



STATE OF MINNESOTA
Office of Minnesota Secretary of State
Steve Simon

VIA EFILING

October 6, 2025

The Honorable Judge Eric L. Lipman
Administrative Law Judge
Court of Administrative Hearings

**In the Matter of the Proposed Permanent Rules Relating to Elections
Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440**

Dear Judge Lipman:

In advance of the October 10, 2025 rulemaking hearing in the above-entitled matter, the Office of the Minnesota Secretary of State (OSS) submits for filing the following documents:

1. The request for comments published in the State Register;
2. The proposed rules, with a certificate of approval as to form by the Revisor;
3. The statement of need and reasonableness (SONAR);
4. A certificate showing the SONAR was sent to the Legislative Reference Library;
5. The dual notice as mailed and as published in the State Register;
6. The certificate of mailing the notice of hearing;
7. The certificate of accuracy of the mailing list;
8. The certificate of additional notice;
9. Written comments on the proposed rule;
10. The certificate of notice to legislators;
11. The certificate of giving notice to hearing requesters; and
12. The certificate of giving notice to Minnesota Management and Budget.

The documents are submitted pursuant to the Minnesota Rules, part 1400.2220. If you have any questions or concerns, please contact me at justin.erickson@state.mn.us or 651-201-6895.

Respectfully,

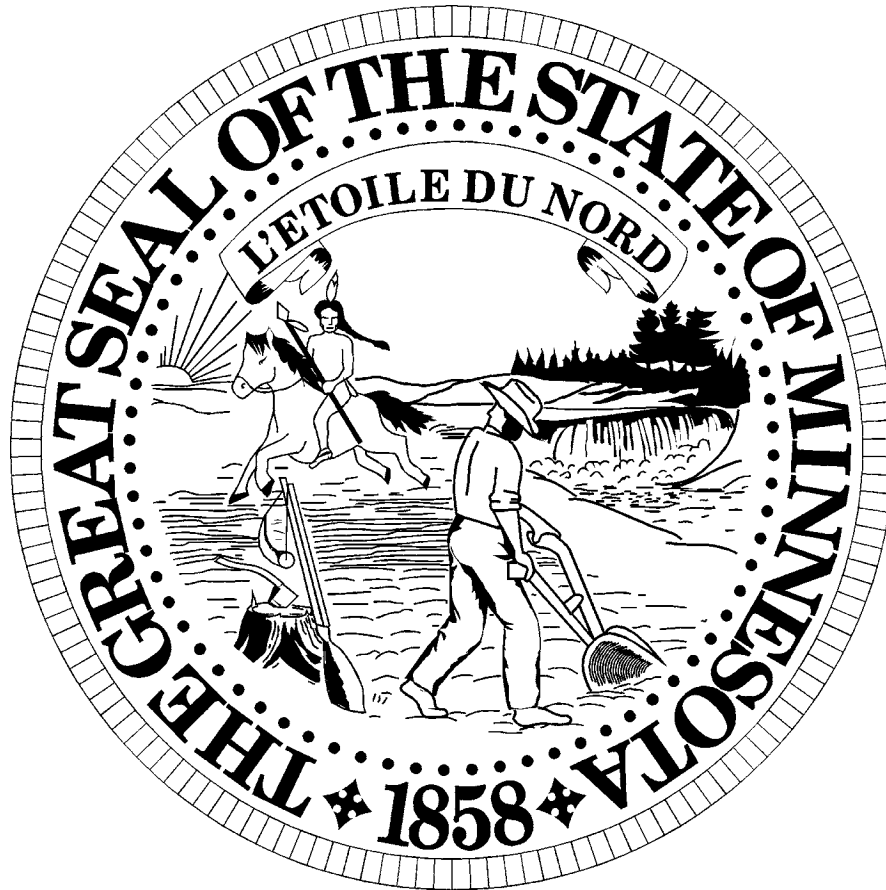


Justin R. Erickson
General Counsel

Request for Comments

Minnesota State Register

Published every Monday (Tuesday when Monday is a holiday)



**Proposed, Adopted, Emergency, Expedited, Withdrawn, Vetoed Rules;
Executive Orders; Appointments; Commissioners' Orders; Revenue Notices;
Official Notices; State Grants & Loans; State Contracts; Non-State Public Bids,
Contracts and Grants**

**Monday 21 August 2023
Volume 48, Number 8
Pages 171 - 186**

Official Notices

Agency contact person. Written comments, questions, requests to receive rule drafts, and requests for more information on these possible rules should be directed to Kim Parker, General Counsel, Kim.Parker@state.mn.us, 651-201-7170, or the Department of Public Safety, 445 Minnesota Street, St. Paul, MN 55101.

Alternative format. Upon request, the information in this notice can be made available in an alternative format such as large print, braille, or audio. To make a request, please contact Kim Parker.

Note: Comments received in response to this notice will not necessarily be included in the formal rulemaking record submitted to the administrative law judge if a proceeding to adopt rules is started.

The department must submit to the judge only those written comments received in response to the rules after they are formally proposed in a notice of intent to adopt published in the *State Register*; if you submit comments before the notice is published and you want to ensure that the administrative law judge reviews your comments, you should resubmit your comments after the rules are formally proposed.

Dated: August 21, 2023

Bob Jacobson, Commissioner
Department of Public Safety

Minnesota Office of the Secretary of State REQUEST FOR COMMENTS for the Possible Amendment of Rules Governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Presidential Nomination Primary, Voting System Testing, Optical Scan Voting Systems, Recounts, Election Judge Training Program, Ballot Preparation and Redistricting, *Minnesota Rules*, 8200, 8205, 8210, 8215, 8220, 8230, 8235, 8240, 8250 and 8255; Revisor's ID Number R-04824

Subject of Rules. The Office of the Minnesota Secretary of State requests comments on its possible amendment to rules governing Election Administration, Voter Registration, Petitions, Absentee Ballots, Presidential Nomination Primary, Voting System Testing, Optical Scan Voting Systems, Recounts, Election Judge Training Program, Ballot Preparation, and Redistricting. The Office is considering rules and rule amendments including but not limited to amendments to reflect statutory changes made in recent years as well as: affecting voter registration generally, including but not limited to the manner, format, content of and procedures relating to voter registration materials, verification procedures, and records; petitions generally, including but not limited to the manner, format, content and procedures relating to petitions; absentee and mail balloting generally, including but not limited to the manner, format, content of and procedures for absentee and mail balloting materials and records; presidential nomination primary administration generally, including but not limited to ballot preparation, roster preparation and administration, absentee and mail voting administration, election judge training, and local expense reimbursement; voting system testing generally, including but not limited to the scope and standards for voting system examination and testing, the examination and certification of voting systems, the preparation and testing of election programs, the security of voting systems and programs; optical scan voting systems generally, including but not limited to procedures for central count optical scan voting systems and precinct-count optical scan voting systems; ballot marking devices generally, including but not limited to text and audio instructions for voters; election judge training programs generally, including but not limited to training requirements and standards, training methods and programs, courses and materials, records, plans, certifications, feedback and schedules; and ballot preparation generally, including but not limited to the format and layout of partisan and nonpartisan ballots, ballots for electronic voting systems, and redistricting, as well as other elections-related rule provisions that may arise but only as time permits, as well as changes suggested by the recipients of this request for comments, or the general public.

Persons Affected. The rules and possible amendments to rules would likely affect voters, local election officials and election staff, political parties, candidates, election equipment vendors and manufacturers, private and county attorneys, and election advocacy groups.

Statutory Authority. *Minnesota Statutes*, sections 201.022, 201.061, 201.071, 201.091, 201.221, 203B.04, 203B.08, 203B.09, 203B.125, 203B.14, 204B.071, 204B.14, 204B.19, 204B.25, 204B.45, 204C.361, 204D.08, 204D.11, 205.17, 205A.08, 206.57, 206.81, 206.82, 206.84, 206.882, 207A.11, 211C.03, 211C.04 and 211C.06, authorize the Office: to adopt rules for the administration of the statewide voter registrations system; to define documentation sufficient for election day registration; to define the form of the voter registration application and the voter certificate of eligibility; to provide for public information list or statewide information system requests; governing the general administration of voter registration and the format and use of polling place rosters; governing absentee ballot procedures for persons permanently unable to go to the polling place due to illness or disability; providing procedures for the accurate and timely return of absentee ballots; establishing methods and procedures for issuing ballot cards and related absentee ballot forms; establishing the form, content and type size and style for the printing of blank applications for absentee ballots, absentee voter lists, return envelopes, certificates of eligibility to vote by absentee ballot, ballot envelopes and directions for casting an absentee ballot; providing for the reconciliation of voters and ballot cards; governing the manner in which petitions required for any election are circulated, signed, filed and inspected; establishing programs for the training of county auditors, local election officials and election judges; providing for the conduct of mail balloting, including instructions to voters, procedures for the challenge of voters, public observation of the counting of ballots, and procedures for the proper handling and safeguarding of ballots to ensure the integrity of the election; adopting uniform recount procedures; providing for the format and preparation of the state primary ballot and the state general election ballot as well as municipal and school district ballots; providing for the examination and use of electronic voting systems; providing for the experimental use of electronic voting systems; specifying test procedures for electronic voting systems and electronic ballot markers; providing for procedures to instruct election judges and voters in the use of electronic voting systems and electronic ballot markers, as well as standard ballot formats for electronic voting systems; governing the rotation of candidate names; governing the presidential nomination primary; and prescribing the manner and form of a recall petition as well as the evaluation of the number and eligibility of signers of a recall petition.

Public Comment. Interested persons or groups may submit comments or information on these possible rules changes and suggestions in writing until 4:30 p.m. on Friday, October 20, 2023. The Office of the Secretary of State also requests comments about the “cumulative effect of the rule with other federal and state regulations,” as required by *Minnesota Statutes*, section 14.131(8), and whether the cost of complying with the rule in the first year after the rule takes effect will exceed \$25,000 for one small city or business, as required by *Minnesota Statutes*, section 14.127. The Office of the Secretary of State also requests commenters detail the nature or causes of recent compliance cost increases, if any are noted.

Rules Drafts. The Office of the Secretary of State has not yet drafted the possible rule amendments, and is seeking feedback on the goals and objectives that should inform the drafting of these rule amendments from interested persons and stakeholders. The Office of the Secretary of State does not anticipate that a draft of the rules will be available before the publication of the proposed rules.

Agency Contact Person. Written comments, questions, and requests for more information on these possible rules should be directed to: Nicole Freeman, Government Relations Director at the Office of the Secretary of State, 180 State Office Building, 100 Rev. Dr. Martin Luther King Jr. Blvd., Saint Paul, MN 55155; Phone 651-201-1334; Fax 651-296-3073; Email Nicole.Freeman@state.mn.us TTY users may call the Office of Secretary of State at 711.

Alternative Format. Upon request, this information can be made available in an alternative format, such as large print, braille, or audio. To make such a request, please contact the agency contact person at the address or telephone number listed above.

NOTE: Comments received in response to this notice will not necessarily be included in the formal rulemaking record submitted to the administrative law judge if and when a proceeding to adopt rules is started. The agency is required to submit to the judge only those written comments received in response to the rules after they are proposed. If you submitted comments during the development of the rules and you want to ensure that the Administrative Law Judge reviews the comments, you should resubmit the comments after the rules are formally proposed.

Dated: August 14, 2023

Steve Simon
Secretary of State

Proposed Rules

Office of the Revisor of Statutes

Administrative Rules



TITLE: Proposed Permanent Rules Relating to Election Administration

AGENCY: Secretary of State

REVISOR ID: R-4824

MINNESOTA RULES: Chapters 8200, 8210, 8215, 8220, 8230, 8235, 8240, and 8250

The attached rules are approved for
publication in the State Register

A handwritten signature in blue ink, appearing to read "Jason F. Kuenle", is written over a horizontal line.

Jason F. Kuenle
Assistant Deputy Revisor

1.1 **Secretary of State**

1.2 **Proposed Permanent Rules Relating to Election Administration**

1.3 **8200.3000 REGISTRATION IN WRONG COUNTY.**

1.4 A county auditor must accept a voter registration application delivered to the county
1.5 auditor, even if the voter registration application includes a residential address outside of
1.6 the county. When a county auditor receives a voter registration application ~~from a person~~
1.7 ~~whose~~ with a residential address is in another county, the auditor shall within two working
1.8 days forward the application to the auditor of the proper county if the county can be
1.9 ascertained.

1.10 **8200.3550 NOTICE OF CHALLENGE REMOVAL.**

1.11 The county auditor shall mail a notice indicating the person's name, address, precinct,
1.12 and polling place to any registered voter whose ~~civil rights have~~ right to vote has been
1.13 restored after ~~a felony conviction~~ the person is no longer incarcerated; who has been removed
1.14 from under a guardianship of the person under which the person did not retain the right to
1.15 vote; or who has been restored to capacity by the court after being ineligible to vote. The
1.16 notice must require that it be returned if not deliverable.

1.17 **8200.5100 REGISTRATION AT PRECINCT ONLY.**

1.18 Subpart 1. **Procedure; proof.** Any person otherwise qualified but not registered to
1.19 vote in the precinct in which the person resides may register to vote on election day at the
1.20 polling place of the precinct in which the person resides. To register on election day, a
1.21 person must complete and sign the registration application and provide proof of residence.
1.22 A person may prove residence on election day only:

1.23 [For text of items A to D, see Minnesota Rules]

1.24 E. by having an employee employed by and working in a residential facility located
1.25 in the precinct, who knows that the applicant is a resident of that residential facility, vouch

for that facility resident, and sign the oath in part 8200.9939, in the presence of the election judge.

~~"Residential facility" means transitional housing as defined in Minnesota Statutes, section 256E.33, subdivision 1; a supervised living facility licensed by the commissioner of health under Minnesota Statutes, section 144.50, subdivision 6; a nursing home as defined in Minnesota Statutes, section 144A.01, subdivision 5; a residence registered with the commissioner of health as a housing with services establishment as defined in Minnesota Statutes, section 144D.01, subdivision 4; a veterans home operated by the board of directors of the Minnesota Veterans Homes under Minnesota Statutes, chapter 198; a residence licensed by the commissioner of human services to provide a residential program as defined in Minnesota Statutes, section 245A.02, subdivision 14; a residential facility for persons with a developmental disability licensed by the commissioner of human services under Minnesota Statutes, section 252.28; housing support as defined in Minnesota Statutes, section 256I.03, subdivision 3; a shelter for battered women as defined in Minnesota Statutes, section 611A.37, subdivision 4; or a supervised publicly or privately operated shelter or dwelling designed to provide temporary living accommodations for the homeless is defined in Minnesota Statutes, section 201.061.~~

To be eligible to sign the oath, the employee must show proof of employment at the residential facility, which may be accomplished by methods including:

[For text of subitems (1) to (3), see Minnesota Rules]

[For text of subpart 2, see Minnesota Rules]

Subp. 3. [See repealer.]

Subp. 4. [Repealed, 38 SR 1368]

Subp. 5. **Update.** A registered voter may change the information on record on election day at the polling place of the precinct in which the voter now resides. To do so, the voter

must submit a voter registration application meeting all the requirements of Minnesota Statutes, section 201.071, and provide proof of residence as described in subparts 1 or 2. Subparts 1 and 2 and parts 8200.5200 to 8200.5500 apply to any update of a registration under this subpart.

8200.9115 FORM OF POLLING PLACE ROSTERS.

Subpart 1. **General form of roster.** The polling place rosters must contain the following items from the statewide registration system: voter's name, voter's address, voter's date of birth, voter's school district number, and a line on which the voter's signature can be written. When a voter's registration has been challenged pursuant to Minnesota Statutes, section 201.121, subdivision 2, an indicator noting the voter's challenged status must be printed on the line or included in the field provided for the voter's signature. A similar indicator must be printed on the line or included in the field provided for the voter's signature to note a voter's guardianship or ~~felony~~ incarceration status, if any.

The following certification must be included at the top of each page of the polling place roster: "I swear or affirm that I am at least 18 years of age and a citizen of the United States; that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota for 20 days immediately preceding ~~this~~ the election and maintain residence at the address or location shown; that I am not under guardianship of the person in which the court order revokes my right to vote, have not been found by a court to be legally incompetent to vote, and that I have the right to vote because, if convicted of a felony, ~~my felony sentence has expired (been completed) or I have been discharged from my sentence~~ I am not currently incarcerated for that conviction; and that I am registered and will be voting only in this precinct. I understand that giving false information is a felony punishable by not more than five years imprisonment and a fine of not more than \$10,000, or both."

4.1 For polling places using electronic rosters, the same certification must be included as
4.2 part of the voter signature certificate pursuant to Minnesota Statutes, section 201.225,
4.3 subdivision 2, clause (9).

4.4 One or more pages in a printed polling place roster must be provided for use by voters
4.5 who register to vote in the polling place on election day. An election day registrant shall
4.6 fill in the registrant's name, address, and date of birth and shall sign the roster on the line
4.7 provided.

4.8 The polling place roster must also contain the name of the precinct and, for paper
4.9 rosters, must include a page number. In addition, each line provided for a voter's signature
4.10 must be consecutively numbered on each page.

4.11 The roster may also include additional material as permitted under Minnesota Statutes,
4.12 section 201.221, subdivision 3.

4.13 *[For text of subparts 2 and 3, see Minnesota Rules]*

4.14 **8200.9300 MAINTAINING CERTAIN VOTER REGISTRATION RECORDS;**
4.15 **SECURITY.**

4.16 *[For text of subparts 1 to 9, see Minnesota Rules]*

4.17 Subp. 10. **Voter's receipt.** The election judges shall determine the number of ballots
4.18 to be counted by ~~adding the number of return envelopes from accepted absentee ballots to~~
4.19 comparing the number of ballots with the number of voter's receipts issued pursuant to
4.20 Minnesota Statutes, section 204C.10, subdivision 2, ~~or to the number of names signed on~~
4.21 ~~the polling place roster.~~ The election jurisdiction may require that the election judges number
4.22 or initial each voter's receipt as it is issued.

4.23 *[For text of subpart 11, see Minnesota Rules]*

5.1 **8200.9310 TREATMENT OF VOTER REGISTRATION APPLICATIONS.**

5.2 *[For text of subparts 1 to 3, see Minnesota Rules]*

5.3 Subp. 4. [Repealed, 31 SR 350]

5.4 Subp. 5. **Updates.**

5.5 A. A voter with an active voter registration may change the information on record
5.6 by submitting a voter registration application meeting all the requirements ~~for a new voter~~
5.7 ~~registration application~~ of Minnesota Statutes, section 201.071, subdivision 1. Parts
5.8 8200.2600 to 8200.4000 shall apply to the processing of any update submitted through this
5.9 subpart.

5.10 *[For text of item B, see Minnesota Rules]*

5.11 **8200.9940 PRECINCT LIST OF PERSONS VOUCHING FOR VOTER RESIDENCE**
5.12 **ON ELECTION DAY AND NUMBER OF PERSONS VOUCHER FOR.**

5.13 Subpart 1. Required information. Information regarding persons vouching for voter
5.14 residence on election day must be tracked according to the form and instructions in subpart
5.15 2. Counties, municipalities, or school districts authorized to use electronic rosters pursuant
5.16 to Minnesota Statutes, section 201.225, may instead collect this information electronically.

5.17 Subp. 2. Instructions and form.

5.18 Instructions and Form:

5.19 Precinct List of Persons Vouching

5.20 City/Town _____ Ward _____ Precinct _____

- 5.21 • To be completed by election judges.
- 5.22 • Use to track the number of people vouched for by each voucher.
- 5.23 • Cross out the next number each time that person vouches for a registrant.
- 5.24 • Employees of residential facilities may vouch for an unlimited number of facility
- 5.25 residents who are registering to vote at the facility's address. Otherwise, vouchers
- 5.26 may only vouch for a maximum of eight registrants.

6.1	Voucher's Name	Voucher's Voter	Number Vouched for
6.2		ID No.	on Election Day
6.3	Example: John Doe	1234567	1 2 3 4 5 6 7 8
6.4	1		1 2 3 4 5 6 7 8
6.5	2		1 2 3 4 5 6 7 8
6.6	3		1 2 3 4 5 6 7 8
6.7	4		1 2 3 4 5 6 7 8
6.8	5		1 2 3 4 5 6 7 8
6.9	6		1 2 3 4 5 6 7 8
6.10	7		1 2 3 4 5 6 7 8
6.11	8		1 2 3 4 5 6 7 8
6.12	9		1 2 3 4 5 6 7 8
6.13	10		1 2 3 4 5 6 7 8
6.14	11		1 2 3 4 5 6 7 8
6.15	12		1 2 3 4 5 6 7 8
6.16	13		1 2 3 4 5 6 7 8
6.17	14		1 2 3 4 5 6 7 8
6.18	15		1 2 3 4 5 6 7 8
6.19	16		1 2 3 4 5 6 7 8
6.20	17		1 2 3 4 5 6 7 8
6.21	18		1 2 3 4 5 6 7 8
6.22	19		1 2 3 4 5 6 7 8
6.23	20		1 2 3 4 5 6 7 8
6.24	21		1 2 3 4 5 6 7 8
6.25	22		1 2 3 4 5 6 7 8
6.26	23		1 2 3 4 5 6 7 8
6.27	24		1 2 3 4 5 6 7 8
6.28	25		1 2 3 4 5 6 7 8
6.29	26		1 2 3 4 5 6 7 8

7.1 27 1 2 3 4 5 6 7 8
 7.2 28 1 2 3 4 5 6 7 8
 7.3 29 1 2 3 4 5 6 7 8
 7.4 30 1 2 3 4 5 6 7 8

7.5 Certified by the Head Election Judge of the Precinct:

7.6 _____

7.7 Printed Name Signature Date

7.8 **8200.9950 CHALLENGES TO VOTER REGISTRATION, SPECIFIED BY PART**
 7.9 **8200.7100.**

7.10 To the Auditor of _____ County

7.11 County Courthouse

7.12 _____ (County Seat), Minnesota

7.13 I, _____ (Name of person making challenge), am a registered

7.14 voter in _____ County, Minnesota. I reside at

7.15 _____ (Street or Route No.) _____ (City or

7.16 Township).

7.17 I challenge the registration of _____ (Name of challenged voter)

7.18 whose registration lists his or her residence as _____ (Street or

7.19 Route No.) _____ (City or Township).

7.20 The grounds for my challenge are based on the following facts and circumstances: ____

7.21 _____

7.22 _____

7.23 (attach additional sheets of signed statement, including supporting documents, affidavits,

7.24 or other evidence, if necessary).

8.1 This challenge is based on my personal knowledge, and I have exercised due diligence
8.2 to personally verify the facts and circumstances establishing the basis for the challenge.

8.3 ____/____/____

8.4 (Date)

(Signature of Challenger)

8.5 **8210.0100 PRESIDENTIAL ABSENTEE BALLOTS.**

8.6 *[For text of subpart 1, see Minnesota Rules]*

8.7 Subp. 2. **Form of certificate of eligibility.**

8.8 Signature Envelope

8.9 **Voter must complete this section**

please print clearly

8.10 **Voter name**_____

8.11 **Voter former address in MN**_____

8.12 _____ MN

8.13 **ID number**

8.14 (MN driver's license #,

8.15 MN ID card #,

8.16 or last four digits of SSN) _____

8.17 ○ I do not have a MN-issued driver's license, MN-issued ID card,
8.18 or Social Security number.

8.19 Current phone number (optional):

8.20 _____

8.21 Current email address (optional):

8.22 _____

8.23 I certify that I

8.24 • will be at least 18 years old on election day;

8.25 • am a citizen of the United States;

- 9.1 • am not under guardianship of the person in which the court order revokes my right
- 9.2 to vote;
- 9.3 • have not been found by a court to be legally incompetent to vote;
- 9.4 • ~~have the right to vote because, if convicted of a felony, my felony sentence has~~
- 9.5 ~~expired (been completed) or I have been discharged from my sentence;~~
- 9.6 • am not currently incarcerated for a conviction of a felony offense;
- 9.7 • previously lived in Minnesota at the address printed above;
- 9.8 • moved from Minnesota to another state within 30 days of the election; and
- 9.9 • am not eligible to vote in the state in which I now live.

9.10 **Voter Signature X** _____

9.11 **8210.0200 PERMANENT ABSENTEE BALLOT APPLICATION VOTER.**

9.12 *[For text of subparts 1 to 3, see Minnesota Rules]*

9.13 Subp. 4. **Permanent ~~application~~ absentee voter.** An eligible voter under Minnesota
 9.14 Statutes, section 203B.04, subdivision 5, may apply to the county auditor or municipal clerk
 9.15 using a form provided by the secretary of state to automatically receive an absentee ballot
 9.16 ~~application~~ for each election in which the voter is eligible to vote. ~~The county auditor shall~~
 9.17 ~~make available the form provided by the secretary of state for this purpose. The voter shall~~
 9.18 ~~complete the form and return it to the county auditor or municipal clerk. A municipal clerk~~
 9.19 ~~who receives a completed application shall forward it to the county auditor immediately.~~
 9.20 The voter's permanent ~~application~~ absentee voter status must be indicated and permanently
 9.21 maintained on the voter's registration record on the statewide voter registration system.

9.22 The county auditor shall maintain a list of voters who have applied to automatically
 9.23 receive an absentee ballot ~~application~~. ~~At least 60 days before each election, the county~~
 9.24 ~~auditor or municipal clerk shall send an absentee ballot application to each person on the~~
 9.25 ~~list who is eligible to vote in the election.~~

9.26 *[For text of subparts 4a to 6, see Minnesota Rules]*

8210.0225 APPLICATIONS FROM CHALLENGED VOTERS.

A voter registration application must be sent with the ballot to any challenged voter ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes, section 201.061, subdivision 1a, or 201.121,~~ who applies for an absentee ballot. The absentee ballot process must be administered as if the voter was not registered to vote.

8210.0500 INSTRUCTIONS TO ABSENT VOTER.

Subpart 1. **Required instructions.** Instructions to the absent voter shall be transmitted with the absentee ballot materials ~~sent or delivered to the absent voter.~~ The instructions shall be in the form in subparts 2, 3, or 4 or 5 and 6. The instruction headings with numbers must be in no smaller than 12-point type and the rest of the text must be in no smaller than 10-point type, except for the confidentiality notice, which may be in 7-point type. The instructions must explain how to correctly mark the ballot. The instructions must inform the voter of the effect of casting multiple votes for an office and, in the case of a partisan primary, the effect of voting for candidates of more than one party. The instructions must include information on how to correct a ballot before it is cast and counted, including instructions on how to request a replacement ballot if the voter is unable to change the ballot or correct an error. The instructions must include a graphic depiction of the absentee ballot materials and how they are to be completed and assembled by the voter. The instructions must also include a privacy notice that complies with Minnesota Statutes, section 13.04. The secretary of state must provide each county auditor with sample instructions with graphic depictions. Jurisdictions may provide additional instructions to voters, provided the instructions comply with the typeface requirements of this part.

Subp. 2. Instructions for registered voters.**Instructions****How to vote by absentee ballot**

11.1 **for registered voters**

11.2 **You will need:**

- 11.3 • Ballot*
- 11.4 • Tan ballot envelope*
- 11.5 • White signature envelope*
- 11.6 • Larger white return envelope*
- 11.7 • Pen with black ink
- 11.8 • Your ID number
- 11.9 Minnesota driver's license number, Minnesota ID card number, or the last four digits
- 11.10 of your Social Security number.
- 11.11 *See below if you do not have any of these numbers.*
- 11.12 • Witness
- 11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
- 11.14 on or before the day of the election and who is a citizen of the United States,
- 11.15 *including your spouse or relative,*
- 11.16 *or a notary public,*
- 11.17 *or a person with the authority to administer oaths*
- 11.18 * If any of these items are missing, please contact your local election official.

11.19 **1 Vote!**

- 11.20 • Show your witness your blank ballot, then mark your votes in private.
- 11.21 • Follow the instructions on the ballot.
- 11.22 • Do not write your name or ID number anywhere on the ballot.
- 11.23 • Do not vote for more candidates than allowed. *If you do, your votes for that office*
- 11.24 *will not count.*

11.25 ***See the other side if you make a mistake on your ballot.***

11.26 **2 Seal your ballot in the tan ballot envelope**

12.1 • Carefully refold the ballot the way it was delivered to you.

12.2 • Do not write on this envelope.

12.3 **3 Put the tan ballot envelope into the white signature envelope**

12.4 **4 Fill out the white signature envelope completely**

12.5 • If there is no label, print your name and Minnesota address.

12.6 • Print your Minnesota driver's license number, Minnesota ID card number, or the
12.7 last four digits of your Social Security number.

12.8 **Be sure to use one of the same numbers that you provided on your absentee**
12.9 **ballot application. You may provide both numbers if you are unsure what you**
12.10 **provided on your absentee ballot application.**

12.11 *If you do not have any of these numbers, check the box.*

12.12 • Read and sign the oath.

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~
12.14 ~~(not a P. O. Box)~~, in the box at the top of the witness section and sign their name in
12.15 the box at the bottom of the witness section.

12.16 *If your witness is an official or notary, they must print their title ~~instead of an~~*
12.17 *address.*

12.18 *Notaries must also affix their stamp.*

12.19 • Seal the envelope.

12.20 **5 Put the signature envelope into the larger white return envelope to protect your**
12.21 **private information from view**

12.22 • Seal the envelope.

12.23 **6 Return your ballot by Election Day to the address on the return envelope**

12.24 **Ballots may not be delivered to your polling place**

12.25 You have three options:

12.26 • Send it so it arrives by Election Day, using U.S. mail or a package delivery service,

12.27 • Deliver it in person before election day or by ~~3:00~~ 5:00 p.m. on Election Day, or

- 13.1 • Ask someone to deliver it by ~~3:00~~ 5:00 p.m. on Election Day.

13.2 *This person cannot deliver more than 3 ballots.*

13.3 **See the other side for special instructions if you have a disability.**

13.4 **To check the status of your absentee ballot, visit ~~www.mnvotes.org~~ mnvotes.gov.**

13.5 **Correcting a mistake**

- 13.6 • If time allows, ask for a new ballot from your election office. Contact your election
13.7 office at [email] or [phone number], or

- 13.8 • Completely cross out the name of the candidate you accidentally marked and then
13.9 mark your ballot for the candidate you prefer (do not initial your corrections).

13.10 **If you have a disability:**

13.11 If you have a disability or cannot mark your ballot, your witness may assist you by marking
13.12 your ballot at your direction, assembling the materials, and filling out the forms for you.

13.13 When signing the envelope, Minnesota law says you may:

- 13.14 • Sign the ~~return~~ signature envelope yourself, or
13.15 • Make your mark, or
13.16 • Ask your witness to sign for you in your presence. (Have the witness sign their own
13.17 name as well.)
13.18 • If you have adopted the use of a signature stamp for all purposes of signature, you
13.19 may use your signature stamp or ask your witness to use your signature stamp in
13.20 your presence.

13.21 Minnesota Statutes, section 645.44, subdivision 14

- 13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

14.1 Please note: Voting is not covered by power of attorney. A person with power of attorney
14.2 may only sign for you in your presence, as outlined above.

14.3 Subp. 3. **Instructions for ~~unregistered~~ nonregistered voters.**

14.4 **Instructions**

14.5 **How to vote by absentee ballot**

14.6 **You will need:**

- 14.7 • Ballot*
- 14.8 • Tan ballot envelope*
- 14.9 • Voter registration application*
- 14.10 • White signature envelope*
- 14.11 • Larger white return envelope*
- 14.12 • Pen with black ink
- 14.13 • Minnesota driver's license with your address
- 14.14 *or other authorized proof of where you live.*
- 14.15 *See other side for a list of options*
- 14.16 • Your ID number
- 14.17 Minnesota driver's license number, Minnesota ID card number, or the last four digits
- 14.18 of your Social Security number.
- 14.19 *See below if you do not have any of these numbers.*
- 14.20 • Witness
- 14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
- 14.22 on or before the day of the election and who is a citizen of the United States,
- 14.23 *including your spouse or relative,*
- 14.24 *or a notary public,*
- 14.25 *or a person with the authority to administer oaths*
- 14.26 * If any of these items are missing, please contact your local election official.

15.1 **Important: You must submit the voter registration application with your ballot (in**
15.2 **the white signature envelope) for your vote to be counted.**

15.3 **1 Fill out the voter registration application and sign it**

- 15.4 • Show your witness your driver's license or other authorized proof of where you live.
- 15.5 *See the other side for a list of options.*

15.6 **2 Vote!**

- 15.7 • Show your witness your blank ballot, then mark your votes in private.
- 15.8 • Follow the instructions on the ballot.
- 15.9 • Do not write your name or ID number anywhere on the ballot.
- 15.10 • Do not vote for more candidates than allowed. *If you do, your votes for that office*
15.11 *will not count.*
- 15.12 *See the other side if you make a mistake on your ballot.*

15.13 **3 Seal your ballot in the tan ballot envelope**

- 15.14 • Carefully refold the ballot the same way it was delivered to you.
- 15.15 • Do not write on this envelope.

15.16 **4 Put the tan ballot envelope and the voter registration application in the white**
15.17 **signature envelope**

15.18 **5 Fill out the white signature envelope completely**

- 15.19 • If there is no label, print your name and Minnesota address.
- 15.20 • Print your Minnesota driver's license number, Minnesota ID card number, or the
15.21 last four digits of your Social Security number.
- 15.22 **Be sure to use one of the same numbers that you provided on your absentee**
15.23 **ballot application. You may provide both numbers if you are unsure what you**
15.24 **provided on your absentee ballot application.**
- 15.25 *If you do not have any of these numbers, check the box.*
- 15.26 • Read and sign the oath.

- 16.1 • Ask your witness to print their name and ~~Minnesota street address, including city~~
16.2 ~~(not a P. O. Box)~~, in the box at the top of the witness section, indicate which proof
16.3 you showed them, and sign their name in the box at the bottom of the witness section.

16.4 *If your witness is an official or notary, they must print their title ~~instead of an~~*
16.5 *address.*

16.6 *Notaries must also affix their stamp.*

- 16.7 • Seal the envelope.

16.8 **6 Put the signature envelope into the larger white return envelope to protect your**
16.9 **private information from view**

- 16.10 • Seal the envelope.

16.11 **7 Return your ballot by Election Day to the address on the return envelope**

16.12 **Ballots may not be delivered to your polling place**

16.13 You have three options:

- 16.14 • Send it so it arrives by Election Day, using U.S. mail or a package delivery service,
16.15 • Deliver it in person before election day or by ~~3:00~~ 5:00 p.m. on Election Day, or
16.16 • Ask someone to deliver it by ~~3:00~~ 5:00 p.m. on Election Day.

16.17 *This person cannot deliver more than 3 ballots.*

16.18 **To check the status of your absentee ballot, visit ~~www.mnvotes.org~~ mnvotes.gov.**

16.19 **Options for proof of where you live**

16.20 A valid Minnesota driver's license, Minnesota ID card, or permit with your current
16.21 address

16.22 *or*

16.23 A photo ID that does not have your current address along with a document that has
16.24 your current address

- 16.25 • **Eligible photo IDs:** Minnesota or another state's driver's license, learner's permit,
16.26 or ID card; U.S. passport; U.S. military or veteran ID card; Minnesota high

17.1 school/college/university ID card; or tribal ID card with your signature, from a tribe
17.2 recognized by the Bureau of Indian Affairs (BIA).

17.3 • **Eligible documents with your current address:** an original bill, including account
17.4 statements and start-of-service notifications, dated within 30 days before or with a
17.5 due date 30 days before or after the election; a current student fee statement; or a
17.6 residential lease if valid through election day. Eligible bills are: gas, electric, solid
17.7 waste, water, sewer, phone, cell phone, television, Internet provider, credit card, or
17.8 banking services; or bills for rent or mortgage payments.

17.9 *or one of the following:*

17.10 • A ~~yellow~~ receipt for a valid Minnesota driver's license, Minnesota ID card, or permit
17.11 with your current address

17.12 • Vouching: the signature of a registered voter who lives in your precinct and
17.13 personally knows that you live in the precinct. If your witness is registered to vote
17.14 in this precinct, your witness may vouch for you. *This person must complete and*
17.15 *sign the voucher form on the back of the voter registration application.*

17.16 • A tribal ID card with your name, address, signature, and picture, from a tribe
17.17 recognized by the BIA

17.18 • A "Notice of Late Registration" if you received one from the county auditor or city
17.19 clerk

17.20 • If you have moved within your precinct or changed your name, a current registration
17.21 in the precinct

17.22 • Vouching for residents of certain residential facilities: the signature of an employee
17.23 of your residential facility, including nursing homes, ~~group homes~~ assisted living
17.24 facilities, ~~battered women's~~ domestic abuse victim shelters, homeless shelters, etc.
17.25 If you are not sure if the residential facility where you live is eligible, call your local
17.26 election official. *The employee must complete and sign the voucher form on the*
17.27 *back of the voter registration application.*

17.28 **Correcting a mistake**

17.29 • If time allows, ask for a new ballot from your election office. Contact your election
17.30 office at [email] or [phone number], or

17.31 • Completely cross out the name of the candidate you accidentally marked and then
17.32 mark your ballot for the candidate you prefer (do not initial your corrections).

17.33 **If you have a disability:**

18.1 If you have a disability or cannot mark your ballot, your witness may assist you by marking
18.2 your ballot at your direction, assembling the materials, and filling out the forms for you.

18.3 When signing the envelope, Minnesota law says you may:

- 18.4 • Sign the ~~return~~ signature envelope yourself, or
- 18.5 • Make your mark, or
- 18.6 • Ask your witness to sign for you in your presence. (Have the witness sign their own
18.7 name as well.)
- 18.8 • If you have adopted the use of a signature stamp for all purposes of signature, you
18.9 may use your signature stamp or ask your witness to use your signature stamp in
18.10 your presence.

18.11 Minnesota Statutes, section 645.44, subdivision 14

- 18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

18.18 Please note: Voting is not covered by power of attorney. A person with power of attorney
18.19 may only sign for you in your presence, as outlined above.

18.20 Subp. 4. **Instructions for military and overseas voters transmitted ballots by mail.**

18.21 **Instructions**

18.22 **How to vote by absentee ballot for military and overseas voters**

18.23 **You will need:**

- 18.24 • Ballot*
- 18.25 • Tan ballot envelope*
- 18.26 • White signature envelope*
- 18.27 • Larger white return envelope*
- 18.28 • Pen with black ink

- 19.1 • Your ID number
- 19.2 Minnesota driver's license number, Minnesota ID card number, U.S. passport number,
- 19.3 or the last four digits of your Social Security number.

19.4 *See below if you do not have any of these numbers.*

- 19.5 * If any of these items are missing, please contact your local election official.

19.6 **1 Vote!**

- 19.7 • Mark your votes in private.
- 19.8 • Follow the instructions on the ballot.
- 19.9 • Do not write your name or ID number anywhere on the ballot.
- 19.10 • Do not vote for more candidates than allowed. *If you do, your votes for that office*
- 19.11 *will not count.*

19.12 *See the other side if you make a mistake on your ballot.*

19.13 **2 Seal your ballot in the tan ballot envelope**

- 19.14 • Carefully refold the ballot the way it was delivered to you.
- 19.15 • Do not write on this envelope.

19.16 **3 Put the tan ballot envelope into the white signature envelope**

19.17 **4 Fill out the white signature envelope completely**

- 19.18 • If there is no label, print your name and Minnesota address (present or last).
- 19.19 • Print your email address and phone number (optional).
- 19.20 • Print your Minnesota driver's license number, Minnesota ID card number, passport
- 19.21 number, or the last four digits of your Social Security number.

19.22 **Be sure to use one of the same numbers that you provided on your absentee**

19.23 **ballot application. You may provide both numbers if you are unsure what you**

19.24 **provided on your absentee ballot application.**

19.25 *If you do not have access to any of these documents, leave this space blank.*

- 19.26 • Read and sign the oath.
- 19.27 • Seal the envelope.

19.28 **5 Put the signature envelope into the larger white return envelope to protect your**

19.29 **private information from view**

- 20.1 • Seal the envelope.

20.2 **6 Return your ballot by Election Day to the address on the return envelope**

- 20.3 • Send it so it arrives by Election Day, using mail, a package delivery service, or the
20.4 diplomatic pouch at a U.S. embassy or consulate.

- 20.5 • Postage is not required if the postal permit is on the envelope and it is sent using
20.6 U.S. mail, U.S. military mail, or the diplomatic pouch. Postage may be required if
20.7 you use a foreign mail service or a package delivery service.

20.8 **See the other side for special instructions if you have a disability.**

20.9 **To check the status of your absentee ballot, visit <http://www.mnvotes.org> mnvotes.gov.**

20.10 If you have any questions, contact your county elections office at [insert email address] or
20.11 [insert telephone number].

20.12 **Correcting a mistake**

- 20.13 • If time allows, ask for a new ballot from your election office. Contact your election
20.14 office at [email] or [phone number], or

- 20.15 • Completely cross out the name of the candidate you accidentally marked and then
20.16 mark your ballot for the candidate you prefer (do not initial your corrections).

20.17 **If you have a disability:**

20.18 If you have a disability or cannot mark your ballot, another person may assist you by marking
20.19 your ballot at your direction, assembling the materials, and filling in the forms for you.

20.20 When signing the envelope, Minnesota law says you may:

- 20.21 • Sign the ~~return~~ signature envelope yourself, or
20.22 • Make your mark, or
20.23 • Ask another person to sign for you in your presence. (Have this person sign their
20.24 own name as well.)
20.25 • If you have adopted the use of a signature stamp for all purposes of signature, you
20.26 may use your signature stamp or ask another person to use your signature stamp in
20.27 your presence.

Minnesota Statutes, section 645.44, subdivision 14

- If you have a print disability, you may request that ballots, instructions, and a certificate of voter eligibility be transmitted electronically in an accessible format by contacting your county auditor. If you request a ballot be transmitted electronically in an accessible format, you may then complete your ballot electronically but must print your voted ballot and return this ballot and completed certificate of voter eligibility to your local election office.

Please note: Voting is not covered by power of attorney. A person with power of attorney may only sign for you in your presence as outlined above.

Subp. 5. Cover letter for military and overseas voters transmitted ballots electronically. Dear Military/Overseas Absentee Voter:

Your absentee ballot and supporting materials for the election on [month day, year] are attached. Your absentee ballot is being sent to you electronically because you requested this delivery method on your application. Please print, fill out, and return these materials so they are received by your county by Election Day, [day of the week], [month day, year].

A paper ballot must be returned to Minnesota and received by Election Day to be counted.

You may use the domestic mail service of the country you are located in, an international package delivery service, or the military or state department's mail services. Be sure to vote and return this ballot as soon as possible to ensure timely return. Your ballot must be received by your county elections office by Election Day to be counted.

This communication contains:

- A ballot
- Voting instructions
- Ballot envelope template
- Certificate of Eligibility
- Mailing envelope template

22.1 Carefully follow the instructions to ensure proper return of your voted ballot.

22.2 ☐ Print the materials

22.3 ☐ Fill out your ballot

22.4 ☐ Fold and seal your ballot and place it in your ballot envelope

22.5 ☐ Fill out the Certificate of Eligibility

22.6 ☐ Put the completed materials in your mailing envelope

22.7 ☐ Send your ballot by mail or package delivery service so that it is received by Election
22.8 Day

22.9 **To check the status of your absentee ballot, visit ~~http://www.mnvotes.org~~**
22.10 **mnvotes.gov.**

22.11 Contact your county elections office at [email] or [phone number] if you have any
22.12 questions. Voting assistance for military and overseas citizens is also available at
22.13 https://www.fvap.gov/.

22.14 **Please note:** Each voter must submit an application and receive their own ballot. **Do**
22.15 **not forward this ballot to other voters.** A ballot received from a voter who did not submit
22.16 an application will not be counted. Refer other military or overseas voters who need to apply
22.17 for a ballot to ~~http://www.mnvotes.org~~ mnvotes.gov.

22.18 Thank you.

22.19 Subp. 6. **Instructions for military and overseas voters transmitted ballots**
22.20 **electronically.**

22.21 **Instructions**

22.22 **How to vote by absentee ballot for military and overseas voters sent ballots**
22.23 **electronically**

22.24 **Note: Your ballot must be printed out and physically returned. It cannot be returned**
22.25 **electronically.**

23.1 **You will need:**

- 23.2 • A printer
- 23.3 • A pen with black ink
- 23.4 • Two envelopes (you have 3 options):
 - 23.5 • Address your own blank envelopes by hand
 - 23.6 • Print the envelope templates directly onto envelopes (print the mailing envelope
 - 23.7 onto an envelope approximately 4 1/8 inches x 9 1/2 inches so that everything is
 - 23.8 positioned according to postal regulations)
 - 23.9 • If you do not have access to any envelopes, create the envelopes by folding and
 - 23.10 taping or gluing the attachments.
- 23.11 • Your ID number
 - 23.12 Minnesota driver's license number, Minnesota ID card number, U.S. passport number,
 - 23.13 or the last four digits of your Social Security number.
 - 23.14 *See below if you do not have access to any of these numbers.*

23.15 **1 Print the materials**

- 23.16 • Print your ballot, the Certificate of Eligibility, and the envelope templates if you
- 23.17 are using them.
- 23.18 • Please note that the ballot may take multiple pages.
- 23.19 • Your printer should automatically scale the document to fit on the printable area of
- 23.20 the page. Just be sure that none of the words or ovals are cut off.

23.21 **2 Vote!**

- 23.22 • Mark your votes in private.
- 23.23 • Follow the instructions on the ballot.
- 23.24 • Do not write your name or ID number anywhere on the ballot.
- 23.25 • Do not vote for more candidates than allowed. *If you do, your votes for that office*
- 23.26 *will not count.*
- 23.27 *See below if you make a mistake on your ballot.*

23.28 **3 Use one of the envelopes as the ballot envelope**

- 24.1 • Put your ballot in this envelope to keep your votes private.
- 24.2 • Seal the envelope.
- 24.3 • Do not write on this envelope.

24.4 **4 Fill out the Certificate of Eligibility completely**

- 24.5 • Print your name and your Minnesota street address, including city (present or last).
- 24.6 • Print your email address and phone number (optional).
- 24.7 • Print your Minnesota driver's license number, Minnesota ID card number, passport
- 24.8 number, or the last four digits of your Social Security number.

24.9 **Be sure to use one of the same numbers that you provided on your absentee**
24.10 **ballot application. You may provide both numbers if you are unsure what**
24.11 **you provided on your absentee ballot application.**

24.12 *If you do not have access to any of these documents, leave this space blank.*

- 24.13 • Read and sign the oath.

24.14 **5 Put it all together**

- 24.15 • Attach the Certificate of Eligibility to the ballot envelope.
- 24.16 • Your second envelope is the return (mailing) envelope.
- 24.17 • Put the ballot envelope and the Certificate of Eligibility into the return envelope.
- 24.18 • Seal the return envelope.
- 24.19 • Address the return envelope to:

24.20 Official Absentee Balloting Material

24.21 County

24.22 [Street address]

24.23 [City], MN [Zip Code]

24.24 USA

24.25 **6 Return your ballot by Election Day to the address above**

25.1 • Send it so it arrives by Election Day, using mail, a package delivery service, or the
25.2 diplomatic pouch at a U.S. embassy or consulate.

25.3 • Postage is not required if the postal permit is on the envelope and it is sent using
25.4 U.S. mail, U.S. military mail, or the diplomatic pouch. Postage may be required if
25.5 you use a foreign mail service or a package delivery service.

25.6 **To check the status of your absentee ballot, visit <http://www.mnvotes.org> mnvotes.gov.**

25.7 If you need any help while voting, please contact your county elections office at [insert
25.8 email address] or [insert telephone number].

25.9 **Correcting a mistake**

25.10 • Print out a new ballot, or

25.11 • Ask for a new ballot from your election office, or

25.12 • Completely cross out the name of the candidate you accidentally marked and then
25.13 mark your ballot for the candidate you prefer (do not initial your corrections).

25.14 **If you have a disability:**

25.15 If you have a disability or cannot mark your ballot, another person may assist you by marking
25.16 your ballot at your direction, assembling the materials, and filling out the forms for you.

25.17 When signing the Certificate of Eligibility, Minnesota law says you may:

25.18 • Sign the Certificate yourself, or

25.19 • Make your mark, or

25.20 • Ask another person to sign for you in your presence. (Have this person sign their
25.21 own name as well.)

25.22 • If you have adopted the use of a signature stamp for all purposes of signature, you
25.23 may use your signature stamp or ask another person to use your signature stamp in
25.24 your presence.

25.25 Minnesota Statutes, section 645.44, subdivision 14

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically

26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

26.4 Please note: Voting is not covered by power of attorney. A person with power of attorney
26.5 may only sign for you in your presence as outlined above.

