman

[REDACTED]

Hardin, Alexandra (SEB)

From: rporter2038@everyactioncustom.com on behalf of Richard Porter <rporter2038@everyactioncustom.com>
Sent: Monday, August 5, 2024 10:12 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Richard S Porter, Jr. and I am a registered voter in Gwinnett County.

I am writing to express my opposition to the petition to revise Rule 183-1-12-.02, which seeks to create a definition for certifying the results of a primary, election, or runoff.

I believe the proposed rule is unreasonable for the following reasons:

The proposed definition is too vague and broad. The use of the phrase "after reasonable inquiry" lacks a clear definition. It is uncertain what type of inquiry is acceptable and within what time frame it should occur.

As it stands, Board members are involved in the certification process by certifying that the results presented by the Election Supervisor are a complete and accurate count of the ballots. The statute mandates that they "shall" certify the results, making this certification a ministerial process rather than a discretionary one, as stated by the Supreme Court of Georgia. There should be valid and evidence-based reasons for a board not to certify an election. Certifying or not certifying an election based on speculation can undermine trust in our democratic process and lead to harassment of election officials.

Granting the board members discretion beyond their statutory authority could result in inconsistencies in how election results are certified across different jurisdictions. Different Boards may have varying interpretations of what constitutes "reasonable inquiry," potentially affecting the uniformity and reliability of certified election results across Georgia.

Under O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record. If the Board ultimately adopts the Proposed Rule, I ask that it provide a concise statement of the principal reasons for and against its adoption, and incorporate its reason for overruling the considerations urged against its adoption as required by statute.

Sincerely,
Richard Porter

Hardin, Alexandra (SEB)

From: emgisler@everyactioncustom.com on behalf of Eric Gisler
<emgisler@everyactioncustom.com>
Sent: Monday, August 5, 2024 9:06 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Eric Gisler and I am a registered voter and candidate for Georgia Representative living in Oconee county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Eric Gisler

Hardin, Alexandra (SEB)

From: nlarson08@everyactioncustom.com on behalf of Nancy Larson <nlarson08@everyactioncustom.com>
Sent: Monday, August 5, 2024 9:04 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Nancy Larson and I am a registered concerned voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overly broad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn creates an environment for more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Nancy Larson

Hardin, Alexandra (SEB)

From: anniemail01@everyactioncustom.com on behalf of Ann Mason <anniemail01@everyactioncustom.com>
Sent: Monday, August 5, 2024 8:31 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Ann Mason and I am a registered voter, in Cherokee County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Ann Mason

Hardin, Alexandra (SEB)

From: Loretta Miranda [REDACTED]
Sent: Monday, August 5, 2024 5:42 PM
To: SEB Public Comments; saraghal.seb@gmail.com; jfervier.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com; Coan, Michael (SEB); Hardin, Alexandra (SEB)
Subject: SEB Rule 183-1-12-.02 and SEB Rule 183-1-14-.02 Proposed amendments

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the State Election Board:

I currently serve on the Gwinnett Board of Voter Registrations and Elections, having been sworn in on December 26, 2023. For the past six years prior to being on the Board I was very involved in advocacy for voters in Georgia, having acted as a liaison to Gwinnett County for Georgia Democratic Party's Voter Protection and as a captain on the voter hotline. I have been a resident of Lawrenceville in Gwinnett County for thirty-nine years and have been an active Georgia voter since 1981.

I urge the State Election Board to reject the petition to revise SEB Rule 183-1-12-.02 which would add (c.2) to define "certification", for the following reasons:

- 1) The proposed amendment is unnecessary as certification has been held by the Georgia Supreme Court to be a ministerial act by a county's superintendent of elections.
- 2) Language in OCGA Section 21-2-493(k) requires that "consolidated returns **shall** be certified by the superintendent". The term "shall" in the statute makes this a mandatory action by the superintendent of elections, not a discretionary action.
- 3) Several of the terms in the proposed amendment are vague, namely "reasonable inquiry", "complete and accurate", and "a true and accurate accounting". These vague terms are not consistent with the statutory language of OCGA Section 21-2-493(k), which already provides sufficient guidance for certification. In addition, such indistinct terms will lead to confusion and disparate interpretations and actions throughout Georgia's 159 counties.
- 4) Each county's professional elections staff as well as hired poll officials are required to follow very specific processes in the operation of elections, including accounting for and calculating returns. Such statutory processes are sufficient to ensure a secure and fair election. Adding a new definition of "certification" with unclear terms will lead to delay in certification and uncertainty in the public's perspective concerning election returns.

In addition, I urge the State Election Board to reject the petition to revise SEB Rule 183-1-14-.02 which would add subsections (18) and (19), requiring additional paperwork relating the receipt of absentee ballots at absentee ballot drop locations and video surveillance of drop boxes. This amendments should be rejected for the following reasons:

1) The process for the collection of absentee ballots, including the chain of custody for such ballots as they are returned to the county's election office, is already set forth under Georgia law. The proposed amendment requires unnecessary and time-consuming paperwork which will additionally burden poll officials and election staff.

2) Video surveillance of drop boxes is unnecessary because the drop boxes by law are required to be situated inside the Advanced In Person polling sites. In addition, counties will incur additional costs in providing unnecessary video surveillance.

Pursuant to O.C.G.A. 50-13-4(a)(2), I request that this board include this comment in the rulemaking record. If the Board ultimately adopts the Proposed Rule, I request that a concise statement of the principal reasons for and against its adoption be issued to the public, providing therein the Board's reason for overruling this consideration that urges against the adoption of the above-referenced amendments.

Sincerely,

Loretta J. Mirandola
Member, Gwinnett Board of Voter Registrations and Elections

A large black rectangular redaction box covering the signature area.

Hardin, Alexandra (SEB)

From: Jami Tucker [REDACTED]
Sent: Monday, August 5, 2024 5:36 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Subject: State Election Board meeting - August 6, 2024 - for the record

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Please include in the record my decisions as a constituent:

- 1) APPOINT Independent Investigators to further research the Moncla-Rossi complaint 2023-025 based on the incomplete and inaccurate investigation by the SOS as documented in the [Amended Factual Response](#) letter provided by Kevin Moncla to the SEB dated July 22, 2024.
- 2) REJECT the Fulton Monitor proposal by Ryan Germany which includes the very people who ignored the issues, delayed, or refused to investigate the 2020 complaints. Please appoint your own SEB Monitor team with monitors recommended by each board member.
- 3) REJECT the Rule Petition by Peter Simmons and United to Protect Democracy that seeks to restrict voter challenges.
- 4) APPROVE the Rule Petitions that seek to improve transparency, accuracy, and security of our elections to restore voter confidence including:
 - Hand Recounts – Marilyn Marks
 - Cybersecurity Incident Reporting – Marilyn Marks
 - Mailed Ballot Tracking – David Cross
 - **Update Voter Rolls based on DDS License issued out of state - Debbie Fisher
 - Reconcile Tabulator Tape to Scanner Count – Garland Favorito
 - **Memory Card Retention – Garland Favorito
 - Certified List of Voters Available to Public – Lucia Frazier
 - Daily Reporting of Election Results – Rick Jeffares
- 5) UPHOLD the rules as approved by the Board for the following:
 - **Tabulating Results: Reconciliation and Certification – Bridget Thorne, Salleigh Grubbs, David Hancock
 - Hand Count Ballots at the Precinct – Sharlene Alexander
 - Post the Reconciliation Report – Gail Lee
 - **Drop Box Security – Salleigh Grubbs
 - Clarify Certify Definition – Mike Heekin

Sent to: sebpubliccomments@sos.ga.gov

jfervier.seb@gmail.com Mr. John Fervier, Chairman
saraghazal.seb@gmail.com Mrs. Sara Tindall Ghazal
jjohnstonmd.seb@gmail.com Dr. Janice Johnston
rjeffares.seb@gmail.com Mr. Rick Jeffares
jking.seb@gmail.com Mrs. Janelle King

--
Best,

Jami

Hardin, Alexandra (SEB)

From: jolive@everyactioncustom.com on behalf of John Olive
<jolive@everyactioncustom.com>
Sent: Monday, August 5, 2024 5:15 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is John Olive and I am a registered voter in Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
John Olive

Hardin, Alexandra (SEB)

From: Melissa Elejalde [REDACTED]
Sent: Monday, August 5, 2024 12:03 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Melissa Elejalde, I am a voter in Cherokee County.

I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

I am writing to express my concerns about the proposed revision to Rule 183-1-12-.02, specifically regarding the definition of “reasonable inquiry,” which is notably vague. Approving this petition will lead to inconsistent certification practices across different jurisdictions and create confusion that impacts accuracy of election results.

I strongly encourage you to reject this proposed revision.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Thank you,

Melissa

Hardin, Alexandra (SEB)

From: Jane Fahey [REDACTED]
Sent: Monday, August 5, 2024 11:59 AM
To: SEB Public Comments
Subject: Opposition to proposed amendment to Rule 183-1-12-.02 regarding election certification

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Board members:

I write to express my strong opposition to the proposed amendment to Rule 183-1-12.02 regarding election certification. The proposed amendment appears to violate Georgia's election statute, exceed the Board's authority, mislead the public, and give county superintendents and Boards of Election an degree of discretionary power that invites certification abuse and that would result in chaos in Georgia elections.

More specifically, Georgia's election statute in OCGA 21-2-493(a) and (k) imposes a mandatory duty on county election superintendents to tabulate and certify election returns no later than 5 pm on the Monday following elections. It does not give them discretion to question the results, or make legal judgments. Such questions must go to the courts.

The proposal misleads the public about the US Election Assistance Commission's definition of certification.

Finally, the use of vague language like "reasonable inquiry" and "true and accurate" grants a discretion that can only lead to chaos.

I strongly urge you to reject the proposed amendment.

Sincerely,
Rev. Dr. Jane E.Fahey

[REDACTED]

Hardin, Alexandra (SEB)

From: Nicole Ogden <[REDACTED]>
Sent: Monday, August 5, 2024 11:50 AM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Nicole Ogden and I am a registered voter in Cherokee County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

- The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.
- As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.
- Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,

Nicole Ogden

Hardin, Alexandra (SEB)

From: Efrat, Stacy <Stacy.Efrat@cobbcounty.org>
Sent: Monday, August 5, 2024 11:50 AM
To: SEB Public Comments; jfervier.seb@gmail.com; Sara Ghazal; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com; Hardin, Alexandra (SEB)
Subject: Public Comment Addressing Revisions to Subject 183-1-12-02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

To Members of the GA State Election Board:

My name is Stacy Efrat. I am currently serving on the Cobb County Board of Elections.

I am writing today to ask that you deny the petition to revise Rule 183-1-12-02. This rule creates a definition for certifying the results of a primary, election or runoff that is inconsistent with the current Georgia code requiring that we "shall" certify the results indicating our votes are not discretionary.

This proposed rule jeopardizes the ability to certify results in a timely manner. We do not have the resources in our Elections office to generate the additional materials and be able to certify the election on time. There is already a judicial process in place to handle discrepancies and errors if they occur which does not delay certification.

I reiterate and urge you to reject this proposed rule revision.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,

Stacy Efrat
Board Member, Cobb County Board of Elections
C: [REDACTED]

Hardin, Alexandra (SEB)

From: lisaearlemcleod@everyactioncustom.com on behalf of Elizabeth McLeod
<lisaearlemcleod@everyactioncustom.com>
Sent: Monday, August 5, 2024 11:45 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Elizabeth Earle McLeod ___ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in _Greene County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because: it opens up the opportunity for delay and interpretation. This country was founded on one person, one vote. Revising the rule would give either party a chance to spin it. We're already questioning the validity of elections, this would make that narrative stronger, and does not serve democracy.

Sincerely,
Elizabeth McLeod

Hardin, Alexandra (SEB)

From: Ginny Haines [REDACTED]
Sent: Monday, August 5, 2024 11:44 AM
To: SEB Public Comments
Cc: voting@acluga.org
Subject: Revisions to Subject 183-1-12-.02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Elections Board,

My name is Virginia Haines and I am registered voter in Cherokee County GA

Our Election Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification it a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

I am a Georgia voter and I am very concerned with having my vote count. I am concerned with the angry political nature of the elections here now. I want my vote counted in a timely manner without additional roadblocks to fair voting or human interference.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Ginny Haines
[REDACTED]

Hardin, Alexandra (SEB)

From: Kathleen Gaffney <[REDACTED]>
Sent: Monday, August 5, 2024 11:38 AM
To: SEB Public Comments
Subject: Revision to Subject 183-1-12-.02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I am writing to state my objection to the above referenced proposed rule making on Definitions.

As currently written there is clear and concise language for certification of election returns under a specific timeline. This leads to confidence in the system which is vital to our democratic process.

Adding ambiguous language such as “reasonable inquiry” and “true and accurate” would confuse and reduce the credibility of county election officials if they were to bring their subjectivity into the process. It will also potentially create chaos with a delayed certification. These are not proposals that engender trust and confidence in our elections.

Sincerely,

Kathleen Gaffney
[REDACTED]

Hardin, Alexandra (SEB)

From: Mosbacher, Jennifer <Jennifer.Mosbacher@cobbcounty.org>
Sent: Monday, August 5, 2024 11:27 AM
To: SEB Public Comments; jfervier.seb@gmail.com; Sara Ghazal; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com; Hardin, Alexandra (SEB)
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

To Members of the GA State Election Board:

My name is Jennifer Mosbacher. I am currently the Vice Chair of the Cobb County Board of Elections. Prior to my board position I have been active in local elections as a Poll Worker and Assistant Poll Manager.

I am writing today to ask that you deny the petition to revise Rule 183-1-12-02. This rule creates a definition for certifying the results of a primary, election or runoff that is inconsistent with the current Georgia code requiring that we "shall" certify the results indicating our votes are not discretionary. The broadness of the definition will place an immense burden on our Election Director and staff to produce additional materials that will ultimately end up delaying certification and sowing doubt among voters. We, as a board, put our trust in the Election Director and her team in Cobb to give us the most accurate and current results. It is without doubt that I have certified our elections over the past 3 years in my position. There is a process for the courts to handle discrepancies and errors should they occur. And there is also a prescribed process for recertification. All of these remedies are outlined clearly and serve to guarantee that certification happens timely.

If there is a desire of this State Election Board to enhance the "certify results" definition it would be my resolute recommendation that this must contain parameters and delineate a clear time frame. We have set certification timelines to meet and the vagueness of this definition as it stands would allow abuse and put our board and all other County Election Boards in jeopardy of violating the law. In addition the rule should not allow a single board member to derail the certification process by bogging down our election professionals with burdensome reporting requests and inquiries.

This rule is harmful to me in my role as Board of Elections member in that valuable staff resources are expended at a time when they are most needed. There is additional cost against our budget in terms of labor and production to meet board member demands. And ultimately this impacts the tax paying voter. This rule increases our board's exposure to litigation costs from candidates, political parties, voters and civil rights organizations.

I reiterate and urge you to reject this proposed rule revision.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise

statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,

Jennifer Mosbacher
Board Member
Elections and Registration Board
C: [REDACTED]
www.CobbElections.org

Hardin, Alexandra (SEB)

From: Jessica Elejalde [REDACTED]
Sent: Monday, August 5, 2024 11:27 AM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,
My name is Jessica Elejalde and I am a registered voter in Cherokee County. I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of primary, election, or runoff.

The proposed definition, "after reasonable inquiry," is alarmingly vague and open to broad interpretation. This lack of clarity could result in varying standards being applied by different jurisdictions, undermining the uniformity and reliability of the election certification process across Georgia.

As an Air Force veteran who values integrity in all aspects of life, including our democratic processes, I am deeply concerned that this petition could introduce inconsistencies in our certification practices and erode public trust. If the standards for certifying results vary significantly from one jurisdiction to another, it raises serious questions about the fairness and integrity of our elections. Additionally, differing interpretations of what constitutes a "reasonable inquiry" could lead to discrepancies in how election outcomes are recognized and accepted.

For the sake of maintaining a fair and consistent electoral process, I strongly encourage you to reject this proposed revision.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Respectfully,

Jessica Elejalde

Hardin, Alexandra (SEB)

From: Kenneth Dominguez <[REDACTED]>
Sent: Monday, August 5, 2024 11:09 AM
To: SEB Public Comments
Subject: Public comments against proposed State Election Board amendments

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I, **Kenneth L. Dominguez, MD, MPH, CAPT USPHS RET, resident of DeKalb County, Georgia**, and registered voter, vehemently oppose the two proposed state election board rules and rule amendments related to:

1) requiring more stringent requirements for proving identity of persons dropping off ballots at drop boxes other than the US mail or official drop boxes such as early voting locations and the elections office which are authorized to accept absentee ballots and requiring video surveillance of drop boxes in early voting locations and

2) adding the phrase “Certify the results of a primary, election, or runoff” to the definitions section of the current rules and “means to attest, after reasonable inquiry that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.”

Overall, these amendments aim to fix a voting system in Georgia that is not broken, attempts to decrease the efficiency of the advance voting with the aim of disenfranchising voters, and gives county elections superintendents the power to overturn the will of the majority of voters.

Folks who are more likely to use advance voting options are the elderly, disabled persons, and persons in front-line jobs who can't take time off from their job to vote. Advance voting is vital to ensure all voters can vote. Why should early voters have different rules for dropping off ballots at advance voting locations compared to those who drop off ballots at the USPS or at other official drop boxes? If someone is dropping off ballots for an elderly person at an advance voting location and for whatever reason doesn't have an Identification on them, this invalidates the elderly person's vote who depends on another person to deliver their ballot. It is probable that persons living in indigent communities and who are asked to deliver someone else's ballot are less likely to have an updated identification due to the cost of updating their identification. Even if the voter meets all the requirements, adding unnecessary ID requirements to the person delivering the ballot, disenfranchises registered valid voters and undercuts the American system of voting and pushes the election in favor of candidates supported by more affluent voters, particularly in a close election.

The requirement to have a camera at such early voting places at drop boxes adds a significant cost burden to this option of voting and makes advance voting less sustainable in the long run. Such an added cost is designed to further decrease the number of viable advance voting locations and to disenfranchise voters in socioeconomically disadvantaged communities. This can in turn throw an election, particularly a close election.

The proposed rule to give the county elections superintendent discretionary power to delay certification of election results due to their own judgement, despite having many existing valid and time-tested checks and balances, attempts to invalidate election results. It gives the county elections superintendent the opportunity to circumvent the voice of the majority of voters. It also allows county elections superintendents to delay certification in favor of costly recounts and the like. The costs of such recounts are borne by the community of voters and unnecessarily undermines the financial solvency of the voting system. While many bizarre accusations were made of illegal voting in the last presidential election (2020), no valid evidence was found to support such accusations. We need to ensure that the persons involved in such illegal activities of defrauding the voting system are held accountable to the extent allowable by the American justice system, not change existing valid voting rules!.

