

# EXHIBIT I

**Black, Bert (OSS)**

---

**From:** Matthias Kittok <m.kittok@gmail.com>  
**Sent:** Thursday, June 7, 2018 4:49 AM  
**To:** Black, Bert (OSS)  
**Subject:** Public hearing request

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

////////////////////////////////////

Matthias Kittok  
Burnsville, Minnesota

000095

## Black, Bert (OSS)

---

**From:** Daniel Stephens <dstephenssg103@gmail.com>  
**Sent:** Wednesday, June 6, 2018 4:31 PM  
**To:** Black, Bert (OSS)  
**Subject:** Hold hearings re: proposed permanent rules relating to elections administration

Please, I request public hearings to be held regarding the new rules proposed for elections administration and Presidential nominations.

The rules as proposed disenfranchise non-affiliated voters who find party politics abhorrent.

Voters like myself vote for people on their own standing not their party's principles. I think we should also be looking out for voter privacy which would be put at risk with the methods of carrying out the enforcement of these rules.

Sincerely,  
Daniel Stephens  
Richfield, MN

000000

## Black, Bert (OSS)

---

**From:** Richard Heller <mnricks@mninter.net>  
**Sent:** Wednesday, June 6, 2018 5:31 PM  
**To:** Black, Bert (OSS)  
**Cc:** larsons@macalester.edu; mnricks@mninter.net  
**Subject:** AccessToMinnesotaProposedPermanentRulesRelatingToElectionsAdministration+PresidentialNominationPrimaryDocuments+2018 Electronic  
BalletsSubmitRequest6-6-2018(PDF's 5 attached;sent6-6-2018;HP+RRR)  
**Attachments:** proposed-rules-presidential-primary-rd-4487.pdf; signed-dual-notice.pdf; Testimony of Secretary Steve Simon Minnesota.pdf; Rick Heller March 30 2017.pdf; AccessToMinnesotaProposedPermanentRulesRelatingToElectionsAdministration+PresidentialNominationPrimaryDocuments+2018 Electronic  
BalletsSubmitRequest6-6-2018.pdf  
**Importance:** High

Wednesday June 6<sup>th</sup>,2018 3:33pm[Sent in PDF and HTML formats; Have Request Read Receipt. Thank you to those who let me know they receive this message and attachment(s)].

**Bert Black**, OSS Legal Advisor ;  
Office of the Secretary of State (OSS);  
180 State Office Building;100 Rev. Dr. Martin Luther King, Jr. Boulevard;  
Saint Paul, MN 55155; Phone: 651-201-1326; Fax: 651-215-0682;  
Email: [bert.black@state.mn.us](mailto:bert.black@state.mn.us)  
<https://www.sos.state.mn.us/about-the-office/rulemaking-data-practice/rulemaking/>

Re:  
[AccessToMinnesotaProposedPermanentRulesRelatingToElectionsAdministration+PresidentialNominationPrimaryDocuments+2018 Electronic BalletsSubmitRequest6-6-2018](#) (PDF's 5 attached;sent6-6-2018;HP+RRR)

Dear Mr. Black.

This letter is to register my concerns with access the rule regarding polling place voting (sec 8215.0300) in presidential primaries, and to request that public hearings be held on this rule. As well how the voting machines, functional access(Read out loud) the current paper ballots\*

First. documents of concerns regarding access with required software.

Named: [proposed-rules-presidential-primary-rd-4487.pdf](#) Or Online Source at <https://www.sos.state.mn.us/media/3300/proposed-rules-presidential-primary-rd-4487.pdf> [not meet what is expressed below <\*>

Named: [signed-sonar.pdf](#) (image format only; Created: 4-26-2018: Attached) or [The Statement of Need and Reasonableness](#) (SONAR) online at <https://www.sos.state.mn.us/media/3302/signed-sonar.pdf>

Named: [signed-dual-notice.pdf](#) (image format only; Created: 4-26-2018: Attached) or • [Dual Notice](#) online at <https://www.sos.state.mn.us/media/3301/signed-dual-notice.pdf>

Referring HTML or webpage where the above Three (3) PDFs posted at <https://www.sos.state.mn.us/about-the-office/rulemaking-data-practice/rulemaking/>

<\*>The above is related to this Quote... From: "Jason Kuenle"... Sent: Wednesday, April 15, 2015 12:56 PM... The drafting program developed by this office does not allow exporting pdfs with strike and underscore that is readable by JAWS and we will not be able to implement that functionality..." End quote from page 6 of 8. Online Source at <https://www.lcc.leg.mn/lcdp/meetings/03032016/Heller%20Handouts.pdf>



Next page is image of the above [proposed-rules-presidential-primary-rd-4487.pdf](#) [review [attached PDF](#)]

Page 1 of 2

Above is Meta Data Screen Shot(Ss) Text of the Proposed Rules And The Statement of Need and Reasonableness(SONAR) are **not** fully accessible<\*> with required software to access, according to Minnesota Statue 16e.03 Subd.9 ; Ss Tagged as or Quote...

File: proposed rules-presidential primary rd-4487

Title: Rule Draft rd4487;

Author: Office of the Revisor of Statutes;

[Date] Created+modified:2-20-2018...;

Application: Unknown;

Advance. PDF Producer XEP 24.444

PDF Version: 1.4(Acrobat 5.x)...End Quote. Attached. Named: [proposed-rules-presidential-primary-rd-4487.pdf](#)

Or Online Source at <https://www.sos.state.mn.us/media/3300/proposed-rules-presidential-primary-rd-4487.pdf>

Since electronic messages can get misplaced or lost or attachment(s) can Place E-mails into spam mail, have use my Computer software, to place High Priority(HP) and Request Read Reciept(RRR); Also have spoke to Bert Black about the above. Also spoke to Erik Larson to provide a full accessible PDF Have Copied Erik and self. Last.For functional reasons have attached PDF of this HTML or Email message, named:

AccessToMinnesotaProposedPermanentRulesRelatingToElectionsAdministration+PresidentialNominationPrimaryDocuments+2018 Electronic BalletsSubmitRequest6-6-2018.pdf; Request. Please post online in PDF. Same as currently required by OSS

I do expect follow up and will welcome discussion on this and access What is read out loud, independently on future Electronic ballets\*(attached named below) . I believe a proper legislative hearing a necessary action. Do thank staff at the Office of the Secretary of State for its consideration to this topic and service the State of Minnesota, provides.

RiCk Heller ; 1223 Marion street;Saint Paul, Minnesota 55117; Voice Mail:651.488.2735

Electronic address: [mnriCk@mninter.net](mailto:mnriCk@mninter.net)

Attachments: \*Testimony of Secretary Steve Simon Minnesota.pdf (image: Have request fully accessible PDF; Currently open complaint) ; \*Rick Heller March 30 2017.pdf (3-30-2017)

Cc:

Erik Larson; 700 S 2nd St Apt 31; Minneapolis MN 55401 ;Tel. 612-338-1563; Email: [larsone@macalester.edu](mailto:larsone@macalester.edu)

Self; [mnriCk@mninter.net](mailto:mnriCk@mninter.net) Page 2 of 2

 Virus-free. [www.avast.com](http://www.avast.com)



**STATE OF MINNESOTA**  
Office of Minnesota Secretary of State  
Steve Simon

April 27, 2016

Commissioner Thomas Hicks, Chair  
Commissioner Matthew Masterson  
Commissioner Christy A. McCormick  
United States Election Assistance Commission  
1335 East West Highway, Suite 4300  
Silver Spring, MD 20910

Dear Chairman Hicks and Commissioners,

Greetings and my thanks for taking testimony at today's hearing on accessible voting. While I regret that I cannot be there today, please accept this letter as testimony on this subject.

It has recently come to the attention of my Office that there are certain persons with disabilities for whom voting is not yet fully accessible. I refer to sighted persons who are, for whatever reason, unable to read. These adults who are "pre-readers" have partial accessibility to the ballot with current equipment, but there can be gaps in current technology that render it more difficult for them to understand the ballot and cast a meaningful vote.

These gaps are:

- 1) While audio programs designed to communicate the written words on ballots are already in place on assistive voting technology, those audio programs are not required by EAC guidelines to articulate and pronounce each word on the ballot as it appears on that ballot. When confronted with a word on the ballot that has not previously been programed, the audio programs spell out the word. While this is better than taking no action and while this may be sufficient for voters with certain disabilities, this is unhelpful to pre-readers, as their disability is such that they cannot spell, so spelling out the word does not convey the needed information. It would be useful if the next iteration of the VVSG or similar regulations would require that the machine read all ballot language instead of accepting an audio program that spells out any word.
- 2) Similarly, audio programs are not required to read punctuation marks on the ballot. Pre-readers have indicated to us that reading those marks would be desirable. Thus, the name of candidate Larry "Bud" Melman, would be read out as Larry Quote Bud End-quote Melman. This could also be addressed in the VVSG process. It should be noted that differently disabled persons appear to have different preferences on

99  
000090

whether punctuation should be read and so, while I am not advocating a change on this front, I wanted to relay to you the feedback that was expressed to my Office.

- 3) Finally, pre-readers have indicated to us that it would be useful for the Commission to require that all voting equipment allow for the use of external keyboards, as this is a convenience for persons in this class of voters. Pre-readers are familiar with using keyboards to translate written text into audio through their use of screen readers on computers.

Thank you for your consideration. If your technical staff has or is aware of suggestions or solutions for these issues, I would be glad to hear from them with that information.

Best regards,



Steve Simon  
Secretary of State of Minnesota

000100

Rick Heller

Dear Mr. Heller,

You asked me whether the machines certified in this state could read punctuation out loud and could read words instead of spelling them out in letters.