26.6 [For text of subpart 7, see Minnesota Rules]

26.7 **8210.0600 STATEMENT OF ABSENTEE VOTER.**

26.8 [For text of subpart 1, see Minnesota Rules]

26.9 Subp. 1a. **Statement of registered absentee voter form.**

26.10 Signature Envelope

26.11 **Voter must complete this section** please print clearly

26.12 **Voter name** _____

26.13 **Voter MN address** _____

26.14 _____ MN

26.15 **ID number**

26.16 (MN driver's license #,

26.17 MN ID card #,

26.18 or last four digits of SSN) _____

26.19 ○ I do not have a MN-issued driver's license, MN-issued ID card,
26.20 or a Social Security Number.

26.21 I certify that on Election Day I will meet all the legal requirements to vote.

26.22 **Voter Signature X** _____

26.23 **Witness must complete this section**

26.24 **Witness name** _____

26.25 ~~MN street address~~

26.26 ~~(or title, if an~~

27.1 ~~official or notary)~~

27.2 _____

27.3 ~~Street Address~~

27.4 _____ MN

27.5 ~~City~~

27.6 Title - only required for authorized officials or notaries

27.7 _____

27.8 I certify that:

- 27.9 • the voter showed me the blank ~~ballots~~ ballot before voting;
- 27.10 • the voter marked the ~~ballots~~ ballot in private or, if physically unable to mark the
- 27.11 ~~ballots~~ ballot, the ~~ballots were~~ ballot was marked as directed by the voter;
- 27.12 • the voter enclosed and sealed the ~~ballots~~ ballot in the ballot envelope; and
- 27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
- 27.14 the day of the election and a citizen of the United States, or am a notary, or am
- 27.15 authorized to give oaths.

27.16 **Witness Signature X** _____

27.17 If notary, must affix stamp

27.18 Subp. 1b. **Statement of ~~unregistered~~ nonregistered absentee voter form.**

27.19 Signature Envelope

27.20 **Voter must complete this section** please print clearly

27.21 **Voter name** _____

27.22 **Voter MN address** _____

27.23 _____ MN

27.24 **ID number**

27.25 (MN driver's license #,

27.26 MN ID card #,

28.1 or last four digits of SSN) _____

28.2 ○ I do not have a MN-issued driver's license, MN-issued ID
28.3 card, or a Social Security Number.

28.4 I certify that on Election Day I will meet all the legal requirements to vote.

28.5 **Voter Signature X** _____

28.6 **Witness must complete this section**

28.7 **Witness name** _____

28.8 ~~MN street address~~

28.9 (or title, if an

28.10 official or notary)

28.11 _____

28.12 ~~Street Address~~

28.13 _____ ~~MN~~

28.14 ~~City~~

28.15 **Title - only required for authorized officials or notaries**

28.16 _____

28.17 Witness MUST CHECK ONE indicating proof of residence provided by voter: (See
28.18 instructions)

28.19 ○ MN driver's license, ID card, permit, or receipt

28.20 ○ Bill, student fee statement, or residential lease plus photo ID

28.21 ○ Registered voter in the precinct who vouched for voter's residence in the precinct
28.22 (must complete the voucher form on the back of the Voter Registration Application)

28.23 ○ Tribal ID card

28.24 ○ Notice of late registration

28.25 ○ Previous registration in the same precinct

28.26 ○ An employee of a residential facility in the precinct who vouched for voter's
28.27 residence at the facility (must complete the voucher form on the back of the Voter
28.28 Registration Application)

29.1 I certify that:

- 29.2 • the voter showed me the blank ~~ballots~~ ballot before voting;
- 29.3 • the voter marked the ~~ballots~~ ballot in private or, if physically unable to mark the
- 29.4 ~~ballots~~ ballot, the ~~ballots were~~ ballot was marked as directed by the voter;
- 29.5 • the voter enclosed and sealed the ~~ballots~~ ballot in the ballot envelope;
- 29.6 • the voter registered to vote by filling out and enclosing a voter registration application
- 29.7 in this envelope;
- 29.8 • the voter provided proof of residence as indicated above; and
- 29.9 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
- 29.10 the day of the election and a citizen of the United States, or am a notary, or am
- 29.11 authorized to give oaths.

29.12 **Witness Signature X**_____

29.13 If notary, must affix stamp

29.14 *[For text of subpart 2, see Minnesota Rules]*

29.15 Subp. 3. **Printing specifications.** The statement shall be printed on the back of the

29.16 absentee ballot ~~return~~ signature envelope. The words "Voter must complete this section"

29.17 and "Witness must complete this section" shall be printed in no smaller than 12-point bold

29.18 type. The "X" on the signature lines must be in at least 20-point type. The remainder of the

29.19 statement shall be printed in no smaller than 10-point medium type. The area for the voter's

29.20 name and address must be no smaller than 1-1/4 inches by 3-1/4 inches. The voter's certificate

29.21 must be at least 4-1/8 inches wide. ~~County auditors and municipal clerks may use the existing~~

29.22 ~~stock of absentee ballot return envelopes on hand as of January 1, 2014, for absentee voting~~

29.23 ~~conducted in person.~~

29.24 *[For text of subparts 4 and 4a, see Minnesota Rules]*

29.25 **8210.0710 FORMAT AND INSTRUCTIONS FOR ABSENTEE BALLOT RETURN**

29.26 **ENVELOPES.**

29.27 *[For text of subparts 1 and 2, see Minnesota Rules]*

Subp. 3. **Envelope labeling.** The envelopes with the form printed according to part 8210.0600, subpart 1a, must have the words "Signature Envelope - Registered" printed in no smaller than 8-point type. The envelopes with the form printed according to part 8210.0600, subpart 1b, must have the words "Signature Envelope - ~~Unregistered~~ Nonregistered" printed in no smaller than 8-point type. The envelopes printed with the form printed according to part 8210.0800 must have the words "Signature Envelope - UOCAVA" printed in no smaller than 8-point type.

[For text of subpart 4, see Minnesota Rules]

Subp. 5. **Additional instructions for ~~unregistered~~ nonregistered voters.** The following words must be printed above the voter's certificate for envelopes with the form prepared under part 8210.0600, subpart 1b:

"Put the Ballot Envelope and the
Voter Registration Application
in here, then seal flap"

The words may appear on the reverse side of the envelope.

[For text of subpart 6, see Minnesota Rules]

Subp. 7. **Checklist for ~~unregistered~~ nonregistered voters.** Envelopes with the form printed according to part 8210.0600, subpart 1b, must have the following words printed on the exterior of the return envelope:

"Have you . . .

- ☐ Sealed your ballot in the tan ballot envelope?
- ☐ Put the ballot envelope and your voter registration application in the white signature envelope?
- ☐ Filled out the white signature envelope completely and signed it?

- 31.1 ☐ Asked your witness to complete their section and
31.2 sign their name?
- 31.3 ☐ Put the white signature envelope into this
31.4 envelope?

31.5 **Return your ballot so it is received by Election Day."**

31.6 [For text of subpart 8, see Minnesota Rules]

31.7 **8210.2200 DUTIES OF COUNTY AUDITOR OR MUNICIPAL CLERK UPON**
31.8 **RECEIPT OF ABSENTEE BALLOT RETURN ENVELOPE.**

31.9 Subpart 1. **Personal delivery.** Absentee ballot return envelopes that are delivered in
31.10 person by an absent voter or an agent must be received by the county auditor or municipal
31.11 clerk by ~~3:00~~ 5:00 p.m. on election day. Ballots delivered by agent under Minnesota Statutes,
31.12 section 203B.11, subdivision 4, must be delivered to the county auditor or municipal clerk
31.13 no later than 8:00 p.m. on election day. Ballots received by personal delivery after ~~3:00~~
31.14 5:00 p.m. ~~of~~ on election day or after 8:00 p.m. on election day if delivered under Minnesota
31.15 Statutes, section 203B.11, subdivision 4, shall be marked as received late by the county
31.16 auditor or municipal clerk, and must not be delivered to the ballot board.

31.17 [For text of subparts 2 and 3, see Minnesota Rules]

31.18 **8210.2400 SAFEGUARDING PROCEDURES.**

31.19 The county auditor or municipal clerk shall establish measures for safeguarding absentee
31.20 ballot return envelopes received prior to election day.

31.21 [For text of items A to C, see Minnesota Rules]

31.22 D. When the ballot board opens accepted return envelopes pursuant to Minnesota
31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
31.24 ~~the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
31.25 ~~compared with the record required by this rule to ensure that all envelopes are accounted~~

32.1 ~~for. Any discrepancy shall be reported to the secretary of state promptly~~ they must comply
32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state
32.3 promptly.

32.4 **8210.2450 DUTIES OF BALLOT BOARD MEMBERS WHEN EXAMINING**
32.5 **RETURN ENVELOPES UNDER MINNESOTA STATUTES, SECTION 203B.121.**

32.6 *[For text of subparts 1 to 4, see Minnesota Rules]*

32.7 Subp. 5. **Witness eligibility.** An absentee ballot may not be rejected for lack of an
32.8 eligible witness, if a witness has signed the statement required from a witness by part
32.9 8210.0600, subpart 1a or 1b, and, if appropriate:

32.10 ~~A. has provided a Minnesota address as part of the witness's certification on the~~
32.11 ~~return envelope;~~

32.12 ~~B. A.~~ A. has provided the title indicating that they are eligible to administer oaths;
32.13 or

32.14 ~~C. B.~~ B. has affixed a notarial stamp.

32.15 Subp. 6. **Ballot already cast.** Ballot board members must use the statewide voter
32.16 registration system or available polling place rosters to determine whether another ballot
32.17 from the voter has been accepted. If a ballot is received before the close of business on the
32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from that
32.19 voter and has not been rejected is deemed spoiled and must not be counted. If a ballot is
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and another
32.21 absentee ballot has been accepted for that voter, the return envelope must be marked
32.22 "rejected."

32.23 **8210.2500 MAIL PICKUP.**

32.24 Each municipal clerk shall communicate with the United States postal service facility
32.25 serving the municipality with regard to the handling of absentee ballot return envelopes

received by the post office on election day. The municipal clerk shall take all reasonable steps to ensure that all return envelopes received by the post office ~~before 4 p.m.~~ on election day are delivered before the closing of the polls to the ballot board. Absentee ballots returned by mail delivery and received after election day shall be marked as received late by the county auditor or municipal clerk, and must not be delivered to the ballot board.

8210.2700 RECEIPT OF FEDERAL WRITE-IN ABSENTEE BALLOTS.

Subpart 1. **If Federal Post Card Application was received.** If a voter submits a Federal Write-in Absentee Ballot for which a Federal Post Card Application was received, the county auditor must accept or reject the ballot in accordance with Minnesota Statutes, section ~~203B.24 and 203B.25~~ 203B.23.

[For text of subpart 2, see Minnesota Rules]

8210.3000 MAIL BALLOTING.

[For text of subparts 1 to 3, see Minnesota Rules]

Subp. 4. **Mailing ballots.** The county auditor, municipal clerk, or school district clerk shall mail ballots to the voters registered in the municipality or unorganized territory. A ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~14~~ 28 days prior to the election if mail balloting in the voter's precinct is proceeding pursuant to Minnesota Statutes, section 204B.45. No later than 14 days before the election, the auditor must make a subsequent mailing of ballots to those voters who register to vote after the initial mailing but before the 20th day before the election.

A ballot mailing must be sent no earlier than 46 or later than 14 days prior to the election if a mail election is being conducted in the jurisdiction pursuant to Minnesota Statutes, section 204B.46. No later than 14 days before the election, the auditor or clerk must make a subsequent mailing of ballots to those voters who register to vote after the initial mailing but before the 20th day before the election.

34.1 No ballot may be mailed to a challenged voter. A notice must be transmitted to
34.2 challenged voters with an explanation of the challenge and with instructions on how they
34.3 may apply for an absentee ballot if they believe their registration was challenged in error.

34.4 The mail balloting process for voters whose registrations are incomplete under
34.5 Minnesota Statutes, section 201.061, subdivision 1a, or 201.121, must be administered as
34.6 if the voter were not registered to vote. A notice must be transmitted to voters with incomplete
34.7 registrations with instructions on how they may apply for an absentee ballot.

34.8 Ballots must be sent by nonforwardable mail. Ballots for eligible voters who reside in
34.9 health care facilities may be delivered as provided in Minnesota Statutes, section 203B.11.
34.10 The ballot mailing must be addressed to the voter at the voter's residence address as shown
34.11 on the registration file unless the voter completes an absentee ballot request as provided in
34.12 Minnesota Statutes, section 203B.04 or 203B.16.

34.13 A return envelope, a ballot secrecy envelope, and instructions for marking and returning
34.14 mail ballots must be included with the ballots. The instructions must include a telephone
34.15 number or electronic mail address which voters can call or write for help in mail voting.
34.16 The instructions must also include a privacy notice that complies with Minnesota Statutes,
34.17 section 13.04. At the request of the secretary of state, a survey card that the voter can return
34.18 to the secretary of state must also be included. The ballot return envelope must be printed
34.19 with the mail voter's certificate. The ballot return envelope must be addressed for return to
34.20 the county auditor, municipal clerk, or school district clerk that is conducting the election.
34.21 First class postage must be affixed to the return envelope.

34.22 Subp. 4a. **Form of instructions to mail voters.**

34.23 **Instructions**

34.24 **How to vote by mail ballot**

34.25 **You will need:**

- 35.1 • Ballot*
- 35.2 • Tan ballot envelope*
- 35.3 • White signature envelope*
- 35.4 • Pen with black ink
- 35.5 • Witness
- 35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
- 35.7 on or before the day of the election and who is a citizen of the United States,
- 35.8 *including your spouse or relative,*
- 35.9 *or a notary public,*
- 35.10 *or a person with the authority to administer oaths*
- 35.11 * If any of these items are missing, please contact your local election official.

35.12 1 Vote!

- 35.13 • Show your witness your blank ballot, then mark your votes in private.
- 35.14 • Follow the instructions on the ballot.
- 35.15 • Do not write your name or ID number anywhere on the ballot.
- 35.16 • Do not vote for more candidates than allowed. *If you do, your votes for that office*
- 35.17 *will not count.*
- 35.18 ***See the other side if you make a mistake on your ballot.***

35.19 2 Seal your ballot in the tan ballot envelope

- 35.20 • Carefully refold the ballot the way it was delivered to you.
- 35.21 • Do not write on this envelope.

35.22 3 Put the tan ballot envelope into the white signature envelope**35.23 4 Fill out the white signature envelope completely**

- 35.24 • If there is no label, print your name and Minnesota address.
- 35.25 • Read and sign the oath.

- 36.1 • Ask your witness to print their name and ~~Minnesota street address, including city~~
36.2 ~~(not a P. O. Box)~~, in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

36.4 *If your witness is an official or notary, they must print their title instead of an*
36.5 *address.*

36.6 *Notaries must also affix their stamp.*

- 36.7 • Seal the envelope.

36.8 **5 Return your ballot by Election Day to the address on the signature envelope**

36.9 You have three options:

- 36.10 • Send it so it arrives by Election Day, using U.S. mail or a package delivery service,
36.11 • Deliver it in person by 8:00 p.m. on Election Day, or
36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

36.13 *This person cannot deliver more than 3 ballots.*

36.14 If you have questions, please call (...) ...-.... .

36.15 **See other side for special instructions if you have a disability**

36.16 **Correcting a mistake**

- 36.17 • If time allows, ask for a new ballot from your election office. Contact your election
36.18 office at [email] or [phone number], or
- 36.19 • Completely cross out the name of the candidate you accidentally marked and then
36.20 mark your ballot for the candidate you prefer (do not initial your corrections).

36.21 **If you have a disability:**

36.22 If you have a disability or cannot mark your ballot, your witness may assist you by marking
36.23 your ballot at your direction, assembling the materials, and filling out the forms for you.

36.24 When signing the envelope, Minnesota law says you may:

- 37.1 • Sign the ~~return~~ signature envelope yourself, or
- 37.2 • Make your mark, or
- 37.3 • Ask your witness to sign for you in your presence. (Have your witness sign their
- 37.4 own name as well.)
- 37.5 • If you have adopted the use of a signature stamp for all purposes of signature, you
- 37.6 may use your signature stamp or ask your witness to use your signature stamp in
- 37.7 your presence.

37.8 Minnesota Statutes, section 645.44, subdivision 14

- 37.9 • If you have a print disability, you may request that ballots, instructions, and a
- 37.10 certificate of voter eligibility be transmitted electronically in an accessible format
- 37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
- 37.12 in an accessible format, you may then complete your ballot electronically but must
- 37.13 print your voted ballot and return this ballot and completed certificate of voter
- 37.14 eligibility to your local election office.

37.15 Please note: Voting is not covered by power of attorney. A person with power of attorney

37.16 may only sign for you in your presence as outlined above.

37.17 Subp. 4b. **Form of mail voter's certificate.**

37.18 Signature Envelope

37.19 **Voter must complete this section** please print clearly

37.20 **Voter name** _____

37.21 **Voter MN Address** _____

37.22 _____ MN

37.23 I certify that on Election Day I will meet all the legal requirements to vote.

37.24 **Voter Signature X** _____

37.25 **Witness must complete this section**

37.26 **Witness name** _____

37.27 ~~MN street address~~

37.28 (or title, if an

37.29 official or notary)

38.1 _____
 38.2 ~~Street Address~~
 38.3 _____~~MN~~
 38.4 ~~City~~
 38.5 Title - only required for authorized officials or notaries
 38.6 _____

38.7 I certify that:

- 38.8 • the voter showed me the blank ~~ballots~~ ballot before voting;
- 38.9 • the voter marked the ~~ballots~~ ballot in secrecy or, if physically unable to mark the
- 38.10 ~~ballots~~ ballot, the ~~ballots were~~ ballot was marked as directed by the voter;
- 38.11 • the voter enclosed and sealed the ~~ballots~~ ballot in the ballot envelope; and
- 38.12 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
- 38.13 the day of the election and a citizen of the United States, or am a notary, or am
- 38.14 authorized to give oaths.

38.15 **Witness Signature X** _____

38.16 If notary, must affix stamp

38.17 *[For text of subparts 4c to 13, see Minnesota Rules]*

38.18 **8215.0200 BALLOTS.**

38.19 *[For text of subparts 1 to 4, see Minnesota Rules]*

38.20 Subp. 5. **Order and form of write-in candidate lines.** If a party chair has requested
 38.21 that its party ballot contain a place for write-in candidates, below the name of the last
 38.22 candidate for each office shall be placed a blank line, and on the blank line the voter may
 38.23 write the name of persons not printed on the ballot for whom the voter desires to vote. Above
 38.24 or below the write-in line, the words "write-in, if any" must appear in as large as practicable
 38.25 but no smaller than 6-point type and must be aligned next to the vote target.

8215.0300 POLLING PLACE VOTING.

Subpart 1. **Form of roster.** At the presidential nomination primary, the polling place roster must also state: "I am in general agreement with the principles of the party for whose candidate I intend to vote, and I understand that my choice of a party's ballot will be ~~public information~~ shared with the chair of my selected major political party." This statement must appear separately from the statement certification included in part 8200.9115, subpart 1.

[For text of subparts 2 to 4, see Minnesota Rules]

8215.0400 ABSENTEE VOTING.

[For text of subpart 1, see Minnesota Rules]

Subp. 2. Application form.

[For text of item A, see Minnesota Rules]

B. The absentee ballot oath must also contain the following statement: "I am in general agreement with the principles of the party for whose candidate I intend to vote, and I understand that my choice of a party's ballot will be ~~public information~~ shared with the chair of my selected major political party."

[For text of subparts 3 to 6, see Minnesota Rules]

Subp. 7. **Change of major party choice.** Until the close of business on the ~~seventh~~ 19th day before the election, a voter may change the voter's choice of which major political party ballot the voter wishes to receive by spoiling the voter's ballot and submitting an application indicating the major political party ballot the voter is requesting. ~~An absentee~~ A ballot cast under the alternative procedures provided in Minnesota Statutes, section 203B.081, ~~subdivision 3,~~ cannot be spoiled after it has been deposited in the ballot box.

[For text of subparts 8 and 9, see Minnesota Rules]

40.1 **8215.0500 MAIL BALLOTING.**40.2 *[For text of subparts 1 and 2, see Minnesota Rules]*

40.3 Subp. 3. **Form of instructions to mail voters.** Notwithstanding part 8210.3000,
40.4 subpart 4a, the form of instructions to mail voters to be used in a presidential nomination
40.5 primary must substitute the following instructions:

40.6 **How to vote by mail ballot**40.7 **You will need:**

- 40.8 • Ballot*
- 40.9 • Tan ballot envelope*
- 40.10 • White signature envelope*
- 40.11 • Pen with black ink
- 40.12 • Witness

40.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
40.14 on or before the day of the election and who is a citizen of the United States,

40.15 *including your spouse or relative,*40.16 *or a notary public,*40.17 *or a person with the authority to administer oaths*

40.18 *If any of these items are missing, please contact your local election official.

40.19 **1 Vote!**

- 40.20 • Choose the ballot of the party that you are in general agreement with the principles
40.21 of.
- 40.22 • Show your witness that party's blank ballot, then mark your votes in private.
- 40.23 • Follow the instructions on the ballot.
- 40.24 • Do not write your name or ID number anywhere on your ballot.
- 40.25 • Do not vote for more than one candidate. If you do, your vote will not count.
- 40.26 • Do not vote the ballot of more than one party. Only return one ballot.

- 41.1 • Destroy and discard the extra blank ballot. You can destroy the ballot by shredding
41.2 or tearing the extra ballot in half. Do not return the extra ballot.

41.3 *See the other side if you make a mistake on your ballot.*

41.4 **2 Seal only one voted ballot in the tan ballot envelope**

- 41.5 • Carefully refold the ballot the way it was delivered to you.
41.6 • Do not write on this envelope.

41.7 **3 Put the tan ballot envelope into the white signature envelope**

41.8 **4 Fill out the white signature envelope completely**

- 41.9 • If there is no label, print your name and Minnesota address.
41.10 • In the oath, print the name of the political party ballot that you chose. If you do not
41.11 print a party name, your vote will not count. If you return a different ballot than you
41.12 indicate in the oath, your vote will not count.
41.13 • Read and sign the oath.
41.14 • Ask your witness to print their name ~~and Minnesota street address, including city~~
41.15 ~~(not a PO Box),~~ in the box at the top of the witness section and sign their name in
41.16 the box at the bottom of the witness section.

41.17 *If your witness is an official or notary, they must print their title instead of an*
41.18 *address.*

41.19 *Notaries must also affix their stamp.*

- 41.20 • Seal the envelope.

41.21 **5 Return your ballot by Election Day to the address on the signature envelope**

41.22 You have three options:

- 41.23 • Send it so it arrives by Election Day, using United States mail or a package delivery
41.24 service,
41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.

41.27 *This person cannot deliver more than 3 ballots.*

41.28 If you have questions, please call (...) ...-.... .

42.1 **See other side for special instructions if you have a disability**

42.2 **Correcting a mistake**

- 42.3 • If time allows, ask for a new ballot from your election office. Contact your election
- 42.4 office at [email] or [phone number], or
- 42.5 • Completely cross out the name of the candidate you accidentally marked and then
- 42.6 mark your ballot for the candidate you prefer (do not initial your corrections).

42.7 **If you have a disability:**

42.8 If you have a disability or cannot mark your ballot, your witness may assist you by

42.9 marking your ballot at your direction, assembling the materials, and filling out the forms

42.10 for you.

42.11 When signing the envelope, Minnesota law says you may:

- 42.12 • Sign the ~~return~~ signature envelope yourself, or
- 42.13 • Make your mark, or
- 42.14 • Ask your witness to sign for you in your presence. (Have your witness sign their
- 42.15 own name as well.)
- 42.16 • If you have adopted the use of a signature stamp for all purposes of signature, you
- 42.17 may use your signature stamp or ask your witness to use your signature stamp in
- 42.18 your presence.

42.19 Minnesota Statutes, section 645.44, subdivision 14

- 42.20 • If you have a print disability, you may request that ballots, instructions, and a
- 42.21 certificate of voter eligibility be transmitted electronically in an accessible format
- 42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
- 42.23 in an accessible format, you may then complete your ballot electronically but must
- 42.24 print your voted ballot and return this ballot and completed certificate of voter
- 42.25 eligibility to your local election office.

42.26 Please note: Voting is not covered by power of attorney. A person with power of

42.27 attorney may only sign for you in your presence as outlined above.

42.28 *[For text of subpart 4, see Minnesota Rules]*

Subp. 5. **Form of mail voter's certificate.** Notwithstanding part 8210.3000, subpart 4b, the form of the mail voter's signature certificate to be used in a presidential nomination primary must be as follows:

Signature Envelope

Voter must complete this section

please print clearly

Voter name _____

Voter MN Address _____

_____ MN

I certify that on Election Day I will meet all the legal requirements to vote. I am in general agreement with the principles of the _____ Party, and I understand that my choice of a party's ballot will be ~~public information~~ shared with the chair of my selected major political party.

Voter Signature X _____

Witness must complete this section

Witness name _____

~~MN street address~~

~~(or title, if an official or notary)~~

~~Street Address~~

_____ ~~MN~~

~~City~~

Title - only required for authorized officials or notaries

I certify that:

- the voter showed me the blank ballot before voting;
- the voter marked the ballot in secrecy or, if physically unable to mark the ballot, the ballot was marked as directed by the voter;

- the voter enclosed and sealed the ballot in the ballot envelope; and
- I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before the day of the election and a citizen of the United States, or I am a notary, or I am authorized to give oaths.

Witness Signature X _____

If notary, must affix stamp

[For text of subpart 6, see Minnesota Rules]

Subp. 7. **Change of major party choice.** Until the close of business on the ~~seventh~~ 19th day before the election, a voter may change the voter's choice of which major political party ballot the voter requested by spoiling the voter's ballot and requesting that the county transmit to the voter replacement ballots.

[For text of subpart 8, see Minnesota Rules]

8220.1150 TEST BALLOTS.

All test ballots must be marked "~~TEST.~~" in a manner to indicate they are test ballots.

Ballots must be prepared having votes in excess of the number allowed by law for each office and proposal appearing on the ballot.

For district offices in which the number of candidates appearing on the ballot for that office varies by district, test ballots must be prepared with the number of votes allowed by law for that office in that district.

In partisan primary elections test ballots must be prepared to check the program for splitting tickets. Test ballots must be prepared with votes appearing in the same ballot for candidates of opposite political parties, nonpartisan candidates, and proposals. At least one ballot must be prepared with votes for one party and including votes for a nonpartisan office in excess of the number permitted by law.

In preparing the test deck, a number of the ballots must be voted to include valid votes in the partisan, nonpartisan, and proposal sections of the ballot. The test deck must include ballots involving no overvotes or marks in unassigned locations, valid votes for each candidate and ballot question, overvotes, undervotes, and invalid votes in many different combinations.

At least one test ballot must be prepared in which marks appear in the precinct identifier or ballot style indicator.

At least one test ballot must be included that is folded, as if it were mailed.

At least one test ballot marked by a different pen must be included.

Blank ballots in which no positions have been voted must be included in the test deck.

When required to be used in an election pursuant to Minnesota Statutes, section 206.57, subdivision 5, the test deck must include a number of ballots marked by an electronic ballot marker sufficient to have marked all vote targets on the ballot in every precinct.

8220.1550 PUBLIC ACCURACY TEST.

~~The election jurisdiction must hold a public accuracy test within 14 days prior to the election for the purpose of demonstrating the accuracy of the computer programs and voting systems to be used at the election.~~ In order to demonstrate the accuracy of the computer programs and voting systems to be used at an election, the election jurisdiction must hold a public accuracy test at least three days prior to the voting equipment being used. A ballot-marking device used for absentee voting must be tested according to part 8220.1350.

The public accuracy test must be conducted according to Minnesota Statutes, section 206.83.

The time and place of the public accuracy test must be designated by the election jurisdiction providing the computer program, which must give at least ~~48 hours'~~ five days' public notice of the time and place of the test by publication in official newspapers and by

46.1 posting a notice in the office of the county auditor and each local election official conducting
46.2 the test.

46.3 The test must be open to the public. At least two election judges of different political
46.4 parties must witness the test. The chief election official of the election jurisdiction shall
46.5 explain the methods and test procedures used to determine the accuracy of the computer
46.6 programs. This will include submitting as public record the certificate prepared in accordance
46.7 with part 8220.1450 that all precincts have been tested using the test deck prepared under
46.8 the direction of the election jurisdiction.

46.9 The sealed container containing the computer programs, test deck, and predetermined
46.10 results must be opened and the computer programs tested to determine their accuracy on
46.11 the voting systems on which they are to be used on election day. The testing of the voting
46.12 systems and programs must be with the test deck prepared under the direction of the election
46.13 jurisdiction. In election jurisdictions with three or fewer precincts, all the precincts must be
46.14 tested. In election jurisdictions with more than three precincts, a minimum of three precincts
46.15 must be tested. The precincts must be tested on at least one of each unique model of voting
46.16 equipment used by the election jurisdiction. One precinct from each congressional district,
46.17 legislative district, county commissioner district, ward, and school district on the ballot
46.18 must be tested. The official conducting the election shall select the precincts to be tested.

46.19 If an error is detected in any part of the testing, the cause must be ascertained, the error
46.20 corrected, and an errorless count must be made on all precincts. At the discretion of the
46.21 election jurisdiction, the meeting may be adjourned to a time and date certain.

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those
46.23 devices must be tested under part 8220.1350.

8230.2040 RECORDING VALID WRITE-IN VOTES.

A write-in vote is only valid and able to be counted if the ballot is marked in the oval or other target shape opposite the blank when a voter writes an individual's name on the line provided for write-in votes. If a valid write-in vote exists, the election judges shall determine whether the write-in vote has caused an overvote. If the write-in vote has caused an overvote, the ballot is defective for that office only.

If the write-in vote does not cause an overvote for that office, the election judges shall enter the candidate's name and the office on the write-in vote tally sheet. The ballot must be placed with the other valid ballots for tabulation.

If the write-in vote causes an overvote for that office and the target next to the write-in vote is not completed, the election judges shall place the ballot in the envelope marked "ballots for which duplicates were or are to be made." The manner of duplication is prescribed in part 8230.3850.

At the discretion of the county auditor, the processing of write-in ballots may be done at the central counting center or at the office of the local election official or county auditor rather than at the precinct polling place.

8230.2250 DELIVERY OF TRANSFER CASE.

[For text of subpart 1, see Minnesota Rules]

Subp. 2. **Delivery by two election judges.** The transfer case containing the required items as identified in part 8230.2050 must be delivered directly to the official conducting the election, central counting center, or collection point for transportation to the official conducting the election or central counting center by two election judges, not of the same political party.

8230.3850 DUPLICATION OF BALLOTS.

Any ballots requiring duplication at the polling place or central counting center must be duplicated in the following manner:

[For text of items A to E, see Minnesota Rules]

F. When a ballot created pursuant to Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), requires duplication, it shall be duplicated onto a blank ballot and the same process shall be used as that for other ballots needing duplication under this part.

8230.4355 BALLOT BOXES FOR PRECINCT COUNTING CENTERS.

Ballot boxes used with precinct count voting systems may be separate or part of the ballot counting equipment provided that the ballot is fed directly into a locked or sealed ballot box. ~~The ballot box may contain a compartment that receives ballots on which all votes have been counted except those for offices for which the write-in target has been completed.~~ An auxiliary ballot box, that may be separate or an additional compartment, must be supplied to be used if the voting system fails to function or for ballots that cannot be read by the ballot counter.

8230.4365 PRECINCT COUNT VOTING SYSTEM EQUIPMENT AND PROCEDURES.

[For text of subparts 1 to 4, see Minnesota Rules]

Subp. 5. **Opening ballot box during voting hours.** Two election judges of different political parties may open the ballot boxes on election day to straighten or remove the voted ballots but they shall not count or inspect the ballots. If removing ballots, the election judges shall put the ballots taken from the ballot box's main compartment into containers and seal them. ~~If the ballot box contains a compartment for write-in ballots, the judges shall put the ballots taken from the ballot box's write-in compartment into containers separate from the other ballots and seal them.~~ The judges shall label the ballot containers and store them in a

secure location. The judges shall note on the incident report the fact that the ballot box was opened, the time the box was opened, and, if applicable, the numbers of any seals used to seal the ballot containers.

[For text of subpart 6, see Minnesota Rules]

8235.0300 NOTICE.

Within 24 hours of receipt of any request for a recount for the election of presidential electors or after determining that a publicly funded recount is authorized and requested for any other office, or within 48 hours of receipt of a written request for a discretionary recount and filing of a security deposit if one is required, the official in charge of the recount shall send notice to the candidates for the office to be recounted and the county auditor of each county wholly or partially within the election district. The notice must include the date, starting time, and location of the recount, the office to be recounted, and the name of the official performing the recount. The notice must state that the recount is open to the public.

8235.0700 GENERAL PROCEDURES.

At the opening of a recount the recount official or legal adviser shall present the procedures contained in this rule for the recount. The custodian of the ballots shall make available to the recount official the precinct summary statements, the precinct boxes or the sealed containers of voted ballots, and any other election materials requested by the recount official. If the recount official needs to leave the room for any reason, the recount official must designate a deputy recount official to preside during the recount official's absence. A recount official must be in the room at all times. If the recount includes ballot format as provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the ballots were used by ten or fewer voters in the precinct, the election judges from that precinct are not eligible to participate in conducting a recount or postelection review in that precinct. The containers of voted ballots must be unsealed and resealed within public view. No ballots or election materials may be handled by candidates, their representatives, or members of

the public. There must be an area of the room from which the public may observe the recount. Cell phones and video cameras may be used in this public viewing area, as long as their use is not disruptive. The recount official shall arrange the counting of the ballots so that the candidates and their representatives may observe the ballots as they are recounted. Candidates may each have one representative observe the sorting of each precinct. One additional representative per candidate may observe the ballots when they have been sorted and are being counted pursuant to part 8235.0800, subpart 2. Candidates may have additional representatives in the public viewing area of the room. If other election materials are handled or examined by the recount officials, the candidates and their representatives may observe them. The recount official shall ensure that public observation does not interfere with the counting of the ballots. The recount official shall prepare a summary of the recount vote by precinct.

8240.1600 ELECTION JUDGE BASIC TRAINING COURSE.

[For text of subparts 1 to 3, see Minnesota Rules]

Subp. 4. **Course content.** A basic training course must include necessary information and skill development in the following areas:

[For text of items A and B, see Minnesota Rules]

C. judges' duties during voting hours:

(1) election day voter registration;

(2) electronic pollbook training (if used in the jurisdiction);

~~(2)~~ (3) persons allowed in polling place;

~~(3)~~ (4) challenge process;

~~(4)~~ (5) voting process;

~~(5)~~ (6) spoiled ballots;

51.1 (7) assistance to voters in languages other than English;

51.2 ~~(6)~~ (8) assistance to disabled voters; and

51.3 ~~(7)~~ (9) absentee ballots voter information privacy;

51.4 [For text of items D and E, see Minnesota Rules]

51.5 F. major problems at prior elections; ~~and~~

51.6 G. how to follow instructions from the head election judge; and

51.7 H. if election judges will be working with absentee or early voting, their training
51.8 must also include:

51.9 (1) absentee ballot board procedures; and

51.10 (2) in-person absentee and early voting procedures.

51.11 **8240.1655 QUALIFICATIONS FOR TRAINEE ELECTION JUDGES.**

51.12 [For text of subparts 1 and 2, see Minnesota Rules]

51.13 Subp. 3. **Qualifications.** A trainee election judge must be a United States citizen,
51.14 must be at least 16 years of age, and must meet any residency requirement specified in
51.15 Minnesota Statutes, section 204B.19, subdivision 6. Until graduation, trainee election judges
51.16 must provide certification from their school that they are enrolled in a Minnesota high
51.17 school, and are performing at an academic level acceptable to the principal of the trainee's
51.18 high school. Until graduation, a trainee election judge who is home-schooled must provide
51.19 certification from the trainee's parent that the trainee is performing at an academic level
51.20 acceptable to serve as a trainee election judge.

51.21 [For text of subparts 4 to 6, see Minnesota Rules]

51.22 **8240.1750 HEAD ELECTION JUDGE TRAINING.**

51.23 [For text of subpart 1, see Minnesota Rules]

52.1 Subp. 2. **Course content.** The head election judge training course must include
52.2 information on the following topics:

52.3 *[For text of items A to F, see Minnesota Rules]*

52.4 G. security and emergency plans;

52.5 ~~G.~~ H. head election judges' duties at the polling place after the polls close; and

52.6 ~~H.~~ I. how to return election materials to the local election official after the ballots
52.7 have been counted.

52.8 **8240.2700 MUNICIPAL CLERK TRAINING REQUIREMENT.**

52.9 *[For text of subparts 1 to 4, see Minnesota Rules]*

52.10 Subp. 5. **Training content.** An election administration training course for municipal
52.11 clerks must include training on:

52.12 *[For text of items A to H, see Minnesota Rules]*

52.13 I. electronic pollbook training (if used in the jurisdiction);

52.14 ~~I.~~ J. mail ballot precincts and mail elections;

52.15 ~~J.~~ K. voting before election day (absentee and early voting);

52.16 ~~K.~~ L. security practices and emergency plans; and

52.17 ~~L.~~ M. post-election duties.

52.18 *[For text of subparts 6 to 10, see Minnesota Rules]*

52.19 **8240.2800 SCHOOL DISTRICT CLERK TRAINING REQUIREMENT.**

52.20 *[For text of subparts 1 to 4, see Minnesota Rules]*

52.21 Subp. 5. **Training content.** An election administration training course for school
52.22 district clerks must include training on:

53.1 [For text of items A to H, see Minnesota Rules]

53.2 I. electronic pollbooks, if used in the school district;

53.3 ~~I.~~ J. mail elections;

53.4 ~~J.~~ K. absentee voting;

53.5 ~~K.~~ L. security practices and emergency plans; and

53.6 ~~L.~~ M. post-election duties.

53.7 [For text of subparts 6 to 10, see Minnesota Rules]

53.8 **8240.2900 COUNTY AUDITOR ELECTION ADMINISTRATION**
53.9 **CERTIFICATION.**

53.10 [For text of subparts 1 to 3, see Minnesota Rules]

53.11 Subp. 4. **Training content.** An election administration training course for county
53.12 auditors must include training on:

53.13 [For text of items A to E, see Minnesota Rules]

53.14 F. ballot and equipment preparation;

53.15 [For text of item G, see Minnesota Rules]

53.16 H. mail ballot precincts and mail elections;

53.17 I. voting before election day (early and absentee voting);

53.18 [For text of item J, see Minnesota Rules]

53.19 K. security practices and emergency plans;

53.20 L. post-election duties; ~~and~~

53.21 M. records retention and data practice requests; and

M. N. the duties performed by municipal and school district clerks.

[For text of subparts 5 to 9, see Minnesota Rules]

8250.1810 FORMAT OF BALLOTS FOR OPTICAL SCAN SYSTEMS.

[For text of subparts 1 to 8, see Minnesota Rules]

Subp. 9. **Order of candidates for ~~partisan office~~ president and vice president in general election.** ~~At the same time that the secretary of state certifies the names of nominees under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify to the county auditors the order in which the names of the candidates representing the political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear for every partisan office on the ballot. Candidates nominated by petition must appear on the ballot beneath the names of the candidates of the political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary of state.~~ At least 11 weeks before the state general election, the secretary of state shall draw lots once by political party or principle for the candidates for president and vice president nominated by petition. To draw the lot, a candidate who has used the word "independent" to designate the candidate's party or principle must be identified by the word "independent" followed by the candidate's surname. If more than one candidate is nominated by petition for the same office within the same political party or principle, the secretary of state shall draw a supplementary lot within that party or principle by candidate surname to determine the order of those candidates. ~~The order of political parties or principles determined by the drawing of lots applies to all partisan offices on the ballot.~~

[For text of subparts 10 to 17, see Minnesota Rules]

Subp. 18. **Example ballot.** The secretary of state shall supply each auditor with a copy of an example ballot by May 1 of each year. Translated copies of the example ballots shall be provided according to Minnesota Statutes, section 204B.295, subdivision 1. The

55.1 example ballot must illustrate the format required for the ballots used in the primary and
55.2 general elections that year. The county auditor shall distribute copies of the example ballot
55.3 to municipal and school district clerks in municipalities and school districts holding elections
55.4 that year. The official ballots must conform in all respects to the example ballot.

55.5 Subp. 19. **Alternative ballot.** The requirements in this part do not apply to the printed
55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota
55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative
55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the
55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;
55.10 and the voter's votes for each office or question, generated from the voter's use of a touch
55.11 screen or other electronic device on which a complete ballot meeting the information
55.12 requirements of all applicable laws was displayed electronically. The ballot must also include
55.13 lines for initials of at least two election judges.

55.14 **REPEALER.** Minnesota Rules, parts 8200.5100, subpart 3; and 8200.9320, are repealed.

Statement of Need and Reasonableness



STATE OF MINNESOTA
Office of Minnesota Secretary of State
Steve Simon

STATEMENT OF NEED AND REASONABLENESS

Proposed Permanent Rules Relating to Election
Administration, Minnesota Rules, 8200-8250; Revisor's ID
Number R-04824

Office of the Minnesota Secretary of State
Elections Division

August 2025

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Acronyms

APA	Administrative Procedures Act
ALJ	Administrative Law Judge
CFR	Code of Federal Regulations
MAT	MN Association of Townships
Minn. R. pt	Minnesota Rules part
Minn. Stat.	Minnesota Statutes
MMB	Minnesota Management and Budget
MN	Minnesota
MORS	MN Office of the Revisor of Statutes
CAH	Court of Administrative Hearings
Office	Office of the Minnesota Secretary of State
SONAR	Statement of Need and Reasonableness

Introduction and Overview

Introduction

The Office of the Secretary of State (Office) is the state's chief election office. In 2023, 2024, and 2025 the Minnesota Legislature passed several changes to legislation related to elections and the administration of elections. As a result of these changes, there were many places that Minnesota Statutes and Minnesota Rules conflicted. As a result, the Office began a rulemaking process to amend the current rules governing elections and election administration. In addition to the proposed changes in direct response to legislative action, since the last election-related rulemaking, the Office has received comments from election officials and citizens requesting changes to forms, instructions, and other items reflected in the rules. The Office has been collecting these comments and suggestions, and has considered them in the proposed rule revisions.

A Request for Comments was published in the State Register on August 21, 2023, and a number of responses were received. The Request for Comments was also sent to a broad spectrum of interested parties pursuant to a Notice Plan described in this Statement of Need and Reasonableness (SONAR). The Office used the comments received in response to the Request for Comments as well as comments and suggestions received prior to the rulemaking to draft the proposed rules.

Availability and Alternative Formats

Availability: The State Register notice, this Statement of Need and Reasonableness (SONAR), and the proposed rule will be available during the public comment period on the Office's Rulemaking & Data Practices page: <https://www.sos.state.mn.us/about-the-office/rulemaking-data-practice/>

Agency contact for information, documents, or alternative formats: Upon request, this Statement of Need and Reasonableness can be made available in an alternative format, such as large print, braille, or audio. To make a request, contact Justin R. Erickson, General Counsel, Office of the Minnesota Secretary of State, 20 W. 12th Street, St. Paul, MN 55155; telephone 651-201-6895; email justin.erickson@state.mn.us; or use your preferred telecommunications relay service.

Scope of Proposed Amendments

The following chapters of Minnesota rules are affected by the proposed changes:

- PART 8200.3000 – Registration in Wrong County
- PART 8200.3550 – Notice of Challenge Removal
- PART 8200.5100 – Registration at Precinct Only
- PART 8200.9115 – Form of Polling Place Rosters

- PART 8200.9300 – Maintaining Certain Voter Registration Records; Security
- PART 8210.9310 - Treatment of Voter Registration Applications
- PART 8200.9320 – Interaction with Department of Public Safety
- PART 8200.9940 - Precinct List of Persons Vouching for Voter Residence on Election Day and Number of Persons Vouched For
- PART 8200.9950 – Challenges to Voter Registration, specified by Part 8200.7100
- PART 8210.0100 – Presidential Absentee Ballots
- PART 8210.0200 – Permanent Absentee Ballot Application
- PART 8210.0225 – Applications from Challenged Voters
- PART 8210.0500 – Instructions to Absent Voter
- PART 8210.0600 – Statement of Absentee Voter
- PART 8210.0710 - Format and Instructions for Absentee Ballot Return Envelopes
- PART 8210.2200 – Duties of County Auditor or Municipal Clerk upon receipt of Absentee Ballot Return Envelope
- PART 8210.2400 – Safeguarding Procedures
- PART 8210.2450 – Duties of Ballot Board members When Examining Return Envelopes under Minnesota Statutes section 203B.121.
- PART 8210.2500 – Mail Pickup
- PART 8210.2700 – Receipt of Federal Write-In Absentee Ballots
- PART 8210.3000 – Mail Balloting
- PART 8215.0200 – Ballots
- PART 8215.0300 – Polling Place Voting
- PART 8215.0400 – Absentee Voting

- PART 8215.0500 – Mail Balloting
- PART 8220.1150 – Test Ballots
- PART 8220.1550 – Public Accuracy Test
- PART 8230.2040 – Recording Valid Write-In Votes
- PART 8230.2250 - Delivery of Transfer Case
- PART 8230.3850 – Duplication of Ballots
- PART 8230.4355 – Ballot Boxes for Precinct Counting Centers
- PART 8230.4365 – Precinct Count Voting System Equipment and Procedures
- PART 8235.0300 – Notice Ballot Boxes for Precinct Counting Centers
- PART 8235.0700 – General Procedures
- PART 8240.1600 – Election Judge Basic Training Course
- PART 8240.1655 – Qualifications for Trainee Election Judges
- PART 8240.1750 – Head Election Judge Training
- PART 8240.2700 – Municipal Clerk Training Requirement
- PART 8240.2800 – School District Clerk Training Requirement
- PART 8240.2900 – County Auditor Election Administration Certification
- PART 8250.1810 – Format of Ballots for Optical Scan Systems

Statutory Authority

The Office’s statutory authority to adopt rules related to elections is set forth as follows:

Minnesota Statutes, section 201.121, subd. 3, which provides, in relevant part:

Within ten days after an election, the county auditor shall send the notice required by subdivision 2 to a random sampling of the individuals registered on election day. The random sampling shall be determined in accordance with the rules of the secretary of state.

Minnesota Statutes, section 201.022, subd. 2, which provides:

The secretary of state shall make permanent rules necessary to administer the system required in subdivision 1.

Minnesota Statutes, section 201.061, subd. 3, which provides, in relevant part:

An individual who is eligible to vote may register on election day by appearing in person at the polling place for the precinct in which the individual maintains residence, by completing a registration application, making an oath in the form prescribed by the secretary of state and providing proof of residence.

Minnesota Statutes, section 201.071, subd. 4, which provides, in relevant part:

A county auditor who receives a registration application indicating that an individual was previously registered in a different county in Minnesota shall update the voter's record electronically through the statewide registration system in the manner prescribed by the secretary of state.

Minnesota Statutes, section 201.091, subd. 4, which provides, in relevant part:

Requests to examine or obtain information from the public information lists or the statewide registration system must be made and processed in the manner provided in the rules of the secretary of state.

Minnesota Statutes, section 201.221, subd. 1, which provides:

To implement the provisions of this chapter, the secretary of state shall adopt rules consistent with federal and state election laws.

Minnesota Statutes, section 201.221, subd. 2, which provides:

The secretary of state shall assist local election officers by devising uniform forms and procedures. The secretary of state shall provide uniform rules for maintaining voter registration records on the statewide registration system. The secretary of state shall supervise the development and use of the statewide registration system to ensure that it conforms to applicable federal and state laws and rules.

Minnesota Statutes, section 201.221, subd. 3, which provides, in relevant part:

The secretary of state shall prescribe the form of paper polling place rosters that include the voter's name, address, date of birth, school district number, and space for the voter's signature... The secretary of state may prescribe additional election-related information to be placed on the polling place rosters on an experimental basis for one state primary and general election cycle... The secretary of state shall prescribe procedures for transporting the polling place rosters to the election judges for use on election day. The secretary of state shall prescribe the form for a county or municipality to request the date of birth from currently registered voters.

Minnesota Statutes, section 203B.04, subd. 5(c), which provides:

The secretary of state shall adopt rules governing procedures under this subsection [relating to permanent absentee voter status].

Minnesota Statutes, section 203B.08, subd. 4, which provides:

The secretary of state shall adopt rules establishing procedures to be followed by county auditors and municipal clerks to assure accurate and timely return of absentee ballots. The rules of the secretary of state may authorize procedures and methods of return in addition to those specified in this section.

Minnesota Statutes, section 203B.09, which provides:

The secretary of state shall adopt rules establishing the form, content, and type size and style for the printing of blank applications for absentee ballots, absentee voter lists, return envelopes, certificates of eligibility to vote by absentee ballot, ballot envelopes and directions for casting an absentee ballot. Any official charged with the duty of printing any of these materials shall do so in accordance with these rules.