Both proposed changes fly in the face of a truly democratic society and a tried-and-true system that has many checks and balances in place. Remember the old mantra, if you can't win fairly, then cheat, lie, and do whatever necessary to win an election? This is the basic principle ascribed to by a few disgruntled voters who voted for a failed candidate and then tried to steal an election and are trying to steal all future elections. We as American citizens, are proud that our country's laws protect the sacred right to vote, and balk at sham elections held in countries such as Russia, Venezuela, South Korea, and Nicaragua, where authoritarian rulers routinely steal the vote and illegally jail or dispose of political opponents.

Let's continue to enjoy our free elections and steadfastly and soundly reject the efforts of those few un-American individuals who feel entitled and who think their will supersedes the will of the majority of voters.

A vote **against** these amendments is a vote for democracy and the sanctity of our right to vote.

A vote **for** these amendments is a vote for totalitarian and authoritarian beliefs and for the beliefs that the will of a few to supersede the will of the majority.

Any **real American** will vote **against** these proposed rules and amendments. Such amendments have no place in a free and democratic society that values the sacred right to vote.

Hardin, Alexandra (SEB)

From: Pat Fagan [REDACTED]
To: SEB Public Comments; jfervier.seb@gmail.com; sarahazal.seb@gmail.com; jjohstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: Not Revise Rule 183-1-12-02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

My name is Patrick Fagan and I am a registered voter in Cherokee County. I am writing to urge you to not accept the petition to revise Rule 183-1-12-02 which creates a definition for certifying the results of a primary, election of runoff. The proposed rule is unreasonable because allowing the board member to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies." Reasonable inquiry" potentially impacting the uniformity and reliability of elections being certified across Georgia.

This rule directly harms me as a voter by creating a possibility where my county board members could chose to delay election certification due to a suspicion or perceived need for inquiry to be done.

Pursuant to O.C.G.A. 50-13-4 (a) (2) I request that the board include this comment in the rule making record and if the board ultimately adopts the proposed rule , we request that it issue a concise statement of the principal reason for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statue.

Patrick Fagan
Cherokee County

Sent from [Mail](#) for Windows

Hardin, Alexandra (SEB)

From: swill509@everyactioncustom.com on behalf of William Dix <swill509@everyactioncustom.com>
Sent: Monday, August 5, 2024 10:54 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Dr. William Dix and I am a registered voter in Oconee county.

I urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff. Adopting this revision would overstep your authority as you are not elected officials, but rather are appointed by the governor. This revision would change your responsibilities in ways that only the legislature and governor should be permitted to do. Your job is not to agree or disagree with the results of an election, but rather to certify that election was conducted in the manner prescribed by law and that the election supervisor provided you with a complete and accurate count of the ballots.

In addition, the proposed definition is vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear what type of inquiry could be done and the time frame within which that inquiry has to occur.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority will lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
William Dix

Hardin, Alexandra (SEB)

From: Dana Singleterry [REDACTED]
Sent: Monday, August 5, 2024 10:50 AM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-02.

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Dana Singleterry and I'm a registered voter in Fulton county. I'm writing to urge you to NOT accept the petition to revise Rule 183-1-12-02, which creates a definition for certifying the results of a primary, election, or runoff. The proposed rule is unreasonable for various reasons including the following:

1. The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum "reasonable inquiry" should be more specifically defined in both substance and time frame.
2. As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes the certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.
3. Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia

This rule directly harms me as a voter by creating a possibility where my county board members could choose to delay election certification due to a suspicion or perceived need for more inquiry to be done.

Thank you for hearing my concerns.

--

Dana Singleterry | [REDACTED]

Hardin, Alexandra (SEB)

From: Robert Kaplan [REDACTED]
Sent: Monday, August 5, 2024 10:31 AM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Subject: Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

My name is Robert Kaplan and I am a registered voter, and current Poll Worker in Cherokee County, Ga.

I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

Points about the rule:

- The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum “reasonable inquiry” should be more specifically defined in both substance and time frame.
- As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.
- Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia. Make it personal:
 - This rule directly harms me as a voter by... (example: by creating a possibility where my county board members could choose to delay election certification due to a suspicion or perceived need for more inquiry to be done).
 - This rule directly harms me as a poll worker by... (example: the intimidation and harm they might face from any additional, unnecessary audit that would mean more time under the gaze of poll watchers or more scrutiny from community members the longer it takes to certify an election, how that actually sows more distrust in elections as opposed to confidence)

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement

of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Hardin, Alexandra (SEB)

From: Donna Wolfe <[REDACTED]>
Sent: Monday, August 5, 2024 9:46 AM
To: SEB Public Comments; jking.seb@gmail.com; jfervier.seb@gmail.com; saraghazal.seb@mail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Donna Wolfe and I am a registered voter in Cherokee County.

I am asking you to not accept the petition to revise Rule183-1-12-.02. This revision creates a definition for certifying results of a primary, election or runoff.

The proposed rule is not reasonable because the proposed definition is too vague and lacks specificity. The type of inquiry as well as the time frame for this inquiry are not defined in operational terms .

I am concerned that the election results in my county could be delayed and in essence my vote not counted.

Thank you

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule,

I request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Hardin, Alexandra (SEB)

From: Robert Sinsheimer [REDACTED]
Sent: Monday, August 5, 2024 9:12 AM
To: SEB Public Comments
Subject: Opposition to Change in Georgia Election Certification

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I am writing to express my opposition to the proposed amendment to change the definition of Georgia election certification.

Sincerely,

Robert Sinsheimer

Hardin, Alexandra (SEB)

From: Jennifer [REDACTED]
Sent: Monday, August 5, 2024 9:02 AM
To: jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com; SEB Public Comments
Cc: voting@aclu.org

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Jennifer Arp, and I am a registered voter in Cherokee County Ga.

I am writing to urge you **to not accept** the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

1. The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum "reasonable inquiry" should be more specifically defined in both substance and time frame.
2. As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials. Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

This rule directly harms me as a voter by creating a possibility where my county board members could choose to delay election certification due to suspicion or perceived need for more inquiry to be done. This rule directly harms poll workers as we have seen in the past, Ruby Freeman and her daughter were turned into criminals overnight by bogus charges from a former President and his allies. The damage caused by politicians' actions in Georgia did more harm in 2020 than can ever be fixed I fear, don't let them do this again.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jennifer Arp

Hardin, Alexandra (SEB)

From: cviolanda [REDACTED]
Sent: Monday, August 5, 2024 8:27 AM
To: SEB Public Comments
Subject: Opposition to proposed election law changes

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I'd like to express my concern and opposition to proposed changes to election laws that would not do anything to make our votes more secure, and instead add cost, burden and complication to a system that is already working and already secure!

First, the requirement for separate ballots with extra voter identification documentation for select drop boxes serves NO rational purpose. These requirements go BEYOND current Georgia Law requirements for voter identification and will only serve to confuse things for voters and add administrative burden.

Secondly video surveillance of drop boxes is completely unnecessary since drop boxes at early vote locations are emptied every night and are secured with all other voting equipment. Elections workers check that they are empty before the early vote site opens each morning.

And finally, to add the phrase "Certify the results of a primary, election, or runoff," to the definitions section of the current rules.

Under state statutes, the county elections superintendent duty to certify election results is mandatory and does not give them leeway to make judgements about the validity of election returns. This proposed rule would give any superintendent of county Board of Election member leave to unfairly or without basis delay certification, the mandatory timeline for which is already extremely tight. This proposed rule would allow for a chaotic and delayed certification process which will be costly in terms of time, resources, and certainty.

We already have an excellent system in Georgia, and just because a few disgruntled voters do not like the outcome should not allow them to change the laws to make it more cumbersome for the rest of us, with no resulting gain in election accuracy.

Carol Haslach
Marietta GA

Sent from my Galaxy

Hardin, Alexandra (SEB)

From: Angie Gust [REDACTED]
Sent: Monday, August 5, 2024 8:20 AM
To: SEB Public Comments
Cc: Angie Gust
Subject: Public comment re proposals to certification process

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Elections Board,

I am writing to comment on the proposals to the certification process (Drop box, overnight surveillance, and the certification role). Using critical thinking skills here would seem to be a good idea. Asking yourself first, what is the problem that needs to be addressed. Second would be outlining a data collection plan. Third would be collecting the data. Fourth and fifth would be analyzing the data, then coming to a conclusion. It seems like these proposals jump past the first steps of critical thinking and focus on the conclusion step that there is indeed a problem with the voting process. None has been presented. Georgia already has a system to ensure only valid votes are counted. This seems to be an example of motivated reasoning where biases lead to a particular conclusion. It is not professional.

Specifically, for the Drop Box proposal, where is the data that there is a problem? Enacting this rule would cause an undue burden on me and other people who deliver ballots for family or friends who are disabled or unable to get to the poll. Requiring a special form that includes the voter's name, signature and photo ID of the voter as well as the person delivering the ballot is ridiculous. This would cause confusion. Delivery of ballots in person should be encouraged not discouraged!

For overnight video surveillance of drop boxes in early voting locations, again where is the data that there is a problem? I am sure the Board knows that Drop boxes are emptied each night at early voting locations. What would the video surveillance be monitoring? I don't think taxpayers would want to pay for this unnecessary security system protecting an empty box. Elections workers check that they are empty before the early vote site opens each morning.

For the phrase "Certify the results of a primary, election, or runoff," to the definitions section of the current rules" ... "means to attest, after *reasonable inquiry* that the tabulation and canvassing of the election are complete and accurate and that the results are a *true and accurate* accounting of all votes cast in that election." I am sure the Board knows that they cannot by rule grant election superintendents

discretionary power or duty of “reasonable inquiry” if the legislature has not explicitly given them such authority. This is a clear attempt to go beyond the description of the position.

I am sure the Board members want to respect the rights of voters and make it easier for more people to carry out this important citizenship opportunity.

With kind regards,
Deborah A. Gust

"Say what you mean, mean what you say and do what you said you were going to do."--Barbara Coloroso

Hardin, Alexandra (SEB)

From: [REDACTED]
Sent: Monday, August 5, 2024 8:20 AM
To: SEB Public Comments
Subject: Opposition to proposed changes to definitions of election certification

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear SEB,

I oppose the proposal to define certification, because the proposed definition appears to add discretion to the process, whereas by state law there is not discretion. There are already stringent procedures in place to assess the accuracy of the counts. With Georgia's 159 counties, this could introduce confusion into what is a very secure and accurate system.

Thank you for your consideration,
Barbara Marston, Candler Park

Hardin, Alexandra (SEB)

From: [REDACTED]
Sent: Monday, August 5, 2024 7:58 AM
To: SEB Public Comments
Subject: Opposition to proposed Amendments to Rules 183-1-12.02 and 183-1-14.02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Gentlemen/Ladies:

I am writing in opposition to the amendments to the captioned rules which will be discussed at the 8/6/24 meeting of the State Election Board.

Rule 183-1-12.02

- Violates Georgia's election statute and exceeds the Board's authority:
 - In the election statute, the Georgia legislature repeatedly declares that the county elections superintendent "shall" tabulate and certify election returns no later than 5pm on the Monday following the election. OCGA 21-2-493(a) and (k).
 - Superintendents' legal duty to certify election results is mandatory and gives them no leeway to make legal judgments on the validity of election returns.
 - Election superintendents cannot withhold certification based on suspected fraud or errors in returns; such issues are instead required to be resolved in the courts.
 - The Board cannot grant election superintendents a discretionary power or duty of "reasonable inquiry" where the legislature has not explicitly given superintendents that authority.
- Misleadingly suggests that it "adopts the U.S. Election Assistance Commission's definition of certification."
 - The EAC does not, in fact, purport to define certification for all 50 states. Instead, the EAC's guidance acknowledges that certification processes vary widely among states, and that those processes are governed by state law.
 - The EAC's guidance also does not include a single reference to conducting a "reasonable inquiry" prior to certification.
- Giving county superintendents and Boards of Elections discretionary power (or creating a purported mandatory duty) to conduct a "reasonable inquiry" of election results invites certification abuse and chaos in Georgia elections.
 - The phrases "reasonable inquiry" and "true and accurate" in the proposed amendment are vague and ripe for abuse by rogue county elections officials.
 - Would give any superintendent or county Board of Elections a broad (likely illegal) mandate to unfairly or unduly delay certification. Indeed, some of the officials proposing this language have already recently voted against certifying election results, contrary to their legal duty.
 - Mandatory timelines for reconciliation and certification are already tight. Cure period does not end until Friday after the Election, and certification must be completed the following Monday.

- Combined with the proposed rule change to 183-1-12-.12.1 which includes permitting county election board members to examine “all election related documentation” prior to certification (to be heard on Aug 19th) this could result in an avalanche of requests from Elections Boards/superintendents which would divert election officials’ attention away from the already monumental task of reconciling and preparing results for certification.

- Combined with the proposed rule change to 183-1-12-.12.1 (discussed above) this could result in litigation over whether it is “reasonable” to refuse to certify the election if every last document “related” to the election is not produced. Such litigation could effectively delay certification.

- Individual Board members should not be empowered to publicly disseminate potentially inaccurate information before county elections officials have had an opportunity to investigate and reconcile potential issues.

- Would make every county superintendent and board of elections member a target for threats of violence by those seeking to subvert elections results.

- Georgia elections officials have already been subjected to a torrent of invective, abuse, and threats. Suggesting that election superintendents have discretionary power over certification would invite further threats and abuse.

Rule 183-1-14.02

- Discriminates against those voters who choose to deliver their absentee ballots to “any absentee ballot drop location” allowed by Georgia law as opposed to voters who choose to mail their absentee ballots by U.S. Mail or to deliver their ballots to an authorized drop box

- Places identification requirements on such voters that exceed those required by Georgia law

- Creates confusion among voters on the requirements regarding the delivery of their absentee ballots

- Creates a new category of provisional ballots that is not authorized by Georgia law

As to Amended Paragraph 19, regarding video surveillance of authorized drop boxes, this amendment:

- Requires security measures that are completely unnecessary given the security measures currently employed under existing law with regard to drop boxes (drop boxes are located within early voting locations that are secured at night with the other voting equipment; all ballots are removed nightly from the drop box and a poll official opens the drop box every morning to ensure there are no ballots in the drop box)
- Imposes a substantial cost to the county to install and monitor the video surveillance
- Current Georgia law sets out in great detail the security measures required for drop boxes; if the Georgia legislature had thought that video surveillance was necessary, it would have added this requirement.

- Imposes an unnecessary and costly retention period for the video recordings

Thanks for considering my input.

James Long



Hardin, Alexandra (SEB)

From: [REDACTED]
Sent: Monday, August 5, 2024 12:12 AM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Ronald Kraus and I am a registered voter in Cherokee county.

I am writing to urge you to not accept the petition to revise Rule 183-1-12-02, which creates definition for certifying the results of a primary, election, or runoff. The proposed rule is unreasonable for several reasons:

1. The proposed definition is bad law, in that it is far too vague and overbroad. "After reasonable inquiry" is not defined and left unclear and open-ended. It also does not define the time that inquiry must happen within.
2. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.
3. Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority will lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, impacting the uniformity and reliability of elections being certified across Georgia.

This rule directly harms me as a voter by creating a possibility where my Cherokee County board members could choose to delay election certification due to a suspicion or perceived need for more inquiry to be done. This is unacceptable.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Ronald Kraus
[REDACTED]

Hardin, Alexandra (SEB)

From: PEGGY GASTRIGHT [REDACTED]
Sent: Sunday, August 4, 2024 11:47 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com
Subject: SEB Written Public Comment Addressing Revisions to Subject 181-1-12-02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the GA State Election Board:

My name is Peggy Gastright, and I am a registered voter, former poll worker, and a current poll watcher in Cherokee County.

I am writing to urge you to NOT accept the petition to revise Rule 183-1-12-02, which creates a definition for certifying the results of a primary, election, or runoff.

I am against the proposed rule for the following reasons. There needs to be a legitimate & evidence-based reason for a board not to certify an election. Strict checks and balances make sure that by the time certifiers get involved, poll workers and local election officials have already done everything to ensure only valid votes are counted. This proposal has nothing to do with election integrity. Georgia already has detailed processes in place to verify, count, or review every single ballot. I have full confidence in the election director, the election staff, the poll workers, and the Board of Elections here in Cherokee County.

Sincerely,
Peggy Gastright
Woodstock, GA

Hardin, Alexandra (SEB)

From: Clare Rubin [REDACTED]
Sent: Sunday, August 4, 2024 11:01 PM
To: SEB Public Comments
Subject: Proposed Rule Changes in Voting Rules

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I am writing to ask that the proposed changes in election rules not be passed, as they are highly problematic.

The proposed rule about requiring a specialized absentee ballot for "unofficial drop boxes, such as early voting locations and elections offices which are already authorized to accept absentee ballots is unduly burdensome. The fact that the photo ID of the person dropping off the ballot must be included does not have a purpose related to election security. There is no rationale for this change other than to make voting more burdensome for elections staff and voters. My 91 year-old elderly neighbor cannot get to the polls, and I deliver her ballot for her. This rule will cause additional stress for her and me. She has voted in every election in the 35 years I have known her, and I do not see why being elderly should make it harder for her to cast a legal absentee ballot.

The second part of this proposed rule change would require early voting locations to have 24 hour video surveillance, a process that would be too costly for many county elections boards and is unnecessary.

The third change adds the phrase "Certify the results of a primary, election, or runoff" to the definitions section of the current rules, and it says that the county elections superintendent is to assure that the results are "a true and accurate accounting of all votes cast in the election." This proposed rule would give any superintendent of a county board of election member the ability to delay certification without cause. This would affect the mandatory timeline which is already extremely tight. In addition, state statutes require that the superintendents cannot withhold certification based on suspected fraud or errors. Instead, such issues are to be resolved in court following certification.

Overall, I urge you to consider that voting is critical in a democracy, and we want the legally cast votes of our Georgia citizens to count and to be counted in a timely manner that is in keeping with state laws and regulations.

Sincerely,
Dr. Clare Rubin

[REDACTED]

Hardin, Alexandra (SEB)

From: SL Sansom [REDACTED]
Sent: Sunday, August 4, 2024 10:20 PM
To: SEB Public Comments
Subject: Opposition to allowing boards of election to question previously validated election results

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Election board:

I am writing to protest the proposed change to Rule 183-1-12-.02 Definitions, (1)(c.2) "Certify the results of a primary, election, or runoff," or words to that effect, means to attest, after reasonable inquiry that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.

It is a gross overstep to authorize election boards to now take on the role of "reasonable" inquiries into the election results, a step that already is well and appropriately managed earlier in the process. This measure simply provides people who have already shown a propensity to overturn legitimate election results greater leverage to do so.

Sincerely,

Stephanie Sansom
Atlanta, GA

Hardin, Alexandra (SEB)

From: Dumont Walker [REDACTED]
Sent: Sunday, August 4, 2024 10:02 PM
To: SEB Public Comments
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear members of the Georgia State Election Board,

My name is Dumont Walker and I am a registered voter living in Cherokee County.

