

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

August 8, 2024

Dear John,

The current process and accounting for Georgia Election Ballots lacks necessary accounting controls including chain of custody, reconciliation procedures, and physical security over the ballots being processed and tabulated. The Secretary of State's office has indicated they would be willing to accept a "safety net" to supplement the existing people, process and technology we have in place today. This is that "safety net." These rules are being proposed to ensure the integrity of our voting process and system and to address the problems identified by Mr. Rossi. Each of these new rules is being submitted as a "stand-alone" rule request and each needs a separate yes or no vote by the SEB. Implementing these rules is a preliminary step; however, more comprehensive changes still need to be made at both the Georgia Legislature and at the State Election Board to ensure accountability, auditability, and integrity. The reason for implementing each of these new rules is the same: To allow accurate accounting and auditing of Absentee Ballots requested, received, scanned and tabulated and posted by the Secretary of State. The current Absentee Ballot processes and systems are un-auditable, and therefore no assurance can be provided that the results of any election are complete and accurate given the people, process and technology we have in place today. Indeed, even Governor Kemp has indicated their appear to be problems and the credibility of Rossi's work and the skepticism and lack of confidence it has created with our elections by many Georgians.

Executive Summary and Rationale for New Rule Requests

Rule Request Number 1:

All ballots must be numerically controlled. All accounting systems use numbering systems for documents to control invoices, purchase orders and checks etc. Document numbers ensure the same document is not used more than once and these numbers will facilitate reconciliation, accounting and auditing. The Dominion system allows the use of ballot numbers to ensure proper accounting. This feature has been turned off in the Georgia Election system and it should be enabled. Additionally, all Absentee, Emergency and Provisional Ballots should be numbered by precinct and colored forms should be used for each distinct type of ballot. Red for provisional and yellow for emergency. Absentee Ballots can be printed on white paper. Finally, in order to be able to audit the post-election results an additional "control copy" or "audit copy" of each ballot shall be printed by the ballot marking device and placed in a locked and sealed audit bin for pickup and storage by local law enforcement in their "evidence room" until an official audit is ordered by the State Election Board.

Rule Request Number 2:

Hall County requires that each Absentee Ballot request received be matched (by precinct) to the Absentee Ballot verification envelope returned for verification of eligible voter registration and comparison of voter signature and identification. This is an excellent procedure that would allow a real Risk Limiting Audit to be performed on Absentee Ballots by precinct. All Absentee Ballots verification envelopes received shall be matched (for all information) to their corresponding Absentee Ballot application. Absentee Ballots verification envelopes received with no corresponding application shall not be counted and shall be considered provisional unless their approved application is located.

Rule Request Number 3:

Verification of every Absentee Ballot application request to its corresponding Absentee Ballot verification envelope received back shall have the name of the county election employee who approved the Absentee Ballot application and the name of the county election employee who matched and verified the Absentee Ballot verification envelope. Both the Absentee Ballot request, and Absentee Ballot Verification envelopes received back must have written approval documenting the printed name, number, signature, date and time of the employee or contractor who performed the work and approved both the application and the verification envelope.

Rule Request Number 4:

In order to comply with the provisions of the Georgia Code for the reconciliation of Absentee Ballot printing records, all issued and mailed Absentee Ballots should be logged prior to being issued and or mailed by the contractor or county election official issuing such ballots. The name, number, signature, date and time of the employee or contractor who performed the work should be included on the log sheet as well as the precinct number.

Rule Request Number 5:

Physical security of Absentee Ballots must be carefully controlled so that a real “Risk Limiting Audit” can be performed by precinct at the end the of the election cycle. Since Absentee Ballots do not contain serial numbers, they are inherently subject to both being “double-scanned” and “swapped-out.” Absentee Ballots shall not be separated from their corresponding Verification envelope until they are ready to be scanned before the election. Prior to scanning and unsealing the Absentee Ballots each unmarked ballot sealing envelope should be separately bates stamped, logged, and reconciled to their precinct intake log. These envelopes should be retained like the tear off strip on a precinct Provisional or Emergency ballot for subsequent audit and reconciliation. Upon completion of Absentee Ballot scanning each precinct’s Absentee Ballots shall be reconciled to the original intake log sheet and placed in a security sealed ballot box and locked. Seals and locks for each precinct shall be issued by the State Election Board for the estimated number of ballot boxes needed by precinct. Any unused locks and seals need to be returned to the State Election Board.

Rule Request Number 6:

Absentee Ballots received after the start of scanning and processing but before election day shall be accounted for separately in accordance with Rules 1 through 5.

Rule Request Number 7:

Require that each precinct's final Absentee Ballot election tabulation totals be checked to ensure that the results posted on the Secretary of State website are complete and accurate and they have been reconciled to the county totals for both total number of Absentee Ballots requested, received, scanned, tabulated and that the votes are posted accurately for each candidate. This will require both a date and time signature of each County Registration & Elections Director prior to certification of the election results.

I am Erik Dean Christensen Bachelor of Science in Business from Miami University, Oxford, Ohio 1982 with a double major in Accounting and Finance, former State of Georgia Licensed CPA, former Audit Manager with Arthur Andersen and former CPA and Financial Systems Consulting Manager with Deloitte. I am qualified to make these recommendations based upon my experience and training.

There are no legal authorities that support this proposal as they do not conflict with federal, State of Georgia, or State Election Board laws, rules or regulations nor the existing people, process or technology currently being used. These are basic accounting and auditing controls which any CPA or accountant should be familiar with. Tedious but not technical. These are not "unfunded mandates" and all counties in Georgia should be expected to follow these procedures in the future.

These are not partisan requests and anyone on either side of the aisle who is interested in fair play, integrity, and truth should enthusiastically support these recommendations.

