



THE LEAGUE OF WOMEN VOTERS OF HAWAII

COMMENTS ON RULES TO BE ADOPTED

Kevin Cronin, Chief Election Officer
Office of Elections
802 Lehua Avenue
Pearl City, HI 96782

Dear Mr. Cronin,

Because the repealed and proposed rules were not ramsayered, we found it too difficult to do a thorough review especially because of the lack of time. Because auditing so so important, we focused our remarks on that section, although we did review most of the proposed rules .

In subchapter 9, Vote Disposition, under Auditing, beginning on page 172-70, (a) (2) on page 172-71, we would like to suggest that the word "may" be changed to "shall". We believe that the guidelines must be followed if we are to have faith in the auditing. (By having strict guidelines, we might build some trust in the manual audit team. From comments we have heard, the selection of the audit team members is very important. It should not be left entirely in the hands of the head of the team.)

Also in the same (a) (2), we notice that the sentence, "At least one precinct if any from the early pick-up, and at least one pick-up from the final pick-up " has been repealed. Does this refer to absentee ballots? Aren't absentee ballots audited as charged by a testifier? If so, isn't this unwise?

In (a) (3) in the same subchapter, we would like to see the word "randomly" inserted so that the sentence reads, "The manual audit team shall randomly select the voting precincts to audit.

In (a) (5) of the same subchapter, the word "official" should be added, so that the sentence reads, "Official observers may request to conduct a manual audit." (In one of the past elections, a group asked to do some manual audit. I observed them for some time, and they seemed unable to count or tally correctly and I believe they gave it up. I could be wrong, because I wasn't with them to the end.)

In (a) (7) in the same subchapter, the rule reads, "The manual audit shall be concluded when a majority of the team members so decide." Shouldn't words be added to give them guidelines on when a manual audit should be concluded, especially the requirement that 10% of the ballots be audited?

On page 174-7, the newly added section , 3-174-6, Waiver of requirement for an application for absentee voter ballot, it is not clear how these voters would receive their ballots, or how they should vote especially If an emergency situation occurs too late for the mailing of ballots.

Thank you for the opportunity to comment on some of the rules. We think that these amendments ,if you should consider adopting them, will not call for a second hearing. We cannot afford that.

Jean Aoki and JoAnn Maruoka
League of Women Voters of Hawaii