Minnesota Statutes, section 203B.125, which provides:

The secretary of state shall adopt rules establishing methods and procedures for issuing ballot cards and related absentee forms to be used as provided in section 203B.08, subdivision 1a, and for the reconciliation of voters and ballot cards before tabulation under section 204C.20, subd. 1.

Minnesota Statutes, section 204B.071(a) which provides:

The secretary of state shall adopt rules governing the manner in which petitions required for any election in this state are circulated, signed, filed, and inspected. The secretary of state shall provide samples of petition forms for use by election officials.

Minnesota Statutes, section 204B.14, subdivision 4, which provides, in relevant part:

Any change in the boundary of an election precinct must be adopted at least ten weeks before the date of the next election and, for the state primary and general election or presidential nomination primary, no later than December 1 in the year prior to the year of the state general election...

Alternate dates for adopting changes in precinct boundaries, posting notices of boundary changes, and notifying voters affected by boundary changes pursuant to this subdivision, and procedures for coordinating precinct boundary changes with reestablishing local government election district boundaries may be established in the manner provided in the rules of the secretary of state.

Minnesota Statutes, section 204B.25, subd. 2, which provides:

The secretary of state shall adopt rules establishing programs for the training of county auditors, local election officials, and election judges by county auditors as required by this section.

Minnesota Statutes, section 204B.45, subd. 3, which provides:

The Minnesota Election Law is applicable to mail balloting except as provided by this section or by rules adopted by the secretary of state, but only paper ballots may be used. The secretary of state shall adopt rules for the conduct of mail balloting, including instructions to voters, procedures for challenge of voters, public observation of the counting of ballots, and procedures for proper handling and safeguarding of ballots to ensure the integrity of the election.

Minnesota Statutes, section 204D.08, subd. 1, which provides, in relevant part:

The secretary of state shall adopt rules for the format and preparation of the state primary ballot.

Minnesota Statutes, section 204D.11, subd. 1, which provides, in relevant part:

[The state general election ballot] shall be prepared by the county auditor subject to the rules of the secretary of state. The secretary of state shall adopt rules for preparation and time of delivery of the state general election ballot.

Minnesota Statutes, section 205.17, subd. 6, which provides:

The ballots for municipal elections must be prepared by the municipal clerk in the manner provided in the rules of the secretary of state.

Minnesota Statutes, section 205A.08, subd. 5, which provides:

The ballots for school district elections must be prepared by the school district clerk in the manner provided in the rules of the secretary of state.

Minnesota Statutes, section 206.57, subd. 1, which provides, in relevant part:

The secretary of state may adopt permanent rules consistent with sections 206.55 to 206.90 relating to the examination and use of electronic voting systems.

Minnesota Statutes, section 206.61, subd. 5, which provides, in relevant part:

The rules adopted by the secretary of state for the rotation of candidate names must use the number of registered voters in each precinct as of 8:00 a.m. on May 1 of the year when the rotation will be made as the basis for determining the rotation of names.

Minnesota Statutes, section 206.81, which provides, in relevant part:

The secretary of state may adopt rules consistent with sections 206.55 to 206.90 relating to experimental use [of electronic voting systems]. The extent of experimental use must be determined by the secretary of state.

Minnesota Statutes, section 206.82, subd. 1, which provides, in relevant part:

The secretary of state shall adopt rules further specifying test procedures [for testing of electronic voting systems].

Minnesota Statute, section 206.84, subd. 3, which provides, in relevant part:

The secretary of state shall provide by rule for standard ballot formats for electronic voting systems.

Minnesota Statutes, section 207A.11(c), which provides:

The secretary of state must adopt rules to implement the provisions of this chapter. The secretary of state shall consult with the party chairs throughout the rulemaking process, including seeking advice about possible rules before issuing a notice of intent to adopt rules, consultation before the notice of comment is published, consultation on the statement of need and reasonableness, consultation in drafting and revising the rules, and consultation regarding any modifications to the rule being considered.

Under these statutes, the Office has the necessary statutory authority to adopt the proposed rules.

Public Participation and Stakeholder Involvement

Consistent with the Administrative Procedures Act (APA), the Office published a Request for Comments in the Minnesota State Register on August 21, 2023. To increase accessibility and opportunity for feedback, the Office posted information about the comment period on its website. This information was available online from the time the Request for Comments was published, and continues to be available.

Additionally, pursuant to its Additional Notice Plan approved by CAH on August 10, 2023, the Office solicited initial feedback on the proposed rules from a variety of organizations that are most likely to be affected by the rule revisions, including:

- Various members and committees of the State Legislature;
- The Governor's Office;
- Former Secretaries of States;
- Chairs of Minnesota's major and minor political parties;
- Various election law attorneys;
- Representatives of voting equipment and service vendors;
- Representatives of local government associations; and
- Representatives of various public-interest and advocacy groups.

The Additional Notice Plan is described further starting on page 34 of this document.

Reasonableness of the Amendments

Statement of General Need

Minn. Stat. §§ 14.14, subd. 2, and 14.23, require the Office to establish the need for the proposed rules by an affirmative presentation of facts. The proposed amendments to the rules are intended to update and clarify the rules, implement procedural changes necessitated by statutory amendments and staff experience, and ensure that current processes are clearly explained. They are necessary to address changes in practice as well as new circumstances that have arisen since the rules were last amended.

The Additional Notice Plan is described further starting on page 32 of this SONAR.

Statement of General Reasonableness

Minn. Stat. §§ 14.14, subd. 2, 14.23, and Minn. R. 1400.2070, subp. 1, require the Office to establish that the proposed rules are a reasonable solution to the problems they are intended to address, that the Office relied on evidence in choosing the approach adopted in the rules, and that the evidence relied on is rationally related to the approach the Office chose to adopt.

First, the process used to develop the rules facilitated informed decision-making and was the most efficient method for establishing reasonable rules. The Office notified all persons and organizations that could be identified as potentially interested in or affected by the rules and invited them to comment.

Staff considered the public comments, the experience and expertise of program staff, and knowledge of other states' election laws, when drafting the rules.

Second, the rules' approach to implementing policy goals is reasonable. The Office has determined that the proposed rule amendments are the most reasonable way to update the rules to increase clarity, reduce duplication of statutory language, clarify program procedures, and modify procedural requirements. The reasonableness of each specific provision is addressed below.

Rule-by-Rule Analysis

The Secretary is proposing relatively few changes to the rules other than those required by or in response to the statutory amendments adopted by the Minnesota Legislature in 2023. In this section, the Office will describe each proposed rule change and explain the need, reasonableness, and other approaches that were considered in developing the language, when applicable.

The full text of the rule is attached as Appendix A.

PART 8200.3000 – Registration in Wrong County

The amendment to this part clarifies that county auditors are required to accept all voter registration applications, even if the address listed on the application is not located within the county. Under the current process, county auditors are required to forward voter registration applications from persons who do not live in the county to the proper county only if the auditor accepts the application. However, some county auditors do not accept applications from persons who do not live in the county. Although county auditors attempt to notify individuals when their application is rejected, this does not always occur. The result is that if a person inadvertently submits a voter registration application in the wrong county, it may be rejected without their knowledge and they may not know they need to reapply in the correct county. Consequently, the person may believe they are registered when they are not, leading to confusion and delays on election day or when requesting an absentee ballot. In some cases, it may lead to a person not being able to vote on election day if they do not have time to gather the correct documentation to register at their polling place.

This change clarifies that county auditors must accept all voter registration applications, regardless of address and forward them to the correct county if the county can be ascertained. It is reasonable to make this change to clarify the responsibility of county auditors and ensure individuals are able to register to vote.

PART 8200.3550 – Notice of Challenge Removal

The amendment to this part is to conform this rule language with a 2023 amendment to Minnesota Statutes section 201.014, subdivision 2a. This statutory amendment restored the civil right to vote to individuals who were previously ineligible to do so because of a felony conviction and who were no

longer incarcerated for that offense. Consequently, the rule change is needed and reasonable so that county auditors notify those individuals that the challenge to their voting record has been removed once they are no longer incarcerated.

PART 8200.5100 – Registration at Precinct Only

The Office proposes to modify the definition of “Residential Facility” in subpart 1, item E, because it is simply a duplicate of the definition contained in Minnesota Statutes section 201.061, subdivision 3(c). This change is needed and reasonable to streamline the rules, reduce unnecessary duplication of language, and eliminate the possibility of a definition being changed in statutes but not rules, or vice versa, which would cause confusion.

The Office proposes to repeal subpart 3 because the requirements related to proof of residence for students were codified at Minnesota Statutes 201.061, subpart 3a, in 2023. This change is needed and reasonable to streamline the rules and reduce unnecessary duplication of language.

Finally, the Office proposes to add a subpart 5 governing how a person already registered to vote may update the information on record on election day. This change is needed in light of 2025 amendments to Minnesota election law, which clarified that already-registered voters could update their applications without re-registering. This change is reasonable because it clarifies the process for updating a voter application at a precinct is substantially the same as registering at the precinct.

PART 8200.9115 – Form of Polling Place Rosters

The amendments to subpart 1 are to conform this rule language with a 2023 amendment to Minnesota Statutes section 204C.10(a)(7) and a 2025 amendment to Minnesota Statutes section 204C.10(a)(4). The 2023 statutory amendment is a change to the voter certificate that reflects the fact that the civil right to vote had been restored to individuals who were previously ineligible to do so because of a felony conviction and who were no longer incarcerated for that offense. The 2025 amendment is a change to the same certificate reflecting the fact that the voter must certify they maintain residence at the address “or location” shown. Consequently, the rule change is needed and reasonable so that polling place certificates accurately reflects current eligibility requirements under Minnesota law. In addition, the addition of the third paragraph is necessary to clarify that polling places using electronic rosters must use the same certification for their voter signature certificates. This change is reasonable because it clarifies that paper and electronic rosters must have the same certification.

PART 8200.9300 – Maintaining Certain Voter Registration Records; Security

The amendment to subpart 10 clarifies that the number of ballots to be counted in a polling place should be determined by comparing the number of ballots with the number of voter receipts or the number of names signed on the polling place roster. The current rule also requires that the number of return envelopes from absentee ballots be added to this total. Because absentee ballots are now reviewed and accepted by absentee ballot boards pursuant to Minnesota Statutes section 203B.121, absentee return

envelopes are no longer included in polling places and should not be included in the count. This change is necessary and reasonable to clarify the appropriate method to calculate the number of ballots to be counted in polling places and accurately reflect the manner in which absentee ballots are now accepted under Minnesota law.

In addition, the Office proposes eliminating the reference to subdivision 2 of Minnesota Statutes section 204C.10 because there is no subdivision 2 in that section. It appears that subdivision 2 was removed in 1990 but the reference in rules was not updated. It is necessary and reasonable to amend this reference for accuracy.

PART 8200.9310 - Treatment of Voter Registration Applications

The amendment to the first sentence of subpart 5 clarifies that any voter registration application that a person submits to update their registration must meet all the requirements of Minnesota Statutes section 201.071, subdivision 1. The previous rule stated that the application only needed to meet the requirements of a new voter registration application without identifying what those requirements were. This change is reasonable and necessary to define specifically what information must be provided in order to update a person's registration.

In addition, the Office proposes adding a second sentence to subpart 5 to clarify that any update to a person's voter registration under this subpart must be processed the same way as a new voter registration application. Previously, there was no such requirement. This change is reasonable and necessary to ensure that updates to a person's voter registration are processed consistent with new voter registrations, which, among other things, ensure the person is given notice and an opportunity to correct any deficient or incomplete application as well as notify the person whether the update was submitted too late to be effective for an upcoming election.

PART 8200.9320 – Interaction with Department of Public Safety

The Office proposes to repeal this part because automatic voter registration was codified at Minnesota Statutes section 201.161 in 2023. The current rule language requires that the Department of Public Safety provide a single unified application to permit eligible voters to simultaneously register to vote and apply for a driver's license and state identification card. However, section 201.161 establishes a process by which individuals applying for a driver's license or state identification card with the Department of Public Safety are automatically registered to vote, making it unnecessary for the Department of Public Safety to provide a unified application anymore. This change is needed and reasonable to streamline the rules and eliminate the possibility of confusion regarding the method by which a person can register to vote when applying for a driver's license or state identification card.

8200.9940 - Precinct List of Persons Vouching for Voter Residence on Election Day and Number of Persons Vouched For

The Office proposes to add a subpart one clarifying that vouching information must be tracked and collected using the form and instructions already contained in the rule. The current rule contains the language and form but was not clear as to whether collection of this information according to this process is mandatory. The new subpart makes clear the process that must be followed to collect vouching information. Subpart 1 further authorizes counties, municipalities, and school districts using electronic rosters to collect this information electronically. Local election officials who use electronic rosters have requested this change, indicating that it will be more efficient to collect this information electronically if they are already using electronic rosters.

The addition of subpart 2 and its title are clarifications in light of the addition of subpart 1 to the rule.

PART 8200.9950 – Challenges to Voter Registration, specified by Part 8200.7100

The amendments to this part are necessary to conform this rule language with 2023 amendments to Minnesota Statutes section 201.195. The statutory amendment established new processes by which a registered voter could challenge the eligibility of another voter registered within that county, established new requirements for what information needs to be provided for a challenge, and identified categories of reasons that could not constitute adequate grounds for a challenge.

This rule part provides the form that registered voters must use to make a challenge to another voter's eligibility. The proposed amendment updates the form to reflect the new statutory requirements for challenges. Consequently, the rule change is needed and reasonable so that the voter registration challenge form accurately reflects the new standards and processes in statute.

PART 8210.0100 – Presidential Absentee Ballots

The amendment to subpart 2 is to conform this rule language with a 2023 amendment to Minnesota Statutes section 201.014, subdivision 2a. This statutory amendment restored the civil right to vote to individuals who were previously ineligible to do so because of a felony conviction and who were no longer incarcerated for that offense. Consequently, the rule change is needed and reasonable so that the certificate of eligibility reflects the new requirements to be eligible to vote.

PART 8210.0200 – Permanent Absentee Ballot Application

The amendment to the title of this part and to subpart 4 is to conform this rule language with a 2023 amendment to Minnesota Statutes section 203B.04, subdivision 5, which created a permanent absentee voter program in place of the permanent absentee application program. The current rule language references the previous process, where a person could apply to have an absentee ballot application sent to them before each election. Following the 2023 statute amendment, the new process is that a person submits a single application and can then have the absentee ballot itself sent to them for each election (rather than needing to apply for the absentee ballot each time). Consequently, the rule change is needed and reasonable to accurately reflect the program being administered under Minnesota law.

PART 8210.0225 – Applications from Challenged Voters

The Office proposes to eliminate the language “and to each voter whose voter registration application is incomplete under Minnesota Statutes section 201.161, subdivision 1a or 201.121,” from this rule because the purpose of the rule is to govern the mailing of absentee ballots to challenged voters. Individuals who submit an incomplete voter registration application are not challenged under Minnesota law and the process by which they are notified of their incomplete application is already governed by Minnesota Statutes sections 201.061 and 201.121. Consequently, the rule change is needed and reasonable to accurately reflect the purpose of this rule and avoid confusion as to the status of voters who submit an incomplete application.

PART 8210.0500 – Instructions to Absent Voter

The Office proposes to strike the language “sent or delivered to the absent voter” in subpart 1 because it is duplicative and unnecessary; it is already clear in the sentence which materials are being referenced. The Office further proposes to insert language in subpart 1 allowing jurisdictions to provide supplemental instructions to their voters. This proposed change is reasonable and necessary because the Office has received feedback from local election administrators that they would benefit from being able to include jurisdiction-specific instructions with their materials, such as more specific guidance on where to return a ballot if it is being delivered in person.

The Office proposes modifying certain instructions in subparts 2, 3, 4, 5, and 6. These are instructions for registered voters (subpart 2), unregistered voters (subpart 3), and military and overseas voters (subpart 4) to fill out an absentee or mail ballot. Subparts 5 and 6 contain instructions for military and overseas voters to submit ballots electronically.

First, in 2023, Minnesota Statutes section 203B.08, which was amended to change the time by which an absentee ballot must be returned from 3:00 p.m. to 8:00 p.m. on election day. In 2025, the deadline for in-person delivery was amended from 8:00 p.m. to 5:00 p.m. Consequently, the Office proposes to amend subparts 2 and 3 to reflect the updated time. This change is needed and reasonable to ensure that voters have accurate information on when their ballot must be returned in order for it to be counted.

The addition of an instruction in subparts 2, 3, and 4 stating that voters should “[c]arefully refold the ballot the way it was delivered to you” is reasonable and necessary because if a ballot is refolded in a different way, it is possible the ballot will not easily fit into the ballot envelope or that a crease could pass through a target, which could make it more difficult for the ballot to be tabulated and possibly require duplication. This change is reasonable and necessary to more clearly direct voters returning their ballot, and to lessen the burden on local election administrators by reducing the number of ballots that come back improperly folded.

The modification of “unregistered” to “nonregistered” in subpart 3 is reasonable and necessary to make the language consistent with the remainder of the instructions, which use the phrase nonregistered.

The Office proposes amending the instructions regarding witnesses in subparts 2 and 3 to reflect 2024 amendments made to Minnesota Statutes section 203B.07, subdivision 3. Under previous law, and in the current rules, only a registered voter could serve as a witness for an absentee ballot. However, in 2024, the statute was amended so that any U.S. citizen at least 18 years or older can be an eligible witness. These changes are reasonable and necessary to ensure the instructions that accompany an absentee ballot accurately reflect Minnesota law.

The Office further proposes amending the instruction “Sign the return envelope yourself” in subparts 2, 3, and 4 to “Sign the signature envelope yourself.” This change is necessary because under Minnesota law, voters are not required to sign the return envelope, they are required to sign the signature envelope. This change is reasonable because it clarifies what actually needs to be signed under existing law.

The amendment to the instructions following the heading “If you have a disability” in subparts 2, 3, 4, and 6 is necessary to conform this rule language with the 2023 enactment of Minnesota Statutes section 203B.29, subdivision 2, which requires ballots, instructions, and certificates of voter eligibility be transmitted electronically in an accessible format to voters with a print disability. This amendment is necessary and reasonable to ensure the instructions inform voters of this option so they may take advantage of it as appropriate.

The addition of the instruction “You may provide both numbers if you are unsure what you provide on your absentee ballot application” in subparts 2, 3, 4, and 6 is reasonable and necessary to inform voters that it is acceptable to provide both numbers if they cannot remember which one they provided when they registered to vote.

The removal of the color of receipt in subpart 3 is necessary and reasonable because receipts issued by the Department of Public Safety for driver’s licenses and state identification cards are no longer yellow. This change is needed and reasonable to avoid confusion among voters and ensure that the rules do not conflict with current Department of Public Safety practice.

The change of the terms “group homes” to “assisted living facilities” and “battered women’s” to “domestic abuse victim” in subpart 3 is necessary and reasonable to more precisely address the particular residential facilities where vouching may occur.

The Office proposes adding an instruction to subpart 5 providing a website where military and overseas voters can go for additional information regarding their ballot. This is the website for the Federal Voting Assistance Program, an official source of information from the US Department of Defense for military and overseas voters. This change is reasonable and necessary to provide those voters additional resources to help them cast their ballot.

Finally, the Office proposes changing <http://www.mnvotes.org> to <http://www.mnvotes.gov> throughout the instructions contained in this rule. This is the Office’s web page on elections and voting, and it provides various information on how voters can register, vote, search candidate filings, view election

results, and find other useful election-related information. This change is reasonable and necessary because the Office has changed the domain of this page from .org to .gov.

PART 8210.0600 – Statement of Absentee Voter

This part contains the form to be used for the statement of the absentee voter. This form must be completed by a person submitting an absentee ballot and contains the voter's personal information and attestation that they are eligible to vote.

In subparts 1a and 1b, the Office proposes to remove the field for the witness' street address and clarify that the witness' title is only required if the witness is an authorized official or notary. Under previous law, and in the current rules, only a registered voter could serve as a witness for an absentee ballot and the witness address was needed to in order to verify the witness was a registered Minnesota voter. However, in 2024, Minnesota Statutes section 203B.07, subdivision 3 was amended so that any U.S. citizen at least 18 years or older can be an eligible witness. Consequently, a witness no longer needs to provide their address to establish they are a Minnesota registered voter. These changes are reasonable and necessary to ensure the instructions that accompany an absentee ballot accurately reflect Minnesota law and to streamline the statement process.

The modification of "unregistered" to "nonregistered" in subpart 1b is reasonable and necessary to make the language consistent with the remainder of the instructions and state election law, which use the phrase nonregistered.

The Office proposes amending the certification regarding witnesses in subparts 1a and 1b. Under previous law, and in the current rules, a witness had to certify they were a notary or authorized to give oaths or a registered Minnesota voter to serve as a witness. However, in 2024, Minnesota Statutes section 203B.07, subdivision 3 was amended so that any U.S. citizen at least 18 years or older can be an eligible witness, in addition to notaries or persons authorized to give oaths. These changes are reasonable and necessary to ensure the witness certification accurately reflects the requirements of Minnesota law.

The OSS further proposes amending the certification in subparts 1a and 1b to change references from "ballots" to "ballot." While it has never been the case that a voter could fill out more than one ballot, the OSS has received feedback from local election officials that they receive questions from constituents who are concerned this suggests multiple ballots are contained in one envelope. This change is reasonable and necessary to eliminate confusion and provide clarity.

The Office proposes to strike the last sentence of subpart 3. This language previously authorized county auditors and municipal clerks to use the existing stock of absentee ballot return envelopes for in-person absentee voting even if the instructions on the envelopes no longer reflected current law. However, because the requirements for those envelopes has now been modified by statute, this change is necessary and reasonable to ensure old materials that do not accurately reflect election law are not used. Additionally, this language applied only to existing stock that was on hand as of January 1, 2014; although it is possible that some envelopes printed before 2014 are still available, it is unlikely and

therefore the Office believes that this change will not impact election officials. Furthermore, it is necessary and reasonable to ensure that absentee ballot return envelopes that are more than a decade out of date cannot be used.

The Office further proposes amending the instruction “Sign the return signature envelope yourself” in subpart 3 to “Sign the signature envelope yourself.” This change is necessary because under Minnesota law, voters are not required to sign the return envelope, they are required to sign the signature envelope. This change is reasonable because it clarifies what actually needs to be signed under existing law.

PART 8210.0710 – Format and Instructions for Absentee Ballot Return Envelopes

The modification of “un-registered” to “non-registered” throughout this part is reasonable and necessary to make the language consistent with other parts of the rules, which use the phrase nonregistered.

PART 8210.2200 – Duties of County Auditor or Municipal Clerk upon receipt of Absentee Ballot Return Envelope

The Office proposes modifying the deadline for delivery of absentee ballots in subpart 1. In 2023, Minnesota Statutes section 203B.08 was amended to change the time by which an absentee ballot must be returned from 3:00 p.m. to 8:00 p.m. on election day. In 2025, the same statute was modified to change time by which an absent voter would need to deliver their ballot in person from 8:00 p.m. to 5:00 p.m. Consequently, the Office proposes to amend subpart 1 to reflect the updated time while clarifying the deadline for elections conducted pursuant to Minnesota Statutes section 203B.11, subdivision 4 remains 8:00 p.m. This change is needed and reasonable to ensure that county auditors and municipal clerks receive ballots in accordance with Minnesota law.

PART 8210.2400 – Safeguarding Procedures

The Office proposes modifying subpart D. In 2025, Minnesota Statutes section 203B.121, subdivision 4 was amended to provide new procedures for processing absentee ballots. Consequently, the procedures in this rule are outdated. The rule change is necessary and reasonable to conform the rule with the statutory change and ensure that ballot board members process the ballots in accordance with state law.

PART 8210.2450 – Duties of Ballot Board members When Examining Return Envelopes under Minnesota Statutes section 203B.121.

The Office proposes amending the instructions regarding review of witness eligibility in subpart 5. Under previous law, and in the current rules, only a registered Minnesota voter could serve as a witness for an absentee ballot and the witness address was needed to in order to verify the witness was a registered Minnesota voter. However, in 2024, Minnesota Statutes section 203B.07, subdivision 3 was amended so that any U.S. citizen at least 18 years or older can be an eligible witness. Consequently, an absentee ballot can no longer be rejected because a witness failed to provide a Minnesota address. In addition, witnesses no longer will be required to provide their address, as discussed elsewhere with the changes

to these rules. These changes are reasonable and necessary to ensure ballots not rejected for improper reasons under Minnesota law.

The amendment to subpart 6 is necessary to conform this rule language with 2023 amendments to Minnesota Statutes sections 203B.121, which moved the deadline from which absentee ballots could be opened from secrecy envelopes, duplicated if needed, and deposited in the appropriate ballot box from seven days before the election to 19 days before the election. The rule change is necessary and reasonable to conform the rule with the statutory change and ensure that ballot board members either reject or spoil ballots as appropriate given the new absentee deadlines.

PART 8210.2500 – Mail Pickup

The amendment to this part is to clarify that municipal clerks must take all reasonable steps to deliver return envelopes to ballot boards before the closing of polls (rather than before 4 p.m. on election day, as is reflected in the current language). Historically, the last delivery from the United States Postal Service arrived no later than 4:00 p.m. Since COVID-19 pandemic, however, municipal clerks have indicated that they often receive deliveries later than 4:00 p.m. In addition, the USPS has in recent elections instituted extraordinary measures at its facilities to ensure all possible ballots are delivered before polls close. This change is needed and reasonable to ensure municipal clerks will take all appropriate steps to deliver all ballots received on election day before polls close, including those received after 4:00 p.m.

PART 8210.2700 – Receipt of Federal Write-In Absentee Ballots

Subpart 1 references two statutes that have been repealed; this amendment replaces those references with the current correct citation. This change is reasonable and necessary to cite to the appropriate statute and ensure that the rule accurately reflects the current operation of the law.

PART 8210.3000 – Mail Balloting

The Office proposes amending subpart 4 to reflect 2025 amendments made to Minnesota Statutes section 204B.45, subdivision 2. Under previous law, mail ballot jurisdictions needed to mail ballots to each registered voter no later than 14 days prior to the election. However, in 2025, the statute was amended to require ballots be mailed no later than 28 days prior to the election. This change is reasonable and necessary to ensure the deadlines to mail ballots accurately reflect Minnesota law.

The Office proposes amending the instructions regarding witnesses in subpart 4a and the certificate regarding witnesses in subpart 4b to reflect 2024 amendments made to Minnesota Statutes section 203B.07, subdivision 3. Under previous law, and in the current rules, only a registered voter could serve as a witness for an absentee ballot. However, in 2024, the statute was amended so that any U.S. citizen at least 18 years or older can be an eligible witness. These changes are reasonable and necessary to ensure the instructions and certificate that accompany a mail ballot accurately reflect Minnesota law.

The Office further proposes amending the instruction “Sign the return envelope yourself” in subpart 4a to “Sign the signature envelope yourself.” This change is necessary because under Minnesota law, voters are not required to sign the return envelope, they are required to sign the signature envelope. This change is reasonable because it clarifies what actually needs to be signed under existing law.

The Office further proposes the addition of an instruction in subpart 4a stating that voters should “[c]arefully refold the ballot the way it was delivered to you.” This addition is reasonable and necessary because if a ballot is refolded in a different way, it is possible the ballot will not easily fit into the ballot envelope or that a crease could pass through a target, which could make it more difficult for the ballot to be tabulated and possibly require duplication. This change is reasonable and necessary to more clearly direct voters returning their ballot, and to lessen the burden on local election administrators by reducing the number of ballots that come back improperly folded.

The OSS further proposes amending the certification in subpart 4b to change references from “ballots” to “ballot.” While it has never been the case that a voter could fill out more than one ballot, the OSS has received feedback from local election officials that they receive questions from constituents who are concerned this suggests multiple ballots are contained in one envelope. This change is reasonable and necessary to eliminate confusion and provide clarity.

The amendment to the instructions following the subheading “If you have a disability:” in subpart 4a is necessary to conform this rule language with the 2023 enactment of Minnesota Statutes section 203B.29, subdivision 2, which requires ballots, instructions, and certificates of voter eligibility be transmitted electronically in an accessible format to voters with a print disability. This amendment is necessary and reasonable to ensure the mail ballot instructions inform voters of this option so they may take advantage of it as appropriate.

PART 8215.0200 – Ballots

The amendments to subpart 5 are necessary to conform this rule language with Minnesota Statutes section 207A.13, which requires, if requested by the political party, that a ballot for a participating party in the presidential nominating primary contain a blank line below the other choices on the ballot so that a voter may write in the name of a person not listed on the ballot. The amendments are reasonable and necessary to ensure that ballots in the presidential nominating primary are formatted in a manner that is consistent with state law.

PART 8215.0300 – Polling Place Voting

The amendments to subpart 1 are necessary to conform this rule language with 2023 amendments to Minnesota Statutes sections 201.091, subdivision 4a and 207A.12, which makes the political party ballot selected by a voter private data that may only be shared with the chair of the major political party whose ballot the voter selected. The current rule reflects previous state law, which made the political party ballot the voter selected public data. The amendment is reasonable and necessary to ensure that data is treated with the appropriate classification under state law.

PART 8215.0400 – Absentee Voting

The amendment to subpart 2 is necessary to conform this rule language with 2023 amendments to Minnesota Statutes sections 201.091, subdivision 4a, and 207A.12, which makes the political party ballot selected by a voter private data that may only be shared with the chair of the major political party whose ballot the voter selected. The current rule reflects previous state law, which made the political party

ballot the voter selected public data. The amendment is reasonable and necessary to ensure that data is treated with the appropriate classification under state law.

The amendment to subpart 7 is necessary to conform this rule language with 2023 amendments to Minnesota Statutes sections 203B.121. Previously, absentee ballots could be opened from secrecy envelopes, duplicated if needed, and deposited in the appropriate ballot box from seven days before the election. In 2023, this was changed to 19 days before the election. Additionally, the alternative procedure in Minnesota Statutes section 203B.081 is now an alternate procedure for both early and absentee voting; the Office proposes to amend subpart 7 to simply remove the word “absentee” and the reference to subdivision 3 so that this subpart now refers more generally to the entire statute. The rule changes in this part are necessary and reasonable to ensure the rule accurately reflects the new deadlines under state law and for what purposes the alternative procedure is available.

PART 8215.0500 – Mail Balloting

The Office proposes amending the instructions regarding witnesses in subpart 3 and the certificate regarding witnesses in subpart 5 to reflect 2024 amendments made to Minnesota Statutes section 203B.07, subdivision 3. Under previous law, and in the current rules, only a registered voter could serve as a witness for an absentee ballot. However, in 2024, the statute was amended so that any U.S. citizen at least 18 years or older can be an eligible witness. These changes are reasonable and necessary to ensure the instructions and certificate that accompany an absentee ballot accurately reflect Minnesota law.

The addition of an instruction in subpart 3 stating that voters should “[c]arefully refold the ballot the way it was delivered to you” is reasonable and necessary because if a ballot is refolded in a different way, it is possible the ballot will not easily fit into the ballot envelope or that a crease could pass through a target, which could make it more difficult for the ballot to be tabulated and possibly require duplication. This change is reasonable and necessary to more clearly direct voters returning their ballot, and to lessen the burden on local election administrators by reducing the number of ballots that come back improperly folded.

The Office further proposes amending the instruction “Sign the return signature envelope yourself” in subpart 3 to “Sign the signature envelope yourself.” This change is necessary because under Minnesota law, voters are not required to sign the return envelope, they are required to sign the signature envelope. This change is reasonable because it clarifies what actually needs to be signed under existing law.

The Office also proposes amending the instructions following the heading “If you have a disability” in subpart 3 to provide additional information about how you may obtain ballots, instructions, and a certificate of voter eligibility in an accessible format if you have a print disability. This change is necessary to conform this rule language with the 2023 enactment of Minnesota Statutes section 203B.29, subdivision 2, which requires ballots, instructions, and certificates of voter eligibility be transmitted electronically in an accessible format to voters with a print disability. This amendment is necessary and

reasonable to ensure the instructions inform voters of this option so they may take advantage of it as appropriate.

The amendment to subpart 5 is necessary to conform this rule language with 2023 amendments to Minnesota Statutes sections 201.091, subdivision 4a and 207A.12, which makes the political party ballot selected by a voter private data that may only be shared with the chair of the major political party whose ballot the voter selected. Previously, this was classified as public information.

The amendment to subpart 7 is necessary to conform this rule language with the 2023 amendments to Minnesota Statutes sections 204B.45, which moved the deadline from which absentee ballots could be opened from secrecy envelopes, duplicated if needed, and deposited in the appropriate ballot box from seven days before the election to 19 days before the election. The rule change is necessary and reasonable to conform the rule with the statutory change and ensure that ballots are either rejected or spoil ballots as appropriate given the new absentee deadlines.

PART 8220.1150 – Test Ballots

The Office proposes modifying the label on test ballots from “TEST” to any manner that indicates the ballot is a test ballot. Vendors that create pre-marked test decks use a variety of means to identify test ballots and this change is reasonable and necessary to provide that flexibility, while still maintaining a standard that it be apparent the ballot is a test ballot.

The Office proposes adding requirements that at least one test ballot that is folded as if mailed and one ballot that is marked by different pens must be included when ballots are being tested before an election. These requirements are reasonable and necessary because, in consultation with local election officials, these are scenarios that often occur with actual ballots and so it is appropriate to test for them in preparing for elections.

PART 8220.1550 – Public Accuracy Test

The amendment to the first sentence of the first paragraph is reasonable and necessary to conform this rule language with the 2023 amendments to Minnesota Statutes section 206.83, which changes the deadline for when a public accuracy test must be conducted from 14 days before the voting equipment is used to three days. The previous rule reflected the standard in the previous statute.

The amendment to the first sentence of the second paragraph is reasonable and necessary to confirm this rule language with the 2025 amendments to Minnesota Statutes section 206.83, which changes the deadline for public notice of the public accuracy test from 48 hours to five days. The previous rule reflected the standard in the previous statute.

The amendment to the fourth paragraph clarifies that an election jurisdiction must publicly test each unique model of voting equipment used by the jurisdiction. Every ballot counter used in an election must complete preliminary testing according to 8220.1350. However, the previous language in 8220.1550 was ambiguous and could be interpreted not to require public accuracy testing of all unique models. It is necessary and reasonable to clarify this requirement to ensure that each voting jurisdiction publicly tests

all models of voting equipment before an election, reducing the risk of issues during voting that can undermine public confidence in the election system and create logistical difficulties in accurately tallying votes.

The addition of the last sentence makes clear that ballot marking devices for absentee voting need only be tested according to the standard established in 8220.1350. Ballot marking devices are used for absentee voting, which begins 46 days before election day, whereas the remaining equipment subject to a public accuracy test is not used until 19 days before the election (at the earliest). This addition is reasonable and necessary because it clarifies that ballot marking devices must still be tested before use but does not require local election officials to hold a separate public accuracy test for just those devices.

PART 8230.2040 – Recording Valid Write-In Votes

In 2023, Minnesota Statutes sections 204B.09 and 206.90 were amended to require that the ballot be marked in the oval opposite the blank line for a write-in vote. Previously, a voter could write in a name without marking the corresponding oval. In addition, the 2023 amendments to section 204B.09 provide local jurisdictions the option to pass a resolution to determine how write-in votes are counted. To conform with these statutory changes, the proposed amendments to this part explain the counting of write-in votes and state that write in votes are “able” to be counted. These amendments are necessary and reasonable to ensure that the rule language on write-in ballots conforms with the current statutory requirements, reducing the risk of confusion among election administrators and the public.

PART 8230.2250 – Delivery of Transfer Case

The Office proposes to amend subpart 2 to clarify that the transfer case, which carries, among other things, valid voter ballots, envelopes containing spoiled and defective ballots, and the summary statement be delivered “directly” by election judges from the precinct to the official conducting the election. While most election judges already deliver the transfer case directly to the appropriate official, the rule was ambiguous as to whether this was a requirement. The amendment eliminates this ambiguity. The amendment is reasonable because direct delivery of the transfer case ensures the items remain secure and there is no delay in delivery to the appropriate official.

PART 8230.3850 – Duplication of Ballots

In 2023, Minnesota Statutes section 206.80 was amended to establish new requirements for the paper ballots produced by electronic voting systems. Previously, neither the statute nor the rule addressed this situation. This amendment is necessary to establish how these ballots should be duplicated if necessary, since this is a situation not previously contemplated in the rule. The proposed language states that, if this type of ballot needs to be duplicated, the same process must be followed as for other ballots needing duplication. This is a reasonable approach because it treats these ballots the same as all other ballots requiring duplication. Having the same process is simpler and more efficient for local election administrators.

PART 8230.4355 – Ballot Boxes for Precinct Counting Centers

The Office proposes deleting the language “The ballot box may contain a compartment that receives ballots on which all votes have been counted except those for offices for which the write-in target has been completed” from this part. This language applies only to voting equipment that contains a compartment that receives only ballots that do not contain write-in votes, and this type of equipment is no longer used in Minnesota. The change is reasonable and necessary to avoid confusion and eliminate unnecessary language.

PART 8230.4365 – Precinct Count Voting System Equipment and Procedures

The Office proposes deleting the language “If the ballot box contains a compartment for write-in ballots, the judges shall put the ballots taken from the ballot box's write-in compartment into containers separate from the other ballots and seal them.” This language applies only to voting equipment that contains a compartment that receives only ballots that do not contain write-in votes, and this type of equipment is no longer used in Minnesota. The change is reasonable and necessary to avoid confusion and eliminated unnecessary language.

PART 8235.0300 – Notice

In 2024, Minnesota Statutes section 204C.35 was amended to require that recounts for the election of presidential electors be completed within six days of the recount being requested. The Office proposes amending this rule part to require that notice to candidates be provided within 24 hours of any request for such a recount. Previously, there was no specific timeline for a recount for the election of presidential electors. This proposed rule change is necessary because notice must be provided as soon as possible in order to meet the new six-day timeline requirement. It is reasonable because election officials will already have the necessary contact information for candidates, so a 24-hour timeline for providing notice should not be burdensome.

PART 8235.0700 – General Procedures

The Office proposes amending this part to include language that mirrors 2023 amendments to Minnesota Statutes section 206.80, specifying the procedures to be used in a recount when certain ballot formats were included and they were used by 10 or fewer voters in a precinct. This change is reasonable and necessary to ensure the rule conforms with new statutory requirements.

PART 8240.1600 – Election Judge Basic Training Course

The Office proposes amending subpart 4 to add additional topics that must be covered in election judge basic training. These additions are reasonable to reflect changes in election processes that have occurred since the rules were last modified. These additions are necessary because they are specific topics on which local election administrators have shared that their election judges could benefit from additional training. It is important to add these topics to the rules to ensure that election judges across the state benefit from training on all essential topics and elections across the state are run consistently, accurately, and effectively.

PART 8240.1655 – Qualifications for Trainee Election Judges

The Office proposes amending this part to include language that mirrors 2023 amendments to Minnesota Statutes section 204B.19, which clarified that a student could serve as a trainee election judge until after the student graduates and reaches the age of 18. This change is reasonable and necessary to ensure the rule conforms with new statutory requirements.

PART 8240.1750 – Head Election Judge Training

The Office proposes amending subpart 2 to add Security and Emergency Plans to the head election judge training program. County election officials are required to develop emergency plans under Minnesota Statutes section 204B.181 and it is necessary and reasonable to include training on these plans for head election judges so that they know how to address incidents appropriately.

PART 8240.2700 – Municipal Clerk Training Requirement

The Office proposes amending subpart 5 to add additional topics that must be covered in municipal clerk training. These additions are reasonable to reflect changes in election processes that have occurred since the rules were last modified. These additions are necessary because they are specific topics on which local election administrators have shared that their staff could benefit from additional training. It is important to add these topics to the rules to ensure that municipal clerks across the state benefit from training on all essential topics and elections across the state are run consistently, accurately, and effectively.

PART 8240.2800 – School District Clerk Training Requirement

The Office proposes amending subpart 5 to add additional topics that must be covered in school district clerk training. These additions are reasonable to reflect changes in election processes that have occurred since the rules were last modified. These additions are necessary because they are specific topics on which local election administrators have shared that their staff could benefit from additional training. It is important to add these topics to the rules to ensure that school district clerks across the state benefit from training on all essential topics and elections across the state are run consistently, accurately, and effectively.

PART 8240.2900 – County Auditor Election Administration Certification

The Office proposes amending subpart 4 to add additional topics that must be covered in county auditor training. These additions are reasonable to reflect changes in election processes that have occurred since the rules were last modified. These additions are necessary because they are specific topics on which local election administrators have shared that their staff could benefit from additional training. It is important to add these topics to the rules to ensure that county auditors across the state benefit from training on all essential topics and elections across the state are run consistently, accurately, and effectively.

PART 8250.1810 – Format of Ballots for Optical Scan Systems

The Office proposes amending subpart 9. The previous law and current rules establish a process by which the order of candidates is determined for all partisan offices appearing on the ballot. In 2024, Minnesota Statutes section 204D.13, subdivision 2 was amended to provide a specific process by which the order of candidates for president and vice president appear on the ballot and subdivision 2a was added to provide a new process by which the order of candidates for other partisan offices is determined. These changes are reasonable and necessary to ensure the order of candidates is determined in a manner consistent with state law.

The Office proposes amending subpart 18 to require the Office to prepare and provide translated copies of the example ballots to county auditors. This change is reasonable and necessary to reflect the 2023 amendments to Minnesota Statutes section 204B.295, which impose this duty on the Office.

The Office proposes amending subpart 19 to identify how alternative ballots authorized under Minnesota Statutes section 206.80 must be prepared. These ballots did not previously exist when the current rule was passed and the 2023 amendments to section 206.80 establish what information the ballot must contain. This change is reasonable and necessary to reflect the 2023 amendments to Minnesota Statutes section 206.80, which authorized the creation of these ballots.

Regulatory Analysis

Minnesota Statutes section 14.131 sets out eight factors for a regulatory analysis that must be included in the SONAR. The sections below quote these factors and then give the Secretary of State's response.

Classes Affected

Eligible voters will benefit from the proposed rule amendments because the rules clarify election procedures and ensure that election officials are informed of updated procedures and trained to carry out accurate, consistent, and efficient elections. These changes include changes to the absentee, mail, and military and overseas ballot instructions. These changes will provide voters more information about how to successfully cast their ballots, including providing them up-to-date information on how those with print disabilities can obtain assistance; what resources are available to those voting from overseas; and what qualifications a witness must have for any person not voting in person.

Election officials and local governments will benefit from the proposed rule amendments because they ensure that the rules conform with recent statutory amendments, reducing the potential for confusion and allowing local elections officials to better rely upon the rules as a guide. The amendments also eliminate obsolete provisions regarding election processes and equipment no longer in use in Minnesota, again reducing the potential for confusion. Finally, the proposed rules are updated to reflect additional topics that must be covered in election official training, ensuring election officials receive up-to-date education on the changing election environment.

The **Office of the Secretary of State** will benefit from the proposed rules because they clarify the rules, modify the rules so that they comply with current law, make changes requested by local election officials, and remove obsolete rules. The more that voters and election officials understand the rules, the fewer resources the Office of the Secretary of State must expend to answer questions.

Classes of Persons Bearing the Costs of the Proposed Rules

The **Office of the Secretary of State** will bear some of the costs of the proposed rules. The Office will incur staff costs, for example, to prepare new sample instructions and materials that comply with the changes made in the proposed rules. These costs should be minimal, however, because the Office's staff simply will make the changes to the current electronic versions of the forms and print these new samples. The Office makes some changes to forms on a somewhat regular basis so this is within the scope of the Office's ongoing election administration work.

Election officials and the local governments for whom they work will bear some costs related to printing new instructions, forms and materials, but these costs should be minimal as many of these materials are printed separately for each election and counties, cities, and towns do not keep a large supply of pre-printed materials on hand. In addition, some of the changes are designed specifically to permit cost savings by election officials – in the printing of voter registration materials, for example.

In both cases, the majority of proposed rule amendments are to conform with statutory amendments, so any cost to the Office or local governments would not be above the cost to conform with the underlying statute.

Department/Agency Costs

The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues.

The Secretary of State will be required to provide training on these rule changes, but the Secretary of State is already required to conduct training for election officials. The provisions of the new rules will be incorporated into the current training session. As discussed above, the Secretary's office already provides samples of the material discussed in the rules to local governments and does not expect to incur any additional costs due to the proposed rules.

To the best of the knowledge and belief of the Office of the Secretary of State, there will be no impact on state or local revenues, nor will the proposed rules cause any other state agency to incur costs. As previously mentioned, the majority of proposed rule amendments are to conform with statutory amendments, so any minor cost to the Office or local governments would not be above the cost to conform with the underlying statute.

Less Costly or Intrusive Methods

A determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule.

Where applicable, this factor is discussed in the rule-by-rule section of the analysis. However, the overwhelming majority of the proposed rule amendments are to conform with statutory amendments, so the rule amendments are the only available method to achieve the purpose.

Alternative Methods

A description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule.

Where applicable, this factor is discussed in the rule-by-rule section of the analysis. In addition to the discussion in the rule-by-rule section of the analysis, the Office looked to other states and solicited feedback from election administrators to determine alternative means for achieving the purpose of the proposed rules. Because of the unique nature of many of Minnesota's election laws, many alternative methods employed by other states were not applicable in Minnesota.

In addition, the Office also considered making no changes to the rules. The Office determined that this was not an option because the majority of the proposed rule amendments are to conform with statutory amendments, no alternative method is available other than updating the rules.

Costs to Comply

The probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals.

There will be some very limited one-time cost increases to county, city, township, and school district election officials due to the need to re-print forms and instructions (for those that have leftover stock remaining to be used). However, this should be minimal because many jurisdictions print new materials for each election and have no leftover stock. Further, most of the proposed changes to forms and instructions are already effective as they were required by the legislative changes adopted in 2023, 2024, and 2025 and not independently imposed by the proposed rules.

Costs of Non-Adoption

The probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals.

The majority of the proposed rule changes are a result of legislative changes in 2023, 2024, and 2025. Without these proposed rule changes, the Administrative Rules would conflict with statute. Further, there would be non-financial costs with respect to voter confusion, reduction in election integrity, and additional burdens carried by election administrators.

With regards to the few proposed rule changes that are not the result of statutory amendments, if these changes are not made, voters, election officials, local governments, and the Office will not benefit from the improved clarity and more efficient procedures proposed in the rules.

Differences from Federal Regulations

An assessment of any differences between the proposed rule and existing federal regulations and a specific analysis of the need for and reasonableness of each difference.

Nothing in the proposed rule is in conflict with federal regulations. Various federal laws and regulations govern election administration, but the proposed changes govern state-specific election administration and do not conflict with nor modify any federal regulation or law.

Cumulative Effect

An assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

The primary purpose of the proposed rule amendments are to bring the rules in line with current Minnesota law and increase clarity and accessibility for voters. Because the proposed rule amendments do not cover areas addressed by federal law, and because proposed rule amendments relating to state law are designed to bring the rules in line with state statute, this consideration is not applicable. To the extent that a proposed rule amendment is designed to bring the rules in line with state statute, that is noted in the rule-by-rule section of the analysis.

Notice Plan

Minnesota Statutes, section 14.131, requires that an agency include in its SONAR a description of its efforts to provide additional notification to persons or classes of persons who may be affected by the proposed rule or must explain why these efforts were not made.

Details on the previous measures taken to ensure stakeholders received both required and additional notice of this rulemaking during the Request for Comments and rule development period can be found on pages 12 of this SONAR.

Required Notice

The Office is required under Minnesota Statutes, chapter 14 to identify and send notice to several groups. The steps the Office will take to meet those statutory requirements are laid out in detail below.

Consistent with Minnesota Statutes, section 14.14, subd. 1a, on the day the Dual Notice is published in the *State Register*, the Office will send via email or U.S. mail a copy of the Dual Notice and the proposed rule to the contacts on the Office's list of all persons who have registered with the Office for the purpose of receiving notice of rule proceedings. There are roughly 7,500 on the Office's list of persons who have requested notice of all rule proceedings via email. No persons have requested notice of rule proceedings via postal mail. The Dual Notice will be sent at least 33 days before the end of the comment period.

Consistent with Minnesota Statutes, section 14.116(b), the Office will send a copy of the Dual Notice, a copy of the proposed rules, and a copy of the SONAR to the chairs and ranking minority party members of the House State Government Finance and Policy Committee, House Elections Finance and Policy Committee, the House Judiciary Finance and Civil Law Committee, the Senate Elections Committee, the Senate Judiciary and Public Safety Committee, the Senate State and Local Government Committee, and the Legislative Coordinating Commission. These documents will be sent at least 33 days before the end of the comment period.

Consistent with Minnesota Statutes, section 14.131, the Office will send a copy of the SONAR to the Legislative Reference Library when the Dual Notice is sent.

There are several notices required under Minnesota Statutes, chapter 14 in certain situations that do not apply for this rulemaking. These notices are laid out in detail below.