I am writing to urge all members of the board to not accept the petition to revise Rule 183-1-12-02. The proposed rule is not acceptable and unreasonable.

The proposed rule is overly broad and far too vague which creates a potentially harmful precedent. The wording in the proposed rule opens the door for Board Members the opportunity to omit legitimate and evidence-based reason which in turn places the entire election process and our democracy in danger.

--

Dumont J. Walker III
[REDACTED]

Hardin, Alexandra (SEB)

From: Julie R. Glade [REDACTED]
Sent: Sunday, August 4, 2024 8:12 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board:

My name is Julie Glade. I am the Vice Chair of the Cherokee County Board of Elections and Registration, and am a registered voter in Georgia.

Please do NOT accept the petition to revise Rule 183-1-12-.02, regarding the definition for certifying the results of a primary, general, or runoff election. The proposed revision is UNREASONABLE, OVERLY VAGUE AND OVERLY BROAD.

Inserting into the definition that certification occurs after "reasonable inquiry" is not specific enough to provide necessary guidance to Boards of Election. It allows for a wide variety of results, when certification efforts and processes should be uniform throughout the state. The term "reasonable" could mean anything, with board members acting in bad faith using the term to avoid certification of the vote if they do not like the election results. A definition of the term "reasonable inquiry" is necessary to avoid inconsistent results amongst the counties, decisions on certification based on speculation and individual discretion instead of evidence and rational bases, litigation, delay and expense. Simply including the term without definition will contribute to ongoing mistrust of the election process.

The proposed change does not provide a time limit within which certifications after "reasonable inquiries" must be completed. This would allow bad actors who do not like the election outcome to delay certification indefinitely. If the term must be inserted, a concise, clear and detailed definition of reasonable inquiry must be provided, including a time frame within which these inquiries must be completed.

The election code states that BOE members "shall" certify election results, and the GA Supreme Court has interpreted this to mean that certification is a ministerial duty, not a discretionary one. The proposed revision violates existing law. Changes must be made by the legislature, not the SEB.

This proposed rule directly hampers my ability to function effectively as a Cherokee County Board of Elections and Registration member. The change as proposed simply introduces chaos, uncertainty and discord into our Board's certification process. Our

primary obligation is to ensure that our voters' rights are protected and that the voters' choices are honored. We all know that Georgia is a hot-bed for conspiracy theories, misinformation, suspicion and cynicism around voting. Accepting this rule as stated, without clear definitions and time frames, only allows the ongoing mistrust to blossom into chaos. Its the worst possible outcome that could be introduced prior to this very important election season. Accepting this proposed rule change as is, without definition, would constitute negligent administration on the SEB's part.

I appreciate your thoughtful consideration of these points. Please do not throw the BOERs' efforts and duties, and this consequential election, into disarray.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, I request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Respectfully submitted,

--

Julie R. Glade, Vice Chair, Cherokee County Board of Elections

[REDACTED]

Hardin, Alexandra (SEB)

From: [REDACTED]
Sent: Sunday, August 4, 2024 8:07 PM
To: SEB Public Comments
Subject: Your upcoming meeting

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Good morning;

I have reviewed the tentative changes that are proposed to Georgia election law. The new proposals on their face are a concerted effort to undermine and slow the election process. Likely these are efforts championed by election officials; that also are the academic definition of election deniers. Persons who would waste no time and spare no efforts to assist Donald Trump in his cause to illegally steal the election in broad daylight and in real time. I would like to voice my strong opposition to any changes in Georgia election law and would like to request that any further efforts to examine; change, and/or undermine current laws be halted immediately. Any effort to the contrary not only would place the question of a free and fair election in the spotlight; but also be detrimental to the very underpinnings of democracy.

J Richardson

Hardin, Alexandra (SEB)

From: Michele Sarkisian <[REDACTED]>
Sent: Sunday, August 4, 2024 7:51 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; Jan Johnston; rjeffares.seb@gmail.com; jking.seb@gmail.com
Subject: Public Comments for SEB meeting August 6, 2024

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Members of the Georgia State Elections Board,

Many people in Georgia have done considerable research and work to provide thoughtful insights, rules, facts and petitions to improve our state's running of secure and accurate elections. We submit the PUBLIC COMMENTS below and Ask that you Do the Following to help protect Georgia Election Integrity, both for previous and upcoming elections.

- 1) Appoint Independent Investigators to further research the Moncla-Rossi complaint 2023-025 based on the incomplete and inaccurate investigation by the SOS as documented in the [Amended Factual Response](#) letter provided by Kevin Moncla to the SEB on July 22, 2024.
- 2) Reject the Fulton Monitor proposal by Ryan Germany which includes the very people who ignored the issues, delayed, or refused to investigate the 2020 complaints. Please appoint your own SEB Monitor team with monitors recommended by each board member.
- 3) Reject the Rule Petition by Peter Simmons and United to Protect Democracy that seeks to restrict voter challenges.
- 4) Approve the Rule Petitions that seek to improve transparency, accuracy, and security of our elections to restore voter confidence including:
 - Hand Recounts – Marilyn Marks
 - Cybersecurity Incident Reporting – Marilyn Marks
 - Mailed Ballot Tracking – David Cross
 - **Update Voter Rolls based on DDS License issued out of state - Debbie Fisher
 - Reconcile Tabulator Tape to Scanner Count – Garland Favorito
 - **Memory Card Retention – Garland Favorito
 - Certified List of Voters Available to Public – Lucia Frazier
 - Daily Reporting of Election Results – Rick Jeffares
- 5) Uphold the rules as approved by the Board for the following:
 - **Tabulating Results: Reconciliation and Certification – Bridget Thorne, Salleigh Grubbs, David Hancock
 - Hand Count Ballots at the Precinct – Sharlene Alexander
 - Post the Reconciliation Report – Gail Lee
 - **Drop Box Security – Salleigh Grubbs
 - Clarify Certify Definition – Mike Heekin

Thank you.

Kirk and Michele Sarkisian
Johns Creek, Georgia

Hardin, Alexandra (SEB)

From: RJ Berry <[REDACTED]>
Sent: Sunday, August 4, 2024 6:22 PM
To: SEB Public Comments
Subject: Comments on proposed rule amendments to state election board

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I am a Georgia resident and I strongly oppose the state election board approving these proposed rule amendments. There is no legal evidence that any problems exist that these amendments might correct. These changes will increase the workload of election office workers throughout Georgia and add significant burdens to voters, their families and caretakers. I believe that these changes are intended to disenfranchise voters and significantly weaken the confidence that voters have in our current system of elections:

1. Suggested changes to absentee ballot voting.

Adding identification requirements for voters as well as their family members/care takers to complete a form when delivering an absentee ballot for a voter go well beyond the requirements under Georgia law. For voters with limited mobility, this could be a significant enough impediment to disenfranchise their vote. Busy family members may not easily find the time needed to request and fill out a form when they return the ballot. It is also burdensome to election staff. USPS is currently less than reliable regarding mail delivery so the state election board should be encouraging all efforts to deliver ballots to the election office and dropboxes without adding more burdens.

Why is there a need to add overnight video surveillance of drop boxes in early voting locations when these drop boxes are already located inside locations known to be safe and secure? The drop boxes in early voting locations are emptied every night and are secured with all other voting equipment. To install and monitor and store video surveillance footage would impose a substantial cost to the counties.

2. What is the reason for adding a new definition for certifying elections? "Certify the results of a primary, election, or runoff," or words to that effect, means to attest, after reasonable inquiry, that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.

Why give county elections superintendents new powers to question election results that have been compiled by trained and experienced election staff with the assistance of volunteers from both political parties? Their job, as defined under state statute, is merely to certify election results. They can't withhold certification based on suspected fraud or errors in returns; these issues are to be resolved in the courts AFTER certification. The phrases "reasonable inquiry" and "true and accurate" are not clearly defined and are vague and ripe for abuse by rogue county election officials.

Thank you,

Robert J Berry, MD, MPHTM
[REDACTED]

Hardin, Alexandra (SEB)

From: fstyred@everyactioncustom.com on behalf of Jamie Goodloe
<fstyred@everyactioncustom.com>
Sent: Sunday, August 4, 2024 5:55 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jamie Goodloe and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jamie Goodloe

Hardin, Alexandra (SEB)

From: winicox@everyactioncustom.com on behalf of WINI COX
<winicox@everyactioncustom.com>
Sent: Sunday, August 4, 2024 4:36 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Wini Cox___ and I am a registered voter in Spalding County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
WINI COX

Hardin, Alexandra (SEB)

From: Maggie Paon [REDACTED]
Sent: Sunday, August 4, 2024 4:29 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: Revisions to Subject 183-1-12-.02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Margaret Zwettler and I am a registered voter in Cherokee County.

I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

This rule directly harms me as a voter by creating a possibility where my county board members could choose to delay election certification due to a suspicion or perceived need for more inquiry to be done.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely
Margaret Zwettler
[REDACTED]

Hardin, Alexandra (SEB)

From: williswm@everyactioncustom.com on behalf of Bill Willis
<williswm@everyactioncustom.com>
Sent: Sunday, August 4, 2024 4:12 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Bill Willis, and I am a registered voter in Douglas County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Bill Willis

Hardin, Alexandra (SEB)

From: Mark Mosbacher [REDACTED]
Sent: Sunday, August 4, 2024 3:39 PM
To: SEB Public Comments; rjeffares.seb@gmail.com; jjohnstonmd.seb@gmail.com; saraghazal.seb@gmail.com; jfervier.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org; Hardin, Alexandra (SEB)
Subject: SEB Written Public Comment Addressing Revisions Subject to 183-1-14.02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear members of the State Election Board,

My name is Mark Mosbacher and I am a registered voter and a poll worker in Cobb County.

I am writing to express my deep concerns and urge you to not accept the petition to revise Rule 183-1-14.02 which creates regulations regarding the counting of ballots at each precinct on election night.

The proposed rule is an unreasonable ask for election workers, many of whom are exhausted after a 14 hour workday.

For background, I have spent many election nights on the floor, crawling into the ballot scanners, trying to organize 4000 plus pieces of paper into plastic ziplock bags to return to the election office. I do that after a long grueling day of working at my polling place, providing excellent customer service for the voters of Cobb County. I understand that you are considering requiring in Rule 183-1-14.02 that 3 poll workers must independently count each piece of scanned ballot paper and match the count on the scanner before organizing them into the ziplocks.

Every poll worker is very busy doing all the work required to close out the polls, having 3 undistracted workers count like this is simply an untenable task. I challenge each of you on the board to count about 4000 anything right now and each come up with an accurate count. Time yourself and see how long it takes and report back to the SEB. Keep in mind how big a ream of paper is, well that is only 500 sheets, so you are requiring 3 people in every large polling place to count 8 to 9 REAMS of paper.

Not only is this an onerous task, **it will greatly delay the delivery of the memory cards to the election office** for upload to the Secretary of State at a time when you have already compressed the deadline for loading the results to the SOS.

I implore you to reject this proposed rule amendment on behalf of election workers throughout the great State of Georgia and every voter who deserves results in a timely manner!

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Thank you,

Mark Mosbacher

Email:

Cell:

Hardin, Alexandra (SEB)

From: Jane Seward [REDACTED]
Sent: Sunday, August 4, 2024 3:33 PM
To: SEB Public Comments
Subject: Comments to state election board proposed rule amendments

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I am a Georgia voter who strongly opposes the state election board approving the following rule amendments. These amendments are unnecessary and add significant burdens to voters, their families and caretakers and to election office workers throughout the state and they have the potential to disenfranchise voters and significantly weaken the confidence that voters have in our current system of elections:

1. Suggested changes to absentee ballot voting.

Adding identification requirements for voters as well as their family members/care takers to complete a form when delivering an absentee ballot for a voter go well beyond the requirements under Georgia law. For voters with limited mobility, this could be a significant enough impediment to disenfranchise their vote. Busy family members may not easily find the time needed to request and fill out a form when they return the ballot. It is also burdensome to election staff. USPS is currently less than reliable regarding mail delivery so the state election board should be encouraging all efforts to deliver ballots to the election office and dropboxes without adding more burdens.

Overnight video surveillance of drop boxes in early voting locations. The drop boxes are inside locations known to be safe and secure. The drop boxes in early voting locations are emptied every night and are secured with all other voting equipment. To install and monitor video surveillance and to retain the video footage is completely unnecessary and it would impose a substantial cost to the counties (and thus taxpayers).

2. Adding a new definition for certifying elections. "Certify the results of a primary, election, or runoff," or words to that effect, means to attest, after reasonable inquiry that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.

Why are we giving county elections superintendents new power to question election results that have been compiled by trained and experienced election staff with the assistance of volunteers from both political parties? Their job, as defined under state statute is merely to certify election results. They can't withhold certification based on suspected fraud or errors in returns; these issues are to be resolved in the courts AFTER certification. And what, on earth do the phrases "reasonable inquiry: and "true and accurate" mean? They are not clearly defined and they are vague and ripe for abuse by rogue county election officials.

Thank you,

Jane Seward



Hardin, Alexandra (SEB)

From: Cindy Trow [REDACTED]
Sent: Sunday, August 4, 2024 3:01 PM
To: SEB Public Comments
Subject: Fwd: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

----- Forwarded message -----

From: Cindy Trow [REDACTED]
Date: Sun, Aug 4, 2024 at 2:51 PM
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-02. Definitions
To: <jfervier.seh@gmail.com>, <saraghazal.seb@gmail.com>, <SFRPublicComments@sos.ga.gov>, <johnstonmd.seb@gmail.com>, <rjeffares.seb@gmail.com>, <jking.seb@gmail.com>
Cc: <voting@acluga.org>

My name is CINDY TROW and I am a registered voter in Cobb County, Georgia.

I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

- The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum "reasonable inquiry" should be more specifically defined in both substance and time frame.
- As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

I appreciate your serious consideration and I urge you to make the right decision in accordance with the talking points of this request!


Best,
Cindy Trow

--

Cindy Trow
Wellness Now with Cindy Trow
Certified Health & Wellness Coach
www.CindyTrow.com
[REDACTED]

Who do you know that is looking to create victories both on and off the scale so that they can live their best life? Please introduce us! I can help.

--

Cindy Trow
Wellness Now with Cindy Trow
Certified Health & Wellness Coach
www.CindyTrow.com


Who do you know that is looking to create victories both on and off the scale so that they can live their best life? Please introduce us! I can help.

Hardin, Alexandra (SEB)

From: Linda Arnold [REDACTED]
Sent: Sunday, August 4, 2024 2:58 PM
To: jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: SEB Public Comments
Subject: State Election Board meeting 8/6/24 Public Comment

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Board;

I believe the role of the State Election Board is to safeguard the integrity of our election processes in order to protect the confidence of the electorate. This confidence has been shattered over the last few cycles due to the abundance of irregularities that have been documented and are now in the public domain. The result is a distrust of the results which is a primary contributing factor to the division we now have in the United States. A significant step in restoring confidence and encouraging unity must be the establishment of some Common Sense measures to ensure the integrity of the process.

“Common Sense” measures to secure Georgia elections:

- 1) Appoint Independent Investigators to further research the Moncla-Rossi complaint 2023-025 based on the incomplete and inaccurate investigation by the SOS as documented in the Amended Factual Response letter provided by Kevin Moncla to the SEB on July 22, 2024. This investigation should be made public.
- 2) Reject the Fulton Monitor proposal by Ryan Germany which includes the very people who ignored the issues, delayed, or refused to investigate the 2020 complaints. The SEB should appoint their own SEB Monitor team with monitors recommended by each board member and accountable to the board.
- 3) Reject the Rule Petition by Peter Simmons and United to Protect Democracy that seeks to restrict voter challenges.
- 4) Approve the Rule Petitions that seek to improve transparency, accuracy, and security of our elections to restore voter confidence including:
 - Hand Recounts – Marilyn Marks
 - Cybersecurity Incident Reporting – Marilyn Marks
 - Mailed Ballot Tracking – David Cross
 - **Update Voter Rolls based on DDS License issued out of state - Debbie Fisher
 - Reconcile Tabulator Tape to Scanner Count – Garland Favorito
 - **Memory Card Retention – Garland Favorito
 - Certified List of Voters Available to Public – Lucia Frazier
 - Daily Reporting of Election Results – Rick Jeffares
- 5) Uphold the rules as passed for the following:
 - **Tabulating Results: Reconciliation and Certification – Bridget Thorne, Salleigh Grubbs, David Hancock
 - Hand Count Ballots at the Precinct – Sharlene Alexander
 - Post the Reconciliation Report – Gail Lee
 - **Drop Box Security – Salleigh Grubbs

- Clarify Certify Definition – Mike Heekin

Measures like these are long overdue. As a Georgia resident, I am embarrassed at the national reputation we have regarding corruption in our elections. If we are going to be taken seriously as the Jewel of the South, it is time we clean up our processes and do everything possible to restore confidence in our ability to accurately reflect the Will of the People.

--

Thanks so much,

Linda L Arnold

[REDACTED]

Hardin, Alexandra (SEB)

From: julespierce@everyactioncustom.com on behalf of Julie Pierce
<julespierce@everyactioncustom.com>
Sent: Sunday, August 4, 2024 12:47 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Julie Pierce and I am a registered voter in Gwinnett County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Julie Pierce

Hardin, Alexandra (SEB)

From: nins@everyactioncustom.com on behalf of Leone Feather
<nins@everyactioncustom.com>
Sent: Sunday, August 4, 2024 12:46 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Leone Feather

Hardin, Alexandra (SEB)

From: JOHN SPAULDING <[REDACTED]>
Sent: Sunday, August 4, 2024 12:41 PM
To: SEB Public Comments
Subject: re: Proposed change to Georgia State Election Board Rule Revision

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

I am a registered voter who has been a resident of Forsyth County Georgia for 18 years and am writing to urge you to deny the petition to revise Rule 183-1-12-.02 (Definitions), which creates a definition for certifying the results of a primary, election or runoff.

To me, the dangers in permitting this change are obvious. The language "reasonable inquiry" is undefined and unduly broad. The result would open the door to unending speculation about our election results ... the effect of which would be to delay election certification. At the very least, this term **MUST** be defined within the new rule.

Talking Points:

Another problematic element: There is no timetable given for the "reasonable Inquiry." Again, this creates the potential for conflicts with the election certification law, which requires that an election be certified no later than the Monday following the election day.

Also, given our fractious partisan political climate, I believe that allowing county elections board members this much discretion (for interpretation) will cause result in a tangle of MULTIPLE interpretations, increase the likelihood of costly litigation, deepen the already existing distrust in the Georgia election process, and ultimately cost county taxpayers skyrocketing legal expenses for a needless exercise that could simply be avoided.

There is little doubt that this proposed rule revision will adversely impact the reliability and uniformity of elections in Georgia. And that outcome should **NEVER** be the intent of any State Election Board rule.

In the end, I implore you to do the right thing for Georgia voters (and taxpayers) by turning down the requested rule revision in the interest of fairness, decency, and a functional (and strong) democracy.