Our staff has reviewed the machines:

- 1) The AutoMARK machine can be programmed to both read punctuation and to read the words on the ballot in complete words, not spelling the words out. If someone were to write-in a name on the ballot, the read-back function might not work if the written-in name was not pre-programmed. The nature of write-ins being what it is, a spontaneous expression, it is possible that the name would not have been in the vocabulary of the machine. However, the voter would have had to type in the write-in name in the first place.
- 2) Ramsey County utilizes Hart InterCivic's Verity Voting System. The assistive voting technology is the VerityTouch Writer. In speaking with the county, the equipment is capable of reading punctuation in the audio output, and – with the exclusion of reading the write-in selection input by the voter, can read all words, not spelling them out. With the Verity System, the ballot instructions are "canned", while ballot information – offices, candidates, questions, etc. are recorded by a real person and used by the technology. So, it would be up to the individual election staff recording the data to read "quote unquote" etc.
- 3) Sherburne County utilizes Dominion's Democracy Suite Voting System. The assistive voting technology is the ImageCast Evolution. In speaking with Sherburne, this equipment is also capable of reading punctuation and reading all words. Sherburne does not self-program, but works with their vendor to complete the programming. In proofing the files, they can instruct the programmer to tweak language as necessary. Once again, the reading of all words does not extend to reading a voter's write-in selection. In this instance, the equipment will read back the individual letters selected by the voter, not the word they create. Dakota County also uses this model of equipment and all of the above applies to them as well, except that Dakota County self-programs their machines.

I hope this information is useful to you.

Best regards,

Bert Black  
Legal Advisor  
Office of the Secretary of State

000101



Wednesday June 6<sup>th</sup>, 2018 ;3:33pm [Sent in PDF and HTML formats; Have Request Read Receipt. Thank you to those who let me know they receive this message and attachment(s)].

**Bert Black**, OSS Legal Advisor ;

Office of the Secretary of State (OSS);  
180 State Office Building; 100 Rev. Dr. Martin Luther King, Jr. Boulevard;  
Saint Paul, MN 55155; Phone: 651-201-1326; Fax: 651-215-0682;  
Email: [bert.black@state.mn.us](mailto:bert.black@state.mn.us)

<https://www.sos.state.mn.us/about-the-office/rulemaking-data-practice/rulemaking/>

Re: [AccessToMinnesotaProposedPermanentRulesRelatingToElectionsAdministration+PresidentialNominationPrimaryDocuments+2018 Electronic BallotsSubmitRequest6-6-2018](#) (PDF's 5 attached; sent 6-6-2018; HP+RRR)

Dear Mr. Black:

This letter is to register my concerns with access the rule regarding polling place voting (sec 8215.0300) in presidential primaries, and to request that public hearings be held on this rule. As well how the voting machines, functional access (Read out loud) the current paper ballots\*

First. documents of concerns regarding access with required software.

Named: [proposed-rules-presidential-primary-rd-4487.pdf](#) Or Online Source at <https://www.sos.state.mn.us/media/3300/proposed-rules-presidential-primary-rd-4487.pdf> [not meet what is expressed below <\*>

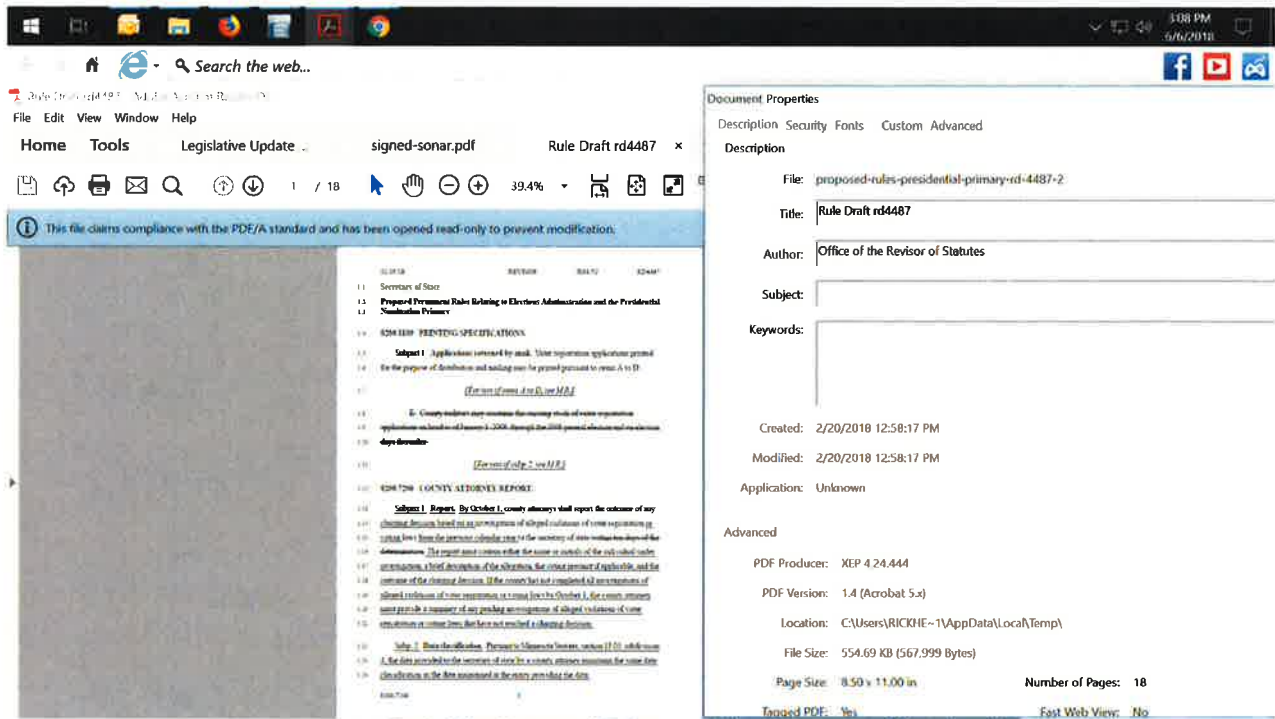
Named: [signed-sonar.pdf](#) (image format only; Created: 4-26-2018: Attached) or [The Statement of Need and Reasonableness](#) (SONAR) online at <https://www.sos.state.mn.us/media/3302/signed-sonar.pdf>

Named: [signed-dual-notice.pdf](#) (image format only; Created: 4-26-2018: Attached) or • [Dual Notice](#) online at <https://www.sos.state.mn.us/media/3301/signed-dual-notice.pdf>

Referring HTML or webpage where the above Three (3) PDFs posted at <https://www.sos.state.mn.us/about-the-office/rulemaking-data-practice/rulemaking/>

<\*>The above is related to this Quote... From: "Jason Kuenle"... Sent: Wednesday, April 15, 2015 12:56 PM... The drafting program developed by this office does not allow exporting pdfs with strike and underscore that is readable by JAWS and we will not be able to implement that functionality..." End quote from page 6 of 8. Online Source at <https://www.lcc.leg.mn/lcdp/meetings/03032016/Heller%20Handouts.pdf>

Next page is image of the above [proposed-rules-presidential-primary-rd-4487.pdf](#) [review attached PDF]



Above is Meta Data Screen Shot(Ss) Text of the Proposed Rules And The Statement of Need and Reasonableness(SONAR) are **not** fully accessible<\*> with required software to access, according to Minnesota Statute 16e.03 Subd.9 ; Ss Tagged as or Quote...

File: proposed rules-presidential primary rd-4487

Title: Rule Draft rd4487;

Author: Office of the Revisor of Statutes;

[Date] Created+modified:2-20-2018...;

Application: Unknown;

Advance. PDF Producer XEP 24.444

PDF Version: 1.4(Acrobat 5.x)... End Quote. Attached. Named: proposed-rules-presidential-primary-rd-4487.pdf

Or Online Source at <https://www.sos.state.mn.us/media/3300/proposed-rules-presidential-primary-rd-4487.pdf>

Since electronic messages can get misplaced or lost or attachment(s) can Place E-mails into spam mail, have use my Computer software, to place High Priorty(HP) and Request Read Reciept(RRR); Also have spoke to Bert Black about the above. Also spoke to Erik Larson to provide a full accessible PDF Have Copied Erik and self. Last.For functional reasons have attached PDF of this HTML or Email message, named: AccessToMinnesotaProposedPermanentRulesRelatingToElectionsAdministration+PresidentialNominationPrimaryDocuments +2018 Electronic BallotsSubmitRequest6-6-2018.pdf; Request. Please post online in PDF. Same as currently required by OSS

I do expect follow up and will welcome discussion on this and access What is read out loud, independently on future Electronic ballots\*(attached named below) . I believe a proper legislative hearing a necessary action. Do thank staff at the Office of the Secretary of State for its consideration to this topic and service the State of Minnesota, provides.

RiCk Heller ; 1223 Marion street;Saint Paul, Minnesota 55117; Voice Mail:651.488.2735

Electronic address: mnriCk@mninter.net

Attachments: \*Testimony of Secretary Steve Simon Minnesota.pdf (image; Have request fully accessible PDF. Currently open complaint) ; \*Rick Heller March 30 2017.pdf (3-30-2017)

Cc:

Erik Larson; 700 S 2nd St Apt 31; Minneapolis MN 55401 ;Tel. 612-338-1563; Email: [larsone@macalester.edu](mailto:larsone@macalester.edu)

Self; [mnriCk@mninter.net](mailto:mnriCk@mninter.net)

000103

## Black, Bert (OSS)

---

**From:** Theresa Dykoschak <dykoschak@gmail.com>  
**Sent:** Wednesday, June 6, 2018 4:22 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request for Public Hearing

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary (Revisor's ID Number R-04487) as published in the Minnesota State Register on May 7, 2018 (Volume 42, Number 45).

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning how Presidential primary voters will be required to state their support for a particular party before being allowed to vote and that will make voters' party selection public information.