Minnesota Statutes, section 14.116(c) requires that the Office "make reasonable efforts to send a copy of the notice and the statement to all sitting legislators who were chief house of representatives and senate authors of the bill granting the rulemaking authority" if it is within two years of the effective date of the law granting rulemaking authority. This requirement does not apply because no bill within the past two years granted the Office additional authority for this rulemaking.

Minnesota Statutes, section 14.111 requires the Office to provide the commissioner of agriculture with a copy of the proposed rule change if the agency plans to adopt or repeal a rule that affects farming operations. This requirement does not apply because the proposed amendments will not have any effect on farming operations in Minnesota.

Additional Notice

In addition to the required notice referenced above, the Office will make the Dual Notice, SONAR, and proposed rule available on the webpage created for this rulemaking.

The Office also intends to send an electronic notice with a hyperlink to electronic copies of the Dual Notice, SONAR, and proposed rule to:

All members of the following legislative committees with policy oversight in this area of law:

- House State Government Finance and Policy Committee
- House Elections Finance and Government Operations
- Senate Elections Committee
- Senate State and Local Government Committee

Chairs and Ranking Minority Members of the following legislative committees with fiscal oversight in this area:

- House State Government Finance and Policy Committee
- House Elections Finance and Policy Committee
- House Ways and Means Committee
- Senate Elections Committee
- Senate State and Local Government Committee
- Senate Finance Committee

House and Senate Leadership from the Majority and Minority Caucuses

Governor Tim Walz

Former Secretaries of State:

- Mark Ritchie
- Mary Kiffmeyer
- Joan Anderson Growe

Chairs of Minnesota's major political parties:

- Democratic-Farmer-Labor Party
- Republican Party of Minnesota

Chairs of Minnesota's minor political parties:

- Grassroots-Legalize Cannabis Party
- Forward Independence Party of Minnesota (Previously Independence-Alliance)

Libertarian Party of Minnesota
Legal Marijuana Now Party

The following election attorneys:

David Asp
Daniel Cragg
James Dickey
Matthew Haapoja
Jeffrey Holth
Erick Kaardal
Rachel Kitze
Fritz Knaak
John Knapp
Reid LeBeau
Eric Magnuson
William Mohrman
Richard Morgan
Michael Murphy
Charles Nauen
Jared Reams
Steven Reitenour
Vince Reuter
Brian Rice
Douglas Seaton
Virginia Stark
Tony Trimble
Peter Wattson
David Zoll

Representatives of voting equipment and service vendors:

Clear Ballot Group, Inc.
Democracy Live
Dominion Voting System Corp.
Election Systems & Software, Inc.
Election Administrators
Hart Intercivic, Inc.
Knowink
Modus Elections Software
Scytl
Taylor
Votem

Representatives of local government associations:

- Association of Minnesota Counties
- League of Minnesota Cities
- Minnesota Association of County Officers, and all Minnesota County Auditors
- Minnesota Association of Townships
- Minnesota School Boards Association
- Minnesota County Attorney Association

Representatives of public-interest groups:

- AARP
- ACLU of Minnesota
- Catholic Charities
- Minnesota Election Integrity Solutions
- Center of the American Experiment
- Common Cause Minnesota
- Education Minnesota
- FairVote Minnesota
- League of Women Voters of Minnesota
- Minnesota Advocates for Human Rights
- Minnesota Board on Aging
- Minnesota Citizens Concerned for Life
- Minnesota Council of Nonprofits
- Minnesota Department of Veteran's Affairs
- Minnesota Majority
- Minnesota Taxpayers League
- Minnesota Voters Alliance
- Minnesota Public Interest Research Group
- Minnesota School Employees Association
- TakeAction Minnesota
- We Choose Us

Representatives of the following agencies and organizations of people with disabilities:

- Arc Minnesota
- Minnesota Commission of Deaf, Deaf-Blind and Hard of Hearing People
- Minnesota Disability Law Center
- Minnesota State Council on Disability
- National Alliance for the Mentally Ill - Minnesota
- National Federation of the Blind

Representatives of the following groups representing communities of color in Minnesota:

Asian Americans Advancing Justice
Council on American-Islamic Relations Minnesota
Council on Asian-Pacific Minnesotans
Council for Minnesotans of African Heritage
Council on Latino Affairs
Hmong American Partnership
Immigrant Law Center
International Institute of Minnesota
Karen Organization of Minnesota
Minnesota Indian Affairs Council
Urban League – Twin Cities
NAACP – Minneapolis
NAACP – St. Paul
Native Vote Alliance of Minnesota
Somali Action Alliance

On August 10, 2023, the Office received confirmation from CAH that these steps meet the notice requirements for persons or classes of persons who may be affected by the proposed amendments to these rules under Minn. Stat. § 14.14, subd. 1a.

Performance-Based Rules

Minnesota Statutes, section 14.002, requires state agencies, whenever feasible, to develop rules that are not overly prescriptive and inflexible, and rules that emphasize achievement of the agency's regulatory objectives while allowing maximum flexibility to regulated parties and to the agency in meeting those objectives.

These proposed rules increase flexibility in application procedures and participant voting procedures, allowing multiple methods of complying with the rules depending on the situation. This will reduce barriers for applicants and participants.

In drafting these rules, the Office has incorporated feedback from stakeholders who have identified areas for improvement.

Consultation with MMB on Local Government Impact

As required by Minnesota Statutes, section 14.131, the Office will consult with Minnesota Management and Budget (MMB). We will do this by sending MMB copies of the proposed rules and SONAR before the Office publishes the Dual Notice. The Office will submit a copy of the cover correspondence and any

response received from Minnesota Management and Budget to CAH at the hearing or with the documents it submits for ALJ review.

As discussed above, county and municipal election officials will need to engage with the Office to ensure they understand the rule changes. As detailed above and based on the experience of program staff, the costs of rulemaking to counties, cities, townships and school districts should be minimal. In fact, the burden on counties is likely to be little because many of these changes were already required by legislation adopted in 2023.

Impact on Local Government Ordinance and Rules

As required by Minn. Stat. § 14.128, subd. 1, the Office has considered whether these proposed rules will require a local government to adopt or amend any ordinance or other regulation in order to comply with these rules. The Office has determined that they do not because elections in Minnesota are governed by federal and state laws. Thus, no local ordinance or local regulatory changes are required.

Costs of Complying for Small Business or City

Agency Determination of Cost

As required by Minn. Stat. § 14.127, the Office has considered whether the cost of complying with the proposed rules in the first year after the rules take effect will exceed \$25,000 for any small city or small business and the Office has determined that it will not. The Office has made this determination based on the minimal printing costs needed to comply with the proposed rule, as described in the Regulatory Analysis section of this SONAR and the rule-by-rule analysis.

Authors, Witnesses, and Exhibits

Authors

The primary authors of this SONAR are Justin R. Erickson, General Counsel, Office of the Minnesota Secretary of State and Nicole Freeman, Government Relations Director, Office of the Minnesota Secretary of State.

Witnesses

If these rules go to a public hearing, the Office anticipates having the following witnesses testify in support of the need for and reasonableness of the rules:

- Paul Linnell, Office of the Minnesota Secretary of State, Elections Director
- Emily Hunt, Office of the Minnesota Secretary of State, Deputy Elections Director

- Nicole Freeman, Office of the Minnesota Secretary of State, Government Relations Director

Conclusion

In this SONAR, the Office has established the need for and the reasonableness of each of the proposed amendments to Minnesota Rules, Chapters 8200-8250. The Office has provided the necessary notice and documented its compliance with all applicable administrative rulemaking requirements of Minnesota statute and rules.

Based on the foregoing, the proposed amendments are both needed and reasonable.

A handwritten signature in black ink that reads "Steve Pimm". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Secretary of State

August 22, 2025

Date

Certificate of Delivery to the Legislative Reference Library

Certificate of Sending the Statement of Need and Reasonableness to the Legislative Reference Library

Office of the Minnesota Secretary of State

Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250

I certify that on August 22, 2025, at St. Paul, Ramsey County, Minnesota, when the statement of need and reasonableness became available to the public on the website of the Office of the Secretary of State, I sent a copy of the statement to the Legislative Reference Library. I did this by emailing the statement to sonars@lrl.leg.mn. This was done to comply with Minnesota Statutes, section 14.23. The cover letter for this email is attached to this certificate.



Justin R. Erickson
General Counsel



STATE OF MINNESOTA
Office of Minnesota Secretary of State
Steve Simon

August 22, 2025

VIA EMAIL

Legislative Reference Library
sonars@lrl.leg.mn

In the Matter of the Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440

Dear Legislative Reference Library:

The Office of the Secretary of State intends to adopt rules relating to election administration. We plan to publish a Dual Notice in the August 25, 2025 *State Register*.

We have prepared a Statement of Need and Reasonableness. As required under Minnesota Statutes, sections 14.131 and 14.23, we are sending the library an electronic copy of the Statement of Need and Reasonableness at the same time that we are sending our Notice of Intent to Adopt Rules.

If you have any questions or concerns, please contact me at justin.erickson@state.mn.us or 651-201-6895

Sincerely,

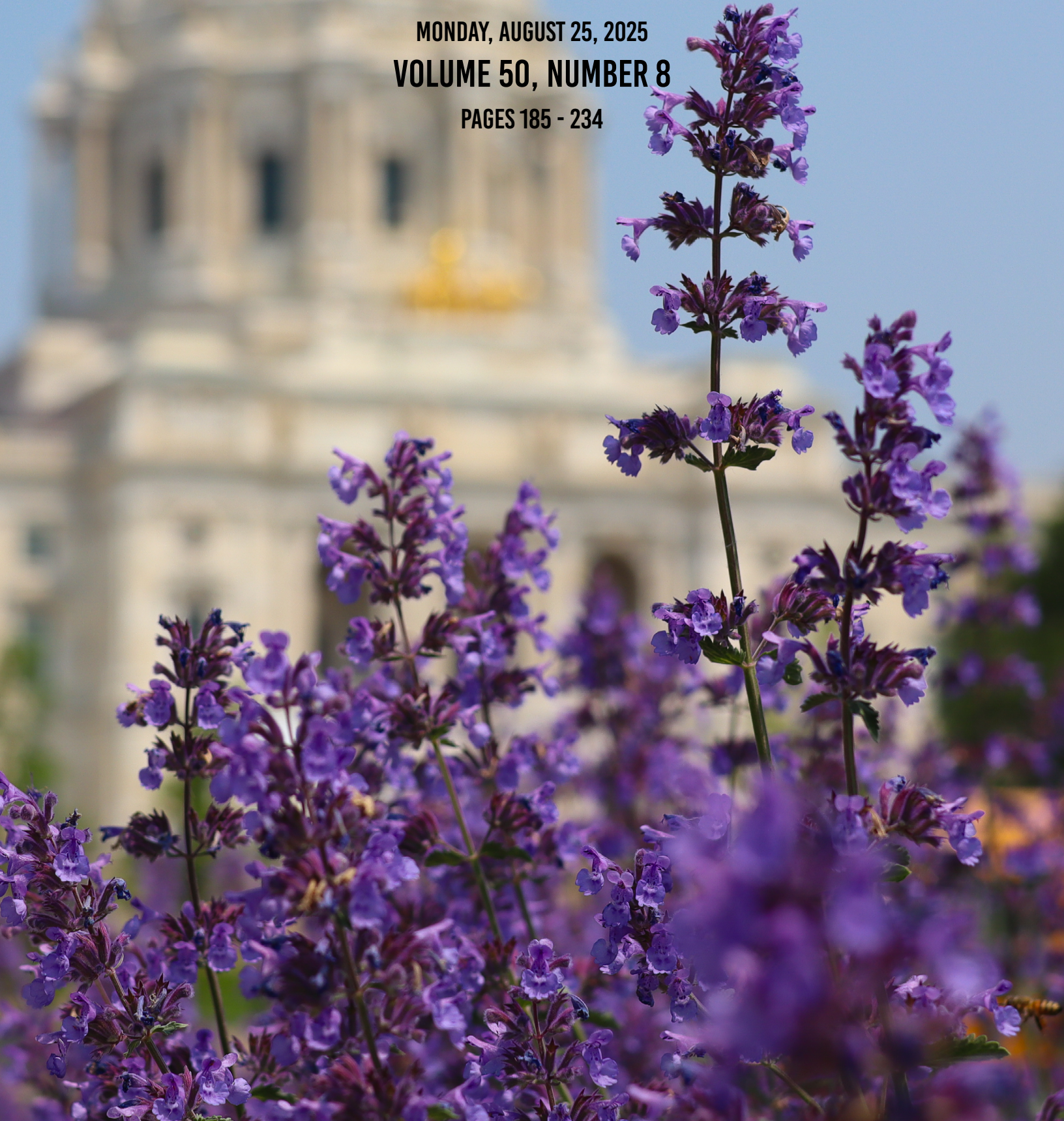
Justin R. Erickson
General Counsel

Enclosure: Statement of Need and Reasonableness

Dual Notice

MINNESOTA STATE REGISTER

MONDAY, AUGUST 25, 2025
VOLUME 50, NUMBER 8
PAGES 185 - 234



Proposed Rules

Comments on Planned Rules or Rule Amendments. An agency must first solicit Comments on Planned Rules or Comments on Planned Rule Amendments from the public on the subject matter of a possible rulemaking proposal under active consideration within the agency (*Minnesota Statutes* §§ 14.101). It does this by publishing a notice in the *State Register* at least 60 days before publication of a notice to adopt or a notice of hearing, and within 60 days of the effective date of any new statutory grant of required rulemaking.

Rules to be Adopted After a Hearing. After receiving comments and deciding to hold a public hearing on the rule, an agency drafts its rule. It then publishes its rules with a notice of hearing. All persons wishing to make a statement must register at the hearing. Anyone who wishes to submit written comments may do so at the hearing, or within five working days of the close of the hearing. Administrative law judges may, during the hearing, extend the period for receiving comments up to 20 calendar days. For five business days after the submission period the agency and interested persons may respond to any new information submitted during the written submission period and the record then is closed. The administrative law judge prepares a report within 30 days, stating findings of fact, conclusions and recommendations. After receiving the report, the agency decides whether to adopt, withdraw or modify the proposed rule based on consideration of the comments made during the rule hearing procedure and the report of the administrative law judge. The agency must wait five days after receiving the report before taking any action.

Rules to be Adopted Without a Hearing. Pursuant to *Minnesota Statutes* § 14.22, an agency may propose to adopt, amend, suspend or repeal rules without first holding a public hearing. An agency must first solicit **Comments on Planned Rules** or **Comments on Planned Rule Amendments** from the public. The agency then publishes a notice of intent to adopt rules without a public hearing, together with the proposed rules, in the *State Register*. If, during the 30-day comment period, 25 or more persons submit to the agency a written request for a hearing of the proposed rules, the agency must proceed under the provisions of §§ 14.1414.20, which state that if an agency decides to hold a public hearing, it must publish a notice of intent in the *State Register*.

KEY: Proposed Rules - Underlining indicates additions to existing rule language. ~~Strikeouts~~ indicate deletions from existing rule language. If a proposed rule is totally new, it is designated “all new material.” **Adopted Rules** - Underlining indicates additions to proposed rule language. ~~Strikeout~~ indicates deletions from proposed rule language.

Office of the Minnesota Secretary of State

Proposed Permanent Rules Relating to Election Administration; DUAL NOTICE: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Persons Request a Hearing, and Notice of Hearing if 25 or More Requests for Hearing Are Received

Proposed Permanent Rules Relating to Elections Administration; Revisor’s ID Number R-4824; CAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250

Introduction. The Office of the Minnesota Secretary of State intends to adopt rules without a public hearing following the procedures in the rules of the Court of Administrative Hearings, *Minnesota Rules*, parts 1400.2300 to 1400.2310, and the Administrative Procedure Act, *Minnesota Statutes*, sections 14.22 to 14.28. You may submit written comments and/or a written request that a hearing be held on the proposed rules until **4:30 p.m. on Friday, September 26, 2025**.

Hearing. If 25 or more persons submit a written request for a hearing on the rules **4:30 p.m. on Friday, September 26, 2025**, the agency will hold a virtual public hearing on **Friday, October 10, 2025 at 12:00 pm**. You can participate in the virtual hearing, which will be conducted by an Administrative Law Judge from the Court of Administrative Hearings, via WebEx by using this link along with the associated access code and password:

Proposed Rules

For a video and audio connection, join the hearing through an internet connection:

- Web link: **Webex Meeting Link**
- Meeting Number (access code): 2497 428 6333
- Password: i7nWuZXmc55

For audio-only connection, join the virtual hearing by telephone:

- Call: 1-415-655-0003 (this is not a toll-free number)
- Access code: 2497 428 6333
- Password: i7nWuZXmc55

To find out whether the agency will adopt the rules without a hearing or if it will hold the hearing, you should contact the agency contact person or check the agency website at [https://www.sos.mn.gov/about-the-office/rulemaking-data-practice/rulemaking/ after September 26, 2025 and before October 10, 2025](https://www.sos.mn.gov/about-the-office/rulemaking-data-practice/rulemaking/after%20September%2026,%202025%20and%20before%20October%2010,%202025).

Subject of Rules. The proposed rules are related to election administration. In particular, the proposed rules modify language related to voter registration; ballot formatting and instructions; absentee ballot administration; ballot safeguard procedures; mail balloting procedures; testing of voting systems; and election official training. The majority of the proposed changes are technical or clarifying in nature or are to conform to the rules with Minnesota Statutes. The Office also proposes to eliminate rules that are duplicative of, or inconsistent with, changes made to Minnesota Statutes.

Statutory Authority. The statutory authority to adopt these rules is Minnesota Statutes sections 201.121, subd. 3, 201.022, subd. 2, 201.061, subd. 3, 201.071, subd. 4, 201.091, subd. 4, 201.221, subd. 1, 201.221, subd. 2, 201.221, subd. 3, 203B.04, subd. 5(c), 203B.08, subd. 4, 203B.09, 203B.125, 204B.071(a), 204B.14, subdivision 4, 204B.25, subd. 2, 204B.45, subd. 3, 204D.08, subd. 1, 204D.11, subd. 1, 205.17, subd. 6, 205A.08, subd. 5, 206.57, subd. 1, 206.61, subd. 5, 206.81, 206.82, subd. 1, 206.84, subd. 3, and 207A.11(c).

Publication of proposed rules. A copy of the proposed rules is published in the *State Register* and attached to this notice as mailed. The proposed rules may be viewed at: <https://www.sos.mn.gov/about-the-office/rulemaking-data-practice/elections-rulemaking-2023-24/>

Statement of Need and Reasonableness. The statement of need and reasonableness (SONAR) contains a summary of the justification for the proposed rules, a description of who will be affected by the proposed rules, and an estimate of the probable cost of the proposed rules. You may review or obtain copies for the cost of reproduction by contacting the agency contact person. The SONAR may also be viewed at: <https://www.sos.mn.gov/about-the-office/rulemaking-data-practice/elections-rulemaking-2023-24/>

Agency Contact Person. The agency contact person is Justin R. Erickson at the Office of the Minnesota Secretary of State, 20 W 12th Street, Saint Paul, MN 55155, 651-201-6895, justin.erickson@state.mn.us. You may contact the agency contact person with questions about the rules.

Public Comment. You have until **4:30 p.m. on Friday, September 26, 2025**, to submit written comment in support of or in opposition to the proposed rules or any part or subpart of the rules.

Your comment must be in writing and received by the due date. Your comments should identify the portion of the proposed rules addressed, the reason for the comment, and any change you propose. Any comments that you have about the legality of the proposed rules must be made during this comment period. All evidence that you present should relate to the proposed rules. If the proposed rules affect you in any way, the agency encourages you to participate. All comments or responses received are public data and will be available for review.

Submit written comments via the **Court of Administrative Hearings Rulemaking eComments website** (<https://mn.gov/oah/forms-and-filing/ecomments/>), by U.S. Mail delivered to the Court of Administrative Hearings, 600 North Robert Street, P.O. Box 64620, Saint Paul, Minnesota 55164-0620, or by fax 651-539-0310.

Proposed Rules

All comments or responses received are public data and will be available for review on the eComments website.

Request for a Hearing. In addition to submitting comments, you may also request that the agency hold a public hearing on the rules. You must make your request for a public hearing in writing by **4:30 p.m. on Friday, September 26, 2025**. You must include your name and address in your written request for hearing. You must identify the portion of the proposed rules that you object to or state that you oppose the entire set of rules. You are also encouraged to state the reason for the request and any changes you want made to the proposed rules. Any request that does not comply with these requirements is not valid and the agency cannot count it when determining whether it must hold a public hearing.

Withdrawal of Requests. If 25 or more persons submit a valid written request for a hearing, the agency will hold a public hearing unless a sufficient number of persons withdraw their requests in writing. If enough requests for hearing are withdrawn to reduce the number below 25, the agency must give written notice of this to all persons who requested a hearing, explain the actions the agency took to bring about the withdrawal, and ask for written comments on this action. If the agency is required to hold a public hearing, it will follow the procedures in *Minnesota Statutes*, sections 14.131 to 14.20.

Cancellation of Hearing. The agency will cancel the hearing scheduled for October 10, 2025, if the agency does not receive requests for a hearing from 25 or more persons. If you requested a public hearing, the agency will notify you before the scheduled hearing whether the hearing will be held. You may also call the agency contact person at 651-201-6895 after September 26, 2025, to find out whether the hearing will be held. On the scheduled day, you may check for whether the hearing will be held by going online at <https://www.sos.mn.gov/about-the-office/rulemaking-data-practice/elections-rulemaking-2023-24/>

Notice of Hearing. If 25 or more persons submit valid written requests for a public hearing on the rules, the agency will hold a hearing following the procedures in *Minnesota Statutes*, sections 14.131 to 14.20. The agency will hold the hearing on the date and at the time and place listed above. The hearing will continue until 4:00 pm or until all interested persons have been heard, whichever occurs first. Administrative Law Judge Eric L. Lipman is assigned to conduct the hearing. Judge Lipman can be reached by contacting William Moore, Rules Coordinator, Court of Administrative Hearings, 600 North Robert Street, P.O. Box 64620, Saint Paul, Minnesota 55164-0620, telephone 651-361-7893, and william.t.moore@state.mn.us.

Hearing Procedure. If the agency holds a hearing, you and all interested or affected persons, including representatives of associations or other interested groups, will have an opportunity to participate. You may present your views orally at the hearing or in writing at any time before the hearing record closes. All evidence presented should relate to the proposed rules.

You may also submit written material to the Administrative Law Judge to be recorded in the hearing record for five working days after the public hearing ends. At the hearing, the Administrative Law Judge may order this five-day comment period extended for a longer period but for no more than 20 calendar days.

After the comment period, there is a five-working-day rebuttal period when the agency and any interested person may respond in writing to any new information submitted. No one may submit new evidence during the five-day rebuttal period.

The Court of Administrative Hearings must receive all comments and responses submitted to the Administrative Law Judge via the ***Court of Administrative Hearings Rulemaking eComments website*** (<https://mn.gov/oah/forms-and-filing/ecomments/>) no later than 4:30 p.m. on the due date. If using the eComments website is not possible, you may submit post-hearing comments in person or via United States mail addressed to Judge Lipman at the address listed above. All comments or responses received are public data and will be available for review on the eComments website.

This rule hearing procedure is governed by *Minnesota Rules*, parts 1400.2000 to 1400.2240, and *Minnesota Statutes*, sections 14.131 to 14.20. You may direct questions about the procedure to the Administrative Law Judge, through William Moore, the CAH Rules Coordinator listed above.

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Modifications. The agency may modify the proposed rules either as a result of public comment or as a result of the rule hearing process. It must support modifications by data and views submitted during the public comment and rule hearing process. The adopted rules may not be substantially different than these proposed rules unless the agency follows the procedure under *Minnesota Rules*, part 1400.2110. If the final rules are identical to the rules originally published in the *State Register*, the agency will publish a notice of adoption in the *State Register*. If the final rules are different from the rules originally published in the *State Register*, the agency must publish a copy of the changes in the *State Register*.

Adoption Procedure if No Hearing. If no hearing is required, the agency may adopt the rules after the end of the comment period. The agency will submit the rules and supporting documents to the Court of Administrative Hearings for a legal review. You may ask to be notified of the date the rules are submitted to the office. If you want to receive notice of this, to receive a copy of the adopted rules, or to register with the agency to receive notice of future rule proceedings, submit your request to the agency contact person listed above.

Adoption Procedure after a Hearing. If a hearing is held, after the close of the hearing record, the Administrative Law Judge will issue a report on the proposed rules. You may ask to be notified of the date that the Administrative Law Judge's report will become available and can make this request at the hearing or in writing to the Administrative Law Judge. You may also ask to be notified of the date that the agency adopts the rules and the rules are filed with the Secretary of State, or register with the agency to receive notice of future rule proceedings by requesting this at the hearing or by writing to the agency contact person stated above.

Lobbyist Registration. *Minnesota Statutes*, chapter 10A, requires each lobbyist to register with the State Campaign Finance and Public Disclosure Board. You may direct questions about this requirement to the Campaign Finance and Public Disclosure Board at: Suite #190, Centennial Building, 658 Cedar Street, St. Paul, Minnesota 55155, telephone (651) 539-1180 or 1-800-657-3889.

Alternative Format/Accommodation. Upon request, this information can be made available in an alternative format, such as large print, braille, or audio. To make such a request or if you need an accommodation to make this hearing accessible, please contact the agency contact person at the address or telephone number listed above.

Order. I order that the rulemaking hearing be held at the date, time, and location listed above.

August 22, 2025

Steve Simon
Secretary of State

8200.3000 REGISTRATION IN WRONG COUNTY.

A county auditor must accept a voter registration application delivered to the county auditor, even if the voter registration application includes a residential address outside of the county. When a county auditor receives a voter registration application ~~from a person whose~~ with a residential address is in another county, the auditor shall within two working days forward the application to the auditor of the proper county if the county can be ascertained.

8200.3550 NOTICE OF CHALLENGE REMOVAL.

The county auditor shall mail a notice indicating the person's name, address, precinct, and polling place to any registered voter whose ~~civil rights have~~ right to vote has been restored after ~~a felony conviction~~ the person is no longer incarcerated; who has been removed from under a guardianship of the person under which the person did not retain the right to vote; or who has been restored to capacity by the court after being ineligible to vote. The notice must require that it be returned if not deliverable.

8200.5100 REGISTRATION AT PRECINCT ONLY.

Subpart 1. **Procedure; proof.** Any person otherwise qualified but not registered to vote in the precinct in which the person resides may register to vote on election day at the polling place of the precinct in which the person resides. To

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register on election day, a person must complete and sign the registration application and provide proof of residence. A person may prove residence on election day only:

[For text of items A to D, see Minnesota Rules]

E. by having an employee employed by and working in a residential facility located in the precinct, who knows that the applicant is a resident of that residential facility, vouch for that facility resident, and sign the oath in part 8200.9939, in the presence of the election judge.

“Residential facility” means transitional housing as defined in Minnesota Statutes, section 256E.33, subdivision 1; a supervised living facility licensed by the commissioner of health under Minnesota Statutes, section 144.50, subdivision 6; a nursing home as defined in Minnesota Statutes, section 144A.01, subdivision 5; a residence registered with the commissioner of health as a housing with services establishment as defined in Minnesota Statutes, section 144D.01, subdivision 4; a veterans home operated by the board of directors of the Minnesota Veterans Homes under Minnesota Statutes, chapter 198; a residence licensed by the commissioner of human services to provide a residential program as defined in Minnesota Statutes, section 245A.02, subdivision 14; a residential facility for persons with a developmental disability licensed by the commissioner of human services under Minnesota Statutes, section 252.28; housing support as defined in Minnesota Statutes, section 256I.03, subdivision 3; a shelter for battered women as defined in Minnesota Statutes, section 611A.37, subdivision 4; or a supervised publicly or privately operated shelter or dwelling designed to provide temporary living accommodations for the homeless is defined in Minnesota Statutes, section 201.061.

To be eligible to sign the oath, the employee must show proof of employment at the residential facility, which may be accomplished by methods including:

[For text of subitems (1) to (3), see Minnesota Rules]

[For text of subpart 2, see Minnesota Rules]

Subp. 3. [See repealer.]

Subp. 4. [Repealed, 38 SR 1368]

Subp. 5. Update. A registered voter may change the information on record on election day at the polling place of the precinct in which the voter now resides. To do so, the voter must submit a voter registration application meeting all the requirements of Minnesota Statutes, section 201.071, and provide proof of residence as described in subparts 1 or 2. Subparts 1 and 2 and parts 8200.5200 to 8200.5500 apply to any update of a registration under this subpart.

8200.9115 FORM OF POLLING PLACE ROSTERS.

Subpart 1. **General form of roster.** The polling place rosters must contain the following items from the statewide registration system: voter’s name, voter’s address, voter’s date of birth, voter’s school district number, and a line on which the voter’s signature can be written. When a voter’s registration has been challenged pursuant to Minnesota Statutes, section 201.121, subdivision 2, an indicator noting the voter’s challenged status must be printed on the line or included in the field provided for the voter’s signature. A similar indicator must be printed on the line or included in the field provided for the voter’s signature to note a voter’s guardianship or felony incarceration status, if any.

The following certification must be included at the top of each page of the polling place roster: “I swear or affirm that I am at least 18 years of age and a citizen of the United States; that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota for 20 days immediately preceding ~~this the~~ the election ~~and maintain residence at the address or location shown~~; that I am not under guardianship of the person in which the court order revokes my right to vote, have not been found by a court to be legally incompetent to vote, and that I have the right to vote because, if convicted of a felony, ~~my felony sentence has expired (been completed) or I have been discharged from my sentence~~ I am not currently incarcerated for that conviction; and that I am registered and will be voting only in this precinct. I understand that giving false information is a felony punishable by not more than five years imprisonment and a fine of not more than \$10,000, or both.”

For polling places using electronic rosters, the same certification must be included as part of the voter signature certificate pursuant to Minnesota Statutes, section 201.225, subdivision 2, clause (9).

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One or more pages in a printed polling place roster must be provided for use by voters who register to vote in the polling place on election day. An election day registrant shall fill in the registrant's name, address, and date of birth and shall sign the roster on the line provided.

The polling place roster must also contain the name of the precinct and, for paper rosters, must include a page number. In addition, each line provided for a voter's signature must be consecutively numbered on each page.

The roster may also include additional material as permitted under Minnesota Statutes, section 201.221, subdivision 3.

[For text of subparts 2 and 3, see Minnesota Rules]

8200.9300 MAINTAINING CERTAIN VOTER REGISTRATION RECORDS; SECURITY.

[For text of subparts 1 to 9, see Minnesota Rules]

Subp. 10. **Voter's receipt.** The election judges shall determine the number of ballots to be counted by ~~adding the number of return envelopes from accepted absentee ballots to~~ comparing the number of ballots with the number of voter's receipts issued pursuant to Minnesota Statutes, section 204C.10, ~~subdivision 2,~~ or to the number of names signed on the polling place roster. The election jurisdiction may require that the election judges number or initial each voter's receipt as it is issued.

[For text of subpart 11, see Minnesota Rules]

8200.9310 TREATMENT OF VOTER REGISTRATION APPLICATIONS.

[For text of subparts 1 to 3, see Minnesota Rules]

Subp. 4. [Repealed, 31 SR 350]

Subp. 5. **Updates.**

A. A voter with an active voter registration may change the information on record by submitting a voter registration application meeting all the requirements ~~for a new voter registration application~~ of Minnesota Statutes, section 201.071, subdivision 1. Parts 8200.2600 to 8200.4000 shall apply to the processing of any update submitted through this subpart.

[For text of item B, see Minnesota Rules]

8200.9940 PRECINCT LIST OF PERSONS VOUCHING FOR VOTER RESIDENCE ON ELECTION DAY AND NUMBER OF PERSONS VOUCHER FOR.

Subpart 1. **Required information.** Information regarding persons vouching for voter residence on election day must be tracked according to the form and instructions in subpart 2. Counties, municipalities, or school districts authorized to use electronic rosters pursuant to Minnesota Statutes, section 201.225, may instead collect this information electronically.

Subp. 2. **Instructions and form.**

Instructions and Form:

Precinct List of Persons Vouching

City/Town _____ Ward _____ Precinct _____

- To be completed by election judges.
- Use to track the number of people vouched for by each voucher.
- Cross out the next number each time that person vouches for a registrant.
- Employees of residential facilities may vouch for an unlimited number of facility residents who are registering to vote at the facility's address. Otherwise, vouchers may only vouch for a maximum of eight registrants.

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Voucher's Name	Voucher's Voter ID No.	Number Vouched for on Election Day
Example: John Doe	1234567	1 2 3 4 5 6 7 8
1		1 2 3 4 5 6 7 8
2		1 2 3 4 5 6 7 8
3		1 2 3 4 5 6 7 8
4		1 2 3 4 5 6 7 8
5		1 2 3 4 5 6 7 8
6		1 2 3 4 5 6 7 8
7		1 2 3 4 5 6 7 8
8		1 2 3 4 5 6 7 8
9		1 2 3 4 5 6 7 8
10		1 2 3 4 5 6 7 8
11		1 2 3 4 5 6 7 8
12		1 2 3 4 5 6 7 8
13		1 2 3 4 5 6 7 8
14		1 2 3 4 5 6 7 8
15		1 2 3 4 5 6 7 8
16		1 2 3 4 5 6 7 8
17		1 2 3 4 5 6 7 8
18		1 2 3 4 5 6 7 8
19		1 2 3 4 5 6 7 8
20		1 2 3 4 5 6 7 8
21		1 2 3 4 5 6 7 8
22		1 2 3 4 5 6 7 8
23		1 2 3 4 5 6 7 8
24		1 2 3 4 5 6 7 8
25		1 2 3 4 5 6 7 8
26		1 2 3 4 5 6 7 8
27		1 2 3 4 5 6 7 8
28		1 2 3 4 5 6 7 8
29		1 2 3 4 5 6 7 8
30		1 2 3 4 5 6 7 8

Certified by the Head Election Judge of the Precinct:

Printed Name

Signature

Date

8200.9950 CHALLENGES TO VOTER REGISTRATION, SPECIFIED BY PART 8200.7100.

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To the Auditor of _____ County
County Courthouse
_____ (County Seat), Minnesota

I, _____ (Name of person making challenge), am a registered voter in
_____ County, Minnesota. I reside at _____ (Street or Route No.)
_____ (City or Township).

I challenge the registration of _____ (Name of challenged voter) whose registration lists his
or her residence as _____ (Street or Route No.) _____ (City or
Township).

The grounds for my challenge are based on the following facts and circumstances: _____

(attach additional sheets of signed statement, including supporting documents, affidavits, or other evidence, if necessary).

This challenge is based on my personal knowledge, and I have exercised due diligence to personally verify the facts and
circumstances establishing the basis for the challenge.

____/____/____
(Date)

(Signature of Challenger)

8210.0100 PRESIDENTIAL ABSENTEE BALLOTS.

[For text of subpart 1, see Minnesota Rules]

Subp. 2. Form of certificate of eligibility.

Signature Envelope

Voter must complete this section

please print clearly

Voter name _____

Voter Former Address in MN _____ MN

ID number

(MN driver's license #,

MN ID card #,

or last four digits of SSN) _____

☐ I do not have a MN-issued driver's license, MN-issued ID card, or
Social Security number.

Current phone number (optional):

Current email address (optional):

I certify that I

- will be at least 18 years old on election day;
- am a citizen of the United States;
- am not under guardianship of the person in which the court order revokes my right to vote;
- have not been found by a court to be legally incompetent to vote;
- ~~have the right to vote because, if convicted of a felony, my felony sentence has expired (been completed) or I have been discharged from my sentence;~~
- am not currently incarcerated for a conviction of a felony offense;
- previously lived in Minnesota at the address printed above;
- moved from Minnesota to another state within 30 days of the election; and
- am not eligible to vote in the state in which I now live.

Voter Signature X _____

8210.0200 PERMANENT ABSENTEE ~~BALLOT APPLICATION~~ VOTER.

[For text of subparts 1 to 3, see Minnesota Rules]

Subp. 4. **Permanent ~~application~~ absentee voter.** An eligible voter under Minnesota Statutes, section 203B.04, subdivision 5, may apply to the county auditor or municipal clerk using a form provided by the secretary of state to automatically receive an absentee ballot ~~application~~ for each election in which the voter is eligible to vote. ~~The county auditor shall make available the form provided by the secretary of state for this purpose. The voter shall complete the form and return it to the county auditor or municipal clerk. A municipal clerk who receives a completed application shall forward it to the county auditor immediately.~~ The voter's permanent application absentee voter status must be indicated and permanently maintained on the voter's registration record on the statewide voter registration system.

The county auditor shall maintain a list of voters who have applied to automatically receive an absentee ballot ~~application~~. At least 60 days before each election, ~~the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

[For text of subparts 4a to 6, see Minnesota Rules]

8210.0225 APPLICATIONS FROM CHALLENGED VOTERS.

A voter registration application must be sent with the ballot to any challenged voter ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes, section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee ballot process must be administered as if the voter was not registered to vote.

8210.0500 INSTRUCTIONS TO ABSENT VOTER.

Subpart 1. **Required instructions.** Instructions to the absent voter shall be transmitted with the absentee ballot materials ~~sent or delivered to the absent voter.~~ The instructions shall be in the form in subparts 2, 3, or 4 or 5 and 6. The instruction headings with numbers must be in no smaller than 12-point type and the rest of the text must be in no smaller than 10-point type, except for the confidentiality notice, which may be in 7-point type. The instructions must explain how to correctly mark the ballot. The instructions must inform the voter of the effect of casting multiple votes for an office and, in the case of a partisan primary, the effect of voting for candidates of more than one party. The instructions must include information on how to correct a ballot before it is cast and counted, including instructions on how to request a replacement ballot if the voter is unable to change the ballot or correct an error. The instructions must include a graphic

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depiction of the absentee ballot materials and how they are to be completed and assembled by the voter. The instructions must also include a privacy notice that complies with Minnesota Statutes, section 13.04. The secretary of state must provide each county auditor with sample instructions with graphic depictions. Jurisdictions may provide additional instructions to voters, provided the instructions comply with the typeface requirements of this part.

Subp. 2. Instructions for registered voters. Instructions

How to vote by absentee ballot

for registered voters

You will need:

- Ballot*
- Tan ballot envelope*
- White signature envelope*
- Larger white return envelope*
- Pen with black ink
- Your ID number

Minnesota driver's license number, Minnesota ID card number, or the last four digits of your Social Security number.

See below if you do not have any of these numbers.

- Witness

~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age on or before the day of the election and who is a citizen of the United States,

including your spouse or relative,

or a notary public,

or a person with the authority to administer oaths

- * If any of these items are missing, please contact your local election official.

1 Vote!

- Show your witness your blank ballot, then mark your votes in private.
- Follow the instructions on the ballot.
- Do not write your name or ID number anywhere on the ballot.
- Do not vote for more candidates than allowed. If you do, your votes for that office will not count.

See the other side if you make a mistake on your ballot.

2 Seal your ballot in the tan ballot envelope

- Carefully refold the ballot the way it was delivered to you.
- Do not write on this envelope.

3 Put the tan ballot envelope into the white signature envelope

4 Fill out the white signature envelope completely

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- If there is no label, print your name and Minnesota address.
- Print your Minnesota driver's license number, Minnesota ID card number, or the last four digits of your Social Security number.

Be sure to use one of the same numbers that you provided on your absentee ballot application. You may provide both numbers if you are unsure what you provided on your absentee ballot application.

If you do not have any of these numbers, check the box.

- Read and sign the oath.
- Ask your witness to print their name ~~and Minnesota street address, including city (not a P. O. Box),~~ in the box at the top of the witness section and sign their name in the box at the bottom of the witness section.

If your witness is an official or notary, they must print their title instead of an address.

Notaries must also affix their stamp.

- Seal the envelope.

5 Put the signature envelope into the larger white return envelope to protect your private information from view

- Seal the envelope.

6 Return your ballot by Election Day to the address on the return envelope

Ballots may not be delivered to your polling place

You have three options:

- Send it so it arrives by Election Day, using U.S. mail or a package delivery service,
- Deliver it in person before election day or by ~~3:00~~ 5:00 p.m. on Election Day, or
- Ask someone to deliver it by ~~3:00~~ 5:00 p.m. on Election Day.

This person cannot deliver more than 3 ballots.

See the other side for special instructions if you have a disability.

To check the status of your absentee ballot, visit ~~www.mnvotes.org~~ mnvotes.gov.

Correcting a mistake

- If time allows, ask for a new ballot from your election office. Contact your election office at [email] or [phone number], or
- Completely cross out the name of the candidate you accidentally marked and then mark your ballot for the candidate you prefer (do not initial your corrections).

If you have a disability:

If you have a disability or cannot mark your ballot, your witness may assist you by marking your ballot at your direction, assembling the materials, and filling out the forms for you.

When signing the envelope, Minnesota law says you may:

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- Sign the return signature envelope yourself, or
- Make your mark, or
- Ask your witness to sign for you in your presence. (Have the witness sign their own name as well.)
- If you have adopted the use of a signature stamp for all purposes of signature, you may use your signature stamp or ask your witness to use your signature stamp in your presence.

Minnesota Statutes, section 645.44, subdivision 14

- If you have a print disability, you may request that ballots, instructions, and a certificate of voter eligibility be transmitted electronically in an accessible format by contacting your county auditor. If you request a ballot be transmitted electronically in an accessible format, you may then complete your ballot electronically but must print your voted ballot and return this ballot and completed certificate of voter eligibility to your local election office.

Please note: Voting is not covered by power of attorney. A person with power of attorney may only sign for you in your presence, as outlined above.

Subp. 3. Instructions for ~~unregistered~~ nonregistered voters. Instructions

How to vote by absentee ballot

You will need:

- Ballot*
- Tan ballot envelope*
- Voter registration application*
- White signature envelope*
- Larger white return envelope*
- Pen with black ink
- Minnesota driver's license with your address
or other authorized proof of where you live.

See other side for a list of options

- Your ID number

Minnesota driver's license number, Minnesota ID card number, or the last four digits of your Social Security number.

See below if you do not have any of these numbers.

- Witness

Anyone registered to vote in Minnesota Any person who is at least 18 years of age on or before the day of the election and who is a citizen of the United States,

including your spouse or relative,

or a notary public,

or a person with the authority to administer oaths

- * If any of these items are missing, please contact your local election official.

Important: You must submit the voter registration application with your ballot (in the white signature envelope) for your vote to be counted.

1 Fill out the voter registration application and sign it

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- Show your witness your driver's license or other authorized proof of where you live.

See the other side for a list of options.

2 Vote!

- Show your witness your blank ballot, then mark your votes in private.
- Follow the instructions on the ballot.
- Do not write your name or ID number anywhere on the ballot.
- Do not vote for more candidates than allowed. *If you do, your votes for that office will not count.*

See the other side if you make a mistake on your ballot.

3 Seal your ballot in the tan ballot envelope

- Carefully refold the ballot the same way it was delivered to you.
- Do not write on this envelope.

4 Put the tan ballot envelope and the voter registration application in the white signature envelope

5 Fill out the white signature envelope completely

- If there is no label, print your name and Minnesota address.
- Print your Minnesota driver's license number, Minnesota ID card number, or the last four digits of your Social Security number.

Be sure to use one of the same numbers that you provided on your absentee ballot application. You may provide both numbers if you are unsure what you provided on your absentee ballot application.

If you do not have any of these numbers, check the box.

- Read and sign the oath.
- Ask your witness to print their name ~~and Minnesota street address, including city (not a P. O. Box);~~ in the box at the top of the witness section, indicate which proof you showed them, and sign their name in the box at the bottom of the witness section.

If your witness is an official or notary, they must print their title ~~instead of an address~~.

Notaries must also affix their stamp.

- Seal the envelope.

6 Put the signature envelope into the larger white return envelope to protect your private information from view

- Seal the envelope.

7 Return your ballot by Election Day to the address on the return envelope

Ballots may not be delivered to your polling place

You have three options:

- Send it so it arrives by Election Day, using U.S. mail or a package delivery service,
- Deliver it in person before election day or by ~~3:00~~ 5:00 p.m. on Election Day, or

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- Send it so it arrives by Election Day, using U.S. mail or a package delivery service,
- Ask someone to deliver it by ~~3:00~~ 5:00 p.m. on Election Day.

This person cannot deliver more than 3 ballots.

To check the status of your absentee ballot, visit ~~www.mnvotes.org~~ mnvotes.gov.

Options for proof of where you live

A valid Minnesota driver's license, Minnesota ID card, or permit with your current address

or

A photo ID that does not have your current address along with a document that has your current address

- **Eligible photo IDs:** Minnesota or another state's driver's license, learner's permit, or ID card; U.S. passport; U.S. military or veteran ID card; Minnesota high school/college/university ID card; or tribal ID card with your signature, from a tribe recognized by the Bureau of Indian Affairs (BIA).
- **Eligible documents with your current address:** an original bill, including account statements and start-of-service notifications, dated within 30 days before or with a due date 30 days before or after the election; a current student fee statement; or a residential lease if valid through election day. Eligible bills are: gas, electric, solid waste, water, sewer, phone, cell phone, television, Internet provider, credit card, or banking services; or bills for rent or mortgage payments.

or one of the following:

- A ~~yellow~~ receipt for a valid Minnesota driver's license, Minnesota ID card, or permit with your current address
- Vouching: the signature of a registered voter who lives in your precinct and personally knows that you live in the precinct. If your witness is registered to vote in this precinct, your witness may vouch for you. *This person must complete and sign the voucher form on the back of the voter registration application.*
- A tribal ID card with your name, address, signature, and picture, from a tribe recognized by the BIA
- A "Notice of Late Registration" if you received one from the county auditor or city clerk
- If you have moved within your precinct or changed your name, a current registration in the precinct
- Vouching for residents of certain residential facilities: the signature of an employee of your residential facility, including nursing homes, ~~group homes~~ assisted living facilities, ~~battered women's~~ domestic abuse victim shelters, homeless shelters, etc. If you are not sure if the residential facility where you live is eligible, call your local election official. *The employee must complete and sign the voucher form on the back of the voter registration application.*

Correcting a mistake

- If time allows, ask for a new ballot from your election office. Contact your election office at [email] or [phone number], or
- Completely cross out the name of the candidate you accidentally marked and then mark your ballot for the candidate you prefer (do not initial your corrections).

If you have a disability:

If you have a disability or cannot mark your ballot, your witness may assist you by marking your ballot at your direction, assembling the materials, and filling out the forms for you.

When signing the envelope, Minnesota law says you may:

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- Sign the return signature envelope yourself, or
- Make your mark, or
- Ask your witness to sign for you in your presence. (Have the witness sign their own name as well.)
- If you have adopted the use of a signature stamp for all purposes of signature, you may use your signature stamp or ask your witness to use your signature stamp in your presence.

Minnesota Statutes, section 645.44, subdivision 14

- If you have a print disability, you may request that ballots, instructions, and a certificate of voter eligibility be transmitted electronically in an accessible format by contacting your county auditor. If you request a ballot be transmitted electronically in an accessible format, you may then complete your ballot electronically but must print your voted ballot and return this ballot and completed certificate of voter eligibility to your local election office.

Please note: Voting is not covered by power of attorney. A person with power of attorney may only sign for you in your presence, as outlined above.

Subp. 4. Instructions for military and overseas voters transmitted ballots by mail. Instructions

How to vote by absentee ballot for military and overseas voters

You will need:

- Ballot*
- Tan ballot envelope*
- White signature envelope*
- Larger white return envelope*
- Pen with black ink
- Your ID number

Minnesota driver's license number, Minnesota ID card number, U.S. passport number, or the last four digits of your Social Security number.

See below if you do not have any of these numbers.

- * If any of these items are missing, please contact your local election official.

1 Vote!

- Mark your votes in private.
- Follow the instructions on the ballot.
- Do not write your name or ID number anywhere on the ballot.
- Do not vote for more candidates than allowed. *If you do, your votes for that office will not count.*

See the other side if you make a mistake on your ballot.

2 Seal your ballot in the tan ballot envelope

- Carefully refold the ballot the way it was delivered to you.
- Do not write on this envelope.

3 Put the tan ballot envelope into the white signature envelope

4 Fill out the white signature envelope completely

Proposed Rules

- If there is no label, print your name and Minnesota address (present or last).
- Print your email address and phone number (optional).
- Print your Minnesota driver's license number, Minnesota ID card number, passport number, or the last four digits of your Social Security number.

Be sure to use one of the same numbers that you provided on your absentee ballot application. You may provide both numbers if you are unsure what you provided on your absentee ballot application.

If you do not have access to any of these documents, leave this space blank.

- Read and sign the oath.
- Seal the envelope.

5 Put the signature envelope into the larger white return envelope to protect your private information from view

- Seal the envelope.

6 Return your ballot by Election Day to the address on the return envelope

- Send it so it arrives by Election Day, using mail, a package delivery service, or the diplomatic pouch at a U.S. embassy or consulate.
- Postage is not required if the postal permit is on the envelope and it is sent using U.S. mail, U.S. military mail, or the diplomatic pouch. Postage may be required if you use a foreign mail service or a package delivery service.