Thank you for your consideration,

Kimber Williams
Cumming, GA

Hardin, Alexandra (SEB)

From: coenen53@everyactioncustom.com on behalf of Sara Coenen <coenen53@everyactioncustom.com>
Sent: Sunday, August 4, 2024 12:36 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Sara Coenen and I am a registered voter in Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sara Coenen

Hardin, Alexandra (SEB)

From: John Fervier <jfervier.seb@gmail.com>
Sent: Sunday, August 4, 2024 11:53 AM
To: Brian Nunez; Hardin, Alexandra (SEB)
Cc: saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com; SEB Public Comments; Isabel Otero
Subject: Re: SPLC Action Fund Comment on Proposed Amendment to SEB Rule 183-1-2-.02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Mr. Nunez:

Thank you for your letter. Pursuant to your request, this letter will be included in the record.

Best regards,
John Fervier
Chairman, State Election Board

On Fri, Aug 2, 2024 at 3:25 PM Brian Nunez [REDACTED] > wrote:

Dear Chairman Fervier and State Election Board Members:

On behalf of the SPLC Action Fund, we write in response to the notice of proposed rulemaking issued by the State Election Board (“SEB” or “Board”) on July 3, 2024. We respectfully submit this comment to the proposed rule which seeks to amend SEB Rule 183-1-2-.02 *Definitions* (“Proposed Rule”) by altering the definition of election certification. We urge the SEB to reject the Proposed Rule because its suggested language is in conflict with the letter of Georgia law as well as longstanding Georgia caselaw such that the Board’s adoption of the Proposed Rule would exceed the SEB’s statutory authority. The Proposed Rule’s vague language would also lead to inconsistent applications and is ripe for abuse. The resulting electoral confusion and disorder stand to negatively impact voter and public confidence in Georgia’s elections. The Proposed Rule is therefore unreasonable in light of these undesirable effects.

Pursuant to [O.C.G.A. § 50-13-4\(a\)\(2\)](#), we request that the SEB include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it “issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption.”

Sincerely,

Pichaya Poy Winichakul, Senior Staff Attorney

Isabel Otero, Georgia Policy Director

Brian Núñez, Georgia Senior Policy Associate



Brian Núñez he/him

Senior Policy Associate / Asociado Superior de Políticas | Policy
Southern Poverty Law Center & SPLC Action Fund

T [REDACTED]

[REDACTED] | splcenter.org | splcactionfund.org

This e-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify the Southern Poverty Law Center immediately by returning it to the sender and deleting this copy from your system. Thank you for your cooperation.

Hardin, Alexandra (SEB)

From: segarsf@everyactioncustom.com on behalf of Fran Segars
<segarsf@everyactioncustom.com>
Sent: Sunday, August 4, 2024 11:16 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Fran___ and I am a (please choose the option that applies: registered voter, in _Fulton ___ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Fran Segars

Hardin, Alexandra (SEB)

From: kkrummert@everyactioncustom.com on behalf of Katherine Krummert
<kkrummert@everyactioncustom.com>
Sent: Sunday, August 4, 2024 10:43 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Katherine Krummert, a resident of Forsyth County, GA. For several years, I have been an active volunteer in helping voters understand Georgia's voting processes and attending our county's monthly election board meetings, and I also participate as a poll worker.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff. The proposed rule is unreasonable because:

The proposed definition is vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Katherine Krummert

Hardin, Alexandra (SEB)

From: cydwells@everyactioncustom.com on behalf of Cydney Wells
<cydwells@everyactioncustom.com>
Sent: Sunday, August 4, 2024 9:39 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am a concerned citizen and registered voter in Oconee County. I am contacting you concerning the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

This vaguely-worded "definition" would not specify the kinds of inquiries that could be done nor limit the time frame in which the inquiry must be completed.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rule-making record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Cydney Wells

Hardin, Alexandra (SEB)

From: kcahastings@everyactioncustom.com on behalf of K C Adkins-Hastings
<kcahastings@everyactioncustom.com>
Sent: Sunday, August 4, 2024 8:19 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Karen Adkins-Hastings___ and I am a (please choose the option that applies: registered voter in Dekalb___ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

I, like many Georgia citizens, am following closely changes in voting regulations and laws as we find there are some who wish to diminish the effect of the people's choices for their leaders in our democratic society. I ask you to please side with our nation's leadership historically to choose our leaders based on the will of the people, not the powerful.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
K C Adkins-Hastings

Hardin, Alexandra (SEB)

From: angwest67@everyactioncustom.com on behalf of Angela West <angwest67@everyactioncustom.com>
Sent: Sunday, August 4, 2024 8:15 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Angela West

Hardin, Alexandra (SEB)

From: sarahbrachar@everyactioncustom.com on behalf of Brooke Rappoport
<sarahbrachar@everyactioncustom.com>
Sent: Sunday, August 4, 2024 1:33 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Brooke Rappoport

Hardin, Alexandra (SEB)

From: droodehchi@everyactioncustom.com on behalf of Daryoosh Roodehchi
<droodehchi@everyactioncustom.com>
Sent: Sunday, August 4, 2024 1:04 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Daryoosh Roodehchi and I am a registered voter in Forsyth county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Daryoosh Roodehchi

Hardin, Alexandra (SEB)

From: ellenirb@everyactioncustom.com on behalf of Ellen Richardson
<ellenirb@everyactioncustom.com>
Sent: Sunday, August 4, 2024 12:19 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Ellen Richardson

Hardin, Alexandra (SEB)

From: melanie0501@everyactioncustom.com on behalf of Melanie Smith <melanie0501@everyactioncustom.com>
Sent: Saturday, August 3, 2024 9:11 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Melanie Smith and I am a (please choose the option that applies: registered voter in Athens-Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Melanie Smith

Hardin, Alexandra (SEB)

From: tnt65@everyactioncustom.com on behalf of Tim Thilman <tnt65@everyactioncustom.com>
Sent: Saturday, August 3, 2024 7:51 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Tim Thilman and I am a (please choose the option that applies: registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Tim Thilman

Hardin, Alexandra (SEB)

From: batyat@everyactioncustom.com on behalf of B Nesin
<batyat@everyactioncustom.com>
Sent: Saturday, August 3, 2024 7:37 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Barbara Nesin and I am a registered voter in Dekalb county. I am proud that Georgia's election officials have stood up for truthfully verifying elections in the face of partisan pressure to do otherwise, thereby ensuring the validity of elections in our state. The nation is watching what Georgia does now. I hope we emerge with our integrity in tact.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one.

THIS IS CRITICAL TO THE VALIDITY OF ANY ELECTION: There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
B Nesin

Hardin, Alexandra (SEB)

From: thejashow@everyactioncustom.com on behalf of Jacqueline Hightower
<thejashow@everyactioncustom.com>
Sent: Saturday, August 3, 2024 7:04 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jacqueline Hightower and I am a registered voter, in Macon-Bibb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jacqueline Hightower

Hardin, Alexandra (SEB)

From: manette.messenger@everyactioncustom.com on behalf of Manette Messenger
<manette.messenger@everyactioncustom.com>
Sent: Saturday, August 3, 2024 6:03 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Manette Messenger and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Manette Messenger

Hardin, Alexandra (SEB)

From: rawsondavis@everyactioncustom.com on behalf of Greg Davis
<rawsondavis@everyactioncustom.com>
Sent: Saturday, August 3, 2024 5:59 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am Greg Davis, as resident of Athens and a poll worker now that I am retired. While I see my role as a poll worker as one who helps insure free and fair elections, I know that they are people in Georgia who will only accept that an election is free and fair if their candidate wins. It is my understanding that it is to cater to such people that you are thinking about allowing Boards of Election treat the certification of elections as a discretionary responsibility. This is wrong. There needs to be a legitimate and evidence-based reason for an election not to be certified. It should not be based on speculation.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Please do the write thing.

Sincerely,
Greg Davis

Hardin, Alexandra (SEB)

From: going.awoc@everyactioncustom.com on behalf of Steph Armistead
<going.awoc@everyactioncustom.com>
Sent: Saturday, August 3, 2024 5:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Stephanie Armistead and I am a tax paying registered voter, I attended the meeting that was conducted on Friday afternoon July 12 at 4 PM. I reject the revision then and do so formally now.

I urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Steph Armistead

Hardin, Alexandra (SEB)

From: jcu127@everyactioncustom.com on behalf of Juan Unzueta <jcu127@everyactioncustom.com>
Sent: Saturday, August 3, 2024 4:40 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Juan Unzueta

Hardin, Alexandra (SEB)

From: tomas.miko@everyactioncustom.com on behalf of Tomas Miko
<tomas.miko@everyactioncustom.com>
Sent: Saturday, August 3, 2024 4:22 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Tomas Miko and I am a registered voter in Paulding county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Tomas Miko

Hardin, Alexandra (SEB)

From: Ainsley Clarke [REDACTED]
Sent: Saturday, August 3, 2024 3:21 PM
To: SEB Public Comments
Cc: Jfervier.seb@gmail.com; Saraghazal.seb@gmail.com; Jjohnstonmd.seb@gmail.com; Rjeffares.seb@gmail.com; Jking.seb@gmail.com
Subject: Rule change request

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Members of the Georgia State Election Board,

I am a Forsyth County registered voter. I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02 (Definitions), which creates a definition for certifying the results of a primary, election, or runoff. My rationale for this request is listed below.

1. Reasonable inquiry is overly broad and undefined. This is an obvious attempt to allow unending speculation about election results, thus delaying the election certification.
2. At a minimum, the term "reasonable inquiry" must be defined in the new rule.
3. There is no timetable given for the "reasonable Inquiry." This potentially conflicts with the election certification law that requires that an election be certified no later than the Monday following the election day.
4. Allowing county elections board members this much discretion will cause multiple interpretations, cause more litigation, promote distrust in the election process, and cost county taxpayers untold costs in legal expenses for a potentially needless exercise.
5. This proposed rule revision will directly impact the reliability and uniformity of elections in Georgia. Quite clearly, that should never be the intent of any State Election Board rule.

I thank you for taking the time to review my request.

Very Respectfully,

Ainsley Clarke.

Hardin, Alexandra (SEB)

From: [REDACTED]
Sent: Saturday, August 3, 2024 2:55 PM
To: SEB Public Comments; Jfervier.seb@gmail.com; Saraghazel.seb@gmail.com; Jjohnstonmd.seb@gmail.com; Rieffares.seb@gmail.com; Jking.seb@gmail.com
Subject: Rule 183-1-12.02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I am writing to urge you to not accept the petition to revise Rule 183-1-12.02, which creates a definition for certifying the results of a primary election or runoff.

I am concerned because this is an obvious attempt to allow unending speculation about election results, thus delaying the election certification. There is no timetable given for the reasonable inquiry which requires that an election be certified no later than the Monday following the election day. This will make it easier for those who do not agree with the results of any election to delay and cause chaos. This rule revision will impact the reliability and uniformity of elections in Georgia. This should never be the intent of any State Election Board rule. Please let the elections be fair and just.

Thank you.

Yvonne Harley
Concern Citizen

Hardin, Alexandra (SEB)

From: mrebeccacarr@everyactioncustom.com on behalf of M Rebecca Carr
<mrebeccacarr@everyactioncustom.com>
Sent: Saturday, August 3, 2024 2:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am a registered voter in Bartow County and I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based only on speculation, this sows distrust in our democratic process. This in turn also creates more harassment towards our election officials and wastes taxpayer money.

Allowing board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
M Rebecca Carr

Hardin, Alexandra (SEB)

From: Steve Smilie <[REDACTED]>
Sent: Saturday, August 3, 2024 1:40 PM
To: SEB Public Comments
Subject: Public Comments

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

- 1) Appoint Independent Investigators to further research the Moncla-Rossi complaint 2023-025 based on the incomplete and inaccurate investigation by the SOS as documented in the [Amended Factual Response](#) letter provided by Kevin Moncla to the SEB on July 22, 2024.
- 2) Reject the Fulton Monitor proposal by Ryan Germany which includes the very people who ignored the issues, delayed, or refused to investigate the 2020 complaints. Please appoint your own SEB Monitor team with monitors recommended by each board member.
- 3) Reject the Rule Petition by Peter Simmons and United to Protect Democracy that seeks to restrict voter challenges.
- 4) Approve the Rule Petitions that seek to improve transparency, accuracy, and security of our elections to restore voter confidence including:
 - Hand Recounts – Marilyn Marks
 - Cybersecurity Incident Reporting – Marilyn Marks
 - Mailed Ballot Tracking – David Cross
 - **Update Voter Rolls based on DDS License issued out of state - Debbie Fisher
 - Reconcile Tabulator Tape to Scanner Count – Garland Favorito
 - **Memory Card Retention – Garland Favorito
 - Certified List of Voters Available to Public – Lucia Frazier
 - Daily Reporting of Election Results – Rick Jeffares
- 5) Uphold the rules as approved by the Board for the following:
 - **Tabulating Results: Reconciliation and Certification – Bridget Thorne, Salleigh Grubbs, David Hancock
 - Hand Count Ballots at the Precinct – Sharlene Alexander
 - Post the Reconciliation Report – Gail Lee
 - **Drop Box Security – Salleigh Grubbs
 - Clarify Certify Definition – Mike Heekin

Sent from my iPhone

Hardin, Alexandra (SEB)

From: kathielittleseas@everyactioncustom.com on behalf of Kathleen Walker
<kathielittleseas@everyactioncustom.com>
Sent: Saturday, August 3, 2024 12:29 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Kathleen Walker

Hardin, Alexandra (SEB)

From: Jeffrey Martin <[REDACTED]>
Sent: Saturday, August 3, 2024 12:19 PM
To: SEB Public Comments
Subject: Opposition to Rule Change - Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Thank you for the opportunity to give you my view of a proposed change to the State Election Board rules.

Specifically I would like to recommend that the Board does not enact the Revisions to Subject 183-1-12-.02. Definitions which would grant new powers to the election superintendent.

I am 64, have spent 58 of my years living and voting in Georgia, a father, husband, son, and brother, a NASCAR fan, a 26 year volunteer at my local school, and an unabashed fan of the State of Georgia.

I think you would be hard pressed to match my record of voting in every general, primary, runoff, and special election. The candidates have not always been my first choice, but I consider it my civic duty to vote, every time. The candidates I voted for sometimes won and sometimes lost, but I supported my elected officials (it is a hard job).

I've seen first hand the work of those citizens who work in the polls. I trust them, value them, and I think the State Board should as well. I have never felt that an election was "rigged" (whatever that means) or "stolen".

I do not think it is good for our state to give such power to a county election superintendent, whether a single person or an election board, to short circuit the work of poll workers, precinct officials, and central staff. The work of election staff at every level ensures that by the time the results are provided for certification by the county election superintendent, voters' eligibility has been confirmed, ballots have been verified and counted, and counts have been checked multiple times.

The superintendent should certify the results and if issues arise, such issues should be resolved in the collaborative process of the Courts. (As you remember in the Bush/Gore election, when asked, both sides made sure the Court knew that the election workers were good and honest persons.)

Thanks,
Jeffrey Martin

[REDACTED]

Hardin, Alexandra (SEB)

From: ledonnahoe@everyactioncustom.com on behalf of Lorri Donnahoe
<ledonnahoe@everyactioncustom.com>
Sent: Saturday, August 3, 2024 11:58 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am a poll worker in Jackson County. I am writing to urge you to reject the petition to revise Rule 183-1-12-.02.

The proposed changes could unnecessarily delay certification of election results. When an election is not certified in a timely manner because of someone's unreasonable questions or speculation about the results, the public tends to distrust our democratic process.

It is apparent to me that very few of the people, if any, who are proposing these changes have ever worked as poll workers. There are already multiple checks and balances in the process. I don't see any reason to fix something that is not broken. The Election Boards in Georgia are staffed with trained and diligent people. Likewise, poll workers are also trained and swear an oath to conduct elections in a manner that sees that all eligible voters get to cast their ballot and have it counted.

To add additional hand counts (which can be notoriously inaccurate), and to allow someone to say they question the results of an election without defining the basis on which election results can be questioned is setting Georgia up for an easily contested election. That could lead to the results being invalid and the votes of the citizens of Georgia being discounted.

It appears that the only reason for this new rule is to make it easy to reject our election results.

I vehemently urge you to reject the petition to revise Rule 183-1-12-.02. It does nothing to add accuracy to the election process already in place. I believe it would make our election process chaotic and make it easy to challenge and discount a free and fair election in Georgia.

I fear that my vote and the votes of other Georgians may not count because of these proposed changes. The passage of this revision to Rule 183-1-12-.02 threatens the long-held premise that we are a nation ruled by the people.

Sincerely,
Lorri Donnahoe

Hardin, Alexandra (SEB)

From: evshacke@everyactioncustom.com on behalf of Elizabeth Shackelford
<evshacke@everyactioncustom.com>
Sent: Saturday, August 3, 2024 11:54 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am Elizabeth Shackelford, Dekalb county, and a poll worker.

Please reject the petition to revise Rule 183-1-12-.02, to create a definition for certifying results of a primary, election, or runoff.

The proposed definition is too vague. It includes "after reasonable inquiry;" no way to know what that means. It leaves the door open to never-ending inquiries.

The statute states that the Board "shall" certify election results. The Supreme Court of Georgia stated that makes certification a ministerial process, rather than a discretionary one.

There should be an evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, it creates fear and distrust in our democratic process.

Giving board members this level of discretion beyond the limits of their statutory authority would ensure inconsistencies in certification across different jurisdictions due to the subjective nature of "reasonable inquiry."

"Pursuant to O.C.G.A. § 50-13-4(a)(2), as required by statute, the Board should include this comment in the rulemaking record. If the Board were to accept this dangerous Proposed Rule, it must publish the reasons for and against its adoption, and articulate its reason for denying the issues raised with this petition. Thank you.

Sincerely,
Elizabeth Shackelford

Hardin, Alexandra (SEB)

From: smrd522@everyactioncustom.com on behalf of Smruti Desai <smrd522@everyactioncustom.com>
Sent: Saturday, August 3, 2024 11:42 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Smruti Desai

Hardin, Alexandra (SEB)

From: tiffnlomax@everyactioncustom.com on behalf of Tiffany Lomax
<tiffnlomax@everyactioncustom.com>
Sent: Saturday, August 3, 2024 11:26 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Tiffany Lomax

Hardin, Alexandra (SEB)

From: taiminteg@everyactioncustom.com on behalf of Tai Min Tegeder
<taiminteg@everyactioncustom.com>
Sent: Saturday, August 3, 2024 10:25 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Tai Min Tegeder and I am a registered voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Tai Min Tegeder

Hardin, Alexandra (SEB)

From: andreasilverman@everyactioncustom.com on behalf of Andrea Silverman
<andreasilverman@everyactioncustom.com>
Sent: Saturday, August 3, 2024 9:35 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Andrea J. Silverman and I am a citizen and registered voter in Chatham County, Georgia.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed revision is vague and too broad. It refers to “after reasonable inquiry,” without giving a definition of that phrase. Thus it is not clear what type of inquiry could be done and the time frame for that inquiry.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Andrea Silverman

Hardin, Alexandra (SEB)

From: williams.tomiyo@everyactioncustom.com on behalf of Tomiyo Williams
<williams.tomiyo@everyactioncustom.com>
Sent: Saturday, August 3, 2024 8:53 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Tomiyo Williams and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Tomiyo Williams

Hardin, Alexandra (SEB)

From: Don Hackney <[REDACTED]>
Sent: Saturday, August 3, 2024 8:46 AM
To: SEB Public Comments
Subject: Comments to Proposed Amendment to Rule 183-1-12-.02 (Certification)

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

To: The State Election Board,

As a retired Georgia attorney, I write to urge the State Election Board to reject the proposed amendment to Rule 183-1-12-. 02, regarding election certification.