Sincerely,  
Theresa Dykoschak  
Saint Paul, MN

000108

## Black, Bert (OSS)

---

**From:** Seth Kuhl-Stennes <skuhlstennes@gmail.com>  
**Sent:** Wednesday, June 6, 2018 3:17 PM  
**To:** Black, Bert (OSS)  
**Subject:** Public Hearing Request: Presidential Primary

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning how Presidential primary voters will be required to state their support for a particular party before being allowed to vote and that will make voters' party selection public information.

My name and address are:

Seth Kuhl-Stennes  
2630 18th Ave S  
Minneapolis, MN 55407

Thank you,

Seth

000105

## Black, Bert (OSS)

---

**From:** John Kruse <johnkruse43@hotmail.com>  
**Sent:** Wednesday, June 6, 2018 2:43 PM  
**To:** Black, Bert (OSS)  
**Subject:** Public comment on voting

Dear Mr. Black:

This letter is to register my objection to certain provisions included in the above-referenced rule regarding polling place voting (sec 8215.0300) in presidential primaries, and to request that public hearings be held on this rule.

I object to portions of the proposed rule regarding polling place voting (sec 8215.0300) in presidential primaries. I request that public hearings be held on this rule.

I do not want any provisions that

requires the voter to identify affiliation with a particular political party.

requires the election judge to officially document the voter's affiliation with a particular political party.

denies citizens who choose to keep their political affiliations to themselves the right to vote in the presidential primary election.

I believe that these provisions will do more harm than good. I do not believe that they address a serious problem, and the disclosure of political affiliation will lead parties to target and contact individuals in aggressive ways in order to influence their voting behavior. A person's vote should be disclosed only if and when they wish.

Get [Outlook for iOS](#)

000106

## **Black, Bert (OSS)**

---

**From:** Andrew Schmitz <as4687@hotmail.com>  
**Sent:** Wednesday, June 6, 2018 1:31 PM  
**To:** Black, Bert (OSS)  
**Subject:** Opposition to sec 8215.0300

Mr. Black,

I object to requiring Primary voters to publicly declare which party's Presidential Primary they vote in as specified in sec 8215.0300

I object to all 4 subparts of sec 8215.0300 because I do not believe Minnesotans should have to open up their political affiliations to the public in order to participate in a presidential primary.

Count this as an objection.

Andrew Schmitz  
2515 Blaisdell Ave S.  
Minneapolis, MN 55404  
as4687@hotmail.com

000107

**Black, Bert (OSS)**

---

**From:** Jennifer Prestholdt <jprestholdt@gmail.com>  
**Sent:** Tuesday, June 5, 2018 10:42 PM  
**To:** Black, Bert (OSS)  
**Subject:** request for hearing

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning how Presidential primary voters will be required to state their support for a particular party before being allowed to vote and that will make voters' party selection public information.

My name is Jennifer Prestholdt and my address is 4015 Pillsbury Avenue South, Minneapolis, MN 55409.

Thank you for your attention to this matter.

Jennifer Prestholdt

000000

**Black, Bert (OSS)**

---

**From:** Patrick D. Finnegan <patrick.d.finnegan@gmail.com>  
**Sent:** Tuesday, June 5, 2018 6:27 PM  
**To:** Black, Bert (OSS)  
**Subject:** Opposition to proposed rules in sections 8215.03-8215.05

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning how Presidential primary voters will be required to state their support for a particular party before being allowed to vote and that will make voters' party selection public information.

My name and address are:

Patrick Finnegan  
763 Orange Ave E.  
St. Paul, MN 55106

000109



**Black, Bert (OSS)**

---

**From:** Robin Phillips <phirob@aol.com>  
**Sent:** Tuesday, June 5, 2018 5:52 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request for Public Hearing

Bert Black  
Office of the Minnesota Secretary of State  
180 State Office Building  
100 Rev. Dr. Martin Luther King Jr. Blvd.  
Saint Paul, MN 55155

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary (Revisor's ID Number R-04487) as published in the Minnesota State Register on May 7, 2018 (Volume 42, Number 45).

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning the requirement that Presidential primary state their support for a particular party before being allowed to vote and that will make voters' party selection public information. I believe this requirement is unnecessary and poses potential risks to battered women and others in similarly exploitative or dependent relationships.

My name and address are:

Robin Phillips  
7906 Victoria Curve  
St Louis Park, MN 55426

Thank you for your consideration.

Sincerely,  
Robin Phillips

000110

**Black, Bert (OSS)**

---

**From:** Peter Gokey <pgokey@gmail.com>  
**Sent:** Friday, June 1, 2018 12:10 PM  
**To:** Black, Bert (OSS)  
**Subject:** Presidential nomination primary

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning how Presidential primary voters will be required to state their support for a particular party before being allowed to vote and that will make voters' party selection public information.

My name and address are:

Peter Gokey  
1939 Silver Bell Rd #107  
Eagan, MN 55122

Cordially,

Pete

000111

## **Black, Bert (OSS)**

---

**From:** Sarah Petersen <sarah.j.petersen@gmail.com>  
**Sent:** Friday, June 1, 2018 9:36 AM  
**To:** Black, Bert (OSS)  
**Subject:** Request for hearing

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning how Presidential primary voters will be required to state their support for a particular party before being allowed to vote and that will make voters' party selection public information.

My name and address are:

Sarah Petersen  
4918 37th Ave S  
Minneapolis, MN 55417

Sincerely,  
Sarah Petersen

## Black, Bert (OSS)

---

**From:** Emily Allgeyer <emileee1@yahoo.com>  
**Sent:** Thursday, May 31, 2018 5:30 PM  
**To:** Black, Bert (OSS)  
**Subject:** Primary

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning how Presidential primary voters will be required to state their support for a particular party before being allowed to vote and that will make voters' party selection public information.

My name and address are:

Emily Allgeyer  
1220 Powderhorn Terrace #35  
Minneapolis, MN 55407

000113

## Black, Bert (OSS)

---

**From:** Katie Jones <katiejonesschmitt@gmail.com>  
**Sent:** Saturday, May 26, 2018 8:37 AM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Presidential Primary Election Rules for MN - Public Hearing Request

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary (Revisor's ID Number R-04487) as published in the Minnesota State Register on May 7, 2018 (Volume 42, Number 45).

I object to provisions in the proposed rules in sections 8215.03-8215.05 concerning how Presidential primary voters will be required to state their support for a particular party before being allowed to vote and that will make voters' party selection public information.

My name and address are:

Katie Jones

2219 Bryant Ave S

Minneapolis, MN 55405

Sincerely,  
Katie Jones

000114

## Black, Bert (OSS)

---

**From:** Erik Larson <larsone@macalester.edu>  
**Sent:** Monday, May 21, 2018 11:05 AM  
**To:** Black, Bert (OSS)  
**Subject:** Objections and Request for Hearing: Elections Administration and the Presidential Nomination Primary  
**Attachments:** Comment and Request for Hearing on Proposed Rules Relating to Presidential Primary Elections.pdf

Dear Mr Black,

Please find attached a submission regarding the proposed permanent rules on elections administration.

I will send a printed copy to your address as well.

Sincerely,

Erik Larson

Erik Larson  
700 S 2<sup>nd</sup> St Apt 31  
Minneapolis MN 55401  
Tel. 612-338-1563  
Email: [larsone@macalester.edu](mailto:larsone@macalester.edu)

May 21, 2018

Bert Black  
Office of the Minnesota Secretary of State  
180 State Office Building  
100 Rev. Dr. Martin Luther King Blvd  
Saint Paul MN 55155  
Email: [bert.black@state.mn.us](mailto:bert.black@state.mn.us)

**Re: Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary**

I write both (a) to request a public hearing for the above referenced rules and (b) to submit objections to the proposed rules. The proposed rules would move Minnesota from a caucus system to a primary system for voters to express preferences among potential Presidential nominees. By moving from a party-organized to a state-organized system for expressing such preferences, the Office of the Secretary of State needs to apply a higher level of scrutiny to the proposed rules. Two provisions of the rules—the requirement that primary voters indicate agreement with the principles of the party of the candidate that they support and the provision that makes individual voters' selection of party public information—introduce problems that could deter individuals from voting and may undermine the integrity of elections. Additionally, these provisions violate the Minnesota constitution and divert public resources to subsidize major political party activities. Even if these concerns were set aside, the analysis that supports these objections points out gaps in the rules as currently drafted. The Office of the Secretary of State would need to address these gaps in any final rule.

Prior to discussing specific objections to the proposed rules, it is important to note a characteristic of the rules.

**The proposed rules entangle the State of Minnesota into the affairs of political parties, which requires the Office of the Secretary of State to subject the rules to increased scrutiny.**

By moving from a caucus-based system organized by political parties to a primary election system organized by the State of Minnesota, the proposed rules increase governmental involvement in the selection of Presidential candidates. Such greater public involvement in the candidate selection process requires the Secretary of State to subject the proposed rules to a higher level of scrutiny than would be required for a caucus system. Such scrutiny requires the Office of the Secretary of State to go beyond the statutory language directing the development of the proposed rules in order to evaluate

000116

the proposed rules with the broader purposes of the Office of the Secretary of State. The proposed rules must not interfere with individuals' right to vote and must not undermine the integrity of Minnesota's electoral system without an overwhelming public benefit. Notwithstanding the legislative action that directed the Office of the Secretary of State to develop the proposed rules, the Office must uphold the higher and foundational principles of protecting citizens' voting rights and the integrity of electoral processes.

As the other points in this submission indicate, the proposed rules fail the tests of not interfering with voting rights, not compromising the integrity of electoral processes, and of promoting public interests; therefore, the proposed rules must not be adopted as written.

The provisions in proposed rules 8215.03-8215.05 have the following deficiencies.