See the other side for special instructions if you have a disability.

To check the status of your absentee ballot, visit <http://www.mnvotes.org> mnvotes.gov.

If you have any questions, contact your county elections office at [insert email address] or [insert telephone number].

Correcting a mistake

- If time allows, ask for a new ballot from your election office. Contact your election office at [email] or [phone number], or
- Completely cross out the name of the candidate you accidentally marked and then mark your ballot for the candidate you prefer (do not initial your corrections).

If you have a disability:

If you have a disability or cannot mark your ballot, another person may assist you by marking your ballot at your direction, assembling the materials, and filling in the forms for you.

When signing the envelope, Minnesota law says you may:

- Sign the return signature envelope yourself, or
- Make your mark, or
- Ask another person to sign for you in your presence. (Have this person sign their own name as well.)
- If you have adopted the use of a signature stamp for all purposes of signature, you may use your signature stamp or ask another person to use your signature stamp in your presence.

Minnesota Statutes, section 645.44, subdivision 14

- If you have a print disability, you may request that ballots, instructions, and a certificate of voter eligibility be transmitted electronically in an accessible format by contacting your county auditor. If you request a ballot be transmitted electronically in an accessible format, you may then complete your ballot electronically but must print your voted ballot and return this ballot and completed certificate of voter eligibility to your local election office.

Proposed Rules

Please note: Voting is not covered by power of attorney. A person with power of attorney may only sign for you in your presence as outlined above.

Subp. 5. Cover letter for military and overseas voters transmitted ballots electronically. Dear Military/Overseas Absentee Voter:

Your absentee ballot and supporting materials for the election on [month day, year] are attached. Your absentee ballot is being sent to you electronically because you requested this delivery method on your application. Please print, fill out, and return these materials so they are received by your county by Election Day, [day of the week], [month day, year].

A paper ballot must be returned to Minnesota and received by Election Day to be counted.

You may use the domestic mail service of the country you are located in, an international package delivery service, or the military or state department's mail services. Be sure to vote and return this ballot as soon as possible to ensure timely return. Your ballot must be received by your county elections office by Election Day to be counted.

This communication contains:

- A ballot
- Voting instructions
- Ballot envelope template
- Certificate of Eligibility
- Mailing envelope template

Carefully follow the instructions to ensure proper return of your voted ballot.

- ☐ Print the materials
- ☐ Fill out your ballot
- ☐ Fold and seal your ballot and place it in your ballot envelope
- ☐ Fill out the Certificate of Eligibility
- ☐ Put the completed materials in your mailing envelope
- ☐ Send your ballot by mail or package delivery service so that it is received by Election Day

To check the status of your absentee ballot, visit <http://www.mnvotes.org> [mnvotes.gov](http://www.mnvotes.org).

Contact your county elections office at [email] or [phone number] if you have any questions. Voting assistance for military and overseas citizens is also available at <https://www.fvap.gov/>.

Please note: Each voter must submit an application and receive their own ballot. **Do not forward this ballot to other voters.** A ballot received from a voter who did not submit an application will not be counted. Refer other military or overseas voters who need to apply for a ballot to <http://www.mnvotes.org> [mnvotes.gov](http://www.mnvotes.org).

Thank you.

Subp. 6. Instructions for military and overseas voters transmitted ballots electronically. Instructions
How to vote by absentee ballot for military and overseas voters sent ballots electronically

Note: Your ballot must be printed out and physically returned. It cannot be returned electronically.

You will need:

Proposed Rules

- A printer
- A pen with black ink
- Two envelopes (you have 3 options):
 - Address your own blank envelopes by hand
 - Print the envelope templates directly onto envelopes (print the mailing envelope onto an envelope approximately 4 1/8 inches x 9 1/2 inches so that everything is positioned according to postal regulations)
 - If you do not have access to any envelopes, create the envelopes by folding and taping or gluing the attachments.
- Your ID number
Minnesota driver's license number, Minnesota ID card number, U.S. passport number, or the last four digits of your Social Security number.
See below if you do not have access to any of these numbers.

1 Print the materials

- Print your ballot, the Certificate of Eligibility, and the envelope templates if you are using them.
- Please note that the ballot may take multiple pages.
- Your printer should automatically scale the document to fit on the printable area of the page. Just be sure that none of the words or ovals are cut off.

2 Vote!

- Mark your votes in private.
- Follow the instructions on the ballot.
- Do not write your name or ID number anywhere on the ballot.
- Do not vote for more candidates than allowed. If you do, your votes for that office will not count.

See below if you make a mistake on your ballot.

3 Use one of the envelopes as the ballot envelope

- Put your ballot in this envelope to keep your votes private.
- Seal the envelope.
- Do not write on this envelope.

4 Fill out the Certificate of Eligibility completely

- Print your name and your Minnesota street address, including city (present or last).
- Print your email address and phone number (optional).
- Print your Minnesota driver's license number, Minnesota ID card number, passport number, or the last four digits of your Social Security number.

Be sure to use one of the same numbers that you provided on your absentee ballot application. You may provide both numbers if you are unsure what you provided on your absentee ballot application.

If you do not have access to any of these documents, leave this space blank.

- Read and sign the oath.

5 Put it all together

Proposed Rules

- Attach the Certificate of Eligibility to the ballot envelope.
- Your second envelope is the return (mailing) envelope.
- Put the ballot envelope and the Certificate of Eligibility into the return envelope.
- Seal the return envelope.
- Address the return envelope to:

Official Absentee Balloting Material
..... County
[Street address]
[City], MN [Zip Code]
USA

6 Return your ballot by Election Day to the address above

- Send it so it arrives by Election Day, using mail, a package delivery service, or the diplomatic pouch at a U.S. embassy or consulate.
- Postage is not required if the postal permit is on the envelope and it is sent using U.S. mail, U.S. military mail, or the diplomatic pouch. Postage may be required if you use a foreign mail service or a package delivery service.

To check the status of your absentee ballot, visit <http://www.mnvotes.org> mnvotes.gov.

If you need any help while voting, please contact your county elections office at [insert email address] or [insert telephone number].

Correcting a mistake

- Print out a new ballot, or
- Ask for a new ballot from your election office, or
- Completely cross out the name of the candidate you accidentally marked and then mark your ballot for the candidate you prefer (do not initial your corrections).

If you have a disability:

If you have a disability or cannot mark your ballot, another person may assist you by marking your ballot at your direction, assembling the materials, and filling out the forms for you.

When signing the Certificate of Eligibility, Minnesota law says you may:

- Sign the Certificate yourself, or
- Make your mark, or
- Ask another person to sign for you in your presence. (Have this person sign their own name as well.)
- If you have adopted the use of a signature stamp for all purposes of signature, you may use your signature stamp or ask another person to use your signature stamp in your presence.

Minnesota Statutes, section 645.44, subdivision 14

- If you have a print disability, you may request that ballots, instructions, and a certificate of voter eligibility be transmitted electronically in an accessible format by contacting your county auditor. If you request a ballot be transmitted electronically in an accessible format, you may then complete your ballot electronically but must print your voted ballot and return this ballot and completed certificate of voter eligibility to your local election office.

Please note: Voting is not covered by power of attorney. A person with power of attorney may only sign for you in your

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presence as outlined above.

[For text of subpart 7, see Minnesota Rules]

8210.0600 STATEMENT OF ABSENTEE VOTER.

[For text of subpart 1, see Minnesota Rules]

Subp. 1a. **Statement of registered absentee voter form.** Signature Envelope

Voter must complete this section

please print clearly

Voter name _____

Voter MN address _____ MN

ID number

(MN driver's license #,

MN ID card #,

or last four digits of SSN) _____

☐ I do not have a MN-issued driver's license, MN-issued ID card, or a Social Security Number.

I certify that on Election Day I will meet all the legal requirements to vote.

Voter Signature X _____

Witness must complete this section

Witness name _____

~~MN street address~~

(or title, if an
official or notary)

Street Address

MN

City

Title - only required for authorized officials or notaries

I certify that:

- the voter showed me the blank ~~ballots~~ ballot before voting;
- the voter marked the ~~ballots~~ ballot in private or, if physically unable to mark the ~~ballots~~ ballot, the ~~ballots~~ ballot was marked as directed by the voter;
- the voter enclosed and sealed the ~~ballots~~ ballot in the ballot envelope; and
- I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before the day of the election and a citizen of the United States, or am a notary, or am authorized to give oaths.

Witness Signature X _____

If notary, must affix stamp

Proposed Rules

Subp. 1b. **Statement of ~~unregistered~~ nonregistered absentee voter form.**

Signature Envelope

Voter must complete this section

please print clearly

Voter name _____

Voter MN address _____
_____ MN

ID number

(MN driver's license #,

MN ID card #,

or last four digits of SSN) _____

☐ I do not have a MN-issued driver's license, MN-issued ID card, or a Social Security Number.

I certify that on Election Day I will meet all the legal requirements to vote.

Voter Signature X _____

Witness must complete this section

Witness name _____

~~MN street address~~

(or title, if an

official or notary)

~~Street Address~~

~~MN~~

~~City~~

~~**Title** - only required for authorized officials or notaries~~

Witness MUST CHECK ONE indicating proof of residence provided by voter: (See instructions)

- ☐ MN driver's license, ID card, permit, or receipt
- ☐ Bill, student fee statement, or residential lease plus photo ID
- ☐ Registered voter in the precinct who vouched for voter's residence in the precinct (must complete the voucher form on the back of the Voter Registration Application)
- ☐ Tribal ID card
- ☐ Notice of late registration
- ☐ Previous registration in the same precinct
- ☐ An employee of a residential facility in the precinct who vouched for voter's residence at the facility (must complete the voucher form on the back of the Voter Registration Application)

I certify that:

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- the voter showed me the blank ~~ballots~~ ballot before voting;
- the voter marked the ~~ballots~~ ballot in private or, if physically unable to mark the ~~ballots~~ ballot, the ~~ballots~~ were ballot was marked as directed by the voter;
- the voter enclosed and sealed the ~~ballots~~ ballot in the ballot envelope;
- the voter registered to vote by filling out and enclosing a voter registration application in this envelope;
- the voter provided proof of residence as indicated above; and
- I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before the day of the election and a citizen of the United States, or am a notary, or am authorized to give oaths.

Witness Signature X _____

If notary, must affix stamp

[For text of subpart 2, see Minnesota Rules]

Subp. 3. **Printing specifications.** The statement shall be printed on the back of the absentee ballot ~~return~~ signature envelope. The words “Voter must complete this section” and “Witness must complete this section” shall be printed in no smaller than 12-point bold type. The “X” on the signature lines must be in at least 20-point type. The remainder of the statement shall be printed in no smaller than 10-point medium type. The area for the voter’s name and address must be no smaller than 1-1/4 inches by 3-1/4 inches. The voter’s certificate must be at least 4-1/8 inches wide. ~~County auditors and municipal clerks may use the existing stock of absentee ballot return envelopes on hand as of January 1, 2014, for absentee voting conducted in-person.~~

[For text of subparts 4 and 4a, see Minnesota Rules]

8210.0710 FORMAT AND INSTRUCTIONS FOR ABSENTEE BALLOT RETURN ENVELOPES.

[For text of subparts 1 and 2, see Minnesota Rules]

Subp. 3. **Envelope labeling.** The envelopes with the form printed according to part 8210.0600, subpart 1a, must have the words “Signature Envelope - Registered” printed in no smaller than 8-point type. The envelopes with the form printed according to part 8210.0600, subpart 1b, must have the words “Signature Envelope - ~~Unregistered~~ Nonregistered” printed in no smaller than 8-point type. The envelopes printed with the form printed according to part 8210.0800 must have the words “Signature Envelope - UOCAVA” printed in no smaller than 8-point type.

[For text of subpart 4, see Minnesota Rules]

Subp. 5. **Additional instructions for ~~unregistered~~ nonregistered voters.** The following words must be printed above the voter’s certificate for envelopes with the form prepared under part 8210.0600, subpart 1b:

“Put the Ballot Envelope and the

Voter Registration Application

in here, then seal flap”

The words may appear on the reverse side of the envelope.

[For text of subpart 6, see Minnesota Rules]

Subp. 7. **Checklist for ~~unregistered~~ nonregistered voters.** Envelopes with the form printed according to part 8210.0600, subpart 1b, must have the following words printed on the exterior of the return envelope:

“Have you . . .

- ☐ Sealed your ballot in the tan ballot envelope?
- ☐ Put the ballot envelope and your voter registration application in the white signature envelope?
- ☐ Filled out the white signature envelope completely and signed it?
- ☐ Asked your witness to complete their section and sign their name?
- ☐ Put the white signature envelope into this envelope?

Return your ballot so it is received by Election Day.”

[For text of subpart 8, see Minnesota Rules]

8210.2200 DUTIES OF COUNTY AUDITOR OR MUNICIPAL CLERK UPON RECEIPT OF ABSENTEE BALLOT RETURN ENVELOPE.

Subpart 1. **Personal delivery.** Absentee ballot return envelopes that are delivered in person by an absent voter or an agent must be received by the county auditor or municipal clerk by ~~3:00~~ 5:00 p.m. on election day. Ballots delivered by agent under Minnesota Statutes, section 203B.11, subdivision 4, must be delivered to the county auditor or municipal clerk no later than 8:00 p.m. on election day. Ballots received by personal delivery after ~~3:00~~ 5:00 p.m. ~~of on~~ election day or after 8:00 p.m. on election day if delivered under Minnesota Statutes, section 203B.11, subdivision 4, shall be marked as received late by the county auditor or municipal clerk, and must not be delivered to the ballot board.

[For text of subparts 2 and 3, see Minnesota Rules]

8210.2400 SAFEGUARDING PROCEDURES.

The county auditor or municipal clerk shall establish measures for safeguarding absentee ballot return envelopes received prior to election day.

[For text of items A to C, see Minnesota Rules]

D. When the ballot board opens accepted return envelopes pursuant to Minnesota Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by the county auditor or municipal clerk shall be removed from the place of safekeeping and compared with the record required by this rule to ensure that all envelopes are accounted for. Any discrepancy shall be reported to the secretary of state promptly~~ they must comply with the provisions of that subdivision and report any discrepancy to the secretary of state promptly.

8210.2450 DUTIES OF BALLOT BOARD MEMBERS WHEN EXAMINING RETURN ENVELOPES UNDER MINNESOTA STATUTES, SECTION 203B.121.

[For text of subparts 1 to 4, see Minnesota Rules]

Subp. 5. **Witness eligibility.** An absentee ballot may not be rejected for lack of an eligible witness, if a witness has signed the statement required from a witness by part 8210.0600, subpart 1a or 1b, and, if appropriate:

~~A. has provided a Minnesota address as part of the witness’s certification on the return envelope;~~

~~B. A.~~ has provided the title indicating that they are eligible to administer oaths; or

~~C. B.~~ has affixed a notarial stamp.

Subp. 6. **Ballot already cast.** Ballot board members must use the statewide voter registration system or available polling place rosters to determine whether another ballot from the voter has been accepted. If a ballot is received before the close of business on the ~~seventh~~ 19th day before the election, any ballot that has been previously received from that voter and has not been rejected is deemed spoiled and must not be counted. If a ballot is received after the close of business on the ~~seventh~~ 19th day before the election and another absentee ballot has been accepted for that voter, the

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return envelope must be marked “rejected.”

8210.2500 MAIL PICKUP.

Each municipal clerk shall communicate with the United States postal service facility serving the municipality with regard to the handling of absentee ballot return envelopes received by the post office on election day. The municipal clerk shall take all reasonable steps to ensure that all return envelopes received by the post office ~~before 4 p.m.~~ on election day are delivered before the closing of the polls to the ballot board. Absentee ballots returned by mail delivery and received after election day shall be marked as received late by the county auditor or municipal clerk, and must not be delivered to the ballot board.

8210.2700 RECEIPT OF FEDERAL WRITE-IN ABSENTEE BALLOTS.

Subpart 1. **If Federal Post Card Application was received.** If a voter submits a Federal Write-in Absentee Ballot for which a Federal Post Card Application was received, the county auditor must accept or reject the ballot in accordance with Minnesota Statutes, section ~~203B.24 and 203B.25~~ 203B.23.

[For text of subpart 2, see Minnesota Rules]

8210.3000 MAIL BALLOTING.

[For text of subparts 1 to 3, see Minnesota Rules]

Subp. 4. **Mailing ballots.** The county auditor, municipal clerk, or school district clerk shall mail ballots to the voters registered in the municipality or unorganized territory. A ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~44~~ 28 days prior to the election if mail balloting in the voter’s precinct is proceeding pursuant to Minnesota Statutes, section 204B.45. No later than 14 days before the election, the auditor must make a subsequent mailing of ballots to those voters who register to vote after the initial mailing but before the 20th day before the election.

A ballot mailing must be sent no earlier than 46 or later than 14 days prior to the election if a mail election is being conducted in the jurisdiction pursuant to Minnesota Statutes, section 204B.46. No later than 14 days before the election, the auditor or clerk must make a subsequent mailing of ballots to those voters who register to vote after the initial mailing but before the 20th day before the election.

No ballot may be mailed to a challenged voter. A notice must be transmitted to challenged voters with an explanation of the challenge and with instructions on how they may apply for an absentee ballot if they believe their registration was challenged in error.

The mail balloting process for voters whose registrations are incomplete under Minnesota Statutes, section 201.061, subdivision 1a, or 201.121, must be administered as if the voter were not registered to vote. A notice must be transmitted to voters with incomplete registrations with instructions on how they may apply for an absentee ballot.

Ballots must be sent by nonforwardable mail. Ballots for eligible voters who reside in health care facilities may be delivered as provided in Minnesota Statutes, section 203B.11. The ballot mailing must be addressed to the voter at the voter’s residence address as shown on the registration file unless the voter completes an absentee ballot request as provided in Minnesota Statutes, section 203B.04 or 203B.16.

A return envelope, a ballot secrecy envelope, and instructions for marking and returning mail ballots must be included with the ballots. The instructions must include a telephone number or electronic mail address which voters can call or write for help in mail voting. The instructions must also include a privacy notice that complies with Minnesota Statutes, section 13.04. At the request of the secretary of state, a survey card that the voter can return to the secretary of state must also be included. The ballot return envelope must be printed with the mail voter’s certificate. The ballot return envelope must be addressed for return to the county auditor, municipal clerk, or school district clerk that is conducting the election. First class postage must be affixed to the return envelope.

Subp. 4a. **Form of instructions to mail voters. Instructions**

How to vote by mail ballot

You will need:

- Ballot*
- Tan ballot envelope*
- White signature envelope*
- Pen with black ink
- Witness

~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age on or before the day of the election and who is a citizen of the United States,

including your spouse or relative,

or a notary public,

or a person with the authority to administer oaths

* If any of these items are missing, please contact your local election official.

1 Vote!

- Show your witness your blank ballot, then mark your votes in private.
- Follow the instructions on the ballot.
- Do not write your name or ID number anywhere on the ballot.
- Do not vote for more candidates than allowed. *If you do, your votes for that office will not count.*

See the other side if you make a mistake on your ballot.

2 Seal your ballot in the tan ballot envelope

- Carefully refold the ballot the way it was delivered to you.
- Do not write on this envelope.

3 Put the tan ballot envelope into the white signature envelope

4 Fill out the white signature envelope completely

- If there is no label, print your name and Minnesota address.
- Read and sign the oath.
- Ask your witness to print their name ~~and Minnesota street address, including city (not a P. O. Box);~~ in the box at the top of the witness section and sign their name in the box at the bottom of the witness section.

If your witness is an official or notary, they must print their title instead of an address.

Notaries must also affix their stamp.

- Seal the envelope.

5 Return your ballot by Election Day to the address on the signature envelope

You have three options:

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- Send it so it arrives by Election Day, using U.S. mail or a package delivery service,
- Deliver it in person by 8:00 p.m. on Election Day, or
- Ask someone to deliver it by 8:00 p.m. on Election Day.

This person cannot deliver more than 3 ballots.

If you have questions, please call (...) ...-.... .

See other side for special instructions if you have a disability

Correcting a mistake

- If time allows, ask for a new ballot from your election office. Contact your election office at [email] or [phone number], or
- Completely cross out the name of the candidate you accidentally marked and then mark your ballot for the candidate you prefer (do not initial your corrections).

If you have a disability:

If you have a disability or cannot mark your ballot, your witness may assist you by marking your ballot at your direction, assembling the materials, and filling out the forms for you.

When signing the envelope, Minnesota law says you may:

- Sign the return signature envelope yourself, or
- Make your mark, or
- Ask your witness to sign for you in your presence. (Have your witness sign their own name as well.)
- If you have adopted the use of a signature stamp for all purposes of signature, you may use your signature stamp or ask your witness to use your signature stamp in your presence.

Minnesota Statutes, section 645.44, subdivision 14

If you have a print disability, you may request that ballots, instructions, and a certificate of voter eligibility be transmitted electronically in an accessible format by contacting your county auditor. If you request a ballot

- be transmitted electronically in an accessible format, you may then complete your ballot electronically but must print your voted ballot and return this ballot and completed certificate of voter eligibility to your local election office.

Please note: Voting is not covered by power of attorney. A person with power of attorney may only sign for you in your presence as outlined above.

Subp. 4b. **Form of mail voter's certificate.**

Signature Envelope

Voter must complete this section

please print clearly

Voter name _____

Voter MN Address _____

MN

I certify that on Election Day I will meet all the legal requirements to vote.

Voter Signature X _____

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Witness must complete this section

Witness name _____

~~MN~~ street address

(or title, if an
official or notary)

Street Address

MN

City

Title - only required for authorized officials or notaries

I certify that:

- the voter showed me the blank ~~ballots~~ ballot before voting;
- the voter marked the ~~ballots~~ ballot in secrecy or, if physically unable to mark the ~~ballots~~ ballot, the ~~ballots-~~
were ballot was marked as directed by the voter;
- the voter enclosed and sealed the ~~ballots~~ ballot in the ballot envelope; and
- I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before the day of the election and a citizen of the United States, or am a notary, or am authorized to give oaths.

Witness Signature X _____

If notary, must affix stamp

[For text of subparts 4c to 13, see Minnesota Rules]

8215.0200 BALLOTS.

[For text of subparts 1 to 4, see Minnesota Rules]

Subp. 5. Order and form of write-in candidate lines. If a party chair has requested that its party ballot contain a place for write-in candidates, below the name of the last candidate for each office shall be placed a blank line, and on the blank line the voter may write the name of persons not printed on the ballot for whom the voter desires to vote. Above or below the write-in line, the words “write-in, if any” must appear in as large as practicable but no smaller than 6-point type and must be aligned next to the vote target.

8215.0300 POLLING PLACE VOTING.

Subpart 1. **Form of roster.** At the presidential nomination primary, the polling place roster must also state: “I am in general agreement with the principles of the party for whose candidate I intend to vote, and I understand that my choice of a party’s ballot will be ~~public information~~ shared with the chair of my selected major political party.” This statement must appear separately from the statement certification included in part 8200.9115, subpart 1.

[For text of subparts 2 to 4, see Minnesota Rules]

8215.0400 ABSENTEE VOTING.

[For text of subpart 1, see Minnesota Rules]

Subp. 2. **Application form.**

[For text of item A, see Minnesota Rules]

B. The absentee ballot oath must also contain the following statement: “I am in general agreement with the

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principles of the party for whose candidate I intend to vote, and I understand that my choice of a party's ballot will be public information shared with the chair of my selected major political party."

[For text of subparts 3 to 6, see Minnesota Rules]

Subp. 7. **Change of major party choice.** Until the close of business on the ~~seventh~~ 19th day before the election, a voter may change the voter's choice of which major political party ballot the voter wishes to receive by spoiling the voter's ballot and submitting an application indicating the major political party ballot the voter is requesting. ~~An absentee A~~ ballot cast under the alternative procedures provided in Minnesota Statutes, section 203B.081, ~~subdivision 3~~, cannot be spoiled after it has been deposited in the ballot box.

[For text of subparts 8 and 9, see Minnesota Rules]

8215.0500 MAIL BALLOTING.

[For text of subparts 1 and 2, see Minnesota Rules]

Subp. 3. **Form of instructions to mail voters.** Notwithstanding part 8210.3000, subpart 4a, the form of instructions to mail voters to be used in a presidential nomination primary must substitute the following instructions:

How to vote by mail ballot

You will need:

- Ballot*
- Tan ballot envelope*
- White signature envelope*
- Pen with black ink
- Witness

~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age on or before the day of the election and who is a citizen of the United States,

including your spouse or relative,

or a notary public,

or a person with the authority to administer oaths

*If any of these items are missing, please contact your local election official.

1 Vote!

- Choose the ballot of the party that you are in general agreement with the principles of.
- Show your witness that party's blank ballot, then mark your votes in private.
- Follow the instructions on the ballot.
- Do not write your name or ID number anywhere on your ballot.
- Do not vote for more than one candidate. If you do, your vote will not count.
- Do not vote the ballot of more than one party. Only return one ballot.
- Destroy and discard the extra blank ballot. You can destroy the ballot by shredding or tearing the extra ballot in half. Do not return the extra ballot.

See the other side if you make a mistake on your ballot.

2 Seal only one voted ballot in the tan ballot envelope

- Carefully refold the ballot the way it was delivered to you.
- Do not write on this envelope.

3 Put the tan ballot envelope into the white signature envelope

4 Fill out the white signature envelope completely

- If there is no label, print your name and Minnesota address.
- In the oath, print the name of the political party ballot that you chose. If you do not print a party name, your vote will not count. If you return a different ballot than you indicate in the oath, your vote will not count.
- Read and sign the oath.
- Ask your witness to print their name ~~and Minnesota street address, including city (not a PO Box),~~ in the box at the top of the witness section and sign their name in the box at the bottom of the witness section.
If your witness is an official or notary, they must print their title instead of an address.
Notaries must also affix their stamp.
- Seal the envelope.

5 Return your ballot by Election Day to the address on the signature envelope

You have three options:

- Send it so it arrives by Election Day, using United States mail or a package delivery service,
- Deliver it in person by 8:00 p.m. on Election Day, or
- Ask someone to deliver it by 8:00 p.m. on Election Day.
This person cannot deliver more than 3 ballots.
If you have questions, please call (...) ...-.... .

See other side for special instructions if you have a disability

Correcting a mistake

- If time allows, ask for a new ballot from your election office. Contact your election office at [email] or [phone number], or
- Completely cross out the name of the candidate you accidentally marked and then mark your ballot for the candidate you prefer (do not initial your corrections).

If you have a disability:

If you have a disability or cannot mark your ballot, your witness may assist you by marking your ballot at your direction, assembling the materials, and filling out the forms for you.

When signing the envelope, Minnesota law says you may:

- Sign the return signature envelope yourself, or
- Make your mark, or
- Ask your witness to sign for you in your presence. (Have your witness sign their own name as well.)
- If you have adopted the use of a signature stamp for all purposes of signature, you may use your signature stamp or ask your witness to use your signature stamp in your presence.

Minnesota Statutes, section 645.44, subdivision 14
- If you have a print disability, you may request that ballots, instructions, and a certificate of voter eligibility be transmitted electronically in an accessible format by contacting your county auditor. If you request a ballot be transmitted electronically in an accessible format, you may then complete your ballot electronically but must print your voted ballot and return this ballot and completed certificate of voter eligibility to your local election office.

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Please note: Voting is not covered by power of attorney. A person with power of attorney may only sign for you in your presence as outlined above.

[For text of subpart 4, see Minnesota Rules]

Subp. 5. **Form of mail voter's certificate.** Notwithstanding part 8210.3000, subpart 4b, the form of the mail voter's signature certificate to be used in a presidential nomination primary must be as follows:

Signature Envelope

Voter must complete this section

please print clearly

Voter name _____

Voter MN Address _____

_____ MN

I certify that on Election Day I will meet all the legal requirements to vote. I am in general agreement with the principles of the _____ Party, and I understand that my choice of a party's ballot will be ~~public~~ information shared with the chair of my selected major political party.

Voter Signature X _____

Witness must complete this section

Witness name _____

~~MN street address~~

(or title, if an official or notary)

Street Address

_____ MN

City

Title - only required for authorized officials or notaries

I certify that:

- the voter showed me the blank ballot before voting;
- the voter marked the ballot in secrecy or, if physically unable to mark the ballot, the ballot was marked as directed by the voter;
- the voter enclosed and sealed the ballot in the ballot envelope; and
- I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before the day of the election and a citizen of the United States, or I am a notary, or I am authorized to give oaths.

Witness Signature X _____

If notary, must affix stamp

[For text of subpart 6, see Minnesota Rules]

Subp. 7. **Change of major party choice.** Until the close of business on the ~~seventh~~ 19th day before the election, a voter may change the voter's choice of which major political party ballot the voter requested by spoiling the voter's ballot and requesting that the county transmit to the voter replacement ballots.

[For text of subpart 8, see Minnesota Rules]

8220.1150 TEST BALLOTS.

All test ballots must be marked “TEST.” in a manner to indicate they are test ballots.

Ballots must be prepared having votes in excess of the number allowed by law for each office and proposal appearing on the ballot.

For district offices in which the number of candidates appearing on the ballot for that office varies by district, test ballots must be prepared with the number of votes allowed by law for that office in that district.

In partisan primary elections test ballots must be prepared to check the program for splitting tickets. Test ballots must be prepared with votes appearing in the same ballot for candidates of opposite political parties, nonpartisan candidates, and proposals. At least one ballot must be prepared with votes for one party and including votes for a nonpartisan office in excess of the number permitted by law.

In preparing the test deck, a number of the ballots must be voted to include valid votes in the partisan, nonpartisan, and proposal sections of the ballot. The test deck must include ballots involving no overvotes or marks in unassigned locations, valid votes for each candidate and ballot question, overvotes, undervotes, and invalid votes in many different combinations.

At least one test ballot must be prepared in which marks appear in the precinct identifier or ballot style indicator.

At least one test ballot must be included that is folded, as if it were mailed.

At least one test ballot marked by a different pen must be included.

Blank ballots in which no positions have been voted must be included in the test deck.

When required to be used in an election pursuant to Minnesota Statutes, section 206.57, subdivision 5, the test deck must include a number of ballots marked by an electronic ballot marker sufficient to have marked all vote targets on the ballot in every precinct.

8220.1550 PUBLIC ACCURACY TEST.

~~The election jurisdiction must hold a public accuracy test within 14 days prior to the election for the purpose of demonstrating the accuracy of the computer programs and voting systems to be used at the election.~~ In order to demonstrate the accuracy of the computer programs and voting systems to be used at an election, the election jurisdiction must hold a public accuracy test at least three days prior to the voting equipment being used. A ballot-marking device used for absentee voting must be tested according to part 8220.1350. The public accuracy test must be conducted according to Minnesota Statutes, section 206.83.

The time and place of the public accuracy test must be designated by the election jurisdiction providing the computer program, which must give at least ~~48 hours~~ five days public notice of the time and place of the test by publication in official newspapers and by posting a notice in the office of the county auditor and each local election official conducting the test.

The test must be open to the public. At least two election judges of different political parties must witness the test. The chief election official of the election jurisdiction shall explain the methods and test procedures used to determine the accuracy of the computer programs. This will include submitting as public record the certificate prepared in accordance with part 8220.1450 that all precincts have been tested using the test deck prepared under the direction of the election jurisdiction.

The sealed container containing the computer programs, test deck, and predetermined results must be opened and the computer programs tested to determine their accuracy on the voting systems on which they are to be used on election day. The testing of the voting systems and programs must be with the test deck prepared under the direction of the election jurisdiction. In election jurisdictions with three or fewer precincts, all the precincts must be tested. In election jurisdictions with more than three precincts, a minimum of three precincts must be tested. The precincts must be tested

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on at least one of each unique model of voting equipment used by the election jurisdiction. One precinct from each congressional district, legislative district, county commissioner district, ward, and school district on the ballot must be tested. The official conducting the election shall select the precincts to be tested.

If an error is detected in any part of the testing, the cause must be ascertained, the error corrected, and an errorless count must be made on all precincts. At the discretion of the election jurisdiction, the meeting may be adjourned to a time and date certain.

This rule does not apply to ballot marking devices used for absentee voting. Those devices must be tested under part 8220.1350.

8230.2040 RECORDING VALID WRITE-IN VOTES.

A write-in vote is only valid and able to be counted if the ballot is marked in the oval or other target shape opposite the blank when a voter writes an individual's name on the line provided for write-in votes. If a valid write-in vote exists, the election judges shall determine whether the write-in vote has caused an overvote. If the write-in vote has caused an overvote, the ballot is defective for that office only.

If the write-in vote does not cause an overvote for that office, the election judges shall enter the candidate's name and the office on the write-in vote tally sheet. The ballot must be placed with the other valid ballots for tabulation.

If the write-in vote causes an overvote for that office and the target next to the write-in vote is not completed, the election judges shall place the ballot in the envelope marked "ballots for which duplicates were or are to be made." The manner of duplication is prescribed in part 8230.3850.

At the discretion of the county auditor, the processing of write-in ballots may be done at the central counting center or at the office of the local election official or county auditor rather than at the precinct polling place.

8230.2250 DELIVERY OF TRANSFER CASE.

[For text of subpart 1, see Minnesota Rules]

Subp. 2. **Delivery by two election judges.** The transfer case containing the required items as identified in part 8230.2050 must be delivered directly to the official conducting the election, central counting center, or collection point for transportation to the official conducting the election or central counting center by two election judges, not of the same political party.

8230.3850 DUPLICATION OF BALLOTS.

Any ballots requiring duplication at the polling place or central counting center must be duplicated in the following manner:

[For text of items A to E, see Minnesota Rules]

F. When a ballot created pursuant to Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), requires duplication, it shall be duplicated onto a blank ballot and the same process shall be used as that for other ballots needing duplication under this part.

8230.4355 BALLOT BOXES FOR PRECINCT COUNTING CENTERS.

Ballot boxes used with precinct count voting systems may be separate or part of the ballot counting equipment provided that the ballot is fed directly into a locked or sealed ballot box. ~~The ballot box may contain a compartment that receives ballots on which all votes have been counted except those for offices for which the write-in target has been completed.~~ An auxiliary ballot box, that may be separate or an additional compartment, must be supplied to be used if the voting system fails to function or for ballots that cannot be read by the ballot counter.

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8230.4365 PRECINCT COUNT VOTING SYSTEM EQUIPMENT AND PROCEDURES.

[For text of subparts 1 to 4, see Minnesota Rules]

Subp. 5. **Opening ballot box during voting hours.** Two election judges of different political parties may open the ballot boxes on election day to straighten or remove the voted ballots but they shall not count or inspect the ballots. If removing ballots, the election judges shall put the ballots taken from the ballot box's main compartment into containers and seal them. ~~If the ballot box contains a compartment for write-in ballots, the judges shall put the ballots taken from the ballot box's write-in compartment into containers separate from the other ballots and seal them.~~ The judges shall label the ballot containers and store them in a secure location. The judges shall note on the incident report the fact that the ballot box was opened, the time the box was opened, and, if applicable, the numbers of any seals used to seal the ballot containers.

[For text of subpart 6, see Minnesota Rules]

8235.0300 NOTICE.

Within 24 hours of receipt of any request for a recount for the election of presidential electors or after determining that a publicly funded recount is authorized and requested for any other office, or within 48 hours of receipt of a written request for a discretionary recount and filing of a security deposit if one is required, the official in charge of the recount shall send notice to the candidates for the office to be recounted and the county auditor of each county wholly or partially within the election district. The notice must include the date, starting time, and location of the recount, the office to be recounted, and the name of the official performing the recount. The notice must state that the recount is open to the public.

8235.0700 GENERAL PROCEDURES.

At the opening of a recount the recount official or legal adviser shall present the procedures contained in this rule for the recount. The custodian of the ballots shall make available to the recount official the precinct summary statements, the precinct boxes or the sealed containers of voted ballots, and any other election materials requested by the recount official. If the recount official needs to leave the room for any reason, the recount official must designate a deputy recount official to preside during the recount official's absence. A recount official must be in the room at all times. If the recount includes ballot format as provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the ballots were used by ten or fewer voters in the precinct, the election judges from that precinct are not eligible to participate in conducting a recount or postelection review in that precinct. The containers of voted ballots must be unsealed and resealed within public view. No ballots or election materials may be handled by candidates, their representatives, or members of the public. There must be an area of the room from which the public may observe the recount. Cell phones and video cameras may be used in this public viewing area, as long as their use is not disruptive. The recount official shall arrange the counting of the ballots so that the candidates and their representatives may observe the ballots as they are recounted. Candidates may each have one representative observe the sorting of each precinct. One additional representative per candidate may observe the ballots when they have been sorted and are being counted pursuant to part 8235.0800, subpart 2. Candidates may have additional representatives in the public viewing area of the room. If other election materials are handled or examined by the recount officials, the candidates and their representatives may observe them. The recount official shall ensure that public observation does not interfere with the counting of the ballots. The recount official shall prepare a summary of the recount vote by precinct.

8240.1600 ELECTION JUDGE BASIC TRAINING COURSE.

[For text of subparts 1 to 3, see Minnesota Rules]

Subp. 4. **Course content.** A basic training course must include necessary information and skill development in the following areas:

[For text of items A and B, see Minnesota Rules]

C. judges' duties during voting hours:

(1) election day voter registration;

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(2) electronic pollbook training (if used in the jurisdiction);

(2)(3) persons allowed in polling place;

(3)(4) challenge process;

(4)(5) voting process;

(5)(6) spoiled ballots;

(7) assistance to voters in languages other than English;

(6)(8) assistance to disabled voters; and

(7)(9) ~~absentee ballots~~ voter information privacy;

[For text of items D and E, see Minnesota Rules]

F. major problems at prior elections; ~~and~~

G. how to follow instructions from the head election judge; and

H. if election judges will be working with absentee or early voting, their training must also include:

(1) absentee ballot board procedures; and

(2) in-person absentee and early voting procedures.

8240.1655 QUALIFICATIONS FOR TRAINEE ELECTION JUDGES.

[For text of subparts 1 and 2, see Minnesota Rules]

Subp. 3. **Qualifications.** A trainee election judge must be a United States citizen, must be at least 16 years of age, and must meet any residency requirement specified in Minnesota Statutes, section 204B.19, subdivision 6. Until graduation, trainee election judges must provide certification from their school that they are enrolled in a Minnesota high school, and are performing at an academic level acceptable to the principal of the trainee's high school. Until graduation, a trainee election judge who is home-schooled must provide certification from the trainee's parent that the trainee is performing at an academic level acceptable to serve as a trainee election judge.

[For text of subparts 4 to 6, see Minnesota Rules]

8240.1750 HEAD ELECTION JUDGE TRAINING.

[For text of subpart 1, see Minnesota Rules]

Subp. 2. **Course content.** The head election judge training course must include information on the following topics:

[For text of items A to F, see Minnesota Rules]

G. security and emergency plans;

~~G.~~ H. head election judges' duties at the polling place after the polls close; and

H. I. how to return election materials to the local election official after the ballots have been counted.

8240.2700 MUNICIPAL CLERK TRAINING REQUIREMENT.

[For text of subparts 1 to 4, see Minnesota Rules]

Subp. 5. **Training content.** An election administration training course for municipal clerks must include training on:
[For text of items A to H, see Minnesota Rules]

~~I.~~ electronic pollbook training (if used in the jurisdiction);

~~I. J.~~ mail ballot precincts and mail elections;

~~J. K.~~ voting before election day (absentee and early voting);

~~K. L.~~ security practices and emergency plans; and

~~L. M.~~ post-election duties.

[For text of subparts 6 to 10, see Minnesota Rules]

8240.2800 SCHOOL DISTRICT CLERK TRAINING REQUIREMENT.

[For text of subparts 1 to 4, see Minnesota Rules]

Subp. 5. **Training content.** An election administration training course for school district clerks must include training on:

[For text of items A to H, see Minnesota Rules]

~~I.~~ electronic pollbooks, if used in the school district;

~~I. J.~~ mail elections;

~~J. K.~~ absentee voting;

~~K. L.~~ security practices and emergency plans; and

~~L. M.~~ post-election duties.

[For text of subparts 6 to 10, see Minnesota Rules]

8240.2900 COUNTY AUDITOR ELECTION ADMINISTRATION CERTIFICATION.

[For text of subparts 1 to 3, see Minnesota Rules]

Subp. 4. **Training content.** An election administration training course for county auditors must include training on:

[For text of items A to E, see Minnesota Rules]

~~F.~~ ballot and equipment preparation;

[For text of item G, see Minnesota Rules]

~~H.~~ mail ballot precincts and mail elections;

~~I.~~ voting before election day (early and absentee voting);

[For text of item J, see Minnesota Rules]

~~K.~~ security practices and emergency plans;

~~L.~~ post-election duties; and

~~M.~~ records retention and data practice requests; and

~~M. N.~~ the duties performed by municipal and school district clerks.

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[For text of subparts 5 to 9, see Minnesota Rules]

8250.1810 FORMAT OF BALLOTS FOR OPTICAL SCAN SYSTEMS.

[For text of subparts 1 to 8, see Minnesota Rules]

Subp. 9. **Order of candidates for ~~partisan office~~ president and vice president in general election.** At the same time that the secretary of state certifies the names of nominees under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify to the county auditors the order in which the names of the candidates representing the political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear for every partisan office on the ballot. Candidates nominated by petition must appear on the ballot beneath the names of the candidates of the political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary of state. At least 11 weeks before the state general election, the secretary of state shall draw lots once by political party or principle for the candidates for president and vice president nominated by petition. To draw the lot, a candidate who has used the word “independent” to designate the candidate’s party or principle must be identified by the word “independent” followed by the candidate’s surname. If more than one candidate is nominated by petition for the same office within the same political party or principle, the secretary of state shall draw a supplementary lot within that party or principle by candidate surname to determine the order of those candidates. ~~The order of political parties or principles determined by the drawing of lots applies to all partisan offices on the ballot.~~

[For text of subparts 10 to 17, see Minnesota Rules]

Subp. 18. **Example ballot.** The secretary of state shall supply each auditor with a copy of an example ballot by May 1 of each year. Translated copies of the example ballots shall be provided according to Minnesota Statutes, section 204B.295, subdivision 1. The example ballot must illustrate the format required for the ballots used in the primary and general elections that year. The county auditor shall distribute copies of the example ballot to municipal and school district clerks in municipalities and school districts holding elections that year. The official ballots must conform in all respects to the example ballot.

Subp. 19. **Alternative ballot.** The requirements in this part do not apply to the printed and marked paper ballots that use the alternative ballot format permitted by Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the name of the precinct; an electronically readable precinct identifier or ballot style indicator; and the voter’s votes for each office or question, generated from the voter’s use of a touch screen or other electronic device on which a complete ballot meeting the information requirements of all applicable laws was displayed electronically. The ballot must also include lines for initials of at least two election judges.

REPEALER. Minnesota Rules, parts 8200.5100, subpart 3; and 8200.9320, are repealed.

From: [Minnesota Secretary of State](#)
To: [Smetana, Sonya \(OSS\)](#); [Parks, Anne \(OSS\)](#); [Bartz-Gallagher, Peter \(OSS\)](#); [Erickson, Alex \(OSS\)](#); [Bellrichard, Josie \(OSS\)](#); [Erickson, Justin \(OSS\)](#); [Neuhauser, Brad \(OSS\)](#); rebecca.a.meyer@state.mn.us; [Doyle, Grace \(OSS\)](#); [Knudson, Cassondra \(OSS\)](#)
Subject: Courtesy Copy: Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; CAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250
Date: Friday, August 22, 2025 1:15:22 PM

This is a courtesy copy of an email bulletin sent by Peter Bartz-Gallagher.

This bulletin was sent to the following groups of people:

Subscribers of Rules (7315 recipients)

Office of the Minnesota Secretary of State, Steve Simon



You are receiving this email because you signed up for the Office of the Secretary of State's email list for the purpose of receiving notice of rule proceedings.

The Office of the Secretary of State is proposing amendments to rules governing election administration. Please [visit our website](#) to view the full Dual Notice, which will be published in the State Register on August 25.

The Office encourages you to submit any comments you may have in support of or in opposition to the

proposed rule. Please submit any comments in writing **between August 25 and September 26 at 4:30 pm**. Submit written comments via the [Office of Administrative Hearings Rulemaking eComments website \(https://mn.gov/oah/forms-and-filing/ecomments/\)](https://mn.gov/oah/forms-and-filing/ecomments/), by U.S. Mail delivered to the Office of Administrative Hearings, 600 North Robert Street, P.O. Box 64620, Saint Paul, Minnesota 55164-0620, or by fax 651-539-0310.

For more information and access to all rulemaking documents, please [visit our website](#).

The agency contact person is Justin Erickson at the Office of the Minnesota Secretary of State, 20 W 12th Street, Saint Paul, MN 55155, 612-201-6895, justin.erickson@state.mn.us. You may contact the agency contact person with questions about the rules.

OFFICE OF THE MINNESOTA SECRETARY OF STATE

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Certificate of Mailing the Notice of Hearing

Certificate of Emailing the Dual Notice to the Rulemaking Mailing List

Office of the Minnesota Secretary of State

Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250

I certify that on August 22, 2025, at least 33 days before the end of the comment period, in St. Paul, Ramsey County, Minnesota, I emailed the Dual Notice, SONAR, and proposed rules by sending an electronic copy to all persons on the rulemaking list under Minnesota Statutes, section 14.14, subdivision 1a. The email message stated that these documents are located on the Secretary of State's rulemaking webpage and available for free public access.



Justin R. Erickson
General Counsel

Certificate of Accuracy of the Mailing List

Certificate of Accuracy of the Mailing List

Office of the Minnesota Secretary of State

Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250

I certify that the list of persons that have requested that their names be placed on the Office of the Secretary of State's rulemaking list under Minnesota Statutes, section 14.14, subdivision 1a, is accurate, complete, and current as of August 22, 2025.



Justin R. Erickson
General Counsel

Certificate of Additional Notice

Certificate of Giving Additional Notice Under the Additional Notice Plan

Office of the Minnesota Secretary of State

Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8290

I certify that on August 22 through August 24, 2025, at St. Paul, Ramsey County, Minnesota, I gave notice according to the Additional Notice Plan approved by the Office of Administrative Hearings on August 10, 2023. Specifically, I caused an electronic notice to be sent by GovDelivery with a hyperlink to electronic copies of the Dual Notice, SONAR, and proposed rule to:

- All members of the following legislative committees with policy oversight in this area of law:
 - o House State Government Finance and Policy Committee
 - o House Elections Finance and Government Operations Committee
 - o Senate Elections Committee
 - o Senate State and Local Government Committee
- Chairs and Ranking Minority Members of the following legislative committees with fiscal oversight in this area:
 - o House State Government Finance and Policy Committee
 - o House Elections and Government Operations Committee
 - o House Ways and Means Committee
 - o Senate Elections Committee
 - o Senate State and Local Government Committee
 - o Senate Finance Committee
- House and Senate Leadership from the Majority and Minority Caucuses
- Governor Walz
- Former Secretaries of State:
 - o Mark Ritchie
 - o Mary Kiffmeyer
 - o Joan Anderson Growe
- Chairs of Minnesota's major political parties:
 - o Democratic-Farmer-Labor Party
 - o Republican Party of Minnesota
- Chairs of Minnesota's minor political parties:
 - o Legal Marijuana Now Party

- Libertarian Party of Minnesota
 - Grassroots-Legalize Cannabis Party
 - Forward Independence Party of Minnesota (previously Independence-Alliance)
- The following election attorneys:
 - David Asp
 - Daniel Cragg
 - James Dickey
 - Matthew Haapoja
 - Jeffrey Holth
 - Erick Kaardal
 - Rachel Kitze Collins
 - Fritz Knaak
 - John Knapp
 - Reid LeBeau
 - Eric Magnuson
 - William Mohrman
 - Richard Morgan
 - Michael Murphy
 - Charles Nauen
 - Jared Reams
 - Steven Reitenour
 - Vince Reuter
 - Brian Rice
 - Virginia Stark
 - Tony Trimble
 - David Zoll
- Representatives of voting equipment and service vendors
 - Clear Ballot Group, Inc.
 - Democracy Live
 - Dominion Voting System Corp.
 - Election Systems and Software
 - Hart Intercivic, Inc.
 - Knowink
 - Modus Elections Software
 - Scytl
 - Taylor
 - Votem
- Representatives of local government associations

- Association of Minnesota Counties
- League of Minnesota Cities
- Minnesota Association of County Officers
- Minnesota Association of Townships
- Minnesota School Boards Association
- Minnesota County Attorney Association
- Representatives of public-interest groups:
 - AARP
 - ACLU of Minnesota
 - Catholic Charities
 - Citizens for Election Integrity Minnesota
 - Center of the American Experiment
 - Common Cause Minnesota
 - Education Minnesota
 - FairVote Minnesota
 - League of Women Voters of Minnesota
 - Minnesota Advocates for Human Rights
 - Minnesota Board on Aging
 - Minnesota Citizens Concerned for Life
 - Minnesota Council of Nonprofits
 - Minnesota Department of Veteran's Affairs
 - Minnesota Taxpayers League
 - Minnesota Voters Alliance
 - Minnesota Public Interest Research Group
 - Minnesota School Employees Association
 - TakeAction Minnesota
 - We Choose Us
- Representatives of the following agencies and organizations of people with disabilities:
 - Arc Minnesota
 - Minnesota Commission Serving Deaf, Deaf-Blind and Hard of Hearing People
 - Minnesota Disability Law Center
 - Minnesota State Council on Disability
 - National Alliance for the Mentally Ill – Minnesota
 - National Federation of the Blind
- Representatives of the following groups representing communities of color in Minnesota:
 - Asian Americans Advancing Justice
 - Council on American-Islamic Relations Minnesota

- Council on Asian-Pacific Minnesotans
- Council for Minnesotans of African Heritage
- Council on Latino Affairs
- Hmong American Partnership
- Immigrant Law Center
- International Institute of Minnesota
- Karen Organization of Minnesota
- Minnesota Indian Affairs Council
- Minneapolis Urban League
- NAACP – Minneapolis
- NAACP – St. Paul
- Native Vote Alliance of Minnesota
- Somali Action Alliance

Although Minnesota Majority and Election Administrators were organizations on the approved Additional Notice Plan, they have since ceased operations. Therefore, I did not send the notice to either entity.