1. This proposed action is, in effect, an improper attempt by the SEB to amend the Georgia Code. The SEB has no legal right to usurp the authority of the General Assembly.

2. This overreach by the SEB will undoubtedly lead to immediate and disruptive litigation on the eve of the General Election, causing significant chaos and delay in the conduct of the election by the county boards of election and their Staffs.

3. The Courts will immediately recognize that this attempt to amend the statute through the guise of a "definition" is disingenuous and will not affect the ultimate finding that this action would be overturned.

4. The Courts will also recognize the practical impact (purpose?) of this proposed amendment. If Vice President Harris defeats former President Trump in Georgia, Republican members of county boards of election will have been handed an easy pathway to create chaos and delay, potentially resulting in wrongfully depriving Harris of Georgia's electoral votes.

5. For the first time in our history, there will be rampant litigation throughout the State in every County where Republican board members make unreasonable document requests or otherwise seek to interfere with or materially delay certification. While this may, in fact, be one of the principal goals of the outside groups that are advocating for these changes, it would be a disaster for Georgia's election.

6. We are very close to the beginning of early voting in the General Election. This proposed amendment, together with many of the others, will cause massive disruption in the conduct of our elections. If the goal is to have accurate and secure elections, please do not saddle the county boards and their Staffs with meaningless additional tasks simply because a handful of election deniers want to pursue their conspiracy theories. Thank you for your consideration.

Best,

Don Hackney

Hardin, Alexandra (SEB)

From: lpcolbrt@everyactioncustom.com on behalf of Linda Colbert
<lpcolbrt@everyactioncustom.com>
Sent: Saturday, August 3, 2024 8:34 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Linda Colbert and I am a : registered voter in Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Linda Colbert

Hardin, Alexandra (SEB)

From: liz.buchanan301@everyactioncustom.com on behalf of Heather Garrison
<liz.buchanan301@everyactioncustom.com>
Sent: Saturday, August 3, 2024 8:20 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Heather Garrison and I am a registered voter in Forsyth county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Heather Garrison

Hardin, Alexandra (SEB)

From: [REDACTED]
Sent: Saturday, August 3, 2024 8:16 AM
To: SEB Public Comments; Jfervier.seb@gmail.com; Saraghazal.seb@gmail.com; Jjohnstonmd.seb@gmail.com; Rjeffares.seb@gmail.com; Jking.seb@gmail.com
Subject: Opposed to petition to revise Rule 183-1-12-02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

I am a registered voter in Forsyth County. I have attended both SEB and county election board meetings.

I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02 (Definitions), which creates a definition for certifying the results of a primary, election or runoff.

Some of the problems with the proposed revision are that:

1. Reasonable inquiry is overly broad and undefined. This is an obvious attempt to allow unending speculation about election results, thus delaying the election certification.
2. At a minimum, the term "reasonable inquiry" must be defined in the new rule.
3. There is no timetable given for the "reasonable Inquiry." Which potentially conflicts with the election certification law that requires that an election be certified no later than the Monday following the election day.
4. Allowing county elections board members this much discretion will cause multiple interpretations, cause more litigation, distrust in the election process and cost county taxpayers untold costs in legal expenses for a potentially needless exercise.
5. This proposed rule revision will directly impact the reliability and uniformity of elections in Georgia. Clearly that should never be the intent of any State Election Board rule.

Making this change will help destroy democracy in our State. We should be a beacon of democracy, not an example of autocracy.

Roger Pennifill

Hardin, Alexandra (SEB)

From: Peggy Wallace [REDACTED]
Sent: Saturday, August 3, 2024 8:13 AM
To: jking.seb@gmail.com; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; SEB Public Comments; jjohnstonmd.seb@gmail.com
Subject: I am opposed the Petition to Revise Rule 183-1-12-02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

I am a registered voter in Forsyth County.

I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02 (Definitions), which creates a definition for certifying the results of a primary, election or runoff.

- 1.
- 2.
3. Reasonable inquiry is overly broad and undefined. This is an obvious attempt to allow
4. unending speculation about election results, thus delaying the election certification.
- 5.
- 6.
- 7.
8. At a minimum, the term "reasonable inquiry" must be defined in the new rule.
- 9.
- 10.
- 11.
12. There is no timetable given for the "reasonable Inquiry." Which potentially conflicts
13. with the election certification law that requires that an election be certified no later than the Monday following the election day.
- 14.
- 15.
- 16.
17. Allowing county elections board members this much discretion will cause multiple interpretations,
18. cause more litigation, distrust in the election process and cost county taxpayers untold costs in legal expenses for a potentially needless exercise.
- 19.
- 20.
- 21.
22. This proposed rule revision will directly impact the reliability and uniformity of elections
23. in Georgia. Clearly that should never be the intent of any State Election Board rule.
- 24.

As a citizen I am appalled that you are even considering these changes and your actions are clearly politically motivated rather than fiduciary and objective.

Peggy Wallace

Hardin, Alexandra (SEB)

From: wendygrw@everyactioncustom.com on behalf of Wendy West
<wendygrw@everyactioncustom.com>
Sent: Saturday, August 3, 2024 6:37 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Gwendolyn West and I am a registered voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Wendy West

Hardin, Alexandra (SEB)

From: tphudock@everyactioncustom.com on behalf of Taylor Hudock
<tphudock@everyactioncustom.com>
Sent: Saturday, August 3, 2024 6:30 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Taylor and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in Bibb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Taylor Hudock

Hardin, Alexandra (SEB)

From: flexfamilyarts@everyactioncustom.com on behalf of Amanda Miller
<flexfamilyarts@everyactioncustom.com>
Sent: Saturday, August 3, 2024 4:18 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Amanda Miller and I am a registered voter in Gwinnett county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Amanda Miller

Hardin, Alexandra (SEB)

From: jbgagirlnow5@everyactioncustom.com on behalf of Joyce Giancola <jbgagirlnow5@everyactioncustom.com>
Sent: Saturday, August 3, 2024 4:00 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Joyce Giancola

Hardin, Alexandra (SEB)

From: meredithmmccain@everyactioncustom.com on behalf of Meredith McCain
<meredithmmccain@everyactioncustom.com>
Sent: Saturday, August 3, 2024 4:00 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Meredith and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because the proposed definition is far too vague and overly broad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rule-making record and, if the Board ultimately adopts the Proposed Rule, I request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Meredith McCain

Hardin, Alexandra (SEB)

From: l.tyler.426@everyactioncustom.com on behalf of Laura Tyler <l.tyler.426@everyactioncustom.com>
Sent: Saturday, August 3, 2024 1:32 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Laura Tyler and I am a registered voter in Forsyth County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Laura Tyler

Hardin, Alexandra (SEB)

From: jennhbuckle@everyactioncustom.com on behalf of Jennifer Hornbuckle
<jennhbuckle@everyactioncustom.com>
Sent: Saturday, August 3, 2024 12:45 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jennifer Hornbuckle____ and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jennifer Hornbuckle

Hardin, Alexandra (SEB)

From: naturalvoter@everyactioncustom.com on behalf of M Kent
<naturalvoter@everyactioncustom.com>
Sent: Friday, August 2, 2024 11:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Martha Kent and I am a registered voter in Cherokee County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
M Kent

Hardin, Alexandra (SEB)

From: chamom11@everyactioncustom.com on behalf of Marci Shaw <chamom11@everyactioncustom.com>
Sent: Friday, August 2, 2024 10:04 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Marci Shaw___ and I am a registered voter) in ___Dawson_ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Marci Shaw

Hardin, Alexandra (SEB)

From: peggygastright@everyactioncustom.com on behalf of Peggy Gastright
<peggygastright@everyactioncustom.com>
Sent: Friday, August 2, 2024 9:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Peggy Gastright

Hardin, Alexandra (SEB)

From: kaitlynomeeks@everyactioncustom.com on behalf of Kaitlyn Meeks
<kaitlynomeeks@everyactioncustom.com>
Sent: Friday, August 2, 2024 8:34 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Kaitlyn and I am a citizen of Barrow County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Kaitlyn Meeks

Hardin, Alexandra (SEB)

From: samuelstone97@everyactioncustom.com on behalf of Sam Stone <samuelstone97@everyactioncustom.com>
Sent: Friday, August 2, 2024 8:10 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Sam Stone and I am a registered voter in Bulloch county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sam Stone

Hardin, Alexandra (SEB)

From: balletcats@everyactioncustom.com on behalf of Sherice Hayes
<balletcats@everyactioncustom.com>
Sent: Friday, August 2, 2024 7:50 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Sherice and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sherice Hayes

Hardin, Alexandra (SEB)

From: melissa25rn@everyactioncustom.com on behalf of Melissa Malone
<melissa25rn@everyactioncustom.com>
Sent: Friday, August 2, 2024 7:58 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Melissa Malone

Hardin, Alexandra (SEB)

From: scolt2001@everyactioncustom.com on behalf of Sharon Coltrain <scolt2001@everyactioncustom.com>
Sent: Friday, August 2, 2024 7:20 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Sharon and I am a registered voter in Cherokee county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sharon Coltrain

Hardin, Alexandra (SEB)

From: amsmolyar@everyactioncustom.com on behalf of Alexandra Smolyar
<amsmolyar@everyactioncustom.com>
Sent: Friday, August 2, 2024 7:17 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Alexandra Smolyar

Hardin, Alexandra (SEB)

From: cinn2000@everyactioncustom.com on behalf of Mary Bolton <cinn2000@everyactioncustom.com>
Sent: Friday, August 2, 2024 7:02 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Mary Bolton and I am a registered voter in Cherokee county.

I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

- The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. At a minimum “reasonable inquiry” should be more specifically defined in both substance and time frame.
- As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification it a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.
- Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

This rule directly harms me as a voter by creating a possibility where my county board members could choose to delay election certification due to a suspicion or perceived need for more inquiry to be done.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Mary Bolton

Hardin, Alexandra (SEB)

From: crononj@everyactioncustom.com on behalf of James Cronon
<crononj@everyactioncustom.com>
Sent: Friday, August 2, 2024 6:44 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is James B. Cronon and I am a registered voter in Oglethorpe County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. Statutory construction is very import, as any attorney can tell you.

The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. Imperfectly-drafted rules give the opportunity for undemocratic and dangerous changes to properly-cast ballots.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials. We Georgians have been leading the vanguard of election security - ballots cast in every election have been fair and accurate. We would not have our Honorable Governor Kemp if they were not.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia. That will tie up our elections in months or years of litigation, thwarting the People's will.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
James Cronon

Hardin, Alexandra (SEB)

From: gakayaker48@everyactioncustom.com on behalf of Paschal McKibben <gakayaker48@everyactioncustom.com>
Sent: Friday, August 2, 2024 6:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am a registered voter in Stephens County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “SHALL” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Paschal McKibben

Hardin, Alexandra (SEB)

From: dizzylyric@everyactioncustom.com on behalf of Courtney Traeger
<dizzylyric@everyactioncustom.com>
Sent: Friday, August 2, 2024 6:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Courtney Traeger and I am a registered in Cherokee county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Courtney Traeger

Hardin, Alexandra (SEB)

From: art@everyactioncustom.com on behalf of Arthur Rosenberg
<art@everyactioncustom.com>
Sent: Friday, August 2, 2024 6:25 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Arthur Rosenberg

Hardin, Alexandra (SEB)

From: luramccoy81@everyactioncustom.com on behalf of Lura McCoy <luramccoy81@everyactioncustom.com>
Sent: Friday, August 2, 2024 5:56 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is __Lura__ and I am a registered voter in __DeKalb__ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Lura McCoy

Hardin, Alexandra (SEB)

From: ginstonic1@everyactioncustom.com on behalf of V. Valletti <ginstonic1@everyactioncustom.com>
Sent: Friday, August 2, 2024 5:45 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Virg Valletti and I am a registered voter in Union county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
V. Valletti

Hardin, Alexandra (SEB)

From: jbm527@everyactioncustom.com on behalf of James Malone <jbm527@everyactioncustom.com>
Sent: Friday, August 2, 2024 5:44 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jim Malone and I am a registered voter, in Cobb county.

Please don't make this state an embarrassment like other red-states that have enacted dis-enfranchising voting rules. 2020 demonstrated that Georgia election are secure and represent the will of the people.

So, I urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
James Malone

Hardin, Alexandra (SEB)

From: wwblue@everyactioncustom.com on behalf of Wheatie Gowen
<wwblue@everyactioncustom.com>
Sent: Friday, August 2, 2024 5:32 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Wheatie Gowen

Hardin, Alexandra (SEB)

From: jfwiles@everyactioncustom.com on behalf of Jean Wiles
<jfwiles@everyactioncustom.com>
Sent: Friday, August 2, 2024 4:58 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jean Wiles

Hardin, Alexandra (SEB)

From: gbottoms@everyactioncustom.com on behalf of Gwendolyn Bottoms
<gbottoms@everyactioncustom.com>
Sent: Friday, August 2, 2024 4:56 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Gwen Bottoms and I am a registered voter in Oconee county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Gwendolyn Bottoms

Hardin, Alexandra (SEB)

From: melanie.ruefli@everyactioncustom.com on behalf of MELANIE Ruefli
<melanie.ruefli@everyactioncustom.com>
Sent: Friday, August 2, 2024 4:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Melanie Ruefli and I am a: registered voter in _Cobb_ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
MELANIE Ruefli

Hardin, Alexandra (SEB)

From: mclaugh@everyactioncustom.com on behalf of Helen McLaughlin
<mclaugh@everyactioncustom.com>
Sent: Friday, August 2, 2024 4:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Helen McLaughlin and I am a registered voter in Fulton County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable and unnecessary, and creates about the certification process.

The proposed definition is far too vague. The definition proposed in this petition includes the term "after reasonable inquiry," without a definition of that phrase. It is unclear what type of inquiry could be done and the time frame in which that inquiry has to happen, thus allowing the process to continue beyond the time that certification is required.

As the code stands, board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation or conjecture, this sows fear and distrust in our democratic process.

Allowing the board members to have a level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, I request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Helen McLaughlin

Hardin, Alexandra (SEB)

From: Debra Mihalic Staples [REDACTED]
Sent: Friday, August 2, 2024 4:32 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: Public Comment Addressing Proposed Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Georgia State Election Board Members,

I'm a registered voter in Cherokee County, Georgia. I am writing to ask that you do NOT accept the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of an election, a primary, or a runoff. The proposed rule is problematic and unreasonable since it fails to specify what constitutes a "reasonable inquiry," nor does it specify a time period for when it must occur. Further, it does not seem to require a legitimate reason, one that is supported by evidence, for the board not to certify an election. It gives the individual board members the means and methods to disrupt and delay certification. As a voter, this directly harms me because it undermines my trust in the board to properly perform its duty to certify the actual election results.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Respectfully,

Debra M. Staples
Canton, GA

Hardin, Alexandra (SEB)

From: rwoodel.woodel@everyactioncustom.com on behalf of Rosemary Woodel
<rwoodel.woodel@everyactioncustom.com>
Sent: Friday, August 2, 2024 4:03 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Rosemary Woodel___ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in Clarke____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Rosemary Woodel

Hardin, Alexandra (SEB)

From: carluccitoni@everyactioncustom.com on behalf of Toni Carlucci
<carluccitoni@everyactioncustom.com>
Sent: Friday, August 2, 2024 3:25 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

Dear Election Board members,

Greetings. I am a registered voter and concerned citizen in Clarke County, Athens, Georgia.

I urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overly broad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rule making record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Toni Carlucci

Hardin, Alexandra (SEB)

From: brad.sell@everyactioncustom.com on behalf of Brad Sell
<brad.sell@everyactioncustom.com>
Sent: Friday, August 2, 2024 3:11 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Brad Sell and I am a registered voter in Cobb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Brad Sell

Hardin, Alexandra (SEB)

From: ramapatel@everyactioncustom.com on behalf of Rama Patel
<ramapatel@everyactioncustom.com>
Sent: Friday, August 2, 2024 2:56 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ___Rama Patel_ and I am a registered voter in ____ Oconee county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Rama Patel

Hardin, Alexandra (SEB)

From: Barbara Kidder [REDACTED]
Sent: Friday, August 2, 2024 2:54 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.se@gmail.com; jking.seb@gmail.com
Cc: voting@acluga.org
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the GA State Election Board, My name is Barbara Kidder and I am a registered voter in Cherokee County, Georgia.

I am writing to not accept the petition to revise Rule 183-1-12-02 which creates a definition for certifying the results of a primary, election, ore runoff.

The proposed rule is unreasonable because it is far too vague and over broad. "After reasonable inquiry", without a definition of that phrase is too open-ended and unclear about what type of inquiry is to be conducted and the time frame isn't stated. It leaves all elections open to political pressure any time the loser has the numbers advantage on the board.

This rule would sow mistrust of our elections and lead to political interference.

"Pursuant to O.C.G.A. 50-13-4(a)(2), I request that the board include this comment in the rule making record, and, if the board ultimately adopts the Proposed Rule, I request it issue a consideration statement of the principal reasons for and against the Proposed Rule and why you are overruling the consideration urged against its adoption as required by statute.