- 1. By requiring that voters affirm their agreement with party principles, the proposed rules compromise the integrity of elections by either disenfranchising voters or by violating the neutrality of polling places.**

The proposed rules require voters to affirm general agreement with "the principles of the party" of the candidate for whom they wish to cast a primary ballot. Requiring voters to make this affirmation before getting a ballot presumes that these principles are known to voters in advance; however, during contested primaries, voters are selecting between two candidates and may not have familiarity with the principles of a party. Any voters who do not know these principles and who seek to vote at a polling place will either have to affirm falsely that they agree with principles that they do not know or disqualify themselves from voting because they cannot affirm something that they do not know. Voters who choose the former route are vulnerable based on their lack of knowledge. Such knowledge-based exclusions from voting recall literacy tests that were used during the Reconstruction era to disenfranchise African-American voters. Voters who honestly state that they do not know the principles and, therefore, cannot affirm their general agreement with such principles will be excluded from voting. The latter outcome, again, disenfranchises some voters who would otherwise participate in the primary election.

A non-disenfranchising alternative would be to display or otherwise have available party principles within the polling place. This alternative, however, would violate prohibitions against having partisan material in polling places.

Either set of outcomes undermines the integrity of elections. As such, the Office of the Secretary of State could and should refuse to implement the portion of the law that requires voters to indicate their agreement with the principles of the party in whose primary they participate.

- 2. The proposed rules fail to articulate both the consequences of a voter falsely affirming agreement with party principles and the basis for determining what the principles of a political party are.**



The proposed rules state that a voter who fails to affirm support of party principles will not be allowed to vote in the primary election. The proposed rules, however, remain silent about what to do in the case of a voter who makes a false affirmation. Although the statutes state that the felony penalty for providing false information when signing a voting roster does not apply to the provision for indicating support of party principles, the proposed rules neither indicate that providing such false information is exempt from the felony penalty nor do they indicate the consequences for providing false information about agreement with party principles. Such a situation leaves local election officials without guidance and could result in different responses in different polling places. Related to this deficiency, the proposed rules do not indicate how one would determine the principles of any political party in the case of a challenge about whether a voter agreed with such principles.

The absence of any consequence to a false affirmation would seem to render the requirement of affirmation moot. Perhaps as a matter of formal law, that may be the case. If so, however, then that provision serves no legal or public purpose and should not be codified into rules.

Even in the absence of a formal consequence, however, the provision may impede voters' exercise of their rights to vote. The provision, as part of law, could be used by people or groups that want to intimidate certain populations in order to suppress their votes. In fact, the silence of the proposed rules on this point facilitates such attempts at suppression. It takes little imagination to move from literature used in previous elections to discourage voter turnout to see how some entities may make factually true statements to depress voter participation. (For example, one can imagine fliers or robocalls declaring something along the lines of: "If you want to vote in the Presidential primary on Tuesday, Minnesota law requires that you support the party's principles before you get a ballot. The law will also make your choice of party public information. If you do not support these principles or do not know whether you support the principles and you vote in the primary, you will be breaking the law.")

Notwithstanding the lack of stated consequences for violation of this provision, the proposed rules remain deficient in identifying how to determine what any particular party's principles are. Perhaps the most obvious source of information would be party platforms. There are, however, two issues. First, the Presidential primary seeks to choose a candidate for a national party; however, the major parties covered by the proposed rule are state parties. National and state parties can (and do) have different platforms, which may give emphasis to different principles (if any principles are listed). Second, using party platforms as a basis for determining who is eligible to vote in a given election, elevates parties' power in ways that seem contrary to the purpose of a public election. As above, if one cannot fathom that there might be a challenge to individuals voting in a particular party's Presidential primary, then this provision has no purpose in the law and, as such, the final rules could remove any reference that requires voters support the principles of the party of the candidate for whom they wish to vote.

**3. The proposed rules undermine citizens' interests in using their vote as an expression of their political views.**

Intra-party electoral contests are not simply questions about the personal qualities of competing candidates. Rather, these primary elections frequently concern policy priorities and debate about what principles a party should espouse. To hold otherwise renders party principles and values as static, a view that history forcefully contradicts. During Reconstruction, the two largest political parties in the United States approached issues of civil rights, states' autonomy, and race in manners radically different than in more recent times. Similarly, the rise of evangelical Christians as a political force coincided with a shift in the values emphasized by these two largest parties. Candidates challenging conventional party orthodoxy from inside of a party can be a potent force for political change and engagement—indeed, in many ways these candidates have been one of the main avenues of such change, as exemplified by the conservative movement of Barry Goldwater and the so-called Reagan Revolution in the Republican Party. Yet, the proposed rules undermine the ability of voters to use their vote as a voice in these political debates, requiring adherence to pre-existing principles, not to the principles advanced by the candidate for whom they are voting.

The timing of the Presidential primary election (in early March) makes this harm all the more apparent. Parties will still have caucuses prior to the primary but will not have state and national conventions finalizing platform changes until months after the primary. That situation means that any substantial attempt to alter a party's priorities will still be in process, leading to a particularly fraught situation in the case of challenges to primary voters. It is not a substantial stretch to imagine widespread challenges to primary voters' participation in the case of an insurgent candidate within a major party.

**4. The proposed rules violate the uniform oath provision for voting of the Minnesota Constitution.**

Article 7, Section 3 of the Minnesota Constitution states that “The legislature shall provide for a uniform oath or affirmation to be administered at elections and no person shall be compelled to take any other or different form of oath to entitle him to vote.” By requiring voters to affirm agreement with particular parties' principles, the proposed rules modify this oath for the Presidential primary election. On their face, the proposed rules indicate that the Presidential primary election would be treated differently than other elections. Additionally, by requiring voters to consent to the State of Minnesota publicly releasing information about the party's ballot they used in a primary, the proposed rules compel people to take an additional action to be entitled to vote. Finally, by deferring to the principles determined by different political parties to determine eligibility to vote in a particular party's primary, the oath that voters must make would differ in substantive content between voters in different parties. This final point is not refuted by the claim that each party's primary election is a separate election, because any voter may only vote for one candidate in one party in any given year.

For the avoidance of doubt, the Statement of Need and Reasonableness refers to the agreement with party principles as an oath: “Although the proposed rule provides a structure to ensure that the statutorily required acts of a voter selecting a ballot choice, reading the oath, and recording the choice on the roster, occur, the proposed rule leaves key flexibility with respect to how the voter indicates her or his ballot choice” (27).

**5. The proposed rules violate the sanctity of a secret ballot in ways that impose costs on and that could imperil the safety of voters.**

By requiring that voters agree to make public their selection of political party, the proposed rules chill political participation and increase the risk of employment discrimination and threats to public safety. Each of these negative consequences is a significant public concern that outweighs the lack of a public benefit from these particular provisions of the proposed rules.

As currently configured, voting in primary and general elections provides individuals with absolutely secret ballots: nobody has an ability to know how an individual voted in a particular election—whether knowing for whom a person voted or for whom one did not vote. By requiring disclosure of party affiliation, other people will be able to ascertain, at the very least, people for whom an individual did not vote. Furthermore, when political parties are sharply divided on issues—to cite an example from a recent election, questions on whether marriage should be limited to only unions between one man and one woman or whether it should be open to any two consenting adults—the choice of party in a Presidential primary may indicate information about a particular individual’s political beliefs. The public disclosure of a voter’s party identification may deter some individuals from voting at all. Such individuals may include employees fearful of employer retaliation, intimate partners fearful of domestic violence, or persons fearful that financial support from parents or other family members may be cut off.

Those who choose to participate despite such fears deriving from domestic or work-related power imbalances could face negative consequences. People who have violent intimate partners may be at risk of further violence if their partner discovers the party that they support. Although the Safe at Home program administered by the Secretary of State’s office seeks to protect victims of intimate partner violence, that program only protects the addresses for those residing outside of a home and would not protect those who reside with the abusive partner from having their party selection disclosed. Similarly, young adults who reside with or are economically dependent on parents might be at risk from freely expressing their views in party choice. This risk could be heightened for LGBT individuals, particularly if they are not out with family members whose political position on LGBT issues differs substantially.

Employers could also access party affiliations of employees. In recent years, some supporters of organizations involved in the debate about marriage equality kept their identities private out of fear that employers might take action against them for their position on this issue. In the future, we might see similar inter-party schisms and associated concerns emerge about peoples’ beliefs about immigration policies (on all

sides of that issue). While any employment-related consequences due to party affiliation are formally prohibited under law, employees bringing such cases typically face an uphill battle. Employees may be unaware of the motivation for employers' or supervisors' actions and may have difficulty proving impermissible motives. In addition, they must bear the costs of any negative consequences prior to and while pursuing any relief.

In short, making political party selection public information provides another means by which people in less powerful positions are further disempowered, and by which people in more powerful positions in social relations can monitor and act against individuals in less powerful positions.

**6. The proposed rules use State of Minnesota resources to subsidize major political party activities.**

The addition of a second state primary election—with separate ballots for each major party—will entail costs that governments in Minnesota will have to take on. Unlike either the current caucus system—through which parties have to gather their own information—or existing primary and general elections—that gather only residential information about voters, the proposed rules provide public information about how a particular voter identifies politically (and how that political identification changes or remains stable over time). As such, the rules will enable more detailed information-gathering about voters.

Political parties will be able to use this information as a means to contact and target voters in ways that they have not been able to do on such a wide scale. Although caucuses allow parties to collect even more information (such as telephone numbers or email addresses), they do so for a much smaller number of individuals and require that parties actually provide the resources to collect, enter, and collate such data. The major parties have, at times, failed to provide such resources, requiring volunteer-run local party units to bear the cost. Rather than devoting their own resources to improving the process for developing their own contact lists, the parties have used the public outcry about long registration lines after the 2016 caucuses to shift this work to the state by inserting a requirement that voters identify a party and that the state make such identification public. As a result, all taxpayers are forced to finance the process by which the major parties get information about who supports them.