In addition, due to a clerical error, notice was not delivered to Minnesota Election Integrity Solutions until August 28, 2025. The undersigned sent a follow-up email directly to the President of this organization on September 3 as well. In addition, while county auditors were not directly sent the dual notice, they were sent on September 29, 2025 the dual notice, a copy of the draft rules, the Statement of Need and Reasonableness and notified that a hearing would be held October 10, 2025.



Justin R. Erickson
General Counsel

Written Comments

39440 Office of the Minnesota Secretary of State Dual Notice of Intent to Adopt Rules

Closed Sep 26, 2025 · Discussion · 69 Participants · 1 Topics · 76 Answers · 5 Replies · 70 Votes


69	1	76	5	70
PARTICIPANTS	TOPICS	ANSWERS	REPLIES	VOTES

SUMMARY OF TOPICS


SUBMIT A COMMENT

 76 Answers · 5 Replies

Important: All comments will be made available to the public. Please only submit information that you wish to make available publicly. The Court of Administrative Hearings does not edit or delete submissions that include personal information. We reserve the right to remove any comments we deem offensive, intimidating, belligerent, harassing, or bullying, or that contain any other inappropriate or aggressive behavior without prior notification.

Max Hailperin · Citizen · (Postal Code: unknown) · Aug 25, 2025 8:19 am
 2 Votes

In part 8210.0500, subparts 4 and 6, lines 19.23 and 24.10, the proposed words "both numbers" would be more appropriately replaced by "more than one number," given that in this UOCAVA context there are three possible numbers — drivers license or ID, passport, and social security. Depending on the UOCAVA voter's circumstances, they may wish to submit two or three of these.

John Billo · Citizen · (Postal Code: unknown) · Sep 01, 2025 8:12 pm
 3 Votes

I oppose the unlimited vouching provision in 8200.5100 and 8200.9940 as it creates loopholes for potential abuse in residential facilities, where residents may be susceptible to influence. Cap vouching for all to prevent fraud, as seen in past cases where facility staff manipulated votes.

Permanent absentee status in 8210.0200 risks widespread fraud by sending ballots indefinitely without re-verification, as evidenced by absentee irregularities in recent elections. Require annual opt-in to ensure only active, eligible voters receive materials.

Extending absentee delivery to 5 p.m. (8210.2200) and spoiling to 19 days pre-election (8210.2450) invites chaos and fraud opportunities, as shorter windows better secure the process. Revert to prior timelines to avoid counting delays and integrity breaches.

The 46-day mail balloting extension in 8210.3000 prolongs ballot vulnerability to loss or

39440 Office of the Minnesota Secretary of State Dual Notice of Intent to Adopt Rules

Closed Sep 26, 2025 · Discussion · 69 Participants · 1 Topics · 76 Answers · 5 Replies · 70 Votes

manipulation, as longer periods have led to issues elsewhere. Shorten to 28 days and mandate enhanced tracking to safeguard votes.

Permitting mid-day ballot box openings in 8230.4365 risks tampering, even with logs, as unbroken seals are essential for trust. Prohibit this to maintain strict security protocols.

Lowering trainee judge age to 16 in 8240.1655 may introduce inexperience into critical processes, heightening errors or impropriety. Raise to 18 and require more rigorous vetting for all.

John Billo · Citizen · (Postal Code: unknown) · Sep 01, 2025 8:18 pm

👍 2 Votes

I respectfully request a hearing.

Response:

SUSAN SMITH · Citizen · (Postal Code: unknown) · Sep 02, 2025 5:41 pm

Thank you for requesting a hearing.

Darren Kratzke · Citizen · (Postal Code: unknown) · Sep 02, 2025 9:51 am

👍 4 Votes

There needs to be a public hearing to determine the validity of these proposed changes.

Response:

SUSAN SMITH · Citizen · (Postal Code: unknown) · Sep 02, 2025 5:41 pm

Thank you for requesting a hearing.

Erik van Mechelen · Citizen · (Postal Code: unknown) · Sep 02, 2025 2:07 pm

👍 5 Votes

This is my written request for public hearing for educational purposes as described here: <https://www.sos.mn.gov/media/t01bnvoh/aug-22-2025-dual-notice.pdf> - It says that if 25 or more similarly request a public hearing by Friday, September 26, 2025, then the agency will hold a virtual public hearing on Friday, October 10, 2025 at 12:00 pm.

Response:

SUSAN SMITH · Citizen · (Postal Code: unknown) · Sep 02, 2025 5:42 pm

Thank you for requesting a hearing.

Patrick Kaluza · Citizen · (Postal Code: unknown) · Sep 02, 2025 3:50 pm

👍 2 Votes

I request a public hearing on the proposed rulemaking.


39440 Office of the Minnesota Secretary of State Dual Notice of Intent to Adopt Rules

Closed Sep 26, 2025 · Discussion · 69 Participants · 1 Topics · 76 Answers · 5 Replies · 70 Votes

Response:


SUSAN SMITH · Citizen · (Postal Code: unknown) · Sep 02, 2025 5:42 pm
Thank you for requesting a public hearing.

SUSAN SMITH · Citizen · (Postal Code: unknown) · Sep 02, 2025 5:44 pm

 1 Votes

I request a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

Jennifer Ray Bertheussen-Chapman · Citizen · (Postal Code: unknown) · Sep 04, 2025 8:01 pm

 1 Votes

I request a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824. We need Transparency in our Election Rule changes requested and/or implemented by our Secretary of State.

Dale Kovar · Citizen · (Postal Code: unknown) · Sep 05, 2025 6:45 am

 3 Votes

This is a request for a public hearing on 39440 Office of the Minnesota Secretary of State Dual Notice of Intent to Adopt Rules.

Public trust in our election process is at an all-time low due to numerous instances of documented fraudulent activity and vulnerabilities in the election system and process. Any further changes in election process should be made to improve security rather than provide further means for nefarious activity.

Specifically, mail balloting is among the largest security risks. When voting in person at a polling location, there is a strict process monitored at every step. With mailed ballots, despite any "requirements" of signatures, etc., there is no reasonable way to determine if a ballot was received, transacted, and/or returned by the actual registered voter. There simply is not the chain of custody safeguards available for each individual ballot.

Thus, any rule change which supports any form of mail-in balloting only serves to further weaken the security and trust in our elections.

I realize it would take legislative action to make any significant corrections. Given the Secretary of State's office's history of weakening election security in the name of "making it easy to vote," I oppose any rule changes at this time.

Instead of being "easy to vote," the fundamental right for citizens (and not illegal aliens) to vote should be guarded in every manner possible, including voting in person only with proper identification. As it was originally, absentee voting must be returned to only legitimate individual cases such as military obligation or disability, and be confirmed before each election cycle begins.

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sandy klocker · Citizen · (Postal Code: unknown) · Sep 05, 2025 3:33 pm

👍 2 Votes

I strongly request that the public be heard in the State of Minnesota pertaining to the State Dual Notice of Intent to Adopt Rules.

Elections belong to the people and I would like my voice to be heard on the adoption of policies because I have documented many dependencies and violations since the preparation of the 2020 elections.

I suggest that not only a public hearing take place but the Secretary of State and the office of the SOS hold a workshop with the public to go over these issues, Thank you for your consideration.

Kathleen Hagen · Citizen · (Postal Code: unknown) · Sep 07, 2025 6:13 pm

👍 1 Votes

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 7th, 2025

To: Court of Administrative Hearings

600 North Robert Street

P.O. Box 64620

St. Paul, MN 55164-0620

Via: U.S. Mail and eComments Website

(<https://minnesotaoah.granicusideas.com/discussions>)

I am writing to formally request a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket Number B-9019-39440; Minnesota Rules Chapter 8200-8250. This request is submitted in full compliance with the requirements specified in the DUAL NOTICE: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Requests for Hearing Are Received. I will also submit a written request for hearing with additional details including my address and a summary of objections with the proposed rules changes. I am opposed to the entire set of Election Administration proposed rules changes due to errors, lack of clarity and consistency, lack of alignment with Minnesota State and Federal Election Laws and standards, and for the deleterious impact that these changes would have on the security, integrity, transparency, and accountability of our election processes and systems. These issues undermine the voters' confidence in election results and inhibit our Election Administrators, Workers, and Certification Board Members in their abilities to fulfill their oaths to protect our voters' ballots and votes.

I respectfully request a public hearing to allow for a more thorough review of the proposed rules and their intent, scope, compliance, and consequences. The hearing should include opportunities for participants to provide testimony and evidence regarding the proposed changes and their adequacy and legality.

Thank you for accepting and considering this request. I look forward to participating in the public hearing as it is an important part of the process that must be provided to analyze and improve the proposed changes. Trust in our election processes and systems has been significantly eroded in our State. The Secretary of State, election workers, and other key stakeholders must be allowed to do this important work carefully, thoughtfully, transparently, and accurately in order to start rebuilding trust.

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Sincerely,
Kathleen Hagen

Kelly Fenton · Citizen · (Postal Code: unknown) · Sep 08, 2025 4:53 pm

👍 2 Votes

I respectfully request a hearing as some of these rules should fall under the legislative process.

Casey McGregor · Citizen · (Postal Code: unknown) · Sep 10, 2025 4:05 pm

👍 1 Votes

I request a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

Jerry Ewing · Citizen · (Postal Code: unknown) · Sep 12, 2025 6:45 pm

👍 1 Votes

I hereby request a public hearing on the proposed rules for elections, Revisor's ID Number R-4824; CAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250.

I particularly object to the following line items: 12.13 and 16.1 and 26.25-27.3 and 32.10 and 36.1 and 37.27 and 41.14 and 43.16:

By objection is that I can write in any name as my witness, without giving a Minnesota address as a positive ID of a real person.
Here is how the law (203B.07 s,3) was changed: "... a person who is registered to vote in Minnesota at least 18 years of age on or before the day of the election and a citizen of the United States or by a notary public..." Nothing in this law or the change to it says that an actual address, as evidence that the witness is a real person, should be removed.

Tom Cleland · Citizen · (Postal Code: unknown) · Sep 14, 2025 10:59 am

👍 1 Votes

I agree with those requesting a public hearing.

Tiffany Heineman · Citizen · (Postal Code: unknown) · Sep 16, 2025 8:09 am

👍 1 Votes

I am requesting a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

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Cynthia Fisher · Citizen · (Postal Code: unknown) · Sep 16, 2025 10:10 am

👍 1 Votes

I request a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824. We need Transparency in our Election Rule changes requested and/or implemented by our Secretary of State.

Barbara Kaiser · Citizen · (Postal Code: unknown) · Sep 19, 2025 9:25 am

👍 1 Votes

I request a public hearing on the proposed rulemaking of Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

deb kaldenberg · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:00 am

👍 1 Votes

I request a public hearing.

Colton Muehring · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:21 am

👍 1 Votes

I am commenting to request a public hearing on the proposed rulemaking.

Jody Mcilrath · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:23 am

👍 1 Votes

his is my written request for public hearing for educational purposes as described here: <https://www.sos.mn.gov/media/t01bnvoh/aug-22-2025-dual-notice.pdf> - It says that if 25 or more similarly request a public hearing by Friday, September 26, 2025, then the agency will hold a virtual public hearing on Friday, October 10, 2025 at 12:00 pm.

Michael Gross · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:39 am

👍 1 Votes

I request a public hearing on the proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

Linda Nara · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:41 am

👍 1 Votes

I request a public hearing on the Proposed Permanent Rules Relating to Elections Administration ID Number R-4824 CAH Docket No. 8-9019 39440 Minnesota Rules Chapter 8200-8250

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Tracie Killion · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:46 am

👍 1 Votes

I request a public hearing on the proposed rulemaking

James Mathias · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:49 am

👍 1 Votes

I request a public hearing on the proposed rulemaking.

Kevin Schleppenbach · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:54 am

👍 1 Votes

I request a public hearing on the proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

Jodi Welsh · Citizen · (Postal Code: unknown) · Sep 19, 2025 11:03 am

👍 1 Votes

I request a public hearing on the proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

James McLaughlin · Citizen · (Postal Code: unknown) · Sep 19, 2025 12:39 pm

👍 1 Votes

I request a public hearing on the proposed rulemaking.

Rose Love · Citizen · (Postal Code: unknown) · Sep 19, 2025 12:53 pm

👍 1 Votes

I request a public hearing on the proposed rulemaking. Thank you.

JILL GAFFNEY · Citizen · (Postal Code: unknown) · Sep 19, 2025 1:38 pm

👍 1 Votes

I request a public hearing on the proposed rulemaking.

Lisa Doyle · Citizen · (Postal Code: unknown) · Sep 19, 2025 1:44 pm

👍 1 Votes

I respectfully request a public hearing on this matter.

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Mary Wheelock · Citizen · (Postal Code: unknown) · Sep 19, 2025 1:58 pm

👍 1 Votes

I respectfully request a public hearing on this matter.

Belinda Kuhn · Citizen · (Postal Code: unknown) · Sep 19, 2025 2:09 pm

👍 1 Votes

I hereby request a public hearing on the proposed rule making

Sonia Slack · Citizen · (Postal Code: unknown) · Sep 19, 2025 2:29 pm

👍 1 Votes

I request a public hearing on the proposed permanent rules relating to elections administration; Minnesota rules chapter 8200-8250; revisor's ID number R-4824

Judy Kretzschmar · Citizen · (Postal Code: unknown) · Sep 19, 2025 2:37 pm

👍 1 Votes

I request a public hearing on 39440.

Greg Copeland Greg Copeland · Citizen · (Postal Code: unknown) · Sep 19, 2025 3:44 pm

👍 1 Votes

I request a full public hearing on 39440. Secure Elections are critical to public confidence in our election outcomes, and rules setting forth specific voter ballot handling procedures deserve intense public review and comment.

LuAnn Morrison · Citizen · (Postal Code: unknown) · Sep 19, 2025 4:34 pm

👍 1 Votes

I request a full public hearing on 39440

Carol Mulvihill · Citizen · (Postal Code: unknown) · Sep 19, 2025 4:42 pm

👍 1 Votes

I request a full public hearing on 39440

cindy macrafc · Citizen · (Postal Code: unknown) · Sep 19, 2025 7:45 pm

👍 1 Votes

I request a full, public hearing on 39440. thank you.

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Susan Baker · Citizen · (Postal Code: unknown) · Sep 19, 2025 10:22 pm

👍 1 Votes

I request a public hearing on the proposed rulemaking.

Michael Natt · Citizen · (Postal Code: unknown) · Sep 19, 2025 11:20 pm

👍 1 Votes

I respectfully request a public hearing on this proposal.

Patricia Moulton · Citizen · (Postal Code: unknown) · Sep 20, 2025 8:37 am

👍 1 Votes

I request a public hearing on the proposed rulemaking. Leaving the public out is not good policy. Discussion: 39440 Office of the Minnesota Secretary of State Dual Notice of Intent to Adopt Rules
DUAL NOTICE

Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824

CAH Docket No. 8-9019-39440

Alan Sherwood · Citizen · (Postal Code: unknown) · Sep 20, 2025 9:40 am

👍 1 Votes

I request a public hearing on the proposed rulemaking.

Diane lange · Citizen · (Postal Code: unknown) · Sep 20, 2025 4:48 pm

👍 1 Votes

I request a public hearing on the proposed rulemaking

Sue Holman-Sutich · Citizen · (Postal Code: unknown) · Sep 20, 2025 4:51 pm

👍 1 Votes

I request a public hearing on the proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824. CAH Docket No. 8-9019-39440

Sue Holman-Sutich · Citizen · (Postal Code: unknown) · Sep 20, 2025 5:24 pm

👍 1 Votes

Please see attached letter

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Dustin Christensen · Citizen · (Postal Code: unknown) · Sep 21, 2025 7:43 pm

👍 1 Votes

I request a public hearing on the proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

Todd Hanson · Citizen · (Postal Code: unknown) · Sep 21, 2025 8:03 pm

👍 1 Votes

I request a public hearing on the proposed rule making.

Andrew Kirsch · Citizen · (Postal Code: unknown) · Sep 22, 2025 8:38 am

👍 1 Votes

I request a public hearing on the proposed rulemaking

Jerry Papenfuss · Citizen · (Postal Code: unknown) · Sep 22, 2025 2:49 pm

👍 1 Votes

"I request a public hearing on the proposed rulemaking

Drew Roach · Citizen · (Postal Code: unknown) · Sep 23, 2025 1:17 pm

👍 1 Votes

This is my formal request for a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

Tad Jude · Citizen · (Postal Code: unknown) · Sep 24, 2025 5:11 pm

👍 2 Votes

This is my formal request for a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

Phillip Parrish · Citizen · (Postal Code: unknown) · Sep 25, 2025 5:08 pm

👍 2 Votes

I strongly oppose the proposed permanent rules related to elections administration (Revisor's ID Number R-4824, CAH Docket No. 8-9019-39440, Minnesota Rules Chapters 8200-8250) in their entirety. These rules, released amid the U.S. Department of Justice's lawsuit against Secretary of State Steve Simon filed on September 25, 2025, fail to address the systemic voter roll fraud exposed in Phillip C. Parrish's recent article (<https://parrish4mn.com/2025/09/update-doj-lawsuit-against-steve-simon-validates-our-warnings-its-time-to-expose-minnesotas-voter-roll-fraud-and-the-criminal-enterprise-behind-it/>). With 3.6 million registered voters against a 4.2 million voting-age population, including ghosts, duplicates, and non-citizens, and post-election ghost additions of

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1,130+ in 2024, these rules are a weak cover-up. They ignore inflated rolls rigging elections, siphoning billions in federal funds, and enabling scandals like Feeding Our Future and District 40B cheating. The rules' technical tweaks to registration, ballots, and training do not mandate real solutions.

Hearing Request:

I request a public hearing under Minnesota Statutes §14.25 to address these failures. I object to the rules' inadequacy in tackling voter fraud, particularly the lack of:

- Real-time roll audits with SSA, Census, and USCIS cross-checks.
- Citizenship proof via Trump's EO 14,248 and SAVE Act.
- Bans on foreign software like Konnech.
- Post-election roll freezes and transparent logging.
- Fraud detection training for officials.
- Funding tied to roll accuracy.
- Public access to DOJ-requested data.

These changes are essential to protect Minnesota's elections. Please schedule the hearing for October 10, 2025, as outlined.

Submission Date: September 25, 2025

Response:

Wendy Henagin · Citizen · (Postal Code: unknown) · Sep 26, 2025 10:21 am
I request a public hearing on the proposed rule making.

Heidi Wanty · Citizen · (Postal Code: unknown) · Sep 25, 2025 5:16 pm
👍 1 Votes

I oppose the proposed rules in full as they fail to address voter roll fraud exposed by the DOJ lawsuit (filed 9/25/25). I request a public hearing under Minn. Stat. §14.25, objecting to [specify, e.g., weak registration proofs]. Implement [list items 1-7]. Heidi Wanty 52 Lone Ridge Lane Foley MN 56329

Diana Friemann · Citizen · (Postal Code: unknown) · Sep 25, 2025 6:24 pm
👍 1 Votes

I request a public hearing regarding the validity of the proposed changes to address voter roll fraud as exposed by the DOJ lawsuit filed on 9/25/2025. I request a public hearing under Minnesota Statute 14.25 objecting to weak registration proofs. The rules are inadequate in tackling voter fraud. Please schedule a hearing on October 10, 2025, as outlined. Diana Friemann, 2021 44th Street NW, Rochester, Minnesota 55901.

Marc x · Citizen · (Postal Code: 55123) · Sep 25, 2025 8:12 pm
👍 1 Votes

I respectfully request a hearing on the matter of "DUAL NOTICE: Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250;

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
Revisor's ID Number R-4824; CAH Docket No. 8-9019-39440. The US DOJ lawsuit filed 09/25/2025 exposed alleged voter roll fraud. I'd like the hearing to address Minnesota Rules Chapters 8200-8250, addressing the following points:

1. Mandatory Real-Time Voter Roll Audits and Purges: Require automatic monthly cross-checks against SSA death records, Census population data, and USCIS citizenship databases to remove deceased, duplicates, and ineligible entries within 30 days. (Target: Subd. 201.071—current rules only “clarify” forwarding apps; add NVRA/HAVA enforcement teeth.)
2. Proof of Citizenship for All Registrations: Enforce Trump’s Executive Order 14,248 and the SAVE Act—demand full citizenship documentation (e.g., birth certificate, passport, or REAL ID) for same-day and absentee registrations, ending the “vouching” loopholes that enable non-citizen fraud. (Amend: 201.061, subd. 3—no more unlimited facility vouching without verification.)
3. Ban Foreign Software and Enhance Data Security: Prohibit tools like Konnech from storing voter data on overseas servers; mandate U.S.-based, auditable systems with end-to-end encryption and public blockchain logging for changes. (Update: 206.82—current testing rules are weak; require independent audits pre-every election.)
4. Post-Election Roll Freezes and Transparent Counting: Lock rolls 30 days pre-Election Day, with no additions/removals until certified results; publish daily logs of all changes, including ballot safeguards against “ghost” additions. (Strengthen: 203B.125 and 204B.45—rules touch safeguards but ignore post-election anomalies like our 2024 drop of 275,000+ registrations.)
5. Expanded Election Official Training on Fraud Detection: Train all judges/clerks on spotting multi-state duplicates, foreign influence (e.g., CCP ties), and ActBlue schemes; include whistleblower protections and penalties for non-reporting. (Revise: 206.57—current expansions are superficial; add modules on DOJ/HAVA compliance.)
6. Federal Funding Tie-In Accountability: Link state election grants to roll accuracy metrics—deduct funds for any >1% inflation rate, redirecting to independent audits. (New rule under 201.221—expose the billions gamed via padded headcounts for Medicaid/welfare.)
7. Public Access to Roll Data with Safeguards: Comply fully with DOJ demands for anonymized access to names, DOBs, addresses, DL/SSN digits—while protecting live voters. Publish quarterly accuracy reports. (Align: 201.091—rules “clarify” notices but dodge transparency.)

Please schedule a hearing on October 10, 2025, as outlined. Marc Olivier, 845 County Road B W, Roseville, Minnesota 55113.

Submission Date: 09/25/2025 at 8:12PM

Jennifer Worth · Citizen · (Postal Code: unknown) · Sep 25, 2025 8:14 pm

 1 Votes

I am requesting a public hearing on the proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

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I oppose the proposed rule changes in their entirety. The removal of specific language in the existing rules creates too many "gray areas" and does NOT support clean and fair elections. These rule changes do not strengthen vote integrity, and appear purposely vague.

As a resident of Minnesota, I request a public hearing under Minnesota Statutes §14.25 on October 10, 2025.

Steven Buus · Citizen · (Postal Code: unknown) · Sep 25, 2025 8:30 pm

👍 1 Votes

I strongly oppose the proposed permanent rules on elections administration (Revisor's ID Number R-4824, CAH Docket No. 8-9019-39440, Minnesota Rules Chapters 8200-8250) in full, as they ignore the voter roll fraud highlighted by the DOJ lawsuit against Secretary of State Steve Simon (filed 9/25/25).

I request a public hearing under Minn. Stat. §14.25, objecting to weak registration proofs and unlimited vouching that enable non-citizen and duplicate voting.

An accurate and verifiable voting system is essential for a properly functioning society.

Steven Buus

Curtis Kuecker · Citizen · (Postal Code: unknown) · Sep 25, 2025 8:32 pm

👍 1 Votes

I oppose the proposed rules in full as they fail to address voter roll fraud exposed by the DOJ lawsuit (filed 9/25/25). I request a public hearing under Minn. Stat. §14.25, objecting to [specify, e.g., weak registration proofs]. Implement

1. Mandatory Real-Time Voter Roll Audits and Purges: Require automatic monthly cross-checks against SSA death records, Census population data, and USCIS citizenship databases to remove deceased, duplicates, and ineligible entries within 30 days. (Target: Subd. 201.071—current rules only “clarify” forwarding apps; add NVRA/HAVA enforcement teeth.)

2. Proof of Citizenship for All Registrations: Enforce Trump's Executive Order 14,248 and the SAVE Act—demand full citizenship documentation (e.g., birth certificate, passport, or REAL ID) for same-day and absentee registrations, ending the “vouching” loopholes that enable non-citizen fraud. (Amend: 201.061, subd. 3—no more unlimited facility vouching without verification.)

3. Ban Foreign Software and Enhance Data Security: Prohibit tools like Konnech from storing voter data on overseas servers; mandate U.S.-based, auditable systems with end-to-end encryption and public blockchain logging for changes. (Update: 206.82—current testing rules are weak; require independent audits pre-every election.)

4. Post-Election Roll Freezes and Transparent Counting: Lock rolls 30 days pre-Election Day, with no additions/removals until certified results; publish daily logs of all changes, including ballot safeguards against “ghost” additions. (Strengthen: 203B.125 and 204B.45—rules touch safeguards but ignore post-election anomalies like our 2024 drop of 275,000+ registrations.)

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5. Expanded Election Official Training on Fraud Detection: Train all judges/clerks on spotting multi-state duplicates, foreign influence (e.g., CCP ties), and ActBlue schemes; include whistleblower protections and penalties for non-reporting. (Revise: 206.57—current expansions are superficial; add modules on DOJ/HAVA compliance.)

6. Federal Funding Tie-In Accountability: Link state election grants to roll accuracy metrics—deduct funds for any >1% inflation rate, redirecting to independent audits. (New rule under 201.221—expose the billions gamed via padded headcounts for Medicaid/welfare.)

7. Public Access to Roll Data with Safeguards: Comply fully with DOJ demands for anonymized access to names, DOBs, addresses, DL/SSN digits—while protecting live voters. Publish quarterly accuracy reports. (Align: 201.091—rules “clarify” notices but dodge transparency.)

Curtis Kuecker
2213 White Bridge Rd NE, Rochester MN 55906

Becky Youngmark · Citizen · (Postal Code: unknown) · Sep 25, 2025 8:54 pm

 1 Votes

I formally request a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor’s ID Number R-4824.

Becky Youngmark

Jack Schlichting · Citizen · (Postal Code: unknown) · Sep 25, 2025 10:11 pm

 1 Votes

I request a public hearing on the Proposed Permanent Rules Relating to Elections Administration. Thanks Jack W Schichting

Clinton Johanneck · Citizen · (Postal Code: unknown) · Sep 25, 2025 10:13 pm

 1 Votes

- Mandatory Real-Time Voter Roll Audits and Purges: Require automatic monthly cross-checks against SSA death records, Census population data, and USCIS citizenship databases to remove deceased, duplicates, and ineligible entries within 30 days. (Target: Subd. 201.071—current rules only “clarify” forwarding apps; add NVRA/HAVA enforcement teeth.)

- Proof of Citizenship for All Registrations: Enforce Trump’s Executive Order 14,248 and the SAVE Act—demand full citizenship documentation (e.g., birth certificate, passport, or REAL ID) for same-day and absentee registrations, ending the “vouching” loopholes that enable non-citizen fraud. (Amend: 201.061, subd. 3—no more unlimited facility vouching without verification.)

- Ban Foreign Software and Enhance Data Security: Prohibit tools like Konnech from storing voter data on overseas servers; mandate U.S.-based, auditable systems with

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end-to-end encryption and public blockchain logging for changes. (Update: 206.82—current testing rules are weak; require independent audits pre-every election.)

- Post-Election Roll Freezes and Transparent Counting: Lock rolls 30 days pre-Election Day, with no additions/removals until certified results; publish daily logs of all changes, including ballot safeguards against “ghost” additions. (Strengthen: 203B.125 and 204B.45—rules touch safeguards but ignore post-election anomalies like our 2024 drop of 275,000+ registrations.)

- Expanded Election Official Training on Fraud Detection: Train all judges/clerks on spotting multi-state duplicates, foreign influence (e.g., CCP ties), and ActBlue schemes; include whistleblower protections and penalties for non-reporting. (Revise: 206.57—current expansions are superficial; add modules on DOJ/HAVA compliance.)

- Federal Funding Tie-In Accountability: Link state election grants to roll accuracy metrics—deduct funds for any >1% inflation rate, redirecting to independent audits. (New rule under 201.221—expose the billions gamed via padded headcounts for Medicaid/welfare.)

- Public Access to Roll Data with Safeguards: Comply fully with DOJ demands for anonymized access to names, DOBs, addresses, DL/SSN digits—while protecting live voters. Publish quarterly accuracy reports. (Align: 201.091—rules “clarify” notices but dodge transparency.)

Meg Bartz · Citizen · (Postal Code: unknown) · Sep 26, 2025 9:25 am
👍 1 Votes

I request a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor’s ID Number R-4824.

Manuel Moreton · Citizen · (Postal Code: unknown) · Sep 26, 2025 1:31 pm
👍 1 Votes

I request a public hearing on the Proposed Permanent Rules to Elections Administrations. Specifically, I request that the following is added to the rules.

1. Mandatory Real-Time Voter Roll Audits and Purges: Require automatic monthly cross-checks against SSA death records, Census population data, and USCIS citizenship databases to remove deceased, duplicates, and ineligible entries within 30 days. (Target: Subd. 201.071—current rules only “clarify” forwarding apps; add NVRA/HAVA enforcement teeth.)

2. Proof of Citizenship for All Registrations: Enforce Trump’s Executive Order 14,248 and the SAVE Act—demand full citizenship documentation (e.g., birth certificate, passport, or REAL ID) for same-day and absentee registrations, ending the “vouching” loopholes that enable non-citizen fraud. (Amend: 201.061, subd. 3—no more unlimited facility vouching without verification.)

3. Ban Foreign Software and Enhance Data Security: Prohibit tools like Konnech from storing voter data on overseas servers; mandate U.S.-based, auditable systems with end-to-end encryption and public blockchain logging for changes. (Update: 206.82—current testing rules are weak; require independent audits pre-every election.)

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4. Post-Election Roll Freezes and Transparent Counting: Lock rolls 30 days pre-Election Day, with no additions/removals until certified results; publish daily logs of all changes, including ballot safeguards against “ghost” additions. (Strengthen: 203B.125 and 204B.45—rules touch safeguards but ignore post-election anomalies like our 2024 drop of 275,000+ registrations.)

5. Expanded Election Official Training on Fraud Detection: Train all judges/clerks on spotting multi-state duplicates, foreign influence (e.g., CCP ties), and ActBlue schemes; include whistleblower protections and penalties for non-reporting. (Revise: 206.57—current expansions are superficial; add modules on DOJ/HAVA compliance.)

6. Federal Funding Tie-In Accountability: Link state election grants to roll accuracy metrics—deduct funds for any >1% inflation rate, redirecting to independent audits. (New rule under 201.221—expose the billions gamed via padded headcounts for Medicaid/welfare.)


7. Public Access to Roll Data with Safeguards: Comply fully with DOJ demands for anonymized access to names, DOBs, addresses, DL/SSN digits—while protecting live voters. Publish quarterly accuracy reports. (Align: 201.091—rules “clarify” notices but dodge transparency.)

Linda Lonn · Citizen · (Postal Code: unknown) · Sep 26, 2025 1:56 pm

 1 Votes

This is my formal request for a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824.

Mary Deming · Citizen · (Postal Code: unknown) · Sep 26, 2025 2:46 pm

 1 Votes

I am requesting a public hearing on the the changes that Secretary of State Steve Simon is proposing on October 10,2025 on the election integrity/voter fraud issues addressed on the Permanent Rules to Elections Administrations. Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824. Thank you

Brenda Remus · Citizen · (Postal Code: unknown) · Sep 26, 2025 3:16 pm

 0 Votes

I respectfully request a public hearing for the Proposed Permanent Rules related to Election Administration. Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824

Ayrlahn Johnson · Citizen · (Postal Code: unknown) · Sep 26, 2025 3:42 pm

 0 Votes

I am writing to oppose these weak proposed rules and to demand a public hearing pursuant to Minn. Stat. §14.25 so all issues can be debated and discussed in a public

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forum. These proposed rules fail to address voter roll fraud as exposed by the DOJ lawsuit filed yesterday 9-25-2025.

The following rules must be incorporated into Minnesota Rules Chapters 8200-8250:

1. Mandatory Real-Time Voter Roll Audits and Purges: Require automatic monthly cross-checks against SSA death records, Census population data, and USCIS citizenship databases to remove deceased, duplicates, and ineligible entries within 30 days. (Target: Subd. 201.071—current rules only “clarify” forwarding apps; add NVRA/HAVA enforcement teeth.)
2. Proof of Citizenship for All Registrations: Enforce Trump’s Executive Order 14,248 and the SAVE Act—demand full citizenship documentation (e.g., birth certificate, passport, or REAL ID) for same-day and absentee registrations, ending the “vouching” loopholes that enable non-citizen fraud. (Amend: 201.061, subd. 3—no more unlimited facility vouching without verification.)
3. Ban Foreign Software and Enhance Data Security: Prohibit tools like Konnech from storing voter data on overseas servers; mandate U.S.-based, auditable systems with end-to-end encryption and public blockchain logging for changes. (Update: 206.82—current testing rules are weak; require independent audits pre-every election.)
4. Post-Election Roll Freezes and Transparent Counting: Lock rolls 30 days pre-Election Day, with no additions/removals until certified results; publish daily logs of all changes, including ballot safeguards against “ghost” additions. (Strengthen: 203B.125 and 204B.45—rules touch safeguards but ignore post-election anomalies like our 2024 drop of 275,000+ registrations.)
5. Expanded Election Official Training on Fraud Detection: Train all judges/clerks on spotting multi-state duplicates, foreign influence (e.g., CCP ties), and ActBlue schemes; include whistleblower protections and penalties for non-reporting. (Revise: 206.57—current expansions are superficial; add modules on DOJ/HAVA compliance.)
6. Federal Funding Tie-In Accountability: Link state election grants to roll accuracy metrics—deduct funds for any >1% inflation rate, redirecting to independent audits. (New rule under 201.221—expose the billions gamed via padded headcounts for Medicaid/welfare.)
7. Public Access to Roll Data with Safeguards: Comply fully with DOJ demands for anonymized access to names, DOBs, addresses, DL/SSN digits—while protecting live voters. Publish quarterly accuracy reports. (Align: 201.091—rules “clarify” notices but dodge transparency.)

Patrick Kaluza · Citizen · (Postal Code: unknown) · Sep 26, 2025 3:47 pm

 0 Votes


See attached

Beth Fraser · Citizen · (Postal Code: unknown) · Sep 26, 2025 3:55 pm

 0 Votes

I am submitting the attached comments on behalf of State Senator Liz Boldon.

Lisa Roden · Citizen · (Postal Code: unknown) · Sep 26, 2025 3:59 pm

 0 Votes

I request a public hearing on the proposed rulemaking

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Request for Public Hearing on Proposed Voting Rules Changes

Date: September 5, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is [Your Name], and my address is [Your Address, City, State, ZIP]. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
[Your Name]

Following are inaccuracies within the document “Proposed Permanent Rules Relating to Election Administration” ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~
10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~
12.14 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22
on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • ~~I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • ~~I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

~~31.23 Statutes, section 203B.121, subdivision 4, all absentee ballot return envelopes retained by~~
~~31.24 the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
~~31.25 compared with the record required by this rule to ensure that all envelopes are accounted~~
~~32.1 for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~
~~32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state~~
~~32.3 promptly.~~

Comment: See no reason for change.

Line item:

~~32.10 A. has provided a Minnesota address as part of the witness's certification on the~~
~~32.11 return envelope;~~

Comment: What law made this change?

Line item:

~~32.18 seventh~~ 19th day before the election, any ballot that has been previously received from
that
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~44~~ 28

Comment: What law made this change?

Line item:

~~35.6 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name ~~and Minnesota street address, including city~~
36.2 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or
36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format

37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~38.12 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~39.17 Subp. 7. Change of major party choice. Until the close of business on the seventh~~
39.18 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

~~40.13 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~41.14 • Ask your witness to print their name and Minnesota street address, including city~~
~~41.15 (not a P. O. Box), in the box at the top of the witness section and sign their name in~~
41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

~~41.25 • Deliver it in person by 8:00 p.m. on Election Day, or~~
~~41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.~~

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~43.16 MN street address~~
~~43.17 (or title, if an official or notary)~~

43.18 _____
43.19 Street Address
43.20 _____ MN

43.21 City

Comment: What law made this change?

Line item:

44.2 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
44.9 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~
45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and~~
~~voting~~
45.17 ~~systems to be used at the election.~~ In order to demonstrate the accuracy of the computer
45.18 programs and voting systems to be used at an election, the election jurisdiction must hold
45.19 a public accuracy test at least three days prior to the voting equipment being used. A
45.20 ballot-marking device used for absentee voting must be tested according to part
8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those
46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as
49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and
the
49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that
precinct
49.24 are not eligible to participate in conducting a recount or postelection review in that
precinct.

Comment: What law allows this change?

Line item:

54.6 general election. ~~At the same time that the secretary of state certifies the names of nominees~~

54.7 ~~under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify~~

54.8 ~~to the county auditors the order in which the names of the candidates representing the~~

54.9 ~~political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear~~

54.10 ~~for every partisan office on the ballot. Candidates nominated by petition must appear on~~

54.11 ~~the ballot beneath the names of the candidates of the political parties as defined in Minnesota~~

54.12 ~~Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary~~

54.13 ~~of state.~~ At least 11 weeks before the state general election, the secretary of state shall draw

54.20 the order of those candidates. ~~The order of political parties or principles determined by the~~

54.21 ~~drawing of lots applies to all partisan offices on the ballot.~~

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed

55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota

55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative

55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the

55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;

55.10 and the voter's votes for each office or question, generated from the voter's use of a touch

55.11 screen or other electronic device on which a complete ballot meeting the information

55.12 requirements of all applicable laws was displayed electronically. The ballot must also include

55.13 *lines for initials of at least two election judges.*

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 20, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: I request a public hearing on the proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824. Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Susan Holman-Sutich, and my address is 555 Abbey Way, Mendota Heights, MN 55120. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Susan Holman-Sutch

Following are inaccuracies within the document “Proposed Permanent Rules Relating to Election Administration” ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~
10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~
12.14 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format

13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22
on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • ~~I am or have been registered to vote in Minnesota at least 18 years of age on or before~~
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
31.24 ~~the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
31.25 ~~compared with the record required by this rule to ensure that all envelopes are accounted~~
32.1 ~~for. Any discrepancy shall be reported to the secretary of state promptly~~ they must comply
32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state
32.3 promptly.

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
32.11 ~~return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~14~~ 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name ~~and Minnesota street address, including city~~
36.2 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

- 36.11 • Deliver it in person by 8:00 p.m. on Election Day, or
36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format
37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~38.12 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

39.17 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
39.18 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

~~40.13 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

41.14 • Ask your witness to print their name ~~and Minnesota street address, including city~~
41.15 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

- 41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must

41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

43.16 ~~MN street address~~

43.17 ~~(or title, if an official or notary)~~

43.18 _____

43.19 ~~Street Address~~

43.20 _____ MN

43.21 ~~City~~

Comment: What law made this change?

Line item:

44.2 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before

44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~

44.9 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and voting~~

45.17 ~~systems to be used at the election. In order to demonstrate the accuracy of the computer~~

45.18 programs and voting systems to be used at an election, the election jurisdiction must hold

45.19 a public accuracy test at least three days prior to the voting equipment being used. A

45.20 ballot-marking device used for absentee voting must be tested according to part 8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as

49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the

49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct

49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.

Comment: What law allows this change?

Line item:

54.6 general election. ~~At the same time that the secretary of state certifies the names of nominees~~

54.7 ~~under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify~~

54.8 ~~to the county auditors the order in which the names of the candidates representing the~~

54.9 ~~political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear~~

54.10 ~~for every partisan office on the ballot. Candidates nominated by petition must appear on~~

54.11 ~~the ballot beneath the names of the candidates of the political parties as defined in Minnesota~~

54.12 ~~Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary~~

54.13 ~~of state.~~ At least 11 weeks before the state general election, the secretary of state shall draw

54.20 the order of those candidates. ~~The order of political parties or principles determined by the~~

54.21 ~~drawing of lots applies to all partisan offices on the ballot.~~

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed

55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota

55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative

55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the

55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;

55.10 and the voter's votes for each office or question, generated from the voter's use of a touch

55.11 screen or other electronic device on which a complete ballot meeting the information

55.12 requirements of all applicable laws was displayed electronically. The ballot must also include

55.13 lines for initials of at least two election judges.

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Duane Quam
State Representative
Co-Chair, Elections Finance
and Government Operations
District 24A
Dodge and Olmsted Counties



Minnesota House of Representatives

September 25, 2025

Re: Comments on Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; CAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250

As members of the Minnesota House Elections Finance and Government Operations Committee, we are writing to provide comments on the proposed changes to rules related to elections administration. While there are parts of the proposed changes that are reasonable, there are several items that are of concern or that should be debated within the legislative process. Particular items of concern include:

8200.3000 REGISTRATION IN WRONG COUNTY.

This change would mandate new procedures for counties and require them to accept voter registration applications even if those applications are from nonresidents. It also could add additional costs and administrative burdens on our county auditors which may result in a delay in the processing of voter registration applications. We request that this item be withdrawn from consideration and brought before the legislature.

8200.3550 NOTICE OF CHALLENGE REMOVAL.

This change adds new mandates on county auditors requiring them to mail notice to convicts once they are no longer incarcerated that their right to vote has been restored. This change is presented as complying with Minnesota's felon voting law, but we believe that it goes beyond what is required in statute. The current rule is reasonable, requiring county auditors to give notice to registered voters that their rights have been restored. The change would add administrative complexities to elections administrators by requiring them to track when voters registered in their counties, who are incarcerated, and have knowledge when they have left incarceration. Additionally, it will add confusion to voters, because a recently incarcerated individual may not move back to the location where they were previously registered to vote once they are released from detention. It would be more appropriate for convicts to be informed of their rights by corrections staff as they are released. We request that this change be withdrawn and be brought forward to the legislature for consideration.

8200.9940 - PRECINCT LIST OF PERSONS VOUCHING FOR VOTER RESIDENCE ON ELECTION DAY AND NUMBER OF PERSONS VOUCHER FOR.

This change updates rules related to vouching. While we are supportive of requiring tracking of vouching information, we have concerns about what this rule change leaves out. During the 2025 legislative session, changes were made related to vouching both by election judges and residential facility staff.

Current statute now includes a prohibition on election judges vouching for individuals in the precinct they are working in unless they have personal knowledge that the voter is a resident of the precinct. This is not mentioned on the instructions for the vouching form.

Statute also requires that residential facilities provide lists of employees working in the facility, and it requires that those employees that are engaged in vouching must provide proof of employment in the residential facility. The existing rules in this section make no mention of these requirements, rather they only mention that residential facility employees may vouch for an unlimited number of people.

If the proposed rule changes are being made to clarify existing statute, as is the rational in the SONAR, then they should reflect the entirety of the statutory requirements and not provide selective information.

8210.0500 INSTRUCTIONS TO ABSENT VOTER.

While we are supportive of many of the changes proposed, we have concerns with line 10.21-10.22, which would allow jurisdictions to provide additional instructions to voters, provided they comply with typeface requirements. In the SONAR the OSS hypothesizes that local elections administrators might use this to provide beneficial jurisdiction specific instructions, however that is not what the proposed rule change says. We feel that if that is the intent of the OSS in modifying the rule, the change should say that, rather than giving blanket authority to include any information as long as it is in the correct typeface.

8210.2500 – MAIL PICKUP

This proposed change alters the time by which municipal clerks must ensure that all return envelopes are received from the post office, from 4:00pm to a general “on election day.” This change is extremely concerning because it will lead to confusion, differing interpretation in municipalities, and potential lawsuits.

Municipal clerks may struggle to process ballots received close to poll close. The rule adds confusion rather than clarity, by implying that return envelopes could be accepted between the poll close at 8:00pm and 11:59pm. This will lead to lawsuits for improperly accepted ballots, or from voters who did not have their ballot accepted after the closing of polls.

In the 2025 legislative session, there was a bipartisan agreement to move the absentee ballot drop off time from 8:00pm to 5:00pm. The legislature is perfectly capable of hearing and debating this similar change. It is appropriate that stakeholders have a chance to weigh in on this significant change in public committee hearings during the legislative session. This rule change adds confusion and is a policy change that is more appropriately decided by the elected representatives of the people. We respectfully request that this change is withdrawn and submitted to the legislature for consideration.

Sincerely,



Duane Quam
State Representative, District 24A
Co-Chair, Elections Finance and
Government Operations Committee



Pam Altendorf, District 20A
Co-Vice Chair, Elections Finance and
Government Operations Committee



Joe McDonald
State Representative, District 29A



Jimmy Gordon
State Representative, District 28A



Ben Davis, District
State Representative, District 06A



Drew Roach
State Representative, District 58B

Liz Boldon

State Senator

Minnesota Senate District 25



Minnesota

Senate

September 26, 2025

Dear Administrative Law Judge Eric Lipman,

As a co-chair of the Inclusive Democracy Caucus and a member of the Senate Elections Committee, I am pleased to provide comments on the Office of the Secretary of State's Proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824. I appreciate the work that the Office has done in drafting the proposed rules, primarily to implement statutory changes over the last few years. My comments will highlight a few areas where I think additional tweaks would make implementation of the statute even more faithful to the legislative intent, as well as focus on using plain language for voter-facing materials to ensure that they are as clear as possible for Minnesotans across the state.

Updating registrations: On 2.24 of the Rule Draft, the OSS proposes to add subpart 5 to implement terminology changes made throughout the Elections statutes (see for example [Minnesota Law 2025, Chapter 39](#), Article 8, Section 7) to clarify that a voter who is already registered and changes their name or address are not "registering to vote" but "updating their registration." To be consistent with the statutory language, I would suggest that on 2.24, the term "change" be replaced with the term "update". While the Secretary proposes to use the term "update" in the heading, it should also be included in the Rule language itself, as headings are not law. This same amendment should also be made on 5.5.

List of Residential Facilities: Lines 17.22 to 17.27 of the Rule Draft provide a list of the types of residential facilities whose employees are authorized to vouch for residents. I am glad to see that the proposed Rule includes the addition of "assisted living facilities", since this is one of three types of facilities that were added to Minnesota Statutes, section 201.061, subd. 3 since the Rules were last amended. To be complete and ensure that voters are aware of all of their options, the other new statutory options, residential treatment programs and adult foster care programs, should also be added to the list.

In addition, I oppose the proposed deletion of "group homes" from the list. This is the plain language term for residential facilities for people with developmental disabilities and these facilities continue to be authorized by statute. Removing this category from the list could confuse voters and employees of residential facilities who might believe that employees of these residential facilities are no longer allowed to vouch for residents. At the least removing this item from the list could generate unnecessary calls with questions to election officials and at the worst it could cause some voters to be disenfranchised if they do not understand that this option is still available to them and do not have another way to provide proof of residence.

Finally, I appreciate that the Secretary proposes to replace the term "battered women's shelter." However, I would suggest that "domestic violence shelter" should be the new term included in the Rule, not "domestic abuse shelter". "Domestic violence shelter" is the term currently used by those in the

field. As one can see on Tubman's website, for example, they use the term domestic violence shelter. (<https://www.tubman.org/get-help/shelter-housing/overview.html>)

Challenger form: On 7.8 to 8.4, the Rule Draft includes amendments to the form used to challenge a voter's eligibility prior to Election Day to reflect statutory changes made to Minnesota Statutes section 201.195. I appreciate the amendments the Secretary proposes, and believe that more are needed to faithfully reflect the legislative intent. First, the statute requires the filer to personally verify the facts and circumstances establishing the basis of the challenge. To provide county auditors with the information they need to assess whether the basis of the challenge meets the requirements of the statute, the form should include a section for the filer to explain what they did to verify the facts and circumstances *establishing the basis for the challenge*. Requiring the filer to provide this explanation is appropriate, since the statute further requires that the filer has the burden of proof, by clear and convincing evidence, that *the basis for challenging* the individual's right to vote is valid. Without this information, the county auditors would be unable to assess whether burden of proof for establishing the basis of the challenge has been met and whether the challenge should be dismissed under subp. 1a.