Sincerely,
Barbara Kidder
[REDACTED]

Hardin, Alexandra (SEB)

From: dodee3d@everyactioncustom.com on behalf of Dosia Donald
<dodee3d@everyactioncustom.com>
Sent: Friday, August 2, 2024 2:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ___Dosia Donald_ and I am a registered voter, in ____Putnam county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Dosia Donald

Hardin, Alexandra (SEB)

From: kharrisefx@everyactioncustom.com on behalf of Kathryn Harris
<kharrisefx@everyactioncustom.com>
Sent: Friday, August 2, 2024 2:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Kathryn Harris and I am a (please choose the option that applies: registered Election Board Member, in Greene county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Kathryn Harris

Hardin, Alexandra (SEB)

From: liblaugh@everyactioncustom.com on behalf of charlotte laughon
<liblaugh@everyactioncustom.com>
Sent: Friday, August 2, 2024 2:34 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
charlotte laughon

Hardin, Alexandra (SEB)

From: LARSON_PT@everyactioncustom.com on behalf of PAUL LARSON
<LARSON_PT@everyactioncustom.com>
Sent: Friday, August 2, 2024 2:05 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _PAUL LARSON___ and I am a registered voter in GWINNETT county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
PAUL LARSON

Hardin, Alexandra (SEB)

From: gilbert.linda@everyactioncustom.com on behalf of Linda Gilbert
<gilbert.linda@everyactioncustom.com>
Sent: Friday, August 2, 2024 1:17 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Linda Gilbert and I am a registered voter in Clarke county, and have previously worked as a poll worker.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Linda Gilbert

Hardin, Alexandra (SEB)

From: stacie.court@everyactioncustom.com on behalf of Stacie Court
<stacie.court@everyactioncustom.com>
Sent: Friday, August 2, 2024 1:10 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Stacie Court

Hardin, Alexandra (SEB)

From: Shel Seidman [REDACTED]
Sent: Friday, August 2, 2024 12:48 PM
To: SEB Public Comments; Jfervier.seb@gmail.com; Saraghazal.seb@gmail.com; Jjohnstonmd.seb@gmail.com; Rjeffares.seb@gmail.com; Jking.seb@gmail.com
Cc: Shel Seidman
Subject: Opposition to Rule Revision Petition 183-1-12-.02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

I am a concerned Forsyth County registered voter, and I am writing to urge you to not accept the petition to revise Rule 183-1-12-.02 (Definitions), which creates a definition for certifying the results of a primary, election, or runoff.

There are several critical concerns regarding this proposed revision:

1. **Reasonable Inquiry is Overly Broad and Undefined:** The term "reasonable inquiry" is not clearly defined within the proposed rule. This ambiguity could lead to unending speculation about election results, ultimately delaying the election certification process. At a minimum, the term "reasonable inquiry" must be defined in the new rule to prevent misuse.
2. **Lack of Timetable for "Reasonable Inquiry":** The proposed revision does not specify a timetable for the completion of a "reasonable inquiry." This omission potentially conflicts with existing election certification laws, which require that an election be certified no later than the Monday following election day.
3. **Discretion of County Elections Board Members:** Allowing county elections board members this much discretion will lead to multiple interpretations, increase litigation, foster distrust in the election process, and burden county taxpayers with significant legal expenses for a potentially needless exercise.

This proposed rule revision will directly impact the reliability and uniformity of elections in Georgia, which clearly should never be the intent of any State Election Board rule. It is essential that we maintain a consistent and trustworthy election process to ensure public confidence in our democratic system.

Thank you for considering my concerns. I urge you to reject the petition to revise Rule 183-1-12-.02.

Sincerely,
Dr. Sheldon Seidman



Dr. Shel Seidman

Hardin, Alexandra (SEB)

From: joseph.a.bailey@everyactioncustom.com on behalf of JOSEPH BAILEY
<joseph.a.bailey@everyactioncustom.com>
Sent: Friday, August 2, 2024 12:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Joe Bailey_ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in __Coweta__ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
JOSEPH BAILEY

Hardin, Alexandra (SEB)

From: Michelle.commeyras@everyactioncustom.com on behalf of Michelle Commeyras
<Michelle.commeyras@everyactioncustom.com>
Sent: Friday, August 2, 2024 12:37 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Michelle Commeyras

Hardin, Alexandra (SEB)

From: donw2181@everyactioncustom.com on behalf of Don Wafer <donw2181@everyactioncustom.com>
Sent: Friday, August 2, 2024 12:31 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Don Wafer and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Don Wafer

Hardin, Alexandra (SEB)

From: LFADJ@everyactioncustom.com on behalf of Liana Layug
<LFADJ@everyactioncustom.com>
Sent: Friday, August 2, 2024 12:26 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Liana Layug and I am a Election official in Cobb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is problematic and unreasonable because the proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. This leaves room for personal bias and we need to limit that as much as we can.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Liana Layug

Hardin, Alexandra (SEB)

From: vondamiles@everyactioncustom.com on behalf of Shavonda Miles
<vondamiles@everyactioncustom.com>
Sent: Friday, August 2, 2024 11:40 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Shavonda Miles

Hardin, Alexandra (SEB)

From: thatguyfdc@everyactioncustom.com on behalf of Fredrick Cantrell
<thatguyfdc@everyactioncustom.com>
Sent: Friday, August 2, 2024 11:29 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Fredrick Dylan Cantrell and I am a registered voter, in Chatham county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Fredrick Cantrell

Hardin, Alexandra (SEB)

From: jobethal@everyactioncustom.com on behalf of JoBeth Allen
<jobethal@everyactioncustom.com>
Sent: Friday, August 2, 2024 11:29 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Joyce allen and I am a registered voter in Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
JoBeth Allen

Hardin, Alexandra (SEB)

From: mjlist@everyactioncustom.com on behalf of Mary Jean Hartel
<mjlist@everyactioncustom.com>
Sent: Friday, August 2, 2024 11:12 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Mary Jean Hartel and I am a registered voter, in Clarke County

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Mary Jean Hartel

Hardin, Alexandra (SEB)

From: poldfath@everyactioncustom.com on behalf of Penny Oldfather
<poldfath@everyactioncustom.com>
Sent: Friday, August 2, 2024 10:47 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Penny Oldfather and I am a registered voter in Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Penny Oldfather

Hardin, Alexandra (SEB)

From: rvcanada@everyactioncustom.com on behalf of Riley Canada II
<rvcanada@everyactioncustom.com>
Sent: Friday, August 2, 2024 10:46 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Riley V Canada II___ and I am a registered voter, in _Cobb___ county.

Reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

OR, GO FUCK YOURSELF MAGA SCUM. ALSO, WHERE IS PROOF OF VOTER FRAUD MAGA SCUM?????

Sincerely,
Riley Canada II

Hardin, Alexandra (SEB)

From: juliadrattell@everyactioncustom.com on behalf of Julia Drattell
<juliadrattell@everyactioncustom.com>
Sent: Friday, August 2, 2024 10:45 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

Hello,

I'm Julia, a resident and voter in Athens-Clarke County. I'm writing regarding Rule 183-1-12-.02. I believe this rule will lead to an untenable amount of confusion and personal interpretation of under what constitutes a reasonable inquiry. I strongly urge you to provide clarity for our voters, BOE members, and ultimately, judges.

The voters should understand your intent in this law, which I'm hoping is in the interest of ensuring our votes are counted in a timely manner with appropriately guidance for those who we have elected to perform their roles on the BOE.

If you go against this plea, I would appreciate you addressing your rationale in any press releases or statements related to its passing.

Sincerely,
Julia Drattell

Hardin, Alexandra (SEB)

From: leslieapope@everyactioncustom.com on behalf of Leslie Pope
<leslieapope@everyactioncustom.com>
Sent: Friday, August 2, 2024 10:41 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Leslie Pope

Hardin, Alexandra (SEB)

From: Forwardgwinnett@everyactioncustom.com on behalf of Steve Toggerson
<Forwardgwinnett@everyactioncustom.com>
Sent: Friday, August 2, 2024 10:05 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Steve Toggerson and I am a registered voter in Gwinnett County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Steve Toggerson

Hardin, Alexandra (SEB)

From: dgxmn@everyactioncustom.com on behalf of Daavid Christman
<dgxmn@everyactioncustom.com>
Sent: Friday, August 2, 2024 8:11 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Daavid Christman

Hardin, Alexandra (SEB)

From: Nikki@everyactioncustom.com on behalf of Kwanesia Bass
<Nikki@everyactioncustom.com>
Sent: Friday, August 2, 2024 7:34 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Kwanesia Bass and I am a Registered Voter in Lee county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Kwanesia Bass

Hardin, Alexandra (SEB)

From: lyndaleemoser17@everyactioncustom.com on behalf of Lynda Moser <lyndaleemoser17@everyactioncustom.com>
Sent: Friday, August 2, 2024 7:16 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Lynda Moser

Hardin, Alexandra (SEB)

From: emariej@everyactioncustom.com on behalf of Elder James
<emariej@everyactioncustom.com>
Sent: Friday, August 2, 2024 7:33 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ___Elder James_ and I am a (please choose the option that applies: registered voter in ___Spalding___ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Elder James

Hardin, Alexandra (SEB)

From: cjsat4701@everyactioncustom.com on behalf of CJ Cheatham <cjsat4701@everyactioncustom.com>
Sent: Friday, August 2, 2024 6:31 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Cindy J. Cheatham__ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in _Fulton__ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
CJ Cheatham

Hardin, Alexandra (SEB)

From: mabee3992@everyactioncustom.com on behalf of Mae Bryan <mabee3992@everyactioncustom.com>
Sent: Friday, August 2, 2024 2:06 AM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Mae Bryan and I am a registered voter laurens county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Mae Bryan

Hardin, Alexandra (SEB)

From: [REDACTED]
Sent: Friday, August 2, 2024 12:16 AM
To: SEB Public Comments; Jfervier.seb@gmail.com; Saraghazal.seb@gmail.com; Jjohnstonmd.seb@gmail.com; Rjeffares.seb@gmail.com; Jking.seb@gmail.com
Subject: Do not accept petition to revise Rule 183-1-12-.02 (Definitions) - Forsyth Co registered voter

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

My name is Robyn Holm. I am a registered voter in Forsyth County living in Cumming. I am writing to urge you to **not** accept the petition to revise Rule 183-1-12-.02 (Definitions), which creates a definition for certifying the results of a primary, election, or runoff.

In particular, this is the wording for the proposed change:

(c.2) "Certify the results of a primary, election, or runoff," or words to that effect, means to attest, after **reasonable inquiry** that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.

The use of the language "reasonable inquiry" is overly broad and undefined. This is a disturbing and blatant attempt to allow unending speculation about election results, delaying the election certification, eroding public trust in the democratic foundations of our dear nation, and allowing ideologically motivated individuals in public office to abuse the bureaucratic process to deny the Will of the People.

There is no clear timetable given for the "reasonable Inquiry" in the proposed changed. At the bare minimum, this must be specifically defined so as not to conflict with the election certification law that requires that an election be certified no later than the Monday following the election day.

In addition, allowing individual county elections board members this much discretion will create a patchwork of interpretations, cause more litigation, generate distrust in the election process of our nation, and cost county taxpayers like myself untold legal expenses for a likely needless exercise.

Georgia has already proven itself to have a very reliable system of elections! I know that my vote was counted correctly in the last Presidential election. This proposed rule revision will directly impact the reliability and uniformity of elections in Georgia. I should certainly hope that would never be the intent of any State Election Board rule, correct?

Robyn Holm

[REDACTED]

[REDACTED]

Hardin, Alexandra (SEB)

From: helmsley28@everyactioncustom.com on behalf of Alisha Nickols <helmsley28@everyactioncustom.com>
Sent: Thursday, August 1, 2024 11:03 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Alisha and I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Alisha Nickols

Hardin, Alexandra (SEB)

From: djgnosis@everyactioncustom.com on behalf of John Robinson
<djgnosis@everyactioncustom.com>
Sent: Thursday, August 1, 2024 11:03 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ___John Robinson and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall"

certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
John Robinson

Hardin, Alexandra (SEB)

From: msdoemac@everyactioncustom.com on behalf of Doreene McIntosh
<msdoemac@everyactioncustom.com>
Sent: Thursday, August 1, 2024 10:11 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Doreene McIntosh and I am a registered voter, in Dekalb County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Doreene McIntosh

Hardin, Alexandra (SEB)

From: covidog.resist@everyactioncustom.com on behalf of Karen Covi
<covidog.resist@everyactioncustom.com>
Sent: Thursday, August 1, 2024 9:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Karen Covi and I am a registered voter and Poll Worker in Athens/Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Karen Covi

Hardin, Alexandra (SEB)

From: tracyng25@everyactioncustom.com on behalf of Tracy Ng <tracyng25@everyactioncustom.com>
Sent: Thursday, August 1, 2024 8:18 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Tracy Ng and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Tracy Ng

Hardin, Alexandra (SEB)

From: suzannemarks@everyactioncustom.com on behalf of Suzanne Marks
<suzannemarks@everyactioncustom.com>
Sent: Thursday, August 1, 2024 8:02 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Suzanne Marks and I am a registered voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Suzanne Marks

Hardin, Alexandra (SEB)

From: ssucklal@everyactioncustom.com on behalf of Sirina Sucklal
<ssucklal@everyactioncustom.com>
Sent: Thursday, August 1, 2024 7:56 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sirina Sucklal

Hardin, Alexandra (SEB)

From: cjasCarlisle@everyactioncustom.com on behalf of Julie Carlisle
<cjasCarlisle@everyactioncustom.com>
Sent: Thursday, August 1, 2024 7:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Julie Carlisle

Hardin, Alexandra (SEB)

From: katrian.henry@everyactioncustom.com on behalf of Katrina Henry
<katrian.henry@everyactioncustom.com>
Sent: Thursday, August 1, 2024 7:37 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ___Katrina Henry_ and I am a registered voter in Fayette county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Katrina Henry

Hardin, Alexandra (SEB)

From: sheilarwoods@everyactioncustom.com on behalf of Sheila Woods
<sheilarwoods@everyactioncustom.com>
Sent: Thursday, August 1, 2024 7:37 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Sheila Woods and I am a (please choose the option that applies: registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sheila Woods

Hardin, Alexandra (SEB)

From: bobomatic13@everyactioncustom.com on behalf of Robert Covi <bobomatic13@everyactioncustom.com>
Sent: Thursday, August 1, 2024 7:19 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Dr. Robert Covi and I am a registered voter and poll worker in Athens-Clark county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Robert Covi

Hardin, Alexandra (SEB)

From: garyuatl@everyactioncustom.com on behalf of Gary Uitvlugt
<garyuatl@everyactioncustom.com>
Sent: Thursday, August 1, 2024 7:14 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Reject the petition to revise Rule 183-1-12-02

Sincerely,
Gary Uitvlugt

Hardin, Alexandra (SEB)

From: lerindaelliott@everyactioncustom.com on behalf of Lerinda Saint Elliott
<lerindaelliott@everyactioncustom.com>
Sent: Thursday, August 1, 2024 6:11 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is __Lerinda Saint Elliott__ and I am a corporate lawyer and a registered voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Lerinda Saint Elliott

Hardin, Alexandra (SEB)

From: robertelliott888@everyactioncustom.com on behalf of Robert Elliott <robertelliott888@everyactioncustom.com>
Sent: Thursday, August 1, 2024 6:03 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Robert Elliott and I am a polling site manager in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Robert Elliott

Hardin, Alexandra (SEB)

From: emlynch1@everyactioncustom.com on behalf of Elizabeth Lynch <emlynch1@everyactioncustom.com>
Sent: Thursday, August 1, 2024 5:44 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Elizabeth Lynch

Hardin, Alexandra (SEB)

From: jnmil@everyactioncustom.com on behalf of james miller
<jnmil@everyactioncustom.com>
Sent: Thursday, August 1, 2024 5:30 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _james miller___ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) registered voter richmond _____ county.

I do not want the rule to change it has worked for many years . I do not see a need to change now it has been working just fine up to now I see no need to revise it . I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
james miller

Hardin, Alexandra (SEB)

From: mpardi@everyactioncustom.com on behalf of Marco Pardi
<mpardi@everyactioncustom.com>
Sent: Thursday, August 1, 2024 5:03 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Marco Pardi

Hardin, Alexandra (SEB)

From: lakenyajohns@everyactioncustom.com on behalf of LaKenya Johnson
<lakenyajohns@everyactioncustom.com>
Sent: Thursday, August 1, 2024 4:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _LaKenyaJohnson___ and I am a registered voter in Cobb ___ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
LaKenya Johnson

Hardin, Alexandra (SEB)

From: terribyrd1966@everyactioncustom.com on behalf of Terri Byrd <terribyrd1966@everyactioncustom.com>
Sent: Thursday, August 1, 2024 4:46 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Terri Byrd and I am a pastor and registered voter in Forsyth County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Our state has excellent election officials who take their positions and responsibilities seriously. Let’s honor them by letting them do their job. And let’s honor all of the good people of Georgia by letting their votes count!

Sincerely,
Terri Byrd

Hardin, Alexandra (SEB)

From: mabennett13@everyactioncustom.com on behalf of Marc Bennett <mabennett13@everyactioncustom.com>
Sent: Thursday, August 1, 2024 4:35 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Marc Bennett and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Marc Bennett

Hardin, Alexandra (SEB)

From: eileenlich@everyactioncustom.com on behalf of Eileen M Lichtenfeld
<eileenlich@everyactioncustom.com>
Sent: Thursday, August 1, 2024 4:30 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Eileen M Lichtenfeld

Hardin, Alexandra (SEB)

From: ghayes2505@everyactioncustom.com on behalf of Gloria Hayes <ghayes2505@everyactioncustom.com>
Sent: Thursday, August 1, 2024 4:12 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Gloria Hayes

Hardin, Alexandra (SEB)

From: blueskiessmilingonme@everyactioncustom.com on behalf of Lisa Robinson
<blueskiessmilingonme@everyactioncustom.com>
Sent: Thursday, August 1, 2024 4:08 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Lisa Robinson and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Lisa Robinson

Hardin, Alexandra (SEB)

From: tomwade@everyactioncustom.com on behalf of Tom Wade
<tomwade@everyactioncustom.com>
Sent: Thursday, August 1, 2024 4:03 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Tom Wade, and I am a registered voter in Cobb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Tom Wade

Hardin, Alexandra (SEB)

From: dariea2006@everyactioncustom.com on behalf of Dariea Stewart <dariea2006@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:54 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Dariea Stewart

Hardin, Alexandra (SEB)

From: m623b118@everyactioncustom.com on behalf of Mary Smith <m623b118@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:54 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Mary Smith and I am a registered voter in Hall county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Mary Smith

Hardin, Alexandra (SEB)

From: madisontiaffay@everyactioncustom.com on behalf of Madison Tiaffay
<madisontiaffay@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:44 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Madison and I am a registered voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Madison Tiaffay

Hardin, Alexandra (SEB)

From: mendezj@everyactioncustom.com on behalf of Javier Mendez
<mendezj@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:44 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Javier Mendez

Hardin, Alexandra (SEB)

From: amanda.wendler@everyactioncustom.com on behalf of Amanda Wendler
<amanda.wendler@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Amanda and I am a registered voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Amanda Wendler

Hardin, Alexandra (SEB)

From: Clare Muller <[REDACTED]>
Sent: Thursday, August 1, 2024 3:30 PM
To: SEB Public Comments; Jfervier.seb@gmail.com; Saraghazal.seb@gmail.com; Jjohnstonmd.seb@gmail.com; Rjeffares.seb@gmail.com; Jking.seb@gmail.com
Subject: Response to the Georgia State Election Board Rule Revision Petition to 183-1-12-.02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

I am a registered voter in Forsyth County and am writing to express my concern regarding the proposed revision to Rule 183-1-12-.02 (Definitions), which introduces a new definition for certifying the results of a primary, election, or runoff. **I urge you not to accept this petition.**

The term “reasonable inquiry” included in the revision is excessively broad and lacks a clear definition. This ambiguity opens the door to prolonged speculation about election results, potentially delaying the certification process. To address this issue, it is essential that the term “reasonable inquiry” be explicitly defined within the rule to ensure clarity and consistency.