In addition, the information will already be organized and accessible via the Office of the Secretary of State. Data entry shifts from party volunteers (who may or may not be well-trained) to civil servants. As such the collection of information about the party choices of Presidential primary voters provides a subsidy to political parties and other organizations. This private purpose for the proposal seems far more important as a motivation for the proposal, particularly given the fact that any public purpose for shifting to a Presidential primary can be gained without requiring voters to indicate support for a particular political party and for making this support public information. The Office of the Secretary of State should not allow public resources of the State of Minnesota and other levels of government to be used for such private purposes, particularly when such use impairs the more fundamental duties of protecting voting rights and election integrity.

As indicated above, the deficiencies in the proposed rules stem from the requirement that Presidential primary voters in Minnesota will have to indicate support for a particular political party and consent to the State of Minnesota making public their selection of political party.

In response to these deficiencies, the Office of the Minnesota Secretary of State should declare that it cannot implement the provisions of Minnesota Statutes, Chapter 207, Minnesota Laws 2016, Chapter 162 due to its higher obligations to uphold the principles of its office and requirements of the Minnesota Constitutions. In doing so, the proposed rules should strike any provision that requires voters to indicate that they agree with the principle of the party in whose primary they wish to vote. In addition, the proposed rules should eliminate provisions that record and make public voters' choice of party for the Presidential primary.

The alternative—mimicking existing primary election provisions in which voters may vote within one party only—will be less costly, will be less confusing for voters (who would face different procedures in Presidential and other primaries), and will better uphold the principles on which Minnesota election procedures must be built.

If the Office of the Secretary of State determines that it should not or cannot follow the course of action suggested in the preceding paragraphs, it must develop specific responses to the gaps in the rules identified above. Namely:

- How voters will be given information about the principles of parties;
- What election officials should do if they encounter a claim that a particular voter does not support a party's principles;
- What will happen to voters who falsely indicate their support of a party's principles;
- How to protect those voters who are vulnerable to harm from their choice of party being made public; and
- What additional provisions should be made for appropriate uses of voters' party selection in any public information request.

I thank the staff of the Office of the Secretary of State for its attention to this matter and service to the State of Minnesota.

Sincerely,

Erik Larson

000122

## **Black, Bert (OSS)**

---

**From:** Jody Keppers <jkeppers@keppersdesign.com>  
**Sent:** Monday, May 7, 2018 6:02 PM  
**To:** Black, Bert (OSS)  
**Subject:** Comments and Request for public hearing re: Revisor's ID Number R-04487

Bert Black  
Office of the Minnesota Secretary of State  
180 State Office Building  
100 Rev. Dr. Martin Luther King Jr. Blvd  
St. Paul, MN 55155

Re: Revisor's ID Number R-04487, Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary, etc.

Dear Mr. Black:

This letter is to register my objection to certain provisions included in the above-referenced rule regarding polling place voting (sec 8215.0300) in presidential primaries, and to request that public hearings be held on this rule.

I object to the following items included in sec 8215.0300:

- Subpart 1. This provision requires the voter to identify affiliation with a particular political party.
- Subpart 2. This provision requires the election judge to officially document the voter's affiliation with a particular political party.
- Subpart 3. This provision denies citizens who choose to keep their political affiliations to themselves the right to vote in the presidential primary election.
- Subpart 4. This is an additional documentation of a citizen's political preferences, which a citizen should be entitled to keep secret if he or she chooses.

I object to the following items included in sec 8215.0400:

- Subpart 6. This requires the county auditor or municipal clerk to enter a citizen's personal identification information and his political party identification in an official government register.
- Subpart 7. This limits the ability of the citizen to change his political affiliations.

My objections to the provisions listed above is as follows:

I believe that the provisions above will tend to the increase of corruption in Minnesota's political process.

Minnesota has a long history of open primary elections, which allow citizens to freely vote for the primary candidates of their choice in private, without fear of public disclosure, intimidation, or reprisal. I believe this tradition should be maintained. Requiring citizens to publicly declare their political affiliations in order to participate in the democratic process is simply wrong.

Secondly, the specific, personally identified political information gathered in this way will be used by the various political parties to target private citizens with annoying robocalls, requests for political contributions, and to gerrymander political districts in a way which gives unfair advantage to the majority political party. I realize that political parties already have ways of gathering this information. However, I do not want the state government to make its acquisition even easier.

If I must disclose my political affiliations in order to vote in a primary, I will not vote.

Sincerely,

Jody Keppers

620 Ridgewood Road

Duluth, MN 55804

218-409-6409

[jkeppers@keppersdesign.com](mailto:jkeppers@keppersdesign.com)

**Black, Bert (OSS)**

---

**From:** Alan Muller <amuller@dca.net>  
**Sent:** Wednesday, June 6, 2018 4:25 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request for public hearing

Office of the Secretary of State  
Bert Black, Legal Advisor  
180 State Office Building  
100 Rev. Dr. Martin Luther King, Jr. Boulevard  
Saint Paul, MN 55155  
Phone: 651-201-1326  
Fax: 651-215-0682

Regarding:

**"Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487"**

Dear Mr. Black:

I join in the calls for a public hearing in this matter. I have several concerns, including the notion that voters would be required to state a party affiliation, and further be required to state "*I am in general agreement with the principles of the party for whose candidate I intend to vote, ....*" This has obvious concerns for privacy and freedom of expression. It may further tend to institutionalize the present two "major parties" at a time when many believe our political systems need to be more open to alternatives.

I realize you have been working on this for a while. Lets have a hearing before proceeding.

Respectfully submitted,

[signed]

Alan Muller  
1110 West Avenue  
Red Wing, <M 55066

000125



**Black, Bert (OSS)**

---

**From:** LISA STEVENS <lisatroys@comcast.net>  
**Sent:** Wednesday, June 6, 2018 4:14 PM  
**To:** Black, Bert (OSS)  
**Subject:** Public hearing for Minn. R. 8200.7200

Mr. Black,

I am writing to request a public hearing on rulemaking for Minn. R. 8200.7200I. I strongly object to any requirement of voters in a Presidential primary election to state whether they belong to the DFL or Republican Party, and whether they agree with their party's principles.

**Lisa A. Stevens**  
1207 Bellows Street  
West St. Paul, MN

000126

**Black, Bert (OSS)**

---

**From:** Deb Wagner <debwagner7@me.com>  
**Sent:** Wednesday, June 6, 2018 4:02 PM  
**To:** Black, Bert (OSS)  
**Subject:** Requesting public hearing for Minn.R. 8200.7200

Dear Mr. Black,  
I am requesting a public hearing for Minn.R. 8200.7200.  
Deborah Wagner  
3636 Fox Tail Trail NW  
Prior Lake, MN. 55372

My comment: no one there gets to tell me that I would have to declare which party I am voting for in a Presidential primary and to agree to party principles or not be able to vote? That's not a democracy, folks!

Sent from my iPhone

000127

## Black, Bert (OSS)

---

**From:** Carol A. Overland <overland@legalectric.org>  
**Sent:** Wednesday, June 6, 2018 3:45 PM  
**To:** Black, Bert (OSS)  
**Subject:** SoS Rulemaking - Presidential Primary and declaration of party

Dear Mr. Black -

I am writing regarding the rulemaking, and specifically, I object to the requirement that a person wanting to vote identify as belonging to one part or another, documentation of that identification, and prohibition of voting of someone chooses not to identify a party.

At this time, I request that a public hearing be held in several locations across Minnesota for the people to weigh in.

Thank you for your consideration,

Carol A. Overland

Red Wing, MN

--

"Our lives begin to end the day we become silent about the things that matter." Dr. Martin Luther King, Jr.

Carol A. Overland  
Attorney at Law  
Legalelectric - Overland Law Office  
1110 West Avenue  
Red Wing, MN 55066

612-227-8638

overland@legalectric.org

www.legalectric.org  
www.nocapx2020.info  
www.not-so-great-northern-transmission-line.org

---  
This email has been checked for viruses by Avast antivirus software.  
<https://www.avast.com/antivirus>

8200

**Black, Bert (OSS)**

---

**From:** Aaron Klemz <klemzaa@gmail.com>  
**Sent:** Wednesday, June 6, 2018 3:35 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request for Hearings on Presidential Nominating Primary Rules

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

In particular, I am concerned about rules that would require voters to identify their party before casting a ballot.

My name and address are:

Aaron Klemz  
1359 Hillcrest Dr NE  
Fridley, MN 55432

Thank you.

Sincerely,

Aaron Klemz

--

---

Aaron Klemz  
(763) 788-0282  
Twitter: @aaronklemz  
Facebook: [facebook.com/aaron.klemz](https://www.facebook.com/aaron.klemz)  
Instagram: @aaronklemz

---

000129

## **Black, Bert (OSS)**

---

**From:** todd elfstrom <toddelfstrom@hotmail.com>  
**Sent:** Wednesday, June 6, 2018 12:41 PM  
**To:** Black, Bert (OSS)  
**Subject:** Presidential primary rules hearing needed!

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary. Rules that require voters to support the principles of are ridiculous, I vote for the best individual running not for my favorite "team", as should every voter! The second best candidate may or may not belong to the same party. In addition voting is a private matter and to ensure a functioning democracy without undue influenct, or even blackmail, all votes must remain private!

Thank you,

Todd Elfstrom  
8389 Bear Ave  
Monticello Mn 55362

000130

## Black, Bert (OSS)

---

**From:** Post service Canada <dbirkholz@mail.com>  
**Sent:** Wednesday, June 6, 2018 12:20 PM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Rule changes

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Daniel Birkholz  
1900 Thomas Ave N #304  
Minneapolis, MN 55411

Further, I'd like to object that how I may or may vote in a primary would be included in a public record. My voting choices should remain private except to those whom I choose to disclose.

Thank you for your attention,  
Daniel Birkholz

1210005

## **Black, Bert (OSS)**

---

**From:** Brown, Roman <brownr1@augzburg.edu>  
**Sent:** Wednesday, June 6, 2018 12:11 PM  
**To:** Black, Bert (OSS)  
**Subject:** Changing rules for primaries?