The other element that needs to be added to the form to faithfully reflect the legislative intent is an oath or affirmation. The statute requires that the petition be accompanied by an affidavit signed by the filer. While "affidavit" is not a statutorily defined term, the common and approved usage (as required by Minnesota Statutes, section 645.08) is a written statement for which the signer swears or affirms, often before a notary or other official, that claims set forth are true and accurate to the best of the person's knowledge. This common definition can be found on a variety of sites by doing a simple search of the internet. See, for example, the definition of affidavit on Legal Dictionary, (<https://legaldictionary.net/affidavit/>). The Legislature clearly indicated the intent that the filer provide a sworn (or affirmed statement) by using the term "affidavit." In order to give effect to all of the law's provisions, as required by Minnesota Statutes, section 645.16, an oath must be added.

Witnesses: I appreciate that the Secretary is updating voter materials to reflect changes to Minnesota Statutes, section 203B.07, subp. 3, which now allow the absentee voter to have any US Citizen who is at least 18 years old serve as a witness. I would, however, encourage the Secretary to use less technical, more plain language to describe the requirements in voter-facing materials, including the absentee ballot instructions and the witness's oath on the Signature Envelope. Using plain language makes it easier for voters and witnesses to understand the requirements and helps ensure compliance with them. For the voter instructions throughout (see 11.13 to 11.14; 14.21 to 14.22; 27.13 to 27.14; 35.6 to 35.7; and 40.13 to 40.14), instead of saying "Any person who is at least 18 years of age on or before the day of the election and who is a citizen of the United States," it would be better to use the phrase: "Any U.S. citizen who is (or will be) at least 18 years old by Election Day." Similarly, on the certificates printed on the Signature Envelopes (see 27.13 to 27.15; 29.9 to 29.11; 38.12 to 38.14; and 44.2 to 44.4), instead of having the witness swear or affirm that "I am at least 18 years of age on or before the day of the election and a citizen of the United States," it would be an improvement to use the following phrase "I am a U.S. citizen and am (or will be) at least 18 years old by Election Day."

Notice about accessible electronic ballot availability: I appreciate that the Secretary proposes to provide notice on the various absentee ballot instructions that voters with certain disabilities are allowed to request and receive an accessible ballot transmitted electronically under Minnesota Statutes, section 203B.29, subd 2). Nevertheless, I believe that the placement of the notice and the exact wording used could be improved. As to the placement, the notice about this option should be moved down, below the note that voting is not covered by power of attorney, so that all of the information related to options for signing the certificate remain together. Moving the notice down will also help to ensure that this information is not mistaken for another bullet point in the list of ways that an envelope can be signed.

The notice to voters can and should be written using plain language, so that it is as easy as possible for voters to understand whether they are eligible to receive the ballot in this way. Instead of the language for the notice proposed throughout (13.22 to 13.27; 18.12 to 18.17; 21.2 to 21.7; 25.26 to 26.3; 37.9 to 37.14; 42.20 to 42.25), I would suggest replacing it with something along the lines of: “If you have a disability that makes it difficult to read, write, or use printed materials, you have a right to use an accessible absentee ballot sent to you by email. You will be able to use your computer or phone to fill out your ballot and the forms, but will need to print them and return the paper copies by Election Day. To request an accessible ballot, contact your county auditor.” Using phrasing like this will make it clearer to voters if they have a disability that would qualify them to receive the ballot in this way, uses plain language to explain what “transmitted electronically” means, and includes the deadline for returning the materials.

Agent delivery and return of ballots under Minnesota Statutes, section 203B.11, subd. 4: I appreciate that the Secretary clearly delineates the two different return deadlines for absentee ballots in proposed Rules 8210.2200, subp. 1 on 31.9 to 31.16. The first deadline is the 5:00 pm deadline that now applies to the vast majority of absentee voters under Minnesota Law 2025, Chapter 39, Article 8, Sect. 30 which amended Minnesota Statutes 203B.08, subd. 1. The second deadline applies to those voters who qualify under Minnesota Statutes, section 203B.11, subd. 4 and remains 8:00 pm. The Secretary appropriately updates the notice to voters of the 5:00 pm deadline that applies to the vast majority of them on the absentee ballot instructions and reminders printed on the envelopes throughout the Rules. I don’t think that the Secretary should add a notice about the later deadline that applies to only a few voters on these materials that are sent to all absentee voters. However, I would urge the Secretary to add a sentence to 8210.0500 subp. 1 to direct county auditors and municipal clerks to provide written notice to voters and agents who are allowed to return their ballots up until 8:00 pm of the delayed deadline. This could be written in red on the instructions, communicated via a sticky note, or with an extra slip of colored paper that stands out. Providing notice to these voters and agents of the extra time they are allowed will help eliminate confusion and the potential disenfranchisement that could result if the voter and agent saw the 5:00 pm deadline on the instructions and other materials and thought it applied to them.

Party affiliation: The Secretary proposes amending the Rules to reflect changes to Minnesota Statutes, sections 201.091, subd. 4a and 207A.12, which changed the data classification of which major political party’s ballot the voter chose to vote in a Presidential Nomination Primary. That data is now protected and only shared with the chair of the political party that the voter chose. The Secretary appropriately modifies the notices to voters to indicate this change, however, I would suggest that the notice be tweaked to be slightly more general, and not specify that it will be shared with the chair. That level of detail could lead the voter to believe that only this one individual will have access to the data, whereas it is likely that the chair will use the data to inform the party’s activities, making others involved in party activities aware of the voter’s choice as well. To implement this suggestion, the Secretary could amend the Rule Draft on 39.5, 39.14 to 39.15, and 43.11 to delete “the chair of” in each of the instances where it is proposed.

Thank you to the Secretary for the large effort that it obviously took him and his staff to draft the Proposed Rules to implement the many statutory changes made in recent years. I hope that my comments and suggestions are helpful in our shared goal to implement the statutes faithfully and make voting as accessible to voters as possible.

Warmly,

A handwritten signature in cursive script that reads "Liz Boldon". The signature is written in black ink and is positioned above a thin horizontal line.

State Senator Liz Boldon

Minnesota Senate District 25

Request for Public Hearing on Voting Rules Changes#39440



Date: September 25, 2025

To: Court of Administrative Hearings

600 North Robert Street

Subject: Request for Public Hearing on
Proposed Voting Rules Changes by Secretary of
State Steve Simon

Dear Administrative Hearings Office:

I am writing to formally request a public hearing
regarding the proposed voting rules changes.
issued by Minnesota Secretary

My name is Elizabeth Spence. My and my
address is 2168 Hwy 3, Two Harbors , MN,
55616.

There are a few concerns I have with the changes
that I would like you to revisit, some of which
include but are not limited to:

Residency is important in voting according the
MN Statute 8200.9115, and does not agree with
the deletion in line 3.16

There being no law to constitute the change, such
as in deleting line items 9.23-9.25,MN Statute
8210.0200; 10.3-4,MN Statute 8210.0225,;11.3,
27.13-14. Registration and witness verification
are necessary steps to identify eligible voters.

Please consider a hearing based on these
concerns. Thank you for your time.

Sincerely,

Elizabeth Spence



September 26, 2025

Justin R. Erickson
General Counsel
Office of the Secretary of State
via email: justin.erickson@state.mn.us

Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Re: Proposed Permanent Rules Relating to Elections Administration;
Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440;
Minnesota Rules Chapter 8290

The Minnesota Association of County Officers (MACO) provides the following written comments regarding the proposed permanent rules related to elections administration drafted by the Office of the Secretary of State (OSS).

MACO is an association encompassing officials of all 87 counties including members who are county election administrators. County election administrators are tasked with the important responsibility of conducting elections. They pride themselves in ensuring every election is administered as fairly and efficiently as possible while effectively spending local taxpayer dollars and ensuring their nonpartisan standing in the processes.

The majority of changes proposed by the OSS are in direct response to legislative action in 2023, 2024, and 2025. MACO appreciates the thoughtfulness and completeness of incorporating these legislative actions into the rules. They are primarily technical changes. These updates ensure election administrators can consistently administer the state's election laws. The updates remove discrepancies where the previous rule language did not align with the recent laws passed by the Minnesota State Legislature.

MACO also appreciates the instances in these proposed rules where feedback collected from election administrators was incorporated. For example:

- **PART 8200.9940** Clarifies the process that must be followed to collect vouching information and allows this information to be collected electronically if electronic rosters are utilized. County election administrators specifically appreciate the ability to use electronic rosters for collection of the vouching information as that will be more efficient for the polling places that use electronic rosters.
- **PART 8220.1550** Clarifies that ballot marking devices (also known as assistive voting devices) must be tested pursuant to Minnesota Rules that require this testing prior to any equipment's use for absentee voting, which starts 46 days before election day.

(continues next page)

MACO wishes to draw attention to one proposed change and respectfully requests consideration of additional changes:

PART 8210.2400 – Safeguarding Procedures

The OSS proposes modifying subpart D to respond to a 2025 law change that provides new procedures for processing absentee ballots. While MACO agrees that current procedures in this rule are outdated, we do not believe the proposed changes provide enough clarity:

D. When the ballot board opens accepted return envelopes pursuant to Minnesota 31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by the county auditor or municipal clerk shall be removed from the place of safekeeping and compared with the record required by this rule to ensure that all envelopes are accounted for. Any discrepancy shall be reported to the secretary of state promptly they must comply with the provisions of that subdivision and report any discrepancy to the secretary of state promptly.~~

MACO requests the proposed added language be modified to clarify that any discrepancy be promptly reported to the secretary of state only in instances when the discrepancy is not resolved by the ballot board. There are instances when a discrepancy identified by the ballot board may be explainable (for example, a returned ballot envelope, once opened, may be found to be empty because the voter did not return their voted ballot). These explainable differences are documented by the ballot board. If the secretary of state were to receive these reports as proposed in the rule, there would be no action taken and no use of the information, resulting in unnecessary work making the proposed change unreasonable.

MACO fully supports the ballot board, through the official responsible for the ballot board (typically the city clerk or county auditor), promptly reporting any discrepancies that are not resolved at that meeting of the ballot board as required by law.

MACO suggests an amended proposed rule such as the below:

D. When the ballot board opens accepted return envelopes pursuant to Minnesota 31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by the county auditor or municipal clerk shall be removed from the place of safekeeping and compared with the record required by this rule to ensure that all envelopes are accounted for. Any discrepancy shall be reported to the secretary of state promptly they must comply with the provisions of that subdivision and the official responsible for the ballot board must report any unexplainable discrepancy to the secretary of state promptly.~~

Thank you for the opportunity to provide comment from county election administrators. Members of MACO's legislative committee can be available to assist with questions or concerns and to provide any technical assistance that may be of value as the rules process continues.



Troy Olsen
Government Relations Consultant,
Ewald Consulting
Minnesota Association of County Officers

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 5, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 25 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Donald Honerbrink, and my address is 2318 E 75th St. Inver Grove Heights MN 55076. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Donald Honerbrink



Following are inaccuracies within the document "Proposed Permanent Rules Relating to Election Administration" ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~

~~10.4 section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot. The absentee~~

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States.

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name and ~~Minnesota street address, including city~~

12.14 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in

12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22
on or before the day of the election and who is a citizen of the United States.

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • ~~I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • ~~I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
~~31.24 the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
~~31.25 compared with the record required by this rule to ensure that all envelopes are accounted~~
~~32.1 for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~
~~32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state~~
~~32.3 promptly.~~

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
~~32.11 return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that

32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than 44 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name and ~~Minnesota street address, including city-~~
36.2 ~~(not a P. O. Box), in the box at the top of the witness section and sign their name in~~
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or

36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format
37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

38.12 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change?

Line item:

39.17 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh-~~
39.18 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

40.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change?

Line item:

41.14 • Ask your witness to print their name and ~~Minnesota street address, including city-~~
41.15 ~~(not a P. O. Box), in the box at the top of the witness section and sign their name in~~
41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

43.16 MN street address

43.17 (or title, if an official or notary)

43.18 _____

43.19 Street Address

43.20 _____

MN-

43.21 City

Comment: What law made this change?

Line item:

44.2 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before

44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh-~~

44.9 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and voting~~

45.17 ~~systems to be used at the election.~~ In order to demonstrate the accuracy of the computer

45.18 programs and voting systems to be used at an election, the election jurisdiction must hold

45.19 a public accuracy test at least three days prior to the voting equipment being used. A

45.20 ballot-marking device used for absentee voting must be tested according to part 8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as

49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the

49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct

49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.

Comment: What law allows this change?

Line item:

54.6 general election. At the same time that the secretary of state certifies the names of nominees

54.7 under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify

54.8 to the county auditors the order in which the names of the candidates representing the

54.9 political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear

54.10 for every partisan office on the ballot. Candidates nominated by petition must appear on

54.11 the ballot beneath the names of the candidates of the political parties as defined in Minnesota

54.12 Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary

54.13 of state. At least 11 weeks before the state general election, the secretary of state shall draw

54.20 the order of those candidates. The order of political parties or principles determined by the

54.21 drawing of lots applies to all partisan offices on the ballot.

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed

55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota

55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative

55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the

55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;

55.10 and the voter's votes for each office or question, generated from the voter's use of a touch

55.11 screen or other electronic device on which a complete ballot meeting the information

55.12 requirements of all applicable laws was displayed electronically. The ballot must also include

55.13 lines for initials of at least two election judges.

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 22, 2025

To: Court of Administrative Hearings

600 North Robert Street

P.O. Box 64620

Saint Paul, Minnesota 55164-0620

SEP 25 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Daniel Passer, and my mailing address is 1201 Robert St S, Ste 3-18172, West Saint Paul MN 55118. I am currently a resident of the State of Minnesota, where I have resided for over the past twenty years. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I question some of the proposed voting rules changes. My concerns stem from the impact these changes are most likely to have on the accuracy, accessibility, structural integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rule changes will alter established procedures in ways that will negatively impact eligible voter participation, while at the same time increasing the ease with which persons may commit voter fraud or not get caught casting an ineligible vote, thus decreasing confidence in the integrity of the electoral process. Without further clarification and public discussion, some of the proposed changes seem likely to undermine the structural integrity and transparency of the electoral process.

I respectfully request a public hearing(s) to allow for a thorough understanding and explanation of the proposed rule changes, including their intent, scope, and consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the legal necessity and constitutionality of the proposed changes. Additionally, I urge the Secretary of State's Office to consider revising the proposed rule changes to ensure they continue to better align with what should continue to be Minnesota's commitment to the structural integrity of election processes, election transparency, free, fair and accessible elections; **Furthermore, in the spirit of helping to further Minnesota's commitment to the structural integrity of election processes, election transparency, free, fair and accessible elections, I request that all reasonable questions regarding the proposed rule or regulation changes that arise during**

the public hearing(s) be allowed during the public hearing(s), regardless of whether such questions have been identified, documented or raised within the submission of the Request for Public Hearing on Proposed Voting Rules Changes; The quantity of proposed voting rules changes is massive and the timeline for submitting the Request for Public Hearing on Proposed Voting Rules Changes is relatively short in order for citizens to be able to exercise their civic responsibility.

I look forward to hopefully participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters. Thank you for considering my request.

Sincerely,
Daniel Edward Passer

Following are legitimate concerns over inaccuracies or the proposed omission of vital and necessary identifying voter information within the document "Proposed Permanent Rules Relating to Election Administration" ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: The voter's residential address is absolutely critical for the purpose of identifying residency in order to identify the voter's correct precinct, polling place, Senate District, House District, School District, Congressional District, and Commissioner District. What is the purpose of lining-out the lined-out words?

Line item:

9.23 receive an absentee ballot ~~application. At least 60 days before each election, the county~~
9.24 ~~auditor or municipal clerk shall send an absentee ballot application to each person on the~~
9.25 ~~list who is eligible to vote in the election.~~

Comment: It is prudent and good management practice to limit the receipt and proper use of absentee ballot applications to those voters who are eligible to vote absentee in the proper time-frame. Therefore, it is right and proper that the county auditor or municipal clerk retain control over the distribution of absentee ballot applications.

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota~~
~~Statutes,~~
10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot. The~~
~~absentee~~
10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Under the proposed rule change to 10.2 and 10.3, what would be the intent and lawful justification for **not** sending a voter registration application to a voter whose voter registration application is incomplete under Minnesota Statutes?

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What is the intent and lawful justification for no longer requiring a witness to be a registered voter?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~
12.14 ~~(not a P. O. Box), in the box at the top of the witness section and sign their name in~~
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is needed. What is the intent of no longer requiring a witness to print their Minnesota street address, including city, (not a PO Box)?

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22
on or before the day of the election and who is a citizen of the United States,

Comment: It is appropriate that a witness needs to be a registered voter in the State of Minnesota.

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
31.24 the county auditor or municipal clerk shall be removed from the place of safekeeping and
31.25 compared with the record required by this rule to ensure that all envelopes are accounted
32.1 for. Any discrepancy shall be reported to the secretary of state promptly ~~they must comply~~
32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state
32.3 promptly.

Comment: See no reason for change. What is the intent of omitting the lined-out wording?
Absentee ballot return envelopes must be retained as evidence of timely postmarks or lack thereof.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
32.11 return envelope;

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change? What is the purpose of this proposed rule change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~14~~ 28

Comment: What law made this change? What is the purpose of this proposed rule change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change? What is the purpose of this proposed rule change?

Line item:

36.1 • Ask your witness to print their name ~~and Minnesota street address, including city~~
36.2 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is needed

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or
36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format
37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

38.12 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change? What is the purpose of this proposed rule change?

Line item:

39.17 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
39.18 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change? What is the purpose of this proposed rule change?

Line item:

40.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change? What is the purpose of this proposed rule change?

Line item:

41.14 • Ask your witness to print their name ~~and Minnesota street address, including city~~
41.15 ~~(not a P. O. Box), in the box at the top of the witness section and sign their name in~~
41.16 ~~the box at the bottom of the witness section.~~

Comment: For witness verification of registration, address is needed.

Line item:

41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

43.16 ~~MN street address~~
43.17 ~~(or title, if an official or notary)~~
43.18 _____
43.19 ~~Street Address~~
43.20 _____ MN
43.21 ~~City~~

Comment: What law made this change? What is the intended purpose of this proposed rule change?

Line item:

44.2 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change? What is the purpose of this proposed rule change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
44.9 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change? What is the purpose of this proposed rule change?

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

~~45.16 election for the purpose of demonstrating the accuracy of the computer programs and voting~~

~~45.17 systems to be used at the election. In order to demonstrate the accuracy of the computer~~

~~45.18 programs and voting systems to be used at an election, the election jurisdiction must hold~~

~~45.19 a public accuracy test at least three days prior to the voting equipment being used. A~~

~~45.20 ballot-marking device used for absentee voting must be tested according to part 8220.1350.~~

Comment: What law made this change in days? What is the purpose of this proposed rule change?

Line item:

~~46.22 This rule does not apply to ballot marking devices used for absentee voting. Those~~

~~46.23 devices must be tested under part 8220.1350.~~

Comment: What law allows this change? All should be tested to the same rule.

Line item:

~~49.21 recount official must be in the room at all times. If the recount includes ballot format as~~

~~49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the~~

~~49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct~~

~~49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.~~

Comment: What law allows this change? What is the purpose of this proposed rule change?

Line item:

~~54.6 general election. At the same time that the secretary of state certifies the names of nominees~~

~~54.7 under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify~~

~~54.8 to the county auditors the order in which the names of the candidates representing the~~

~~54.9 political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear~~

~~54.10 for every partisan office on the ballot. Candidates nominated by petition must appear on~~

~~54.11 the ballot beneath the names of the candidates of the political parties as defined in Minnesota~~

~~54.12 Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary~~

~~54.13 of state. At least 11 weeks before the state general election, the secretary of state shall draw~~

~~54.20 the order of those candidates. The order of political parties or principles determined by the~~

~~54.21 drawing of lots applies to all partisan offices on the ballot.~~

Comment: What law allows this change? What is the purpose of this proposed rule change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed
55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota
55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative
55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the
55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;
55.10 and the voter's votes for each office or question, generated from the voter's use of a
touch
55.11 screen or other electronic device on which a complete ballot meeting the information
55.12 requirements of all applicable laws was displayed electronically. The ballot must also
include
55.13 *lines for initials of at least two election judges.*

Comment: What law allows for this, for the ballot generators appear to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

NO ENVELOPE

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 19, 2025

To: Court of Administrative Hearings

600 North Robert Street

PO Box 64620

St. Paul, Minnesota. 55164-0620

RECEIVED

SEP 25 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments Website:

(<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting changes issued by the Minnesota Secretary of State Steve Simon, as referenced

In the provided document My name is Linda Nara, and my address is 15039 Derby Circle, Rosemount, MN 55068. This request is submitted in accordance with the

requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30PM on Friday, September 26, 2025.

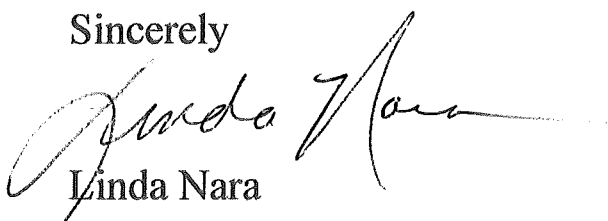
I object to the entire set of proposed voting rules changes for there are inaccuracies. See attached. Also, my concerns stems from the potential impact these changes may have

on the accessibility, integrity, and transparency of the voting process in Minnesota. Specially, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I purpose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, through specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely

A handwritten signature in black ink, appearing to read "Linda Nara", with a long horizontal flourish extending to the right.

Linda Nara

Following are inaccuracies within the document "Proposed Permanent Rules Relating to Election Administration" ID: R-4824.

Line item:

~~3.16 that I reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency.

Cannot delete.

Line item:

~~9.23 receive an absentee ballot application. At least 60 days before each election, the county 9.24 auditor or municipal clerk shall send an absentee ballot application to each person on the 9.25 list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter

~~10.3 and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~

~~10.4 section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot. The absentee~~

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

~~11.13 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age

~~11.14 on or before the day of the election and who is a citizen of the United States,~~

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

~~12.13 - Ask your witness to print their name and Minnesota~~

~~street address, including city~~

12.14 ~~(not a P. O. Box)~~, in the box at the top of the witness section and sign their name in

12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a

13.23 certificate of voter eligibility be transmitted electronically in an accessible format

13.24 by contacting your county auditor. If you request a ballot be transmitted electronically 13.25 in an accessible format, you

may then complete your ballot electronically but must

13.26 print your voted ballot and return this ballot and

completed certificate of voter

13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who

is at least 18 years of age 14.22 on or before the day of the

election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a

18.13 certificate of voter eligibility be transmitted electronically in an accessible format

18.14 by contacting your county auditor. If you request a ballot be transmitted electronically 18.15 in an accessible format, you

may then complete your ballot electronically but must

18.16 print your voted ballot and return this ballot and

completed certificate of voter

18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a

21.3 certificate of voter eligibility be transmitted electronically in an accessible format

21.4 by contacting your county auditor. If you request a ballot be transmitted electronically

21.5 in an accessible format, you may then complete your ballot electronically but must

21.6 print your voted ballot and return this ballot and completed certificate of voter

21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a

25.27 certificate of voter eligibility be transmitted electronically in an accessible format

25.28 by contacting your county auditor. If you request a ballot be transmitted electronically

26.1 in an accessible format, you may then complete your ballot electronically but must

26.2 print your voted ballot and return this ballot and completed certificate of voter

26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota at least~~ 18 years of age on or before 27.14 the day of the election and a citizen of the United States, or am a notary, or am

27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • I am ~~or have been registered to vote in Minnesota at least~~ 18 years of age on or before 29.10 the day of the election and a citizen of the United States, or am a notary, or am

29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, all absentee ballot return envelopes retained by 31.24 the county auditor or municipal clerk shall be removed from the place of safekeeping

~~and 31.25 compared with the record required by this rule to ensure that all envelopes are accounted~~
~~32.1 for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~ 32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state
32.3 promptly.

Comment: See no reason for change.

Line item:

~~32.10 A. has provided a Minnesota address as part of the witness's certification on the~~
~~32.11 return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from that
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~14~~ 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~36.1 • Ask your witness to print their name and Minnesota street address, including city~~
36.2 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or
36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a

37.10 certificate of voter eligibility be transmitted electronically in an accessible format

37.11 by contacting your county auditor. If you request a ballot be transmitted electronically.

37.12 in an accessible format, you may then complete your ballot electronically but must

37.13 print your voted ballot and return this ballot and completed certificate of voter

37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

38.12 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age

38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

39.17 ~~Subp. 7. Change of major party choice. Until the close of business on the seventh~~

39.18 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

Line item:

40.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age

41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

41.14 • ~~Ask your witness to print their name and Minnesota street address, including city~~

41.15 (not a P. O. Box), in the box at the top of the witness section and sign their name in

41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

- 41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
 - 41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.
- Comment:** Shouldn't this be 5 PM?

Line item:

- 42.20 • If you have a print disability, you may request that ballots, instructions, and a
- 42.21 certificate of voter eligibility be transmitted electronically in an accessible format
- 42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
- 41.23 in an accessible format, you may then complete your ballot electronically but must
- 41.24 print your voted ballot and return this ballot and completed certificate of voter
- 41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

- 43.16 ~~MN street address~~
- 43.17 ~~(or title, if an official or notary)~~
- 43.18

43.19 ~~Street Address~~

43.20

~~MN~~ 43.21 ~~City~~

Comment: What law made this change?

Line item:

- 44.2 • ~~I am or have been registered to vote in Minnesota at least~~
 - 18 years of age on or before 44.3 the day of the election and a
 - citizen of the United States, or I am a notary, or I am
- Comment:** What law made this change?

Line item:

- 44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
 - 44.9 19th day before the election, a voter may change the voter's choice of which major political
- Comment:** What law made this change?

Line item:

~~45.15 The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

~~45.16 election for the purpose of demonstrating the accuracy of the computer programs and voting~~

~~45.17 systems to be used at the election. In order to demonstrate the accuracy of the computer~~ 45.18 programs and voting systems to be used at an election, the election jurisdiction must hold 45.19 a public accuracy test at least three days prior to the voting equipment being used. A 45.20 ballot-marking device used for absentee voting must be tested according to part 8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as 49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the

49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct

49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.

Comment: What law allows this change?

Line item:

~~54.6 general election. At the same time that the secretary of state certifies the names of nominees~~

~~54.7 under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify~~

~~54.8 to the county auditors the order in which the names of the candidates representing the~~ ~~54.9 political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear~~

~~54.10 for every partisan office on the ballot. Candidates nominated by petition must appear on~~ ~~54.11 the ballot beneath the names of the candidates of the political parties as defined in Minnesota~~

~~54.12 Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary~~

~~54.13 of state. At least 11 weeks before the state general~~

election, the secretary of state shall draw
54.20 the order of those candidates. ~~The order of political parties
or principles determined by the~~
54.21 ~~drawing of lots applies to all partisan offices on the ballot.~~
Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part
do not apply to the printed
55.6 and marked paper ballots that use the alternative ballot
format permitted by Minnesota 55.7 Statutes, section 206.80,
paragraph (b), clause (2), item (ii). For precincts using
alternative 55.8 ballots, the marked paper ballot must indicate, at
a minimum, the date of the election; the 55.9 name of the
precinct; an electronically readable precinct identifier or ballot
style indicator; 55.10 and the voter's votes for each office or
question, generated from the voter's use of a touch
55.11 screen or other electronic device on which a complete
ballot meeting the information 55.12 requirements of all
applicable laws was displayed electronically. The ballot must
also include
55.13 *lines for initials of at least two election judges.*

Comment: What law allows for this, for the ballot generators
appears to not be controlled or validated. Having 2 lines for
election judges doesn't make these ballots official. This opens
the door for voter fraud and ballot stuffing of drop boxes.

From: [Erickson, Justin \(OSS\)](#)
To: [Moore, William \(He/Him/His\) \(OAH\)](#)
Subject: FW: Comments to the Election Rulemaking Process Posted by MN Secretary of State in August 2025
Date: Thursday, September 25, 2025 9:35:21 AM
Attachments: [Comments to Election Rulemaking Process Regarding Signature Envelopes 9-24-25 voter.docx](#)
[Registered Signature Envelope REDESIGN 2024 FINAL 9-24-25.pdf](#)
[Non-Registered Signature Envelope REDESIGN 2024 FINAL 9-24-25.pdf](#)

Hi William:

More comments attached – thanks!

Justin

From: Pat Trepp <trepppat@gmail.com>
Sent: Wednesday, September 24, 2025 7:08 PM
To: Erickson, Justin (OSS) <Justin.Erickson@state.mn.us>
Cc: Scott Kneeskern <kdkdesign4@gmail.com>
Subject: Comments to the Election Rulemaking Process Posted by MN Secretary of State in August 2025

You don't often get email from trepppat@gmail.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

These comments to the Election Rulemaking Process are provided in response to the MN Secretary of State's posting of the Election Rulemaking Process posted by the MN Secretary of State in August 2025. Specifically, these comments pertain to the **Signature Envelopes used by Registered and NonRegistered Voters and their Witnesses** during the Absentee Ballot and Early Voting processes.

Please see the attachments provided for complete

documentation relating to these comments.

Thank you for the opportunity to provide this input to the
2025 Election Rulemaking Process.

Jill Kneeskern

kdkdesign4@gmail.com

[651-805-6358](tel:651-805-6358)

Pat Trepp

trepppat@gmail.com

612.805.6358

These comments to the Election Rulemaking Process are in response to the Secretary of State's posting of revised election rules posted online in August 2025.

BACKGROUND

Specifically, these comments relate to the text and layout design of the Signature Envelopes used in the Absentee Ballot process. (Section 37-18) The comments pertain to both the Registered and Nonregistered Signature Envelopes.

The authors of these comments are:

Jill Kneeskern - kdkdesign4@gmail.com 651-815-8069

Pat Trepp – trepppat@gmail.com 612-805-6358

Both Jill and Pat work as Absentee Ballot judges for Washington County. During the 2024 presidential election, we observed numerous instances of Absentee Ballots which had to be rejected because the “incorrect” voter identification entries were given on their Signature Envelopes. Those ballots typically had only one of the accepted ID options written in: either their MN Drivers' License **OR** the last four digits of their Social Security number.

Unfortunately, the county's official SVRS Registered Voter Information System had only one of those two IDs entered...and it was too-often **NOT** the one provided by the voter on that Signature Envelope. There were well over a thousand Absentee Ballots that needed to be set aside for expensive and time-consuming research in this process. While some of the issues were resolved by researching and signature comparison, there were 958 ballots that were rejected and **not counted in the official vote totals for the county.**

Additionally, there were multiple ballots rejected because of incomplete information by either the Voter or the Witness (e.g., no signatures and, in the case of NonRegistered Voter Signature Envelopes, no indication of Witness's method of Voter identification).

In addition, we wanted the overall approach to be more mindful of voters for whom English is not the primary language. We feel that it should be easy for **all** voters to complete the required voting tasks on the Signature Envelope just by looking at/reading instructions on the Envelope itself. Reducing the number of words, numbering tasks in the order they need to be performed, and opening up the white space across the entire envelope as we've done with these recommendations will help all voters and witnesses see and complete these voting requirements. While a more detailed Instruction sheet is part of the Absentee Ballot mailing, we feel that more words don't necessarily add clarity to communications, particularly for non-English speakers.

GOAL

Our goal with these comments is to **reduce the number of voter ballots are rejected** due to “incorrect” information or incomplete information provided on the Signature Envelopes for both Registered and Nonregistered voters.

STRATEGIES

1. Revise portions of the **text** on the Signature Envelopes as well as the **overall layout** of the text on the Envelopes.
2. Accomplish these revisions **without changing the size of the Envelopes**. We understand that different counties currently use Signature Envelopes of different sizes: we wanted to show that the revised text and layout could be handled within the constraints of Washington County’s current Envelopes. We assume that the same text and graphic design could be applied to those different envelope sizes as well.
3. Provide **graphic examples** of the revised text and layout to make our comments easier for the reviewers to visualize. We feel these changes make the envelopes cleaner, simpler and **easier for the voter and witness to complete**.
4. In explaining **text** changes in this document, focus on the Signature Envelope for **Registered Voters** in Washington County to illustrate our recommendations. However, also provide an example of the new layout as applied to the NonRegistered Voter Signature Envelope for the reviewers’ use.
5. To the extent possible, incorporate the newly adopted rules by the Secretary of State which are already being used in 2025.

We realize that text revisions to the Envelopes would have a ripple effect for some of the other Election materials (e.g., the EDR, instruction sheets, etc.). If the Envelope revisions are implemented, those related materials would need to be gathered and the revisions implemented.

SPECIFIC SUGGESTIONS FOR SIGNATURE TEXT REVISIONS

OVERALL

1. Simplify and improve the instructions at the top of the envelope.

~~Put~~ Place your ballot in the Ballot Envelope. Place the sealed Ballot Envelope in here. *(with simple arrow)*. ~~the Ballot Envelope in here, then seal flap (with arrow)~~

2. Break those instructions into step-by-step (#1, #2) format to help absentee voters understand and complete the instructions correctly.

See layout design

3. Reinforce that all information on the Signature Envelope must be printed, and strengthen the point that the information provided must be complete.

Add "Signature Envelope" at top of overall information section

~~Please print clearly (voter section only)~~ (please print clearly and fill out completely)

4. Reinforce that there are separate areas of the Signature Envelopes for the voter and for the witness. Use shorter active voice in text to reinforce voters'/witnesses' roles in completing the required information

~~Voter must~~ :complete this section

~~Witness must~~ :complete this section

Voter Section

1. Recognizing that the area designated for Voter Name and Address will likely be already in-place by virtue of the Absentee Ballot labelling process, clean up and simplify this area by removing small boxes and “}”. Provide more space in those areas where voters/witnesses need to enter information by enlarging information “boxes”.

See layout design

2. Revise Voter ID area to provide clarity and to number of rejected ballots.

Add subhead to call this area **Voter Identification Number**.

~~(MN driver's license #, or last four digits of SSN)~~ This has to be the same ID number you provided when you registered to vote. **If you aren't sure which number you provided, we strongly suggest that you enter BOTH numbers here.**

Add clarity in defining each ID number by adding specific names of information to be entered. Also, spell out the information needed more specifically.

MN Drivers License(or MN ID Card, if you don't drive):

Last 4 digits of Social Security /SSN: XXX-XX- (box)

Check here if Voter does ~~to~~ not have a MN-issued driver's license, MN-issued ID card, or a Social Security Number.

3. Voter Certification Area

As a Voter, (added) I certify that on Election Day I will meet all legal requirements to vote.

Witness Section

1. Address incomplete Signature Envelopes by reinforcing that the witness must complete this section for the ballot to be counted.

Witness ~~must~~ : complete this section ~~before~~ prior to voting (this section **must be completed** in order for the ballot to be counted) *(added)*

2. Witness Certification Area

As a Witness, *(added)* I certify that:

- ~~the~~ Voter showed me the blank ballots voting,
- ~~the~~ Voter marked the ballots in private or, i privately. If physically unable not able to mark ~~the ballots~~ it, the ballots ~~were~~ was marked as directed by the Voter directed,
- ~~the~~ Voter enclosed and sealed the ballots in this signature envelope and then in the ballot envelope and,
- I am at least 18 years of age on or before the day of the election and a citizen of the United States, or have been registered to vote, or I am a notary, or I am authorized to give oaths. **If a notary, must affix stamp. that stamp must be placed here.**



1. Place your ballot in the
Ballot Envelope.

2. Place sealed **Ballot**
Envelope in here.

SIGNATURE ENVELOPE (please print clearly and fill out completely)

Voter: complete this section

1. Voter Name:

2. Voter MN Street, City and Zip Code:

3. Voter Identification Number: This has to be the same ID number you provided when you registered to vote. **If you aren't sure which number you provided, we strongly suggest that you enter BOTH numbers here.**

• MN Drivers License (or MN ID Card, if you don't drive):

• Last 4 digits of Social Security/SSN: XXX-XX-

☐ Check here if Voter doesn't have a MN-issued drivers license, a MN ID card, or a Social Security number.

As a Voter, I certify that on Election Day I will meet all legal requirements to vote.

4. Voter Signature:

X

Witness: complete this section (this section **must be completed** in order for the ballot to be counted)

1. Witness Name:

As a Witness, I certify that:

- Voter showed me the blank ballot prior to voting,
- Voter marked the ballot privately. If not able to mark it, the ballot was marked as the Voter directed,
- Voter enclosed and sealed the ballot in the ballot envelope, and then enclosed it in this signature envelope,

and,

- I am at least 18 years of age on or before the day of the election and a citizen of the United States, or am a notary, or am authorized to give oaths.

3. Witness Signature:

X

If a notary, that stamp must be placed here.

For Official Use Only: ☐ Accepted ☐ Rejected

Reason for rejection: _____



1. Place your ballot in the **Ballot Envelope**.
2. Place sealed **Ballot Envelope** **AND** your completed **Voter Registration Application** in here.

SIGNATURE ENVELOPE (please print clearly and fill out completely)

Voter: complete this section

1. Voter Name:
2. Voter MN Street, City and Zip Code:
3. Voter Identification Number: (Please provide both) • MN Drivers License (or MN ID Card, if you don't drive): <div></div> • Last 4 digits of Social Security/SSN: XXX-XX- <div></div> <input type="checkbox"/> Check here if <u>Voter doesn't have</u> a MN-issued drivers license, a MN ID card, or a Social Security number.
As a Voter, I certify that on Election Day I will meet all legal requirements to vote.
4. Voter Signature: X

Witness: complete this section (this section **must be completed** in order for the ballot to be counted)

1. Witness Name:

Witness **MUST CHECK ONE** to certify proof of residence provided by voter: (see separate instruction sheet)

- ☐ MN driver's license, ID card, permit or receipt
- ☐ Bill, student fee statement or residential lease, PLUS photo ID
- ☐ Registered voter in the precinct who vouched for voter's residence in the precinct (**MUST** complete the voucher form on the back of the Voter Registration Application)
- ☐ Tribal ID card
- ☐ Notice of late registration
- ☐ Previous registration in same precinct
- ☐ An employee of a residential facility in the precinct who vouched for voter's residence at the facility (**MUST** complete the voucher form on the back of the Voter Registration Application)

As a Witness, I certify that:

- Voter showed me the blank ballot prior to voting,
 - Voter marked the ballot privately. If not able to mark it, the ballot was marked as the Voter directed,
 - Voter enclosed and sealed the ballot in the ballot envelope, and then enclosed it in this signature envelope,
 - Voter registered to vote by filling out and enclosing a voter registration application in this envelope,
 - Voter provided proof of residence as indicated above
- and,
- I am at least 18 years of age on or before the day of the election and a citizen of the United States, or am a notary, or am authorized to give oaths.

3. Witness Signature: X

If a notary, that stamp must be placed here.

For Official Use Only: ☐ Accepted ☐ Rejected

Reason for rejection: _____

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 5, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 24 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

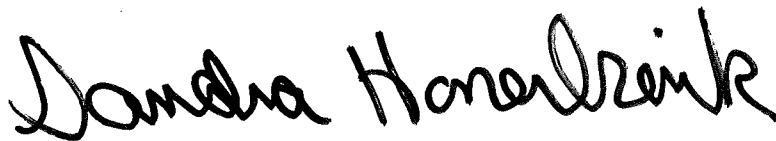
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is [REDACTED] and my address is Sandra Honerbrink 2318 75th St E Inver Grove Heights MN 55076 This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Sandra Honerbrink



Following are inaccuracies within the document "Proposed Permanent Rules Relating to Election Administration" ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 and to ~~each voter whose voter registration application is incomplete under Minnesota Statutes,~~

~~10.4 section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States.

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name and ~~Minnesota street address, including city-~~
12.14 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 Anyone registered to vote in Minnesota Any person who is at least 18 years of age 14,22 on or before the day of the election and who is a citizen of the United States.

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
~~31.24 the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
~~31.25 compared with the record required by this rule to ensure that all envelopes are accounted~~
~~32.1 for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~
~~32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state~~
~~32.3 promptly.~~

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
~~32.11 return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than 44 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name and ~~Minnesota street address, including city-~~
36.2 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or
36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format
37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

38.12 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change?

Line item:

39.17 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh-~~
39.18 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

40.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States.

Comment: What law made this change?

Line item:

41.14 • Ask your witness to print their name ~~and Minnesota street address, including city-~~
41.15 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

43.16 ~~MN street address~~

43.17 ~~(or title, if an official or notary)~~

43.18 _____

43.19 Street Address

43.20 _____ MN

43.21 City

Comment: What law made this change?

Line item:

44.2 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before

44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh-~~

44.9 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and voting~~

45.17 ~~systems to be used at the election. In order to demonstrate the accuracy of the computer~~

45.18 programs and voting systems to be used at an election, the election jurisdiction must hold

45.19 a public accuracy test at least three days prior to the voting equipment being used. A

45.20 ballot-marking device used for absentee voting must be tested according to part 8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as

49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the

49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct

49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.

Comment: What law allows this change?

Line item:

54.6 general election. At the same time that the secretary of state certifies the names of nominees
54.7 under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify
54.8 to the county auditors the order in which the names of the candidates representing the
54.9 political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear
54.10 for every partisan office on the ballot. Candidates nominated by petition must appear on
54.11 the ballot beneath the names of the candidates of the political parties as defined in Minnesota
54.12 Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary
54.13 of state. At least 11 weeks before the state general election, the secretary of state shall draw
54.20 the order of those candidates. The order of political parties or principles determined by the
54.21 drawing of lots applies to all partisan offices on the ballot.

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed
55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota
55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative
55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the
55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;
55.10 and the voter's votes for each office or question, generated from the voter's use of a
55.11 touch
55.12 screen or other electronic device on which a complete ballot meeting the information
55.13 requirements of all applicable laws was displayed electronically. The ballot must also
include
lines for initials of at least two election judges.

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 2, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 24 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is [Your Name], and my address is [Your Address, City, State, ZIP]. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Gary Tonsager/11156 193Rd AVE NW Elk River MN 55330

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 12, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 23 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

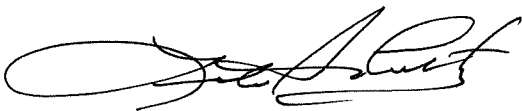
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Linda Schultz, and my address is 19561 York Street NW, Elk River, MN 55330. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Linda Schultz

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 12, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 23 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Carol Mulvihill, and my address is 1154 Orchard Place Mendota Heights, MN 55118. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Carol Mulvihill



Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 5, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 23 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Tom Lopac, and my address is 1003 Briar Creek Road, Eagan, MN, 55123. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Tom Lopac

Following are inaccuracies within the document "Proposed Permanent Rules Relating to Election Administration" ID: R-4824.

MN Statute 8200.9115

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

MN Statute 8210.0200

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the 9.24 list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

MN Statute 8210.0225

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~

10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city-~~
12.14 ~~(not a P.O. Box), in the box at the top of the witness section and sign their name in~~
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter

13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

MN Statute 8210.0600

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • ~~I am or have been registered to vote in Minnesota at least 18 years of age on or before~~
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

MN Statute 8210.02045

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained~~
by 31.24 ~~the county auditor or municipal clerk shall be removed from the place of safekeeping~~
and 31.25 ~~compared with the record required by this rule to ensure that all envelopes are~~
accounted

32.1 ~~for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~
32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state
32.3 promptly.

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
32.11 ~~return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh 19th~~ day before the election, any ballot that has been previously received from
that

32.20 received after the close of business on the ~~seventh 19th~~ day before the election and
another

Comment: What law made this change?

MN Statute 8210.3000

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than 14 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age

35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name and ~~Minnesota street address, including city-~~

36.2 ~~(not a P. O. Box), in the box at the top of the witness section and sign their name in~~

36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or

36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a

37.10 certificate of voter eligibility be transmitted electronically in an accessible format

37.11 by contacting your county auditor. If you request a ballot be transmitted electronically

37.12 in an accessible format, you may then complete your ballot electronically but must

37.13 print your voted ballot and return this ballot and completed certificate of voter

37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

38.12 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age

38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

MN Statute 8215.0400

Line item:

39.17 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh-~~

39.18 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

MN Statute 8215.0500

Line item:

40.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age

41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

41.14 • Ask your witness to print their name and ~~Minnesota street address, including city-~~

41.15 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in

41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

41.25 • Deliver it in person by 8:00 p.m. on Election Day, or

41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

43.16 ~~MN street address~~

43.17 ~~(or title, if an official or notary)-~~

43.18 _____

43.19 ~~Street Address~~

43.20 _____ MN-

43.21 ~~City~~

Comment: What law made this change?

Line item:

44.2 • I am or have been registered to vote in Minnesota at least 18 years of age on or before
44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh-~~
44.9 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

MN Statute 8220.1550

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~
45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and~~
~~voting~~
45.17 ~~systems to be used at the election. In order to demonstrate the accuracy of the computer~~
45.18 ~~programs and voting systems to be used at an election, the election jurisdiction must~~
hold 45.19 a public accuracy test at least three days prior to the voting equipment being used. A
45.20 ballot-marking device used for absentee voting must be tested according to part
8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those
46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

MN Statute 8235.0700

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as
49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and
the
49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that
precinct
49.24 are not eligible to participate in conducting a recount or postelection review in that
precinct.

Comment: What law allows this change?

MN Statute 82505.1810

Line item:

54.6 general election. ~~At the same time that the secretary of state certifies the names of~~
~~nominees~~
54.7 ~~under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall~~
~~certify~~
54.8 ~~to the county auditors the order in which the names of the candidates representing the~~
54.9 ~~political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must~~
~~appear~~
54.10 ~~for every partisan office on the ballot. Candidates nominated by petition must appear on~~
54.11 ~~the ballot beneath the names of the candidates of the political parties as defined in~~
~~Minnesota~~
54.12 ~~Statutes, section 200.02, subdivision 7, and in the order determined by lot by the~~
~~secretary~~
54.13 ~~of state. At least 11 weeks before the state general election, the secretary of state shall~~
~~draw~~
54.20 ~~the order of those candidates. The order of political parties or principles determined by~~
~~the~~
54.21 ~~drawing of lots applies to all partisan offices on the ballot.~~

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed
55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota
55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative
55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the
55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;
55.10 and the voter's votes for each office or question, generated from the voter's use of a
touch
55.11 screen or other electronic device on which a complete ballot meeting the information
55.12 requirements of all applicable laws was displayed electronically. The ballot must also
include
55.13 lines for initials of at least two election judges.

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 19, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

RECEIVED

SEP 23 2025

Office of Administrative Hearings

Via: U.S. Mail

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Attention Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Terri Gardner, 4458 56 Street, NW, Rochester, MN 55901. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Mrs. Terri Gardner

Following are inaccuracies within the document “Proposed Permanent Rules Relating to Election Administration” ID: R-4824.

MN Statute 8200.9115

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

MN Statute 8210.0200

Line item:

9.23 receive an absentee ballot ~~application. At least 60 days before each election, the county~~
9.24 ~~auditor or municipal clerk shall send an absentee ballot application to each person on the~~
9.25 ~~list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

MN Statute 8210.0225

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota~~
~~Statutes,~~
10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot. The~~
~~absentee~~
10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~
12.14 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must

13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

MN Statute 8210.0600

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • ~~I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

MN Statute 8210.02045

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
31.24 ~~the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
31.25 ~~compared with the record required by this rule to ensure that all envelopes are accounted~~
32.1 ~~for. Any discrepancy shall be reported to the secretary of state promptly~~ they must comply
32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state
32.3 promptly.

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
32.11 ~~return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

MN Statute 8210.3000

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than 14 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name ~~and Minnesota street address, including city~~
36.2 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

- 36.11 • Deliver it in person by 8:00 p.m. on Election Day, or
- 36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format
37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~38.12 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

MN Statute 8215.0400

Line item:

39.17 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
39.18 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

MN Statute 8215.0500

Line item:

~~40.13 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

41.14 • Ask your witness to print their name ~~and Minnesota street address, including city~~
41.15 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

- 41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
- 41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format

42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

43.16 ~~MN street address~~

43.17 ~~(or title, if an official or notary)~~

43.18 _____

43.19 ~~Street Address~~

43.20 _____ MN

43.21 ~~City~~

Comment: What law made this change?

Line item:

44.2 • ~~I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before

44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~

44.9 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

MN Statute 8220.1550

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and voting~~

45.17 ~~systems to be used at the election.~~ In order to demonstrate the accuracy of the computer

45.18 programs and voting systems to be used at an election, the election jurisdiction must hold

45.19 a public accuracy test at least three days prior to the voting equipment being used. A

45.20 ballot-marking device used for absentee voting must be tested according to part
8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

MN Statute 8235.0700

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as
49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and
the
49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that
precinct
49.24 are not eligible to participate in conducting a recount or postelection review in that
precinct.