Moreover, the proposed rule does not specify a timeline for conducting this “reasonable inquiry.” This lack of a defined timeframe may conflict with existing election certification laws, which mandate that elections be certified no later than the Monday following Election Day. The absence of a clear timetable could lead to unnecessary delays and complications.

Granting county election board members such wide discretion could result in varying interpretations of the rule, increasing the likelihood of litigation, eroding public trust in the electoral process, and imposing significant legal costs on county taxpayers. Such consequences are detrimental to the integrity and efficiency of our elections.

The proposed revision has the potential to undermine the reliability and uniformity of elections in Georgia. It is crucial that State Election Board rules support clear, fair, and timely election procedures. I strongly urge you to reconsider this proposed rule revision to safeguard the integrity of Georgia’s elections.

Thank you for your attention to this important matter.

Sincerely,

Clare Muller
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Hardin, Alexandra (SEB)

From: tlti@everyactioncustom.com on behalf of Theresa Teague
<tlti@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:30 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Theresa Teague and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable for the following reasons:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of what constitutes "reasonable inquiry". It is unclear and open-ended what type of inquiry could be done and the time frame within which that inquiry must happen.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a Board to not certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing Board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one Board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Theresa Teague

Hardin, Alexandra (SEB)

From: lashesbymocha@everyactioncustom.com on behalf of Malika Lewis
<lashesbymocha@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:25 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Malika _ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in Fulton_ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Malika Lewis

Hardin, Alexandra (SEB)

From: buddhaful2b@everyactioncustom.com on behalf of Martha Baker
<buddhaful2b@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:16 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Martha Baker and I am a registered Democrat in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Martha Baker

Hardin, Alexandra (SEB)

From: jneesmit@everyactioncustom.com on behalf of Jesse NeeSmith
<jneesmit@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:11 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jesse NeeSmith and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jesse NeeSmith

Hardin, Alexandra (SEB)

From: Lnorrell@everyactioncustom.com on behalf of Louise Norrell
<Lnorrell@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:09 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is __Louise Norrell__ and I am a poll worker in __Clarke__ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia. The inconsistencies this rule could cause in different jurisdictions could undermine the integrity of elections. The public could lose confidence in the process.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Louise Norrell

Hardin, Alexandra (SEB)

From: marypathaffey@everyactioncustom.com on behalf of Mary Haffey
<marypathaffey@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:08 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Mary Pat Haffey and I am a registered voter, in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Mary Haffey

Hardin, Alexandra (SEB)

From: Sjgary@everyactioncustom.com on behalf of Sherrill Gary
<Sjgary@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:05 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sherrill Gary

Hardin, Alexandra (SEB)

From: divinehairspray@everyactioncustom.com on behalf of Darlene Moreira
<divinehairspray@everyactioncustom.com>
Sent: Thursday, August 1, 2024 3:02 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Darlene Moreira and my husband & I are active registered voters in Decatur/DeKalb County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of "inquiry" could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board NOT to certify an election.

When an election is not certified based on speculation, misinformation, malfeasance and/or deliberate lies, it sows fear and distrust in our fragile democratic process. This in turn also creates more harassment towards our election officials which is already beyond unacceptable.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. That's the last thing this state needs.

What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia. We cannot allow that to happen and again, implore you to reject said petition.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Darlene Moreira

Hardin, Alexandra (SEB)

From: neiljduggan@everyactioncustom.com on behalf of Neil Duggan
<neiljduggan@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:51 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Neil Duggan and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in Gwinnett county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Neil Duggan

Hardin, Alexandra (SEB)

From: aberyc@everyactioncustom.com on behalf of Chris Abery
<aberyc@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:38 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Chris Abery

Hardin, Alexandra (SEB)

From: rnovkov@everyactioncustom.com on behalf of Russell Novkov
<rnovkov@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:37 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Russell Novkov

Hardin, Alexandra (SEB)

From: srossphoto@everyactioncustom.com on behalf of Sally Ross
<srossphoto@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:35 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Sally Ross and I am a registered voter and poll worker in Clarke County, Georgia. I firmly believe in the credibility of our state election system.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sally Ross

Hardin, Alexandra (SEB)

From: pax@everyactioncustom.com on behalf of paxton riddle
<pax@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:32 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Pax Riddle and I am a registered voter in Cobb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
paxton riddle

Hardin, Alexandra (SEB)

From: Rhonda Cook [REDACTED]
Sent: Friday, July 26, 2024 3:36 PM
To: SEB Public Comments
Subject: proposed amendment to rule concerning election certification

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Board members,

I am disturbed to see the proposed changes to rules governing elections in Georgia so I am writing to ask that you reject them.

I fear these proposals would grant authority where there is none. The proposed changes are vague. And these proposed change also carry a cost to safety and security of our elections workers in that bad actors would see these rules as permission to target our election workers in order to achieve the results they want.

I'll be specific.

-- Safety and security. There is a suggestion that election officials have discretion in certifying an election. Our election workers have already suffered a tsunami of insults, abuse and threats of physical violence and I fear those who want to subvert election results will be embolden to target our county superintendent and board of elections members with more of threats they have already experienced.

-- SEB lacks authority. Under Georgia law, the State Elections Board is not authorized to grant local elections officials a discretionary power to conduct a "reasonable inquiry." As you know, the Georgia Legislature has determined that the county elections superintendent "shall" tabulate and certify returns by 5 p.m. on the Monday following the election. Also, state law is mandatory, stating that local superintendents have a legal duty to certify election results and they cannot make legal judgments on the validity of election returns. State law does not allow local elections officials to withhold certification based on suspected fraud or errors in returns; the courts are charged with making those decisions.

-- Misleading. The proposed change suggests that it complies with the U.S. Election Assistance Commission's definition of "certification." Yet, the EAC says nothing about conducting a "reasonable inquiry" before certification. In fact, the EAC notes that the certification process varies state-to-state and each state must follow their respective laws.

-- Confusing. This proposed rule is vague and only invites certification abuse and chaos in Georgia's elections. The definitions of "reasonable inquiry" and "true and accurate" are unclear. It would allow elections superintendents or members of boards of elections to unfairly or unduly or, most likely, illegally delay certification.

Local elections officials are already working under tight deadlines to cure ballots and then to certify the vote within days of an election. The proposed change, including a proposal to permit board members to examine "all election related documentation" prior to certification, will cause elections staff divert their time and energy to such requests, taking them away from the monumental task of reconciling and preparing results for certification.

I believe this propose rule will make holding elections more difficult and will lead to delaying litigation over whether it is "reasonable" to refuse to certify the election if every last document "related" to the election is not produced.

Individual Board members should not have the power to disseminate to the public potentially inaccurate information before county elections officials have had an opportunity to investigate and reconcile potential issues.

I hope you will consider my concerns and then reject the proposed changes.

Rhonda Cook



Hardin, Alexandra (SEB)

From: Rutledge Hutson [REDACTED]
Sent: Saturday, July 27, 2024 6:17 PM
To: SEB Public Comments
Subject: Comments on proposed amendment to Rule 193-1-12.02.

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the State Election Board:

I write as a longtime volunteer for the Georgia Voter Protection Hotline. My aim is to ensure that all citizens of Georgia are able to exercise their right to vote. I work very hard to help callers: register to vote; check their registration status; learn how to request and return absentee ballots; identify voting locations, dates and times for early voting and election day voting; and cure ballots when challenged. I want all eligible Georgians to be able to vote and to have confidence that their vote will be counted.

It troubles me greatly that your most recent meeting was suddenly scheduled, without public notice, when one of your members was unable to attend. This approach is not only inconsistent with the requirements of Georgia law, but it is also likely to sow distrust in your work and in the integrity of Georgia elections.

I am even more concerned about your proposed amendment to Rule 193-1-12.02. The proposed new definition regarding certification is extremely problematic and will cause confusion, delays and skepticism on the part of voters.

The proposed rule also purport to allow actions that are contrary to Georgia law by adding the following to the definitions:

(c.2) “Certify the results of a primary, election, or runoff,” or words to that effect, means to attest, after reasonable inquiry that the tabulation and canvassing of the election are complete and accurate and that the results are a true and accurate accounting of all votes cast in that election.

Pursuant to O.C.G.A. 21-2-493, county election superintendents “*shall*” certify elections by 5pm on the Monday following the election. Nothing in Georgia law gives them the discretion to question or investigate the validity of election results. Legal judgements regarding the validity of election results can be made only by the courts. As members of the State Election Board, you have no authority to alter Georgia statutes and grant this power to local election boards via your proposed definition.

Finally, I find your claim that this definition “adopts” the U.S. Election Assistance Commission’s definition of certification misleading. The Commission explicitly notes that “[t]he method, scope and

timing of post-election activities vary by state.” The Commission then highlights different methods for certifying the vote, not one of which includes “reasonable inquiry” prior to certification.

I urge you to reconsider and reverse your recommendation regarding the addition of (c.2) to the definitions in Rule 193-1-12.02.

Sincerely,
Rutledge Q. Hutson

Hardin, Alexandra (SEB)

From: Leslie Price [REDACTED]
Sent: Tuesday, July 30, 2024 8:31 PM
To: SEB Public Comments
Subject: Opposition to Proposed amendment to Rule 183-1-12-.02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board:

I am a resident of Fulton County, a registered voter, and a member in good standing of the State Bar of Georgia. I do NOT support adoption of the amendment to the SEB Rule relating to election certification definitions for the following reasons:

1. The proposed amendment exceeds the Board's authority as the Georgia election statute says the county elections Superintendent "shall" tabulate and certify election returns no later than 5 pm on the monday following the election. OCGA 21-2-493 (a) and (k).
2. The Superintendents' duty to certify election results is mandatory and does not give them power to make legal judgments about the validity of election returns.
3. Election Superintendents can't withhold certification based on suspected fraud or errors-those issues must be resolved by the courts.
4. The proposed amendment says it adopts the US Election Assistance Commission's definition of certification. The EAC does NOT define certification for all 50 states. Instead, it gives only guidance and acknowledges the processes vary from state to state and are governed by state law.
5. The EAC's guidance does not include a single reference to conducting a "reasonable inquiry" prior to certification.
6. The phrase "reasonable inquiry" in the proposed amendment is vague and could be abused by county election officials.
7. Any Superintendent or county Board of Elections could unfairly delay certification, contrary to their legal duty.
8. The proposal would make it easier for bad actors to claim fraud in the election if their candidate doesn't win and then refuse to certify the election.

Thanks very much for your consideration,

Leslie Price

Hardin, Alexandra (SEB)

From: [REDACTED]
Sent: Wednesday, July 31, 2024 11:55 AM
To: SEB Public Comments
Subject: Proposed Rule Change 183-1-1-.01 submitted by United to Protect Democracy

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Georgia State Election Board members,

Please accept this written public comment in opposition of this proposed rule change.

O.C.G.A. 21-2-229 [Georgia Code § 21-2-229 \(2022\)](#) and O.C.G.A. 21-2-230 [Georgia Code § 21-2-230 \(2022\)](#) are clear in election law and should remain in totality until our elected officials amend this legislation through the legal process. The GA State Election Board is not in authority to make, alter, change, rewrite or subvert election law as written. It is in your purview to offer any clarity, consistency across counties, and compliance of this legislation, until further amended.

1. (a) Pursuant to O.C.G.A. 21-2-229, “**Any elector of a county or municipality may challenge the qualifications of any person** applying to register to vote in the county or municipality and **may challenge the qualifications of any elector of the county or municipality whose name appears on the list of electors**. Such challenges shall be in writing and shall specify distinctly the grounds of the challenge. **There shall not be a limit on the number of persons whose qualifications such elector may challenge.**”

(b) The burden shall be on the elector making the challenge to prove that the person being challenged is not qualified to remain on the list of electors. **The board of registrars shall have the authority to issue subpoenas for the attendance of witnesses and the production of books, papers, and other material upon application by the person whose qualifications are being challenged or the elector making the challenge.** The party requesting such subpoenas shall be responsible to serve such subpoenas and, if necessary, to enforce the subpoenas by application to the superior court. Any witness so subpoenaed, and after attending, shall be allowed and paid the same mileage and fee as allowed and paid witnesses in civil actions in the superior court.

(Note: The burden of proof in these challenges should match the requirements of a “civil” matter consisting of the legal definition, preponderance of evidence (or greater than a 51% likelihood). Requiring a burden of proof of beyond a shadow (or reasonable) doubt is related to a “criminal” matter. In the Georgia judicial system, should the challenged voter or challenger submit an appeal to the Superior Court, it is heard as a CIVIL matter.)

I hope the SEB will take serious note of the current election law as written. Any attempts to add undue burdensome “add ins” or “wish lists” requested by unelected NGOs will be met with swift rebuke.

Kinds regards,

Lisa Rutherford

Hardin, Alexandra (SEB)

From: Margaret Daniel [REDACTED]
Sent: Wednesday, July 31, 2024 3:50 PM
To: SEB Public Comments
Subject: Comments on State Election Board's Proposed Amendment to Rule 183 - 1-12-.02

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I strongly oppose the proposed amendment to Rule 183-1-12-.02 relating to election certification, because of the reasons listed below, as well as other problems. Please see my comments below:

- This amendment deceptively suggests that it “adopts the U.S. Election Assistance Commission’s (EAC) definition of certification.” The EAC does not, in fact, claim to define certification for all 50 states. Instead, the EAC’s guidance recognizes that certification processes vary significantly among the states, and that those processes are governed by state law.
- The EAC’s guidance also does not include any reference to conducting a “reasonable inquiry” before certification.
- Giving county superintendents and Boards of Elections discretionary power (or creating a purported mandatory duty) to conduct a “reasonable inquiry” of election results encourages certification abuse and turmoil in Georgia elections.
- The phrases “reasonable inquiry” and “true and accurate” in the proposed amendment are vague and likely to result in abuse by rogue county elections officials.
- The proposed amendment would give any superintendent or county Board of Elections a broad (likely illegal) mandate to unfairly or unjustifiably delay certification. Indeed, some officials proposing this language have already recently voted against certifying election results, contrary to their legal duty.
- Mandatory timelines for reconciliation and certification are already tight. The cure period does not end until the Friday after the election, and certification must be completed the following Monday.
- Combined with the proposed rule change to 183-1-12-.12.1 that includes permitting county election board members to examine “all election related documentation” prior to certification (to be heard on Aug 19th), this could result in a flood of requests from Elections Boards/superintendents, which would divert election officials’ attention away from the already overwhelming task of reconciling and preparing results for certification.
- Individual Board members should not be empowered to publicly disseminate potentially inaccurate information before county elections officials have had an opportunity to investigate and reconcile potential issues.
- This proposed amendment would make every county superintendent and board of elections member a target for threats of violence by those trying to challenge elections results.
- Georgia elections officials have already been subjected to a stream of vilification, abuse, and threats. Suggesting that election superintendents have discretionary power over certification would invite further threats and abuse.

Also, I oppose the proposed amendment to 183-1-14-.02 relating to Drop Boxes for these reasons:

- It discriminates against voters who deliver their absentee ballots to “any absentee ballot drop location” allowed by Georgia law as opposed to voters who mail their absentee ballots by U.S. Mail or deliver their ballots to an authorized drop box.
- The identification requirements it imposes on these voters exceed those required by Georgia law.
- It creates confusion among voters on the requirements about delivery of their absentee ballots.
- It creates a new category of provisional ballots not authorized by Georgia law.
- It places identification requirements on these voters that exceed those required by Georgia law.

- It results in confusion among voters on requirements regarding delivery of their absentee ballots.
- The new category of provisional ballots it creates is not authorized by Georgia law.

Thank you for your consideration of this important matter.

Sincerely,

Margaret Perry Daniel

A solid black rectangular box used to redact the signature of Margaret Perry Daniel.

Hardin, Alexandra (SEB)

From: brannenlaw17@everyactioncustom.com on behalf of Lawrence Brannen <brannenlaw17@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:38 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Lawrence Anthony Brannen and I am a registered voter in Richmond County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Lawrence Brannen

Hardin, Alexandra (SEB)

From: joanna_runs@everyactioncustom.com on behalf of Joanna Luth
<joanna_runs@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Joanna Luth

Hardin, Alexandra (SEB)

From: chelliehylton97@everyactioncustom.com on behalf of Michelle Hylton <chelliehylton97@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Michelle Hylton and I am a proud registered voter in Fulton County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Michelle Hylton

Hardin, Alexandra (SEB)

From: stjames.nicole@everyactioncustom.com on behalf of Nicole Berman
<stjames.nicole@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:40 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Nicole and I am a registered voter, Chatham County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable for the following reasons:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Nicole Berman

Hardin, Alexandra (SEB)

From: blct84@everyactioncustom.com on behalf of Gisela Schloss Birkholz <blct84@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:41 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Gisela Schloss Birkholz

Hardin, Alexandra (SEB)

From: byehyde@everyactioncustom.com on behalf of Heidi Kasun
<byehyde@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

Good day.