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

If this move is uncontested it will lock Green, Libertarian and Independent candidates out of the primary process.

This move is not only unwise it is unethical. The right to vote, regardless of political affiliation has been at the core of our democracy for over two hundred years.

You will ended up hurting your own voter base if you isolate the independent voters still willing to vote Democrat. Consider this very carefully. If you force Greens and Libertarians to go down this road we will not reverse the process when our disenfranchised voters take control of your legislature.

My is Roman Brown. My address is 1009 park avenue Minneapolis 55404.

As an independent voter, I can assure you this could be the costliest mistake you make for your party if you fail to comply.

Push the hearing forward now please.

000132

**Black, Bert (OSS)**

---

**From:** Amy Bergquist <berg0512@umn.edu>  
**Sent:** Thursday, May 31, 2018 2:26 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request for hearing on new election rules

Dear Mr. Black,

I request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary, as published in the state register on 7 May 2018.

I object the the provisions in the rules that require voters to state their support for a party before obtaining a ballot, and the provisions that make party affiliation public. At a minimum, there should be an opportunity for voters to opt out of the public disclosure of their choice of party. Otherwise, workers could face retaliation from employers, and victims of intimate partner violence could be at risk of further abuse.

I hope you will consider having a hearing on these proposed rules.

Sincerely,

Amy Bergquist  
700 S 2nd St #31  
Minneapolis, MN 55401



## Black, Bert (OSS)

---

**From:** Lindstrom, Ann <alindstrom@lmc.org>  
**Sent:** Wednesday, June 6, 2018 3:31 PM  
**To:** Black, Bert (OSS)  
**Subject:** LMC Comments on Proposed Rules  
**Attachments:** LMC Comments\_Proposed Rules\_OSS\_June 2018.pdf

Hi Bert,

Please see attached from the League of Minnesota Cities. Let me know if you need additional information from us.

Thank you,

Ann

**Ann Lindstrom, MPP** | Intergovernmental Relations Representative  
**League of Minnesota Cities**

145 University Ave. West | St. Paul, MN 55103

O: 651.281.1261 | C: 612.327.6898

[alindstrom@lmc.org](mailto:alindstrom@lmc.org) | [www.lmc.org](http://www.lmc.org)

*Connecting & Innovating since 1913*

 [Facebook](#)  [Twitter](#)  [Blog](#)

000126



CONNECTING & INNOVATING  
SINCE 1913

June 6, 2018

VIA EMAIL: [Bert.Black@state.mn.us](mailto:Bert.Black@state.mn.us)

Mr. Bert Black  
Office of the Minnesota Secretary of State  
180 State Office Building  
100 Rev. Dr. Martin Luther King Jr. Blvd.  
St. Paul, Minnesota 55155

**Re: Comments of League of Minnesota Cities on Proposed Promulgation and Amendment of Rules Governing Presidential Nomination Primary Election Administration, Voter Registration, Petitions, Absentee Ballots, Voting System Testing, Recounts, Election Judge Training Program, and Ballot Preparation, *Minnesota Rules*, 8200, 8205, 8210, 8220, 8230, 8240, and 8250; Revisor ID R-04487**

Mr. Black,

On behalf of the over 800 member cities of the League of Minnesota Cities, thank you for the opportunity to comment on the proposed promulgation and amendment of various rules governing elections administration and the presidential nomination primary election.

We reviewed the proposed changes internally and also requested comments and feedback from our members. We did so by publishing an article in our weekly e-newsletter to our general membership and by reaching out directly to members of our elections task force, comprised specifically of elections administrators. Based on this, the League is supportive of the proposed changes and would like to thank you for your work to clarify many of the presidential nomination primary procedures.

Thank you again for the work that you do and partnering with elections administrators across the state. Please do not hesitate to contact me directly at 651-281-1261 or [alindstrom@lmc.org](mailto:alindstrom@lmc.org) with any questions.

Sincerely,

Ann Lindstrom  
Intergovernmental Representative  
League of Minnesota Cities

**Black, Bert (OSS)**

---

**From:** Megan Kuhl-Stennes <mckuhl@gmail.com>  
**Sent:** Wednesday, June 6, 2018 11:56 AM  
**To:** Black, Bert (OSS)  
**Subject:** Request for public hearing

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary. I am concerned about many issues, especially related to privacy and party affiliation.

My name and address are:

Megan Kuhl-Stennes  
2630 18th Ave S  
Minneapolis, MN 55407  
612-202-8760

Please let me know if/when this public hearing is to be held.

Thank you,  
Megan Kuhl-Stennes

000126

**Black, Bert (OSS)**

---

**From:** Robert Small <rsmall@mcaa-mn.org>  
**Sent:** Wednesday, May 30, 2018 11:03 AM  
**To:** Black, Bert (OSS)  
**Subject:** Comments of the Minnesota County Attorneys Association to the proposed rule 8200.7200  
**Attachments:** Secretary of State re Proposed Rules.doc

Mr. Black:

Attached please find the comments of the Minnesota County Attorneys Association to the proposed rule 8200.7200.

000127

---

T H E M I N N E S O T A  
C O U N T Y A T T O R N E Y S  
A S S O C I A T I O N

---

May 30, 2018

Office of the Secretary of State  
Bert Black, Legal Advisor  
180 State Office Building  
100 Rev. Dr. Martin Luther King, Jr. Boulevard  
St. Paul, MN 55155

Re: Comment to Proposed Rule 8200.7200

Dear Mr. Black:

On behalf of the Minnesota County Attorneys Association, I am submitting the following comment which relates to the required use of names or initials of the subjects of criminal investigations and precinct numbers to be included in the report to the Secretary of State.

The Minnesota Government Data Practices Act treats most data in active criminal investigations as non-public data. A rule cannot supersede a statute. In virtually every instance of alleged voter fraud, the subject of the investigation has not been arrested (thus her/his name is not public as "arrest data"). Moreover, a strong case can also be made that using the initials of the subject combined with the precinct number and "a brief description" of the alleged fraud when taken in totality, can also sufficiently identify the subject. Thus in those circumstances, including the names of the subjects in the report to the Secretary of State could arguably create a violation of the Minnesota Government Data Practices Act.

We assume the provision of the proposed rule requiring the Secretary of State to maintain the data in the same data classification as a County Attorney Office is an attempt to address our concern. But to our knowledge we are unaware of any circumstance when a County Attorney Office would provide information that could arguably identify the subject of an active criminal investigation to a third party who is not actively involved in the investigation either as an employee of the investigative agency conducting the investigation or of a different law enforcement agency or County Attorney Office who are investigating the subject for a similar crime in another jurisdiction. In other words, we are only aware of the sharing of this type of non-public data when it directly relates to an articulable law enforcement purpose. We understand that the Secretary of State is requiring this data for a reporting purpose, not a law enforcement purpose. Our concern is whether the rule making authority authorizes a County Attorney Office to share this otherwise non-public data with the Secretary of State such that

100 Empire Drive, Suite 200 • St. Paul, MN 55103 • 651-641-1600 • Fax: 651-641-1666

[www.mcaa-mn.org](http://www.mcaa-mn.org)

000128

the County Attorney Office will be fully indemnified and held harmless should a data request be made to the Secretary of State for release of the data.

As an alternative, we think the objective of the proposed rule can be met by the reports to the Secretary of State simply providing "a brief description of the allegation" referenced by the County Attorney Office's internal case reference number, without requiring any information that can explicitly or implicitly, identify the subject of the investigation (e.g. do not require the names or initials of the subjects of the investigation or the precinct numbers where the alleged fraud occurred).

Thank you for considering our comments.

Sincerely,



Robert M. Small  
Executive Director  
Minnesota County Attorneys Association

## Black, Bert (OSS)

---

**From:** Byard, Guthrie <guthriebyard@arcminnesota.org>  
**Sent:** Friday, May 25, 2018 2:25 PM  
**To:** Black, Bert (OSS)  
**Subject:** proposed rules related to elections administration

Hi, Bert--

While Arc is not submitting formal comments on the proposed rules related to elections administration, we do have a few requests regarding timelines and notifications.

- In the case that there is no hearing, Arc asks to be notified when the rules are submitted to the office and would like a copy of the rules
- In the case that there is a hearing, Arc asks to be notified of the date that the ALJ report will be available, the date that the agency adopts the rules, and the date the rules are filed with the Secretary of State's office.

All notifications can be sent to me. And if there's a different contact who should be informed of these requests, please let me know.

Best,

**Guthrie J. Byard, MPH (he/him)**  
Advocate

**The Arc Minnesota**  
2446 University Ave W., Ste. 110  
St. Paul, MN 55114  
Direct: 952-915-3663  
[arcminnesota.org](http://arcminnesota.org)



Together, we are now [The Arc Minnesota](http://The Arc Minnesota). On January 1, 2018, chapters of The Arc across Minnesota merged as one organization to provide essential services to more people with intellectual and developmental disabilities and their families.

000140

## **Black, Bert (OSS)**

---

**From:** Carol T <c.j.t@earthlink.net>  
**Sent:** Thursday, May 10, 2018 8:43 PM  
**To:** Black, Bert (OSS)  
**Subject:** Rule Requiring Voters to Reveal Political Party Allegiance During Elections

**I strongly object to this proposed change in election law.** I assume the law is attempting to target anyone who votes in the primary of another party for the purpose of choosing a more unelectable candidate (which I doubt happens all that often). However, the voting booth is supposed to be private. It's not the business of the rest of the world what party I identify with! I have always been proud of Minnesota in that they don't require a voter to choose a party affiliation - or to vote a straight party ticket.

In the last presidential election, there was a candidate from what is not my chosen party whom I may have voted for if he had been nominated. That did not mean that I supported that party's overall platform.

In addition to an unnecessary intrusion on our privacy, this law would just make voting even more cumbersome, and make politics even more tribal.