Respectfully submitted,



Erik Dean Christensen
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Exhibit A
Rule Request 1.

**Rule 183-1-11.03 Ballot Numbering Required for Precinct, Absentee, Provisional and
Emergency Ballots**

- (1) Absentee Ballots shall be individually numbered with their precinct code and shall include a tear off strip with the corresponding number on both the ballot and the tear off strip. Absentee Ballots shall be white in color.
- (2) Emergency Ballots shall be individually numbered with their precinct code and shall include a tear off strip with the corresponding number on both the ballot and the tear off strip. Emergency Ballots shall be light yellow in color.
- (3) Provisional Ballots shall be individually numbered with their precinct code and shall include a tear off strip with the corresponding number on both the ballot and the tear off strip. Emergency Ballots shall be light red in color.
- (4) Precinct Level Ballots generated by the Ballot Marking Device shall be individually numbered with their precinct code and (2) copies shall be printed one to be scanned by the Dominion scanner and one to be placed in a locked and sealed “audit bin” to be picked up and stored in a locked “evidence room” of local law enforcement.
- (5) Numbering shall be done to ensure ballot secrecy and no record shall be kept that would compromise the secrecy of the ballot.

Exhibit B
Rule Request 2.

Rule 183-1-14-.15 Absentee Ballots Received Back Required to be Matched to their Absentee Ballot Application

- (1) The Verification Envelope for all Absentee Ballots received back shall be Bates stamped and the name, bates stamp number and the precinct number of the elector shall be recorded in the County Absentee Ballot Logbook.
- (2) Absentee Ballot Verification Envelopes shall be logged again, matched and paper clipped to their corresponding Absentee Ballot Application and filed by precinct with the name and Bates stamp number of the elector recorded in the Precinct Absentee Ballot Logbook.
- (3) All Absentee Ballot Verification envelope information shall be compared to the SOS information system for all information including elector name, registration number, address and signature.
- (4) Absentee Ballots Verification Envelopes received back with no corresponding application shall not be processed, shall be separately logged and shall be Priority Mailed daily to the State Election Board for investigation.

Exhibit C
Rule Request 3.

Rule 183-1-14-.16 Matching of Absentee Ballot Request and Absentee Ballot Verification Envelope Received Back Required

- (1) Matching of every Absentee Ballot Application Request to its corresponding Absentee Ballot Verification Envelope package received back shall have the name and signature of the county election employee who approved the Absentee Ballot Application and the name and signature of the county election employee who matched and verified the Absentee Ballot Verification Envelope.

Exhibit D
Rule Request 4.

Rule 183-1-14-.17 Documentation of Mailing of Absentee Ballot Packages in Response to County or SOS System Absentee Ballot Request Required

- (1) All Absentee Ballot Requests processed and mailed by outside contractors or counties shall be logged and include the name of the elector, the precinct of the elector and the name, date, and signature of the contractor or of the county election employee fulfilling the Absentee Ballot Request.

Exhibit E

Rule Request 5 (1 of 2).

Rule 183-1-14-.18 Reconciliation of Absentee Ballot Verification Envelopes, Absentee Ballot Sealing Envelopes, Scanner Counters to the County Intake Log and Precinct Intake Log

- (1) Absentee Ballot Verification Envelopes shall not be separated from their enclosed Ballot Sealing Envelopes until initial processing begins except as provided by O.C.G.A. section 21-2-386.
- (2) Upon completion of scanning of all the Absentee Ballots received prior to the initial scanning cutoff date a reconciliation shall be performed by precinct reconciling Absentee Ballot Verification Envelopes Bates stamped, received and processed to the total Bates stamped Absentee Ballot Sealing Envelopes to the individual scanner counter, to the Precinct Logs and in total to the County Log of Absentee Ballots.
- (3) Upon completion of Absentee Ballot scanning each precinct's Absentee Ballots shall be placed in a security sealed ballot box and locked. Seals and locks for each precinct shall be issued by the State Election Board for the estimated number of ballot boxes needed by precinct. Any unused locks and seals need to be returned to the State Election Board.

Exhibit F
Rule Request 6.

Rule 183-1-14-.19 Absentee Ballots Received After Initial Processing Cutoff Date to be Accounted for Separately

- (1) Absentee Ballot Verification Envelopes received after the cutoff date shall be processed and accounted for separately in accordance with Rules 183-1-14.15 to .18.

Exhibit G
Rule Request 5 (2 of 2)

Rule 183-1-14-.20 Locks and Seals Required for all Absentee Ballots and Precinct Level Ballots

- (1) All Absentee Ballots and all Precinct Ballot Marking Device Ballots processed and scanned shall be locked and sealed by precinct with Locks and Seals provided by the State Election Board.
- (2) Once sealed Ballot boxes shall not be opened by anyone except with the express written consent of the State Election Board for recount, audit, scanning or public access and examination.
- (3) Unlocked and unsealed ballot boxes opened for any reason must be separated and processed individually by precinct with video surveillance and recording at all times. In no event shall multiple precincts be unlocked and unsealed at any time unless in separate locations or locations separated by 20ft with “caution tape” separating each individual processing area.
- (4) Outside vendors engaged in scanning ballots for public access shall be ISO 9006 Certified Document Management Specialists and shall be required to video record such scanning and processing. Additionally, ballot boxes shall be weighed in and weighed out prior to and after scanning and shall be returned in the same manner as they were received.

Exhibit H
Rule Request 7

Rule 183-1-14-.20 Vote Totals to be Certified by Both the County Supervisor of Elections and the Secretary of State Prior to Certification by the Governor

- (1) After tabulation is completed all Absentee Ballot vote totals and Precinct Level vote totals published shall be reconciled, verified, and signed off on by both the County Supervisor of Elections and the Secretary of State prior to certification by the Governor.