Comment: What law allows this change?

MN Statute 82505.1810

Line item:

54.6 general election. ~~At the same time that the secretary of state certifies the names of~~
~~nominees~~
54.7 ~~under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall~~
~~certify~~
54.8 ~~to the county auditors the order in which the names of the candidates representing the~~
54.9 ~~political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must~~
~~appear~~
54.10 ~~for every partisan office on the ballot. Candidates nominated by petition must appear on~~
54.11 ~~the ballot beneath the names of the candidates of the political parties as defined in~~
~~Minnesota~~
54.12 ~~Statutes, section 200.02, subdivision 7, and in the order determined by lot by the~~
~~secretary~~
54.13 ~~of state.~~ At least 11 weeks before the state general election, the secretary of state shall
draw
54.20 the order of those candidates. ~~The order of political parties or principles determined by~~
~~the~~
54.21 ~~drawing of lots applies to all partisan offices on the ballot.~~

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed
55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota
55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative
55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the
55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;
55.10 and the voter's votes for each office or question, generated from the voter's use of a
touch
55.11 screen or other electronic device on which a complete ballot meeting the information
55.12 requirements of all applicable laws was displayed electronically. The ballot must also
include
55.13 *lines for initials of at least two election judges.*

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

RECEIVED

SEP 23 2025

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 22nd, 2025

To: Court of Administrative Hearings

600 North Robert Street

P.O. Box 64620

St. Paul, MN 55164-0620

Office of Administrative Hearings

Via: U.S. Mail and eComments Website (<https://minnesotaoah.granicusideas.com/discussions>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing on the Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket Number B-9019-39440; Minnesota Rules Chapter 8200-8250. This request is submitted in full compliance with the requirements specified in the DUAL NOTICE: Notice of Intent to Adopt Rules Without a Public Hearing Unless 25 or More Requests for Hearing Are Received. My name is Kathleen Hagen, and my address is 10120 Gonvick Avenue, Lonsdale, MN 55046. Please accept this request as it is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed rules changes relating to Elections Administration. I am opposed to the proposed rules changes due to errors, lack of clarity and consistency, lack of alignment with Minnesota State and Federal Election Laws and Standards, and for the deleterious impact that these changes would have on the security, integrity, transparency, and accountability of our election processes and systems. The issues identified so far undermine the voters' confidence in election results and inhibit our Election Administrators, Workers, and Certification Board Members in their abilities to fulfill their sacred, formal, and official oaths to secure and protect our legal voters' ballots and accurately count their legally cast votes. Some of the issues and concerns that have been identified so far are included as Attachment 1. This list is limited by the short amount of time that has been provided for public response to the proposed changes. Also, I have undergone two eye surgeries recently, which has significantly impacted my ability to review all of the proposed changes and related documents in time to meet the deadline for the submission of this request for a public hearing. Additional issues and concerns will be identified and shared during the public hearing.

I respectfully request a public hearing to allow for a more thorough examination and review of the proposed rules, including their intent, scope, compliance with State and Federal statutes, laws, requirements, rules, standards, and best practices. Our review must also consider the risks and consequences of each proposed change. The hearing should include opportunities for participants to provide testimony and evidence regarding the proposed changes and their adequacy and legality.

Thank you for accepting and considering this request. I look forward to participating in the public hearing as it is an important part of the process that must be provided to analyze and improve the proposed changes. Trust in our election processes and systems has been significantly eroded in our State and across our country. The Secretary of State, election workers, and other key stakeholders (including concerned citizens) must be allowed to do this important work carefully, thoughtfully, transparently, and accurately in order for our Secretary of State and our Election Administrators and Workers to start rebuilding trust in their processes, systems, and results.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Hagen', with a stylized, flowing script.

Kathleen Hagen

10120 Gonrick Avenue
Lonsdale MN 55046

Attachment 1: Initial Issues and Concerns with the Proposed Changes to Permanent Rules Relating to Elections Administration

Following are inaccuracies within the document "Proposed Permanent Rules Relating to Election Administration" ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~

10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~
12.14 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter

13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22
on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • ~~I am or have been registered to vote in Minnesota at least 18 years of age on or before~~
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
31.24 ~~the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
31.25 ~~compared with the record required by this rule to ensure that all envelopes are accounted~~
32.1 ~~for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~
32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state
32.3 promptly.

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
32.11 ~~return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~14~~ 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name ~~and Minnesota street address, including city~~
36.2 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or

36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format
37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

38.12 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
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Comment: What law made this change?

Line item:

39.17 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
39.18 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

40.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

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41.14 • Ask your witness to print their name ~~and Minnesota street address, including city~~
41.15 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
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Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
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42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
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41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

43.16 ~~MN street address~~

43.17 ~~{or title, if an official or notary}~~

43.18 _____

43.19 ~~Street Address~~

43.20 _____ ~~MN~~

43.21 ~~City~~

Comment: What law made this change?

Line item:

44.2 • ~~I am or have been registered to vote in Minnesota at least 18 years of age on or before~~

44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~

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Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and voting~~

45.17 ~~systems to be used at the election. In order to demonstrate the accuracy of the computer~~

45.18 programs and voting systems to be used at an election, the election jurisdiction must hold

45.19 a public accuracy test at least three days prior to the voting equipment being used. A

45.20 ballot-marking device used for absentee voting must be tested according to part 8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as

49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the

49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct

49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.

Comment: What law allows this change?

Line item:

54.6 general election. ~~At the same time that the secretary of state certifies the names of nominees~~

54.7 ~~under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify~~

54.8 ~~to the county auditors the order in which the names of the candidates representing the~~

54.9 ~~political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear~~

54.10 ~~for every partisan office on the ballot. Candidates nominated by petition must appear on~~

54.11 ~~the ballot beneath the names of the candidates of the political parties as defined in Minnesota~~

54.12 ~~Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary~~

54.13 ~~of state. At least 11 weeks before the state general election, the secretary of state shall draw~~

54.20 ~~the order of those candidates. The order of political parties or principles determined by the~~

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Comment: What law allows this change?

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55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota

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55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the

55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;

55.10 and the voter's votes for each office or question, generated from the voter's use of a touch

55.11 screen or other electronic device on which a complete ballot meeting the information

55.12 requirements of all applicable laws was displayed electronically. The ballot must also include

55.13 *lines for initials of at least two election judges.*

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

SEP 22 2025

Date: September 17, 2025

To: Court of Administrative Hearings

600 North Robert Street

P.O. Box 64620

Saint Paul, Minnesota 55164-0620

Office of Administrative Hearings

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

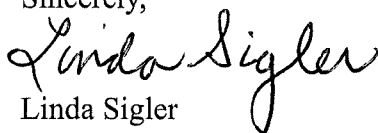
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Linda Sigler, and my address is 2819 St. Paul Rd., Owatonna, MN 55060. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,


Linda Sigler

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 17, 2025

To: Court of Administrative Hearings

600 North Robert Street

P.O. Box 64620

Saint Paul, Minnesota 55164-0620

SEP 22 2025

Office of Administrative Hearings

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Gary Sigler, and my address is 2819 St. Paul Rd., Owatonna, MN 55060. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Gary Sigler

A Request for Public Hearing on Proposed Voting Rules Changes

Date: September 19, 2025

To: Court of Administrative Hearings

600 North Robert Street

P.O. Box 64620

Saint Paul, Minnesota 55164-0620

RECEIVED

SEP 22 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Brenda Miller, and my address is 15160 Quinalt St. NE, Columbus MN 55025. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to following the public hearing process.

Sincerely,
Brenda Miller

Following are inaccuracies within the document "Proposed Permanent Rules Relating to Election Administration" ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~

~~10.4 section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~

12.14 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in

12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
~~31.24 the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
~~31.25 compared with the record required by this rule to ensure that all envelopes are accounted~~
~~32.1 for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~
~~32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state~~
~~32.3 promptly.~~

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
~~32.11 return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that
32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than 14 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name and ~~Minnesota street address, including city~~
36.2 ~~(not a P.O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or
36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format

37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~38.12 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~39.17 Subp. 7. Change of major party choice. Until the close of business on the seventh~~
~~39.18 19th~~ day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

Line item:

~~40.13 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~41.14 • Ask your witness to print their name and Minnesota street address, including city~~
~~41.15 (not a P.O. Box), in the box at the top of the witness section and sign their name in~~
~~41.16 the box at the bottom of the witness section.~~

Comment: For witness verification of registration, address is need.

Line item:

~~41.25 • Deliver it in person by 8:00 p.m. on Election Day, or~~
~~41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.~~

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~43.16 MN street address~~
~~43.17 (or title, if an official or notary)~~

43.18 _____

43.19 Street Address

43.20 _____ MN

43.21 City

Comment: What law made this change?

Line item:

44.2 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before

44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~

44.9 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

Line item:

45.15 The election jurisdiction must hold a public accuracy test within 14 days prior to the

45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and voting~~

45.17 ~~systems to be used at the election.~~ In order to demonstrate the accuracy of the computer

45.18 programs and voting systems to be used at an election, the election jurisdiction must hold

45.19 a public accuracy test at least three days prior to the voting equipment being used. A

45.20 ballot-marking device used for absentee voting must be tested according to part

8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as

49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the

49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct

49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.

Comment: What law allows this change?

Line item:

54.6 general election. At the same time that the secretary of state certifies the names of nominees

54.7 under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify

54.8 to the county auditors the order in which the names of the candidates representing the

54.9 political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear

54.10 for every partisan office on the ballot. Candidates nominated by petition must appear on

54.11 the ballot beneath the names of the candidates of the political parties as defined in Minnesota

54.12 Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary

54.13 of state. At least 11 weeks before the state general election, the secretary of state shall draw

54.20 the order of those candidates. The order of political parties or principles determined by the

54.21 drawing of lots applies to all partisan offices on the ballot.

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed

55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota

55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative

55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the

55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;

55.10 and the voter's votes for each office or question, generated from the voter's use of a touch

55.11 screen or other electronic device on which a complete ballot meeting the information

55.12 requirements of all applicable laws was displayed electronically. The ballot must also include

55.13 lines for initials of at least two election judges.

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Court of Administrative Hearings
600 North Roberts Street
PO Box 64620
Saint Paul, MN 55164-0620

RECEIVED

SEP 19 2025

Office of Administrative Hearings

Jerry Ewing
5995 133rd St. Ct.
Apple Valley, MN 55124

I hereby request a public hearing on the proposed rules for elections,
Revisor's ID Number R-4824; CAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250.

I particularly object to the following line items: 12.13 and 16.1 and 26.25-27.3 and 32.10 and 36.1 and 37.27 and 41.14 and 43.16:

By objection is that I can write in any name as my witness, without giving a Minnesota address as a positive ID of a real person.

Here is how the law ((203B.07 s,3) was changed: "... a person who is registered to vote in Minnesota at least 18 years of age on or before the day of the election and a citizen of the United States or by a notary public..." Nothing in this law or the change to it says that an actual address, as evidence that the witness is a real person, should be removed.

Date: September 2, 2025

RECEIVED

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 17 2025

Office of Administrative Hearings

Via: U.S. Mail

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

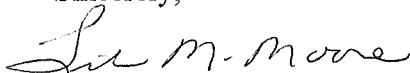
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is [Your Name], and my address is [Your Address, City, State, ZIP]. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Dr. Linda M. Moore

Faribault MN 55021

Date: September 13, 2025

RECEIVED

SEP 17 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Office of Administrative Hearings

Via: U.S. Mail

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

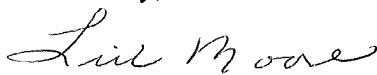
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Dr. Linda Moore, and my address is 4442 197th Street East, Faribault MN, 55021. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Linda M. Moore

Faribault MN 55021

Date: September 13, 2025

RECEIVED

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 17 2025

Office of Administrative Hearings

Via: U.S. Mail

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Mr. Richard J. Moore, and my address is 4442 197th Street East, Faribault MN, 55021. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Richard J. Moore

Faribault MN 55021

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 10, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

RECEIVED

SEP 15 2025

Office of Administrative Hearings

Via: U.S. Mail

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

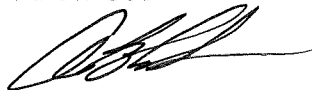
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Andrew Cook, and my address is 202 Central Ave S, Norwood Young America, MN 55397. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Andrew Cook



Request for Public Hearing on Proposed Voting Rules Changes

Date: September 3, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

RECEIVED

SEP 15 2025

Via: U.S. Mail

Office of Administrative Hearings

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I hereby formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Deborah Lloyd and my address is 7302 Laredo Drive, Chanhassen, MN 55317. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the all of the proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a **thorough examination** of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,


Deborah Lloyd

Date: September 11, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

RECEIVED

SEP 15 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

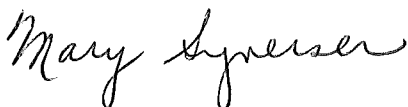
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Mary Syversen, and my address is 112025 Hidden Creek Place, Chaska, MN 55318. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. As a Head Judge for Chaska, Ward 2 I am particularly concerned the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Mary Syversen

RECEIVED

SEP 15 2025

Date: September 11, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

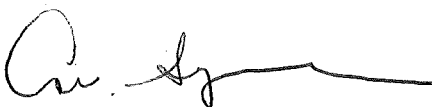
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Carl Syversen, and my address is 112025 Hidden Creek Place, Chaska, MN 55318. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. As a Ballot Board Judge in Carver County, I am particularly concerned the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Carl Syversen

RECEIVED

SEP 15 2025

Request for Public Hearing on Proposed Voting Rules Changes

Office of Administrative Hearings

Date: September 2, 2025

To: Court of Administrative Hearings 600 North Robert Street P.O. Box 64620 Saint Paul, Minnesota 55164-0620

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Margaret Starry, and my address is 1223 3rd St S, Sartell MN 56377. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Margaret Starry

RECEIVED

SEP 15 2025

Request for Public Hearing on Proposed Voting Rules Changes

Office of Administrative Hearings

Date: September 2, 2025

To: Court of Administrative Hearings 600 North Robert Street P.O. Box 64620 Saint Paul, Minnesota 55164-0620

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

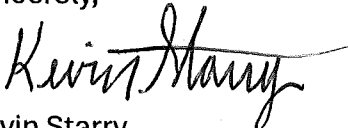
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Kevin Starry, and my address is 1223 3rd St S, Sartell MN 56377. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Kevin Starry

From: [Blue, Michelle](#)
To: [Erickson, Justin \(OSS\)](#)
Subject: Quick Question/Comment About Proposed Rules
Date: Monday, September 15, 2025 8:22:26 AM
Attachments: [image001.png](#)

You don't often get email from michelle.blue@co.dakota.mn.us. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hi Justin,

Good morning! I just had a quick question about the proposed rule changes (line 3.11-3.13):
“A similar indicator must be printed on the line or included in the field provided for the voter's signature 3.13 to note a voter's guardianship or ~~felony~~ incarceration status, if any.”

Because someone could be incarcerated for a misdemeanor or incarcerated while awaiting conviction, I wonder if that sentence needs to be revised to clarify that this only applies to those incarcerated for a felony conviction.

I appreciate your time. Thank you!

Best Wishes,

Michelle Blue
Elections Director



Elections

P 651-438-4314
W www.dakotacounty.us
A 1590 Highway 55, Hastings MN 55033
F 651-438-4391



Note: This email and its attachments may contain information protected by state or federal law or that may not otherwise be disclosed. If you received this in error, please notify the sender immediately and delete this email and its attachments from all devices.

Request for Public Hearing on Proposed Voting
Rule Changes by Secretary of State Steve Simon
To: Court of Administrative Hearings

9 4 2025

600 North Robert Street
PO Box 64620
Saint Paul, Minnesota

55164-0620 RECEIVED

SEP 12 2025

Office of Administrative Hearings

Dear Administrative Hearing Office,

My letter is to request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Linda Nördenhagen, and my address is 7603 Frontiers Trail, Chanhassen, MN 55317. This request is submitted in accordance with the requirements outlined in the provided document, which specifies that requests for a public hearing must be in writing by 4:30 p.m. C.S.T. on Friday, September 26, 2025. My request is dated September 4, 2025.

I object to the entire set of proposed rule changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system without additional clarification and public discussion, these proposed changes risk undermining the democratic process.

Thus, I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

(OVER)

TOL

Thank you for considering this request.

Numerous Minnereads look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Respectfully,

Linda Paulson Vanderhaug

1984
1985

→ Co-Chair, Election Returns
for Hennepin County, League of Women Voters

We collected all of the data from all Hennepin County precincts at the Hennepin Government Center & provided periodic updates to the local news media:

- > radio
- > television
- > print

The subsequent morning

We were done counting ballots (paper ballots, that is) by 2:00-2:30 A.M. & leaving the Hennepin County Government Center, knowing our county results were complete. No changes.

All done via paper. Efficient and accurate.

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 9, 2025

RECEIVED

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 12 2025

Office of Administrative Hearings

Via: U.S. Mail only

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Randy Klocker and my address is 31617 Marigold Lane, Avon, MN 56310. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,

Randy Klocker



Request for Public Hearing on Proposed Voting Rules Changes

Date: September 9, 2025

RECEIVED

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 12 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Sandy Klocker and my address is 31617 Marigold Lane, Avon, MN 56310. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Sandy Klocker

RECEIVED

SEP 11 2025

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 2, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Paul Haik, and my address is 261 Hidden Lane, Chanhassen, MN 55317. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

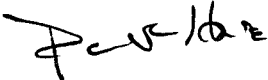
I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,

Paul R. Haik



Request for Public Hearing on Proposed Voting Rules Changes

Date: September 2, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

RECEIVED

SEP 11 2025

Office of Administrative Hearings

Via: U.S. Mail

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

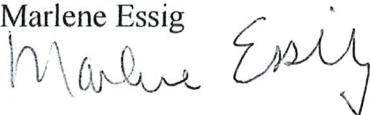
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Marlene Essig, and my address is 105 Trilane Drive NYA, MN 55397. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Marlene Essig



Request for Public Hearing on Proposed Voting Rules Changes

Date: September 2, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

RECEIVED

SEP 11 2025

Office of Administrative Hearings

Via: U.S. Mail

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

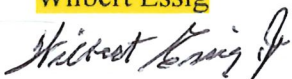
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Wilbert Essig, and my address is 105 Trilane Drive NYA, MN 55397. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Wilbert Essig



Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 2, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 11 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is [Your Name], and my address is [Your Address, City, State, ZIP]. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Gary Tonsager/11156 193rd Ave NW Elk River MN 55330

GLTonsager@msa.com
612-518-6623

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 8, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 10 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,


I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Mariana Schunk and my address is 10827 Hayes Drive, Burnsville, MN 55337. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Mariana Schunk



9/8/25

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 5, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Mariana Schunk and my address is 10827 Hayes Drive, Burnsville, MN 55337. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,

Tom Lopac

Following are inaccuracies within the document "Proposed Permanent Rules Relating to Election Administration" ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~
10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~
12.14 ~~(not a P. O. Box), in the box at the top of the witness section and sign their name in~~
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age 14.22 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

~~31.23 Statutes, section 203B.121, subdivision 4, all absentee ballot return envelopes retained by~~
~~31.24 the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
~~31.25 compared with the record required by this rule to ensure that all envelopes are accounted~~
~~32.1 for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~
~~32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state~~
~~32.3 promptly.~~

Comment: See no reason for change.

Line item:

~~32.10 A. has provided a Minnesota address as part of the witness's certification on the~~
~~32.11 return envelope;~~

Comment: What law made this change?

Line item:

~~32.18 seventh~~ 19th day before the election, any ballot that has been previously received from
that
~~32.20 received after the close of business on the seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

~~33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than 14~~ 28

Comment: What law made this change?

Line item:

~~35.6 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
~~35.7 on or before the day of the election and who is a citizen of the United States,~~

Comment: What law made this change?

Line item:

~~36.1 • Ask your witness to print their name and Minnesota street address, including city~~
~~36.2 (not a P. O. Box), in the box at the top of the witness section and sign their name in~~
~~36.3 the box at the bottom of the witness section.~~

Comment: For witness verification of registration, address is need.

Line item:

~~36.11 • Deliver it in person by 8:00 p.m. on Election Day, or~~
~~36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.~~

Comment: Shouldn't this be 5 PM?

Line item:

~~37.9 • If you have a print disability, you may request that ballots, instructions, and a~~
~~37.10 certificate of voter eligibility be transmitted electronically in an accessible format~~

37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~38.12 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~39.17 Subp. 7. Change of major party choice. Until the close of business on the seventh~~
~~39.18 19th~~ day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

~~40.13 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~41.14 • Ask your witness to print their name and Minnesota street address, including city~~
~~41.15 (not a P. O. Box), in the box at the top of the witness section and sign their name in~~
~~41.16 the box at the bottom of the witness section.~~

Comment: For witness verification of registration, address is need.

Line item:

~~41.25 • Deliver it in person by 8:00 p.m. on Election Day, or~~
~~41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.~~

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~43.16 MN street address~~
~~43.17 (or title, if an official or notary)~~

43.18 _____

43.19 Street Address

43.20 _____ MN

43.21 City

Comment: What law made this change?

Line item:

44.2 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before

44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~

44.9 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and voting~~

45.17 ~~systems to be used at the election.~~ In order to demonstrate the accuracy of the computer

45.18 programs and voting systems to be used at an election, the election jurisdiction must hold

45.19 a public accuracy test at least three days prior to the voting equipment being used. A

45.20 ballot-marking device used for absentee voting must be tested according to part 8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as

49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the

49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct

49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.

Comment: What law allows this change?

Line item:

54.6 general election. At the same time that the secretary of state certifies the names of nominees

54.7 under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify

54.8 to the county auditors the order in which the names of the candidates representing the

54.9 political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear

54.10 for every partisan office on the ballot. Candidates nominated by petition must appear on

54.11 the ballot beneath the names of the candidates of the political parties as defined in Minnesota

54.12 Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary

54.13 of state. At least 11 weeks before the state general election, the secretary of state shall draw

54.20 the order of those candidates. The order of political parties or principles determined by the

54.21 drawing of lots applies to all partisan offices on the ballot.

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed

55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota

55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative

55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the

55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;

55.10 and the voter's votes for each office or question, generated from the voter's use of a touch

55.11 screen or other electronic device on which a complete ballot meeting the information

55.12 requirements of all applicable laws was displayed electronically. The ballot must also include

55.13 lines for initials of at least two election judges.

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Enclosed two letters
1. Jennifer Bertheussen
2. Allen Chapman

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 2, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 10 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

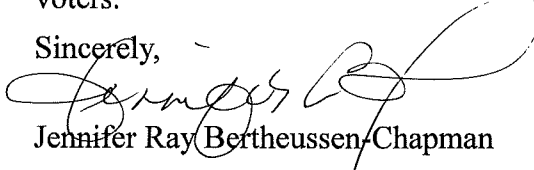
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is [Your Name], and my address is [Your Address, City, State, ZIP]. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Jennifer Ray Bertheussen-Chapman

775 West 96th Street, Chanhassen, MN 55317

cell 612-618-7793

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 2, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

SEP 10 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (~~<https://mn.gov/oah/forms-and-filing/ecomments/>~~)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is [Your Name], and my address is [Your Address, City, State, ZIP]. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,



Allen Chapman

775 West 96th Street, Chanhassen, MN 55317

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 5, 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

RECEIVED

SEP - 8 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

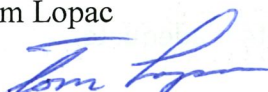
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Tom Lopac, and my address is 1003 Briar Creek Road, Eagan, MN, 55123. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Tom Lopac



Following are inaccuracies within the document “Proposed Permanent Rules Relating to Election Administration” ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot application. ~~At least 60 days before each election, the county auditor or municipal clerk shall send an absentee ballot application to each person on the list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota Statutes,~~

10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot.~~ The absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~
12.14 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

14.21 Anyone registered to vote in Minnesota Any person who is at least 18 years of age 14.22 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

27.13 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

29.9 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am
29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
31.24 ~~the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
31.25 ~~compared with the record required by this rule to ensure that all envelopes are accounted~~
32.1 ~~for. Any discrepancy shall be reported to the secretary of state promptly~~ they must comply
32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state
32.3 promptly.

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
32.11 ~~return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that

32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~14~~ 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age

35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name ~~and Minnesota street address, including city~~

36.2 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in

36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or

36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a

37.10 certificate of voter eligibility be transmitted electronically in an accessible format

37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~38.12 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~39.17 Subp. 7. Change of major party choice. Until the close of business on the seventh~~
~~39.18 19th~~ day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

~~40.13 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

~~41.14 • Ask your witness to print their name and Minnesota street address, including city~~
~~41.15 (not a P. O. Box), in the box at the top of the witness section and sign their name in~~
~~41.16 the box at the bottom of the witness section.~~

Comment: For witness verification of registration, address is need.

Line item:

~~41.25 • Deliver it in person by 8:00 p.m. on Election Day, or~~
~~41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.~~

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~43.16 MN street address~~
~~43.17 (or title, if an official or notary)~~

43.18 _____

43.19 Street Address

43.20 _____ MN

43.21 City

Comment: What law made this change?

Line item:

44.2 • I am ~~or have been registered to vote in Minnesota~~ at least 18 years of age on or before
44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
44.9 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~
45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and~~
45.17 ~~voting systems to be used at the election.~~ In order to demonstrate the accuracy of the computer
45.18 programs and voting systems to be used at an election, the election jurisdiction must hold
45.19 a public accuracy test at least three days prior to the voting equipment being used. A
45.20 ballot-marking device used for absentee voting must be tested according to part
8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those
46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as
49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and
the
49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that
precinct
49.24 are not eligible to participate in conducting a recount or postelection review in that
precinct.

Comment: What law allows this change?

Line item:

54.6 general election. At the same time that the secretary of state certifies the names of nominees

54.7 under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify

54.8 to the county auditors the order in which the names of the candidates representing the

54.9 political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear

54.10 for every partisan office on the ballot. Candidates nominated by petition must appear on

54.11 the ballot beneath the names of the candidates of the political parties as defined in Minnesota

54.12 Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary

54.13 of state. At least 11 weeks before the state general election, the secretary of state shall draw

54.20 the order of those candidates. ~~The order of political parties or principles determined by the~~

54.21 ~~drawing of lots applies to all partisan offices on the ballot.~~

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed

55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota

55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative

55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the

55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;

55.10 and the voter's votes for each office or question, generated from the voter's use of a touch

55.11 screen or other electronic device on which a complete ballot meeting the information

55.12 requirements of all applicable laws was displayed electronically. The ballot must also include

55.13 *lines for initials of at least two election judges.*

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 5, 2025

SEP - 8 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Office of Administrative Hearings

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Julius Zaccagnini, and my address is 5851 Oakgreen CT N, Oak Park heights, MN 55082.

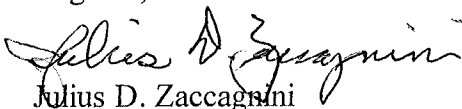
This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Regards,


Julius D. Zaccagnini

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 5, 2025

To: Court of Administrative Hearings

600 North Robert Street

P.O. Box 64620

Saint Paul, Minnesota 55164-0620

SEP - 8 2025

Office of Administrative Hearings

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Mary Zaccagnini, and my address is 5851 Oakgreen CT N, Oak Park heights, MN 55082.

This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Regards,

Mary E. Zaccagnini



Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 4, 2025

To: Court of Administrative Hearings

600 North Robert Street

P.O. Box 64620

Saint Paul, Minnesota 55164-0620

SEP - 8 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Miriam Arnold, and my address is 14535 118th St N, Stillwater, MN 55082. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Miriam Arnold

Request for Public Hearing on Proposed Voting Rules Changes

RECEIVED

Date: September 2, 2025

SEP - 5 2025

To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

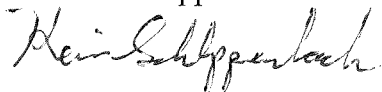
I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Kevin Schleppenbach, and my address is 7921 Upper 145th St West Apple Valley, MN 55124. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes. My concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Kevin Schleppenbach



From: [Darren Kratzke](#)
To: [Erickson, Justin \(OSS\)](#)
Subject: Elections rule making 2025-2026
Date: Tuesday, September 2, 2025 9:47:34 AM

You don't often get email from dnamachinellc@gmail.com. [Learn why this is important](#)

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Docket no. 8-9019-39440 absolutely requires a public hearing.

Thanks,

Darren Kratzke
DNA Machine LLC

From: [State, Secretary \(OSS\)](#)
To: [Erickson, Justin \(OSS\)](#); [Bethke, Lauren \(OSS\)](#)
Subject: FW: Proposed Permanent Rules to Elections Administration
Date: Tuesday, September 2, 2025 4:35:50 PM

-----Original Message-----

From: Marc Olivier <molivier1.geo@yahoo.com>
Sent: Tuesday, September 2, 2025 4:27 PM
To: State, Secretary (OSS) <secretary.state@state.mn.us>
Subject: Proposed Permanent Rules to Elections Administration

[You don't often get email from molivier1.geo@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

To: Secretary Steve Simon
From: Marc Olivier
RE: Request for Public Hearing on Proposed Permanent Rules to Elections Administration

Secretary Simon:

I am requesting a public hearing on the above -mentioned matter. Transparency and public input matters.

Marc Olivier

From: [Jeanine Johnson](#)
To: [M.R.E.L.G.; Erickson, Justin \(OSS\)](#)
Subject: Re: Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; CAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250
Date: Monday, August 25, 2025 5:44:07 PM
Attachments: [8790744F-07C9-419A-A92B-BCB1BF24F901.png](#)
[8790744F-07C9-419A-A92B-BCB1BF24F901.png](#)

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Thank you. FY I. I suggest NG give the link to the Mn notary class and the closer class. . They are the best courses by far! From real life experiences.

Inline image



Notary class covers Traditional and Remote licensing info where other providers are selling just closing courses without the notary piece or just traditional notary. where MRELG has Traditional Notary Licensing, Remote Online Notary (or RON) training, and closer agent licensing - all cover specific MN requirements with lots of real life experiences notaries run into, and important detail about what the state allows as legal identity documents.
I wish MRELG and NG success!

Best!

[Sent from the all new AOL app for iOS](#)

On Monday, August 25, 2025, 4:17 PM, M.R.E.L.G. wrote:

Hello –

Can you please modify the contact email on file for Minnesota Real Estate Learning Group to

landrecs@nogginguru.com?

Thanks in advance!

Best,

Holly

Inline image



Holly Reitmeier

VP, Operations, Minnesota Real Estate Learning Group

holly@nogginguru.com | minnesotarealestatelearning.com

Begin forwarded message:

[Sent from the all new AOL app for iOS](#)

On Friday, August 22, 2025, 1:16 PM, Minnesota Secretary of State <MNSOS@public.govdelivery.com> wrote:

Office of the Minnesota Secretary of State, Steve Simon

You are receiving this email because you signed up for the Office of the Secretary of State's email list for the purpose of receiving notice of rule proceedings.

The Office of the Secretary of State is proposing amendments to rules governing election administration. Please [visit our website](#) to view the full Dual Notice, which will be published in the State Register on August 25.

The Office encourages you to submit any comments you may have in support of or in opposition to the proposed rule. Please submit any comments in writing **between August 25 and September 26 at 4:30 pm**. Submit written comments via the [Office of Administrative Hearings Rulemaking eComments website \(https://mn.gov/oah/forms-and-filing/ecomments/\)](https://mn.gov/oah/forms-and-filing/ecomments/), by U.S. Mail delivered to the Office of Administrative Hearings, 600 North Robert Street, P.O. Box 64620, Saint Paul, Minnesota 55164-0620, or by fax 651-539-0310.

For more information and access to all rulemaking documents, please [visit our website](#).

The agency contact person is Justin Erickson at the Office of the Minnesota Secretary of State, 20 W 12th Street, Saint Paul, MN 55155, 612-201-6895, justin.erickson@state.mn.us. You may contact the agency contact person with questions about the rules.

OFFICE OF THE MINNESOTA SECRETARY OF STATE

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This email was sent to landrecs@aol.com using GovDelivery Communications Cloud on behalf of: Office of the Minnesota Secretary of State · 180 State Office Building, 100 Rev. Dr. Martin Luther King Jr. Blvd · Saint Paul, MN 55115-1299 · 1-877-600-VOTE (8683)



From: [Evie Salzman](#)
To: [OAH Webmaster \(OAH\)](#)
Subject: Request a Public Hearing!
Date: Friday, September 26, 2025 11:17:45 AM

[You don't often get email from salzma@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Need a Public Hearing changes Sec of State Simonson is trying to push through Oct 10.
Sent from my iPhone

Request for Public Hearing on Proposed Voting Rules Changes

Date: September 20, 2025
To: Court of Administrative Hearings
600 North Robert Street
P.O. Box 64620
Saint Paul, Minnesota 55164-0620

RECEIVED

SEP 29 2025

Office of Administrative Hearings

Via: U.S. Mail and eComments website (<https://mn.gov/oah/forms-and-filing/ecomments/>)

Subject: I request a public hearing on the proposed Permanent Rules Relating to Elections Administration; Minnesota Rules Chapter 8200-8250; Revisor's ID Number R-4824. Request for Public Hearing on Proposed Voting Rules Changes by Secretary of State Steve Simon

Dear Administrative Hearings Office,

I am writing to formally request a public hearing regarding the proposed voting rules changes issued by Minnesota Secretary of State Steve Simon, as referenced in the provided document. My name is Susan Holman-Sutich, and my address is 555 Abbey Way, Mendota Heights, MN 55120. This request is submitted in accordance with the requirements outlined in the document, which specifies that requests for a public hearing must be made in writing by 4:30 p.m. on Friday, September 26, 2025.

I object to the entire set of proposed voting rules changes for there are inaccuracies. See below. Also my concerns stem from the potential impact these changes may have on the accessibility, integrity, and transparency of the voting process in Minnesota. Specifically, I am concerned that the proposed rules may alter established procedures in ways that could affect voter participation and confidence in the electoral system. Without further clarification and public discussion, these changes risk undermining the democratic process.

I respectfully request a public hearing to allow for a thorough examination of the proposed rules, including their intent, scope, and potential consequences. I propose that the hearing include opportunities for stakeholders to provide testimony and evidence regarding the necessity and legality of the changes. Additionally, I urge the agency to consider revising the proposed rules to ensure they align with Minnesota's commitment to fair and accessible elections, though specific revisions would depend on the details provided during the hearing.

Thank you for considering this request. I look forward to participating in the public hearing process to ensure these proposed rules are thoroughly vetted for the benefit of all Minnesota voters.

Sincerely,
Susan Holman-Sutich

Following are inaccuracies within the document “Proposed Permanent Rules Relating to Election Administration” ID: R-4824.

Line item:

3.16 that I ~~reside at the address shown and have resided~~ have maintained residence in Minnesota

Comment: address is critical in identifying residency. Cannot delete.

Line item:

9.23 receive an absentee ballot ~~application. At least 60 days before each election, the county~~
9.24 ~~auditor or municipal clerk shall send an absentee ballot application to each person on the~~
9.25 ~~list who is eligible to vote in the election.~~

Comment: What law allows for this deletion?

Line item:

10.2 A voter registration application must be sent with the ballot to any challenged voter
10.3 ~~and to each voter whose voter registration application is incomplete under Minnesota~~
~~Statutes,~~

10.4 ~~section 201.061, subdivision 1a, or 201.121, who applies for an absentee ballot. The~~
absentee

10.5 ballot process must be administered as if the voter was not registered to vote.

Comment: Why send a ballot if the ballot process must be administered as if the voter was not registered to vote? At the polling place, you cannot give a ballot to an individual who is not registered to vote. What law allows the deletion of an incomplete voter registration?

Line item:

11.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
11.14 on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

12.13 • Ask your witness to print their name ~~and Minnesota street address, including city~~

12.14 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in

12.15 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

13.22 • If you have a print disability, you may request that ballots, instructions, and a
13.23 certificate of voter eligibility be transmitted electronically in an accessible format
13.24 by contacting your county auditor. If you request a ballot be transmitted electronically
13.25 in an accessible format, you may then complete your ballot electronically but must
13.26 print your voted ballot and return this ballot and completed certificate of voter
13.27 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~14.21 Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age ~~14.22~~
on or before the day of the election and who is a citizen of the United States,

Comment: Witness needs to be a registered voter. What law changed this?

Line item:

18.12 • If you have a print disability, you may request that ballots, instructions, and a
18.13 certificate of voter eligibility be transmitted electronically in an accessible format
18.14 by contacting your county auditor. If you request a ballot be transmitted electronically
18.15 in an accessible format, you may then complete your ballot electronically but must
18.16 print your voted ballot and return this ballot and completed certificate of voter
18.17 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

21.2 • If you have a print disability, you may request that ballots, instructions, and a
21.3 certificate of voter eligibility be transmitted electronically in an accessible format
21.4 by contacting your county auditor. If you request a ballot be transmitted electronically
21.5 in an accessible format, you may then complete your ballot electronically but must
21.6 print your voted ballot and return this ballot and completed certificate of voter
21.7 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

25.26 • If you have a print disability, you may request that ballots, instructions, and a
25.27 certificate of voter eligibility be transmitted electronically in an accessible format
25.28 by contacting your county auditor. If you request a ballot be transmitted electronically
26.1 in an accessible format, you may then complete your ballot electronically but must
26.2 print your voted ballot and return this ballot and completed certificate of voter
26.3 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

~~27.13 • I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before
27.14 the day of the election and a citizen of the United States, or am a notary, or am
27.15 authorized to give oaths.

Comment: What law changed this?

Line item:

~~29.9 • I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before
29.10 the day of the election and a citizen of the United States, or am a notary, or am

29.11 authorized to give oaths.

Comment: What law changed this?

Line item:

31.23 Statutes, section 203B.121, subdivision 4, ~~all absentee ballot return envelopes retained by~~
~~31.24 the county auditor or municipal clerk shall be removed from the place of safekeeping and~~
~~31.25 compared with the record required by this rule to ensure that all envelopes are accounted~~
~~32.1 for. Any discrepancy shall be reported to the secretary of state promptly they must comply~~
~~32.2 with the provisions of that subdivision and report any discrepancy to the secretary of state~~
~~32.3 promptly.~~

Comment: See no reason for change.

Line item:

32.10 A. ~~has provided a Minnesota address as part of the witness's certification on the~~
~~32.11 return envelope;~~

Comment: What law made this change?

Line item:

32.18 ~~seventh~~ 19th day before the election, any ballot that has been previously received from
that

32.20 received after the close of business on the ~~seventh~~ 19th day before the election and
another

Comment: What law made this change?

Line item:

33.16 ballot mailing must be sent to each registered voter no earlier than 46 or later than ~~14~~ 28

Comment: What law made this change?

Line item:

35.6 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
35.7 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

36.1 • Ask your witness to print their name ~~and Minnesota street address, including city~~
36.2 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
36.3 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

36.11 • Deliver it in person by 8:00 p.m. on Election Day, or

36.12 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

37.9 • If you have a print disability, you may request that ballots, instructions, and a
37.10 certificate of voter eligibility be transmitted electronically in an accessible format
37.11 by contacting your county auditor. If you request a ballot be transmitted electronically
37.12 in an accessible format, you may then complete your ballot electronically but must
37.13 print your voted ballot and return this ballot and completed certificate of voter
37.14 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

38.12 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
38.13 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

39.17 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~
39.18 19th day before the election, a voter may change the voter's choice of which major
political

Comment: What law made this change?

Line item:

40.13 ~~Anyone registered to vote in Minnesota~~ Any person who is at least 18 years of age
41.14 on or before the day of the election and who is a citizen of the United States,

Comment: What law made this change?

Line item:

41.14 • Ask your witness to print their name ~~and Minnesota street address, including city~~
41.15 ~~(not a P. O. Box),~~ in the box at the top of the witness section and sign their name in
41.16 the box at the bottom of the witness section.

Comment: For witness verification of registration, address is need.

Line item:

41.25 • Deliver it in person by 8:00 p.m. on Election Day, or
41.26 • Ask someone to deliver it by 8:00 p.m. on Election Day.

Comment: Shouldn't this be 5 PM?

Line item:

42.20 • If you have a print disability, you may request that ballots, instructions, and a
42.21 certificate of voter eligibility be transmitted electronically in an accessible format
42.22 by contacting your county auditor. If you request a ballot be transmitted electronically
41.23 in an accessible format, you may then complete your ballot electronically but must
41.24 print your voted ballot and return this ballot and completed certificate of voter
41.25 eligibility to your local election office.

Comment: Verbiage of Minnesota Statutes, section 645.44, subdivision 14 is adequate.

Line item:

43.16 ~~MN street address~~

43.17 ~~(or title, if an official or notary)~~

43.18 _____

43.19 ~~Street Address~~

43.20 _____ MN

43.21 ~~City~~

Comment: What law made this change?

Line item:

44.2 • ~~I am or have been registered to vote in Minnesota~~ at least 18 years of age on or before

44.3 the day of the election and a citizen of the United States, or I am a notary, or I am

Comment: What law made this change?

Line item:

44.8 Subp. 7. Change of major party choice. Until the close of business on the ~~seventh~~

44.9 19th day before the election, a voter may change the voter's choice of which major political

Comment: What law made this change?

Line item:

45.15 ~~The election jurisdiction must hold a public accuracy test within 14 days prior to the~~

45.16 ~~election for the purpose of demonstrating the accuracy of the computer programs and voting~~

45.17 ~~systems to be used at the election. In order to demonstrate the accuracy of the computer~~

45.18 programs and voting systems to be used at an election, the election jurisdiction must hold

45.19 a public accuracy test at least three days prior to the voting equipment being used. A

45.20 ballot-marking device used for absentee voting must be tested according to part 8220.1350.

Comment: What law made this change in days?

Line item:

46.22 This rule does not apply to ballot marking devices used for absentee voting. Those

46.23 devices must be tested under part 8220.1350.

Comment: What law allows this change? All should be tested to the same rule.

Line item:

49.21 recount official must be in the room at all times. If the recount includes ballot format as

49.22 provided in Minnesota Statutes, section 206.80, paragraph (b), clause (2), item (ii), and the

49.23 ballots were used by ten or fewer voters in the precinct, the election judges from that precinct

49.24 are not eligible to participate in conducting a recount or postelection review in that precinct.

Comment: What law allows this change?

Line item:

54.6 general election. ~~At the same time that the secretary of state certifies the names of nominees~~

54.7 ~~under Minnesota Statutes, section 204C.32, subdivision 2, the secretary of state shall certify~~

54.8 ~~to the county auditors the order in which the names of the candidates representing the~~

54.9 ~~political parties as defined in Minnesota Statutes, section 200.02, subdivision 7, must appear~~

54.10 ~~for every partisan office on the ballot. Candidates nominated by petition must appear on~~

54.11 ~~the ballot beneath the names of the candidates of the political parties as defined in Minnesota~~

54.12 ~~Statutes, section 200.02, subdivision 7, and in the order determined by lot by the secretary~~

54.13 ~~of state.~~ At least 11 weeks before the state general election, the secretary of state shall draw

54.20 the order of those candidates. ~~The order of political parties or principles determined by the~~

54.21 ~~drawing of lots applies to all partisan offices on the ballot.~~

Comment: What law allows this change?

Line item:

55.5 Subp. 19. Alternative ballot. The requirements in this part do not apply to the printed

55.6 and marked paper ballots that use the alternative ballot format permitted by Minnesota

55.7 Statutes, section 206.80, paragraph (b), clause (2), item (ii). For precincts using alternative

55.8 ballots, the marked paper ballot must indicate, at a minimum, the date of the election; the

55.9 name of the precinct; an electronically readable precinct identifier or ballot style indicator;

55.10 and the voter's votes for each office or question, generated from the voter's use of a touch

55.11 screen or other electronic device on which a complete ballot meeting the information

55.12 requirements of all applicable laws was displayed electronically. The ballot must also include

55.13 *lines for initials of at least two election judges.*

Comment: What law allows for this, for the ballot generators appears to not be controlled or validated. Having 2 lines for election judges doesn't make these ballots official. This opens the door for voter fraud and ballot stuffing of drop boxes.

Certificate of Notice to Legislators

Certificate of Sending the Notice and the Statement of Need and Reasonableness to Legislators

Office of the Minnesota Secretary of State

Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250

I certify that on August 22, 2025, at St. Paul, Ramsey County, Minnesota, when I sent the Dual Notice under Minnesota Statutes section 14.22, I also sent a copy of the Notice, the Statement of Need and Reasonableness, and the rule draft to certain legislators. I did this by emailing their official state email addresses. This was done to comply with Minnesota Statutes, section 14.116. The cover letter for this email and the list of legislators contacted are attached to this certificate.



Justin R. Erickson
General Counsel



STATE OF MINNESOTA
Office of Minnesota Secretary of State
Steve Simon

August 22, 2025

Senator Jim Carlson, Chair
Senator Mark Koran, Ranking
Senate Elections Committee

Senator Tou Xiong, Chair
Senator Andrew Lang, Ranking
Senate State and Local Government Committee

Senator John Marty, Chair
Senator Eric Pratt, Ranking
Senate Finance Committee

Representative Jim Nash, Co-Chair
Representative Ginny Klevorn, Co-Chair
House State Government Finance and Policy Committee

Representative Duane Quam, Co-Chair
Representative Mike Freiberg, Co-Chair
House Elections Finance and Government Operations Committee

Representative Paul Torkelson, Co-Chair
Representative Zack Stephenson, Co-Chair
House Ways and Means Committee

Legislative Coordinating Commission
lcc@lcc.leg.mn

**In the Matter of the Proposed Permanent Rules Relating to Elections Administration;
Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440**

Dear Legislators:

The Office of the Secretary of State intends to adopt rule amendments relating to election administration. The proposed rules modify language related to voter registration; ballot formatting

and instructions; absentee ballot administration; ballot safeguard procedures; mail balloting procedures; testing of voting systems; and election official training. The majority of the proposed changes are technical or clarifying in nature or are to conform to the rules with Minnesota Statutes. The Office also proposes to eliminate rules that are duplicative of, or inconsistent with, changes made to Minnesota Statutes.

We plan to publish a Dual Notice of Intent to Adopt Rules in the August 25, 2025, *State Register* and are now sending the Notice under section 14.14.

As required under section 14.116, we are sending you a copy of the Notice and the Statement of Need and Reasonableness. We are also enclosing a copy of the proposed rules.

If you have any questions or concerns, please contact me at 651-201-6895 or justin.erickson@state.mn.us

Sincerely,



Justin R. Erickson
General Counsel

Enclosures:

Notice of Intent to Adopt Rules
Statement of Need and Reasonableness
Proposed Rules

Certificate of Mailing and Emailing Notice of Hearing

Certificate of Mailing/Emailing a Notice of Hearing to Those Who Requested a Hearing

Office of the Minnesota Secretary of State

Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250

I certify that on September 29, 2025, I mailed and emailed a Notice of Hearing by depositing the Notice in the United States mail with postage prepaid and sending an electronic copy via email to all persons who requested a hearing. The Notice is given under Minnesota Statutes, section 14.25, subdivision 1.



Justin R. Erickson
General Counsel

Certificate of Sending the Notice and the Statement of Need and Reasonableness to
Minnesota Management and Budget

Certificate of Sending the Notice and the Statement of Need and Reasonableness to Minnesota Management and Budget

Office of the Minnesota Secretary of State

Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440; Minnesota Rules Chapter 8200-8250

I certify that on August 8, 2025, at St. Paul, Ramsey County, Minnesota, I sent the rule draft and draft Statement of Need and Reasonableness to Executive Budget Officer Jack Indritz of Minnesota Management and Budget. I did this by emailing his official state email address. This was done to comply with Minnesota Statutes, section 14.131. The cover letter for is attached to this certificate.



Justin R. Erickson
General Counsel

VIA EMAIL

August 8, 2025

Jack Indritz
Executive Budget Officer
Minnesota Management and Budget

In the Matter of the Proposed Permanent Rules Relating to Elections Administration; Revisor's ID Number R-4824; OAH Docket No. 8-9019-39440

Dear Jack:

Minnesota Statutes, section 14.131, requires that an agency engaged in rulemaking consult with the commissioner of Minnesota Management and Budget "to help evaluate the fiscal impact and fiscal benefits of the proposed rule on units of local government."

Enclosed for your review are copies of the following documents on proposed rules relating to elections administration:

1. The August 7, 2025, SONAR draft.
2. The August 7, 2025, Revisor's draft of the proposed rule.

Because the Office of the Secretary of State is a Constitutional office, we historically do not obtain approval from the Governor's Office on rulemaking projects; however, I do plan to let the Governor's Office know that these rules are in progress.

If you have any questions or concerns, please contact me at justin.erickson@state.mn.us or 651-201-6895.

Sincerely,

Justin R. Erickson
General Counsel, Office of the Minnesota Secretary of State