Carol Turnbull  
Woodbury, MN

000141



**Black, Bert (OSS)**

---

**From:** ab.stone@yahoo.com  
**Sent:** Wednesday, May 9, 2018 12:27 PM  
**To:** Black, Bert (OSS)  
**Subject:** Opposition to Proposed Rule 8215.0300 Subp. 2-4

Mr. Black,

I wish to register my opposition to Proposed Rule 8215.0300 Subp. 2-4, relating to the recording of political party affiliation as part of the voting process for the 2020 presidential election and beyond.

This Rule may endanger the privacy of Minnesota citizens by revealing, to the public, information that reveals by inference a Minnesota citizen's political opinions. Such information, if made public, may cause significant harm to Minnesota citizens. For this reason, I believe that the Proposed Rule is contrary to the public interest and should not be adopted.

If collected, the State of Minnesota should classify and treat data relating to political preferences and opinions as "Confidential Data on Individuals" as defined in Minnesota Statute §13.01 Subd. 3.C.

Respectfully,

Adam Stone  
Minnesota Resident

100112

## Black, Bert (OSS)

---

**From:** State, Secretary (OSS)  
**Sent:** Wednesday, May 9, 2018 10:53 AM  
**To:** Black, Bert (OSS)  
**Subject:** FW: Changes to Primary voting in Presidential elections

Hi Bert,

Please the comment below.

Thank you,



### Yonis Musa

*Senior Administrative Assistant*

**Office of Minnesota Secretary of State, Steve Simon**

180 State Office Building, 100 Rev. Dr. Martin Luther King Jr. Blvd.

St. Paul, MN 55155

Ph: 651-201-1324

Website: <http://www.sos.state.mn.us>

---

**From:** Rausch, Catherine (PSC/FOH) (CTR) <Catherine.Rausch@foh.hhs.gov>  
**Sent:** Tuesday, May 8, 2018 1:28 PM  
**To:** State, Secretary (OSS) <secretary.state@state.mn.us>  
**Subject:** Changes to Primary voting in Presidential elections

I strenuously object to having to declare that I agree with the views of the party for whom I want to vote for President. It's none of your business if I am voting for a party platform or a particular candidate. I have lived in other states that utilize primary voting, and never have I had to declare allegiance to a party of philosophy.

I am willing to prove that I am who I say I am, to have my voter registration verified, but the act of actually voting for a certain candidate in this Country is secret and sacred.

**Catherine L. Rausch**  
**4521 South Mallard Trail**  
**Eagan, MN 55122**

000143

## Black, Bert (OSS)

---

**From:** State, Secretary (OSS)  
**Sent:** Wednesday, May 9, 2018 10:50 AM  
**To:** Black, Bert (OSS)  
**Subject:** FW: Comment and Objection to New Primary Election Law

Hi Bert,

Please see the comment below.

Thank you,



### Yonis Musa

*Senior Administrative Assistant*

**Office of Minnesota Secretary of State, Steve Simon**

180 State Office Building, 100 Rev. Dr. Martin Luther King Jr. Blvd.

St. Paul, MN 55155

Ph: 651-201-1324

Website: <http://www.sos.state.mn.us>

**From:** AJ Lee <ajlee@mtu.edu>

**Sent:** Wednesday, May 9, 2018 10:08 AM

**To:** elections@co.ramsey.mn.us; State, Secretary (OSS) <secretary.state@state.mn.us>; rep.carlos.mariani@house.mn; sen.sandra.pappas@senate.mn

**Subject:** Comment and Objection to New Primary Election Law

Mr. Secretary and My Elected Representatives,

I would like to formally register complaint and comments on the new legislation to be implemented for presidential primary elections. I find the new law requiring an oath to the principles of a party to be a deterrent in the election process. I believe it is counter to the mission of direct democracy, and I potentially unconstitutional in its procedure. To pass this without review would be a miscarriage of government, given this procedure is at the heart of the American civic system.

Political party are private groups who gather as a coalition to achieve government. They are not a function of the state as written in the constitution. To enforce membership, even in statement of support alone, means independent voters are not only disfranchised but actively discriminated against in the election process. To counter this the argument, Political parties state it is party business to determine their candidates, and members only should decide. For this I do agree - but in that case a private organization is using public funds to conduct their business. I question the legality of this. So if my money is being used to run an election I expect to participate.

If the parties believe this to be an appropriate process, then please provide a refund mechanism for independent voters who are turned away from participating.

I do expect follow up and will welcome discussion on this. I believe a proper legislative hearing a necessary action.

--

AJ Lee

St Paul, MN

55102 USA

[ajlee@mtu.edu](mailto:ajlee@mtu.edu)

[+1 763 710 1758](tel:+17637101758)

000145

## **Black, Bert (OSS)**

---

**From:** Russell Reilly <russ@russreilly.com>  
**Sent:** Wednesday, May 9, 2018 10:40 AM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary

I want to notify you that there must be a public hearing on these proposed rule.

As these rules stand they force independent voters further out of the political process.

I thought your office is supposed to increase participation.

Please notify me if the hearing will occur.

Thanks,

RUSS

000146

## Black, Bert (OSS)

---

**From:** Vonbargen Sgt Jared L <jared.vonbargen@usmc.mil>  
**Sent:** Tuesday, May 8, 2018 8:35 AM  
**To:** Black, Bert (OSS)  
**Subject:** Primary Rules 2020

Good Morning Bert,

MPR covered the new primary rules about registering for a party to be able to vote. Having been away for the last 15 years, and voting with other guys from other states, I liked the freedom in MN to vote for who I wanted, and thought it odd that other states made people register by party.

I'd like to see 2 exceptions for that rule:

1. for 'in person' registration, in case, for us 'swing voters,' a candidate I like comes along and makes me want to jump parties. It's making extra work for my, to re-register, and the county auditor to change me in their system.
2. allow absentee voting to vote for either party, as it's hard enough to vote absentee, much less to ensure you're registered for the right party, especially if the previous issue happens. I'm someone is fighting in Syria, he's only minimally aware of the voting deadlines back home, much less changing party affiliations, if that were to be something that they wanted to pursue.

Sgt VonBargen  
Squadron Maintenance Management Chief  
612-713-4816  
MWSS-471  
Minneapolis, MN

000107

**Black, Bert (OSS)**

---

**From:** Srinivas Seshadri <srinivesh@hotmail.com>  
**Sent:** Wednesday, June 6, 2018 4:30 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request to hold Public hearing

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

Seshadri Srinivas

173 McKnight Road N

St. Paul, MN 55119

000148

## **Black, Bert (OSS)**

---

**From:** Paula Vollmar-heywood <pollyvh51@gmail.com>  
**Sent:** Wednesday, June 6, 2018 3:59 PM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Permanent Rules

Dear Mr. Black,

I'm writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Paula C. Vollmar-Heywood  
2627 S. 8th St., Apt. B  
Mpls., MN 55454

Thank you,

Paula

00109



**Black, Bert (OSS)**

---

**From:** piriud1@mchsi.com  
**Sent:** Wednesday, June 6, 2018 3:48 PM  
**To:** Black, Bert (OSS)  
**Subject:** public hearings

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Don Pirius  
16 N Summit St  
Gilbert, MN 55741

000150

## **Black, Bert (OSS)**

---

**From:** sean@tcq.net  
**Sent:** Wednesday, June 6, 2018 3:36 PM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Rule for Sec. 8215.0400

Dear Mr. Black,

I am writing to request a public hearing on the proposed rules.

Sincerely,  
Shawne FitzGerald  
1508 East 37th Street  
Minneapolis, MN 55407

000151

**Black, Bert (OSS)**

---

**From:** Carol Mellom <cmellom@gmail.com>  
**Sent:** Wednesday, June 6, 2018 3:10 PM  
**To:** Black, Bert (OSS)  
**Subject:** Presidential primary

Dear Mr.Black

I am writing to request that the office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and Presidential Nomination Primary.

My name is Carol Mellom

854 Stryker Ave.  
St.Paul,Mn 55107  
Thank you

000152

**Black, Bert (OSS)**

---

**From:** Rev. Kevin M. Gregorius, Esq. <kgregorius@gmail.com>  
**Sent:** Wednesday, June 6, 2018 3:08 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request for Full Public Hearing on Election Rules

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name is Kevin Gregorius.

My address is 4575 Washburn Avenue North, Minneapolis MN 55412.

000153

**Black, Bert (OSS)**

---

**From:** Amy Lawler <amylawler@gmail.com>  
**Sent:** Wednesday, June 6, 2018 3:08 PM  
**To:** Black, Bert (OSS)  
**Subject:** Re: Requesting a public hearing on rules to move to a Presidential Primary in MN

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Amy Lawler  
4520 35th Ave S  
Minneapolis, MN 55406

Thank you,  
Amy Lawler

000154

**Black, Bert (OSS)**

---

**From:** Jono Cowgill <jono.cowgill@gmail.com>  
**Sent:** Wednesday, June 6, 2018 3:05 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request for public hearing regarding new election admin rules

Hello Mr. Black,

I request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name is Jono Cowgill and I live at 1910 1st St S in Minneapolis, 55404.

Thank you.

## **Black, Bert (OSS)**

---

**From:** Annette Rondano <annette@greatbackrubs.com>  
**Sent:** Wednesday, June 6, 2018 2:00 PM  
**To:** Black, Bert (OSS)  
**Subject:** Please hold public hearings

Mr. Black ~ I am writing to request that the Office of the MN Secretary of State hold public hearings on the proposed permanent rules relating to elections administration and the presidential nomination primary.

I'm thrilled that this process is moving forward, but think it's imperative that all political parties have the opportunity to weigh in with their comments and concerns.