I am a Georgia registered voter in Chatham county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers “reasonable inquiry” might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Heidi Kasun

Hardin, Alexandra (SEB)

From: 4earls@everyactioncustom.com on behalf of Sari Earl
<4earls@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

Hello,

I am a Georgia resident and ask that the State Election Board to reject a frivolous new rule for certifying elections at their next meeting on August 6. Please reject this damaging rule.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sari Earl

Hardin, Alexandra (SEB)

From: vctmom@everyactioncustom.com on behalf of Velma Tilley
<vctmom@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Velma Cowen Tilley and I am a registered voter in Fulton County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Velma Tilley

Hardin, Alexandra (SEB)

From: carbro74@everyactioncustom.com on behalf of Carrie Brown <carbro74@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Carrie Brown and I am a voter in Fayette County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Carrie Brown

Hardin, Alexandra (SEB)

From: bethany.havas@everyactioncustom.com on behalf of Beth Havas
<bethany.havas@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Beth Havas and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Beth Havas

Hardin, Alexandra (SEB)

From: xavier@everyactioncustom.com on behalf of Xavier Ashe
<xavier@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Xavier Ashe and I am a registered voter in Cobb County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Xavier Ashe

Hardin, Alexandra (SEB)

From: Maxgoldston@everyactioncustom.com on behalf of Max Goldston
<Maxgoldston@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:44 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Max Goldston

Hardin, Alexandra (SEB)

From: becky@everyactioncustom.com on behalf of Becky Minchew
<becky@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:44 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Becky Minchew and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Becky Minchew

Hardin, Alexandra (SEB)

From: vrnkelly@everyactioncustom.com on behalf of Vanessa Kelly
<vrnkelly@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:46 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Vanessa Kelly and I am a registered voter in FULTON county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, I request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Vanessa Kelly

Hardin, Alexandra (SEB)

From: laurina.florio@everyactioncustom.com on behalf of Laurina Florio
<laurina.florio@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:46 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Laurina Florio and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Laurina Florio

Hardin, Alexandra (SEB)

From: wmwatts8@everyactioncustom.com on behalf of William Watts <wmwatts8@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:47 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia. What is important is that the voices of every registered voter is heard and counted in the certification process and not based on partisan whims.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
William Watts

Hardin, Alexandra (SEB)

From: lbell@everyactioncustom.com on behalf of Linda Bell <lbell@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:47 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Linda Bell

Hardin, Alexandra (SEB)

From: bigheart353@everyactioncustom.com on behalf of joanne groshardt <bigheart353@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:47 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
joanne groshardt

Hardin, Alexandra (SEB)

From: Bentley29115@everyactioncustom.com on behalf of Cheryl Bentley <Bentley29115@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:49 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Cheryl Bentley, and I am a registered voter in Clayton County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Cheryl Bentley

Hardin, Alexandra (SEB)

From: sdmjem@everyactioncustom.com on behalf of Sara Minchew
<sdmjem@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:51 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Sara Minchew and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Sara Minchew

Hardin, Alexandra (SEB)

From: toni.cecil@everyactioncustom.com on behalf of Toni Cecil
<toni.cecil@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:53 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Toni Cecil and I am a registered vote in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Toni Cecil

Hardin, Alexandra (SEB)

From: ms2468@everyactioncustom.com on behalf of L Kendrick <ms2468@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:53 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am a registered voter in DeKalb County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because the proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
L Kendrick

Hardin, Alexandra (SEB)

From: lcarpen@everyactioncustom.com on behalf of Lucas Carpenter
<lcarpen@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:54 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Lucas Carpenter___ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in _Newton___ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Lucas Carpenter

Hardin, Alexandra (SEB)

From: jayawarren@everyactioncustom.com on behalf of Jay Warren
<jayawarren@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:56 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jay Warren

Hardin, Alexandra (SEB)

From: joannacy56@everyactioncustom.com on behalf of Joanne Cyrgalis <joannacy56@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:56 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Joanne Cyrgalis and I am registered voter in Cobb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Joanne Cyrgalis

Hardin, Alexandra (SEB)

From: steffstst@everyactioncustom.com on behalf of Stefanie Steele
<steffstst@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:57 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Stefanie Steele and I am a registered voter in Rockdale county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is

The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots.

There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Stefanie Steele

Hardin, Alexandra (SEB)

From: andrea_ferrard@everyactioncustom.com on behalf of Andrea Ferrard
<andrea_ferrard@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:57 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Andrea and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Andrea Ferrard

Hardin, Alexandra (SEB)

From: floydatl@everyactioncustom.com on behalf of Harry Taylor
<floydatl@everyactioncustom.com>
Sent: Thursday, August 1, 2024 12:58 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Floyd Taylor and I am a registered voter.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Harry Taylor

Hardin, Alexandra (SEB)

From: jdesh@everyactioncustom.com on behalf of James Deshotels
<jdesch@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:01 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
James Deshotels

Hardin, Alexandra (SEB)

From: dowdcc@everyactioncustom.com on behalf of Chris Dowd
<dowdcc@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:02 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Chris Dowd and I am a registered voter in Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Chris Dowd

Hardin, Alexandra (SEB)

From: lplong@everyactioncustom.com on behalf of Leland Long
<lplong@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:03 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Leland Long

Hardin, Alexandra (SEB)

From: vjohnson@everyactioncustom.com on behalf of Valerie Johnson
<vjohnson@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:04 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Valerie Johnson and I am a registered voter in Greene county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Valerie Johnson

Hardin, Alexandra (SEB)

From: jacquelineelsner20@everyactioncustom.com on behalf of Jacqueline C Elsner
<jacquelineelsner20@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:05 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am a registered voter in Athens-Clarke County. I attend all meetings of the Athens Clarke Board of Elections and Voter Registration.

Since November, 2018 I have attended my county meetings. Our five-member Board of Elections has received extensive training from the county elections staff and from the available Secretary of State training. They collaborate well together. They visit every polling precinct on election day. They stay with the county elections staff all through election day and night to cooperate and observe the proper conduct of our Athens-Clarke County elections. I attend the certification meetings which happen the Friday after the Tuesday election. I see that our county election board members conduct our elections with integrity, honesty, thoroughness, and commitment to our free and fair elections.

An Athens-Clarke County staff attorney attends each meeting of the Board of Elections. The county attorney listens to board queries about state election law and State Election Board rules to advise the board on lawful actions.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jacqueline C Elsner

Hardin, Alexandra (SEB)

From: ashleyswright84@everyactioncustom.com on behalf of Ashley Wright <ashleyswright84@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:08 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Ashley Wright _ and I am a registered voter in Clayton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Ashley Wright

Hardin, Alexandra (SEB)

From: amyltall@everyactioncustom.com on behalf of Amy Kreissl
<amyltall@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:12 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Amy and I am a registered voter in Cobb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Amy Kreissl

Hardin, Alexandra (SEB)

From: jessicaloisdudley@everyactioncustom.com on behalf of Jessica Dudley
<jessicaloisdudley@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:17 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jessica Dudley and I am a registered voter in Fulton county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jessica Dudley

Hardin, Alexandra (SEB)

From: merlefsmith@everyactioncustom.com on behalf of Merle Smith
<merlefsmith@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:17 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Merle Smith

Hardin, Alexandra (SEB)

From: comet66t@everyactioncustom.com on behalf of joyce cotter
<comet66t@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:17 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _joyce cotter___ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in _DeKalb___ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
joyce cotter

Hardin, Alexandra (SEB)

From: rpandina@everyactioncustom.com on behalf of Robert Pandina
<rpandina@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:17 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Robert Pandina and I am a registered voter in Greene county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Robert Pandina

Hardin, Alexandra (SEB)

From: jennifer.sherrock@everyactioncustom.com on behalf of Jennifer Sherrock
<jennifer.sherrock@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:20 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jennifer Sherrock and I am a registered voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jennifer Sherrock

Hardin, Alexandra (SEB)

From: ogilviemarcia@everyactioncustom.com on behalf of Marcia Ogilvie
<ogilviemarcia@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:23 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Marcia Ogilvie

Hardin, Alexandra (SEB)

From: muntzingsusan@everyactioncustom.com on behalf of Susanne Muntzing
<muntzingsusan@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:24 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Susanne___ and I am a (registered voter, please choose the option that applies:registered voer, Election Board Member, Election Director, Election official) in deKalb____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Susanne Muntzing

Hardin, Alexandra (SEB)

From: ldr999@everyactioncustom.com on behalf of Lyndon Robertson <ldr999@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:31 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Lyndon Robertson and I am a (please choose the option that applies: registered voter in Henry county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Lyndon Robertson

Hardin, Alexandra (SEB)

From: e_a_rome@everyactioncustom.com on behalf of Elizabeth Romey
<e_a_rome@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:31 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Dr. Elizabeth Romey and I am a registered voter in Muscogee County, and I regularly attend our county's election board meetings.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia. I am very impressed with the work of my county's election board and I do not see any reason to make their jobs harder and make the election process more ambiguous and fraught than it presently is.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Elizabeth Romey

Hardin, Alexandra (SEB)

From: bherrin67@everyactioncustom.com on behalf of Barry Herrin <bherrin67@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:31 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Barry Herrin

Hardin, Alexandra (SEB)

From: dcrmph@everyactioncustom.com on behalf of David Ramsey
<dcrmph@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:37 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is David Ramsey and I am a registered voter in Madison County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within. <3%

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
David Ramsey

Hardin, Alexandra (SEB)

From: whutchesonw@everyactioncustom.com on behalf of Wilma Hutcheson-Williams
<whutchesonw@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:37 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Wilma Hutcheson-Williams___ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in _Clarke___ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Wilma Hutcheson-Williams

Hardin, Alexandra (SEB)

From: refugeman@everyactioncustom.com on behalf of Richard Shields
<refugeman@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:39 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Dr. Richard Shields and I am a registered voter in Chatham county and an Assistant Poll Manager..

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

-The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

-As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

-Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Richard Shields

Hardin, Alexandra (SEB)

From: flsadley@everyactioncustom.com on behalf of Faith Sadley
<flsadley@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:40 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is __Faith Sadley__ and I am a (please choose the option that applies: registered voter.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Faith Sadley

Hardin, Alexandra (SEB)

From: oscarsgiant@everyactioncustom.com on behalf of Heather Hunter
<oscarsgiant@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:42 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Heather Hunter and I am a registered voter in DeKalb County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rule making record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Heather Hunter

Hardin, Alexandra (SEB)

From: joancurtis618@everyactioncustom.com on behalf of Joan Curtis <joancurtis618@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Joan Curtis and I am a registered voter and poll worker in Clarke county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Joan Curtis

Hardin, Alexandra (SEB)

From: belou_1@everyactioncustom.com on behalf of Erin Clark <belou_1@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:43 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Erin Clark

Hardin, Alexandra (SEB)

From: arrington.michelle@everyactioncustom.com on behalf of Michelle Arrington
<arrington.michelle@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:46 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Michelle Arrington and I am a registered voter in Fulton County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Michelle Arrington

Hardin, Alexandra (SEB)

From: thebhammy@everyactioncustom.com on behalf of Brian Hamilton
<thebhammy@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:46 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Brian Hamilton and I am a registered voter in Greene county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Brian Hamilton

Hardin, Alexandra (SEB)

From: conchwood@everyactioncustom.com on behalf of Doug Helliesen
<conchwood@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:50 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Doug Helliesen

Hardin, Alexandra (SEB)

From: jaimrad@everyactioncustom.com on behalf of Jaime Steppeler
<jaimrad@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:50 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jaime Steppeler and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jaime Steppeler

Hardin, Alexandra (SEB)

From: shopmelinda@everyactioncustom.com on behalf of Jeffrey Young
<shopmelinda@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:50 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Jeffrey Young and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Jeffrey Young

Hardin, Alexandra (SEB)

From: rdwright67@everyactioncustom.com on behalf of Rhonda D Wright MD <rdwright67@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:52 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Rhonda D. Wright, MD, and I am a registered voter in Dekalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Rhonda D Wright MD

Hardin, Alexandra (SEB)

From: mccarthy.rebecca@everyactioncustom.com on behalf of Rebecca McCarthy
<mccarthy.rebecca@everyactioncustom.com>
Sent: Thursday, August 1, 2024 1:55 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Rebecca McCarthy ___ and I am a registered voter and an elections clerk in Clarke County.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Rebecca McCarthy

Hardin, Alexandra (SEB)

From: roadriverrail@everyactioncustom.com on behalf of James Aultman
<roadriverrail@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:13 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
James Aultman

Hardin, Alexandra (SEB)

From: mkatinsky@everyactioncustom.com on behalf of Michael Katinsky
<mkatinsky@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:14 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Mike Katinsky and I have voted exclusively in Georgia in either Fulton or Dekalb counties for 30 years. With the exception of the long lines encountered in 2016/2018, I have never had anything but pleasant experiences and even with those delays, people waiting in line and the amazing poll workers and volunteers have always shared a welcoming communal spirit.

My candidates of choice have FREQUENTLY lost in what I have never had any reason to think was anything but a fair and responsibly run election process. Since the 2020 election, I have watched as people many of whom had little history of voting and spurred on by divisive rhetoric claimed that the election was fraudulent, that it was stolen, and flung all manner of accusations about. Under the guise of restoring faith, in what has always been a fair, well-functioning system, they and the legislators they have lobbied have passed laws written by political operatives outside of Georgia that have the chilling effect of delaying the certification of our elections through multiple hand recounts, unlimited baseless eligibility challenges, and restricting voting opportunities potentially disenfranchising low income hourly workers and single parents, and concentrating the votes to the last minute election day where problems in registration cannot be timely addressed, and poll workers are likely to be overwhelmed in processing the vote count.

I now understand that there is a petition to revise Rule 183-1-12-.02, creating a definition for certifying the results of a primary, election, or runoff. The proposed definition is far too vague. The phrase "after reasonable inquiry," is undefined and no time limit is established for such an inquiry. This could very easily be abused by partisan actors dissatisfied with the election results they are presented for certification. To presume that the results are incorrect without reason or evidence, simply out of speculation and mistrust is an insult to the integrity of the election workers, whom 30 years of Georgia elections have proven to me to be kind, civic-minded, ethical individuals committed to the sanctity of our democracy.

Certifying the election results have been received is an administrative function, period. The Onus for ensuring the accuracy and integrity of the vote count is the responsibility of the Election Supervisors.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,

Hardin, Alexandra (SEB)

From: Kevincardoza33@everyactioncustom.com on behalf of Kevin Becerra-Cardoza
<Kevincardoza33@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:14 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Kevin Becerra-Cardoza and I am a resident in Gwinnett county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Kevin Becerra-Cardoza

Hardin, Alexandra (SEB)

From: lkdavolos@everyactioncustom.com on behalf of Loretta Davolos
<lkdavolos@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:16 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Loretta Davolos

Hardin, Alexandra (SEB)

From: yanise97@everyactioncustom.com on behalf of Charisma Atkins <yanise97@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:20 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Charisma Atkins

Hardin, Alexandra (SEB)

From: ricciard8@everyactioncustom.com on behalf of Anthony Ricciardi <ricciard8@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:24 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is ____ and I am a (please choose the option that applies: registered voter, Election Board Member, Election Director, Election official) in ____ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

"Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Anthony Ricciardi

Hardin, Alexandra (SEB)

From: holli.semetko@everyactioncustom.com on behalf of Holli Semetko
<holli.semetko@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:24 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

I am a political science professor and a Georgia resident for more than two decades registered to vote in Dekalb County. I urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff. The proposed rule is unreasonable because:

1. The proposed definition is too vague. The definition proposed in this petition includes "after reasonable inquiry," without a definition of that phrase. It is unclear what type of inquiry could be done along with the time frame that inquiry has to happen within.
2. As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they "shall" certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.
3. Allowing the board members to have this level of discretion which is beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board member considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rule-making record and, if the Board ultimately adopts the Proposed Rule, I request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,

Holli A. Semetko, MSc, PhD, MBA

Sincerely,
Holli Semetko

Hardin, Alexandra (SEB)

From: leenakiber@everyactioncustom.com on behalf of Lavleen Kiber
<leenakiber@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:24 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is Lavleen Sidhu Kiber and I am a registered voter in DeKalb county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Lavleen Kiber

Hardin, Alexandra (SEB)

From: christeenmix@everyactioncustom.com on behalf of Christeen Mix
<christeenmix@everyactioncustom.com>
Sent: Thursday, August 1, 2024 2:25 PM
To: SEB Public Comments
Subject: SEB Written Public Comment Addressing Revisions to Subject 183-1-12-.02. Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear State Election Board Public Comment,

My name is _Christeen Mix___ and I am a registered voter, in ___Clarke_ county.

I am writing to urge you to reject the petition to revise Rule 183-1-12-.02, which creates a definition for certifying the results of a primary, election, or runoff.

The proposed rule is unreasonable because:

The proposed definition is far too vague and overbroad. The definition proposed in this petition includes “after reasonable inquiry,” without a definition of that phrase. It is unclear and open-ended what type of inquiry could be done and the time frame that inquiry has to happen within.

As the code stands, Board members play an active role in our certification process by certifying that the results presented to them by the Election Supervisor represent a complete and accurate count of the ballots. The statute states that they “shall” certify the results, which the Supreme Court of Georgia has stated makes that certification a ministerial process, rather than a discretionary one. There needs to be a legitimate and evidence-based reason for a board not to certify an election. When an election is not certified based on speculation, this sows fear and distrust in our democratic process. This in turn also creates more harassment towards our election officials.

Allowing the board members to have this level of discretion above and beyond the limits of their statutory authority could lead to inconsistencies in how election results are certified across different jurisdictions. What one board considers "reasonable inquiry" might differ from another, potentially impacting the uniformity and reliability of elections being certified across Georgia.

“Pursuant to O.C.G.A. § 50-13-4(a)(2), I request that the Board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, we request that it issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption as required by statute.

Sincerely,
Christeen Mix

Hardin, Alexandra (SEB)

From: anita.h.tucker@gmail.com
Sent: Thursday, August 1, 2024 2:32 PM
To: SEB Public Comments; jfervier.seb@gmail.com; saraghazal.seb@gmail.com; jjohnstonmd.seb@gmail.com; rjeffares.seb@gmail.com; jking.seb@gmail.com
Cc: voting@scluga.org; mark.niesse@ajc.com; jake@appenmedia.com; 'Sabrina Kerns'; msmith@forsythco.com
Subject: Revisions to Subject 183-1-12-.02 Definitions

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Members of the Georgia State Election Board,

I am the Assistant Secretary of the Forsyth County Board of Registrations & Elections as well as an engaged voter in Georgia.

Today I am writing to urge you to not adopt the petition to revise Rule 183-1-12-.02, Definitions, which creates a definition for certifying the results of an election including primaries, general elections and runoffs.

From a past poll worker, poll manager now board member perspective, this proposed rule is unreasonable because:

1. The proposed definition for "after reasonable inquiry" is far too vague and overly broad. Without a clear definition, 159 counties will read this in at least 159 different ways.
2. "Reasonable inquiry" must be more refined with types of inquiries allowed and a solid timeline to insure that county elections offices will meet the legally required certification deadlines. This rule definition will no doubt create confusion and potentially a chaotic mess of the November, 2024 Presidential Election. Surely no one wants that to happen.
3. As a Board member, I know that county boards play an active role in the certification process. I have every confidence that the Forsyth County Director and Supervisor will represent a complete and accurate count of the Forsyth County ballots.
4. Statute states that the Board "shall" certify the results. According to the Supreme Court of Georgia, certification of elections results is a ministerial process, not a discretionary process.
5. Boards must present a legitimate and evidence-based reason to not certify an election. Clearly, not certifying an election will create mistrust in an elections system that many hard working elections staff and leaders work diligently to preserve and secure. As a board member, I can tell you we do not need any further mistrust at the county level.
6. Leadership and staff at the Forsyth County elections office already spend hundreds of hours working on voter challenges that are beyond reasonable expectations. Adding more work for some perceived benefit costs counties additional money and more importantly, a severe drop in morale.
7. Processes already exist to identify and resolve discrepancies. That is why we know about the few issues Georgia has had in the past. A concerted, deep dive examination is required to determine if any additional "reasonable inquiries" add any value.

It is imperative that the Georgia State Election Board actively work with leadership in GAVREO to discern what rule changes actually add value to the processes that they administer. Leaving their wise voice out is a disservice to them and to the voters in Georgia.

Pursuant to O.C.G.A. 50-13-4(a)(2) , I request that this board include this comment in the rulemaking record and, if the Board ultimately adopts the Proposed Rule, I request that a concise statement of the principal reasons for and against its adoption be issued to the public. Therein, provide the Board's reason for overruling this consideration that is urging against the adoption as required by statute.

Best Regards,

Anita Tucker
Assistant Secretary, Forsyth County BRE