My address: 4217 45th Avenue South, Minneapolis, MN 55406

Thank you. ~ Annette Rondano

Annette Rondano, Owner  
The Great Metropolitan Backrub, Co  
~ The Backrub Stores  
~ The Highland Backrub  
[annette@greatbackrubs.com](mailto:annette@greatbackrubs.com)  
612-221-0131

[www.my.doterra.com/backruboilsonline](http://www.my.doterra.com/backruboilsonline)

000156

## Black, Bert (OSS)

---

**From:** Paul Busch <pobusch@msn.com>  
**Sent:** Wednesday, June 6, 2018 1:32 PM  
**To:** Black, Bert (OSS)  
**Subject:** Hearing request on Elections Administrations rule changes

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules relating to Elections Administrations and the Presidential Nomination Primary.

My name is Paul Busch and I reside at:  
1523 Laurel Avenue  
Saint Paul, MN 55104

Thank you for your attention on this most important matter.

Sincerely,  
Paul Busch

**Paul Busch, Earth Citizen**  
**Owner/Director/Teacher**  
**The St. Paul Yoga Center (first class is free for local residents!)**  
1162 Selby Avenue  
St. Paul, MN 55104  
**651-644-7141**  
<http://www.stpaulyogacenter.com/>  
cell: 651-646-4656

000157



**Black, Bert (OSS)**

---

**From:** Ryan Johnson <awpmech@gmail.com>  
**Sent:** Wednesday, June 6, 2018 1:07 PM  
**To:** Black, Bert (OSS)  
**Subject:** public hearing request

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID

Thank you,

Ryan Mark Johnson  
Maple Plain, MN

000158

**Black, Bert (OSS)**

---

**From:** ski2thegoddess@aol.com  
**Sent:** Wednesday, June 6, 2018 12:58 PM  
**To:** Black, Bert (OSS)  
**Subject:** Presidential primary?

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Cynthia Ellingson  
6029 Dupont Ave So  
Minneapolis, MN 55419

000159

## **Black, Bert (OSS)**

---

**From:** Joseph Amrhein <amrheinj@augsborg.edu>  
**Sent:** Wednesday, June 6, 2018 12:44 PM  
**To:** Black, Bert (OSS)  
**Subject:** Public Hearing Request

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules relating to Elections Administrations and the Presidential Nomination Primary.

My name is Joseph Amrhein and I reside at:  
30 W. 22nd Street  
Minneapolis, MN 55404

Thank you for your attention on this most important matter.

Sincerely,

Joseph Amrhein

“I never found the companion that was so companionable as solitude.”  
—Henry David Thoreau

57000460

**Black, Bert (OSS)**

---

**From:** Max Holdhusen <maxwellholdhusen@gmail.com>  
**Sent:** Wednesday, June 6, 2018 12:38 PM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Permanent Rules on Elections

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Maxwell Holdhusen  
2112 Dupont Ave S. #1  
Minneapolis, MN 55405

1000151

**Black, Bert (OSS)**

---

**From:** bill withers <t081281@yahoo.com>  
**Sent:** Wednesday, June 6, 2018 12:27 PM  
**To:** Black, Bert (OSS)  
**Subject:** Primary Election Rules

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

////////////////////////////////////

Tim Thomas  
900 Edgewater Drive  
Shoreview, MN

000162

**Black, Bert (OSS)**

---

**From:** Chris Watts <wattsinator88@gmail.com>  
**Sent:** Wednesday, June 6, 2018 12:20 PM  
**To:** Black, Bert (OSS)  
**Subject:** Requesting public hearing

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Thank you,

Christopher Watts  
Mankato, MN

000163

**Black, Bert (OSS)**

---

**From:** andrew.mcneal.us <andrew.mcneal.us@gmail.com>  
**Sent:** Wednesday, June 6, 2018 12:11 PM  
**To:** Black, Bert (OSS)  
**Subject:** Request for public hearing

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

////////////////////////////////////  
Andrew McNeal  
St Paul, MN

000164

**Black, Bert (OSS)**

---

**From:** Nancy Morales <nmorales@gmail.com>  
**Sent:** Wednesday, June 6, 2018 12:09 PM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Permanent Rules Relating to Elections Admin

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:  
Nancy Morales  
2190 Rosewood Lane S  
Roseville, MN 55113

Thank you for your consideration.

000165



## Black, Bert (OSS)

---

**From:** Brian M. <choirbri@yahoo.com>  
**Sent:** Wednesday, June 6, 2018 11:57 AM  
**To:** Black, Bert (OSS)  
**Subject:** Public Hearing Request

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Brian G. Mueller  
755 39th Ave  
Winona, MN 55987

**Black, Bert (OSS)**

---

**From:** Steve Hoehne <shoehne@arvig.net>  
**Sent:** Wednesday, June 6, 2018 11:56 AM  
**To:** Black, Bert (OSS)  
**Subject:** Public Hearing re: Proposed Rules Governing Presidential Nominating Primary, etc.

Dear Mr. Black, Office of the Secretary of State I am requesting in writing, per your official website, a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Tawnia Hoehne  
Frazee, Minnesota

## **Black, Bert (OSS)**

---

**From:** Kristina Mattson <kristinagac@hotmail.com>  
**Sent:** Wednesday, June 6, 2018 11:55 AM  
**To:** Black, Bert (OSS)  
**Subject:** Hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Kristina Mattson  
501 Warwick Street  
Saint Paul , MN  
55116

Sincerely,  
Kristina Mattson  
651-249-8587

000168

**Black, Bert (OSS)**

---

**From:** Brandon Long <blongstpaul@gmail.com>  
**Sent:** Wednesday, June 6, 2018 11:49 AM  
**To:** Black, Bert (OSS)  
**Subject:** Public Hearing Request Re: Presidential Primaries

Dear Mr. Black,

I am writing to request that the Office of the Minnesota Secretary of State hold public hearings on the Proposed Permanent Rules Relating to Elections Administration and the Presidential Nomination Primary.

My name and address are:

Brandon Long  
1189 Cleveland Ave S  
Saint Paul, MN 55116

1.00169

**Black, Bert (OSS)**

---

**From:** Steve Mayne <stevemayne53@gmail.com>  
**Sent:** Wednesday, June 6, 2018 11:37 AM  
**To:** Black, Bert (OSS)  
**Subject:** Public Hearing Request

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Steven Mayne  
Apple Valley, MN

000170

**Black, Bert (OSS)**

---

**From:** Cody <codyhollidaymn@gmail.com>  
**Sent:** Wednesday, June 6, 2018 11:25 AM  
**To:** Black, Bert (OSS)  
**Subject:** Requesting a public hearing

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Cody Holliday  
St. Paul, MN

000171

**Black, Bert (OSS)**

---

**From:** Diane J Rhody <dj\_rhody@yahoo.com>  
**Sent:** Wednesday, June 6, 2018 11:10 AM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Rules Governing Presidential Nominating Rules

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Diane J Rhody RDN LD CPT  
Minneapolis, MN

000172

**Black, Bert (OSS)**

---

**From:** Kurt Eiden <keiden@lakedalelink.net>  
**Sent:** Wednesday, June 6, 2018 11:10 AM  
**To:** Black, Bert (OSS)  
**Subject:** Request for public hearing

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

////////////////////////////////////  
Kurt Eiden  
Maple Lake , MN

000173



**Black, Bert (OSS)**

---

**From:** Chris Marguth <crmarguth@gmail.com>  
**Sent:** Wednesday, June 6, 2018 11:00 AM  
**To:** Black, Bert (OSS)  
**Subject:** Requested Hearing

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Christian Marguth  
Coon Rapids, MN

000174

**Black, Bert (OSS)**

---

**From:** jake lane <lane0168@gmail.com>  
**Sent:** Wednesday, June 6, 2018 10:47 AM  
**To:** Black, Bert (OSS)  
**Subject:** Public hearing request

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

////////////////////////////////////

Jacob Lane  
Little Canada, MN

000175

**Black, Bert (OSS)**

---

**From:** Christine Lundy <mrsclundy@gmail.com>  
**Sent:** Wednesday, June 6, 2018 10:47 AM  
**To:** Black, Bert (OSS)  
**Subject:** Proposed Rules

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Regards,

Christine Lundy  
Maple Grove, MN

000176

## Black, Bert (OSS)

---

**From:** Mark Davis <mdavis104@yahoo.com>  
**Sent:** Wednesday, June 6, 2018 10:10 AM  
**To:** Black, Bert (OSS)  
**Subject:** Public hearing request

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Mark Davis  
Brooklyn Park, MN

[Sent from Yahoo Mail for iPhone](#)

20180606

**Black, Bert (OSS)**

---

**From:** Lee Eiden <lee.eiden@icloud.com>  
**Sent:** Wednesday, June 6, 2018 10:04 AM  
**To:** Black, Bert (OSS)  
**Subject:** Request for public hearing

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing per your official website a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Leo Eiden  
Ramsey, MN

Sent from my iPhone

000178

**Black, Bert (OSS)**

---

**From:** Jeremy Miller <miller.jeremyd@gmail.com>  
**Sent:** Wednesday, June 6, 2018 10:02 AM  
**To:** Black, Bert (OSS)  
**Subject:** Nominating Primary and Amendment of Rules Governing Election Administration

Dear Mr. Black, Office of the Secretary of State

I am requesting in writing, per your official website, a public hearing regarding the Proposed Rules Governing Presidential Nominating Primary and Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Election Judge Training Program, and Ballot Preparation, Minnesota Rules, 8200, 8205, 8210, 8240, and 8250; OAH Docket Number: 71-9019-34528, Revisor ID R-04487

Regards,  
Jeremy Miller  
Rochester, MN

000179

**Black, Bert (OSS)**

---

**From:** Cam Gordon <camgordon333@msn.com>  
**Sent:** Friday, June 1, 2018 3:37 PM  
**To:** Black, Bert (OSS)  
**Subject:** Presidential Primary Rules

Dear Bert,

I hope you are doing well.

I request a public hearing on the proposed rules establishing a Presidential Primary in MN.

Thanks

Cam Gordon  
914 Franklin Terrace  
Minneapolis, MN 55406

000180