



*Election Integrity Project*<sup>®</sup>*California*  
EVERY LAWFULLY CAST VOTE ACCURATELY COUNTED

**CA Secretary of State  
Election Observation Rights and Responsibilities Regulations  
Hearing – Oct. 31, 2023**

**The transparent process that included NO transparency.**

**Transparency**

- **the quality of being open to public scrutiny:**
  - "the majority of the funds disappeared without any transparency regarding the recipients"
  - "the companies' commitment to transparency has meant that they are now more open about their supply chains"
- **the quality of being easy to perceive or detect:**
  - "the transparency of their predatory motives"
- **the quality of allowing light to pass through so that objects behind can be distinctly seen:**
  - "the transparency of ice"

**Yesterday, October 30, 2023 EIPCa sent this email regarding the [CA SOS Election Observation Regulations Proposed Text for 2023](#)**

- EIPCa shared with you our concern about the lack of readability of the **Proposed Regulations** due to the fact that the document was **not formatted....at all.**
- We believed the document was impossible to read without being formatted into an outline, so we did that and sent it to everyone Monday.
- We alerted everyone about the hearing that took place Tuesday morning.

EIPCa learned last evening that there would not be an option to call into the hearing because the Secretary of State's office was only prepared to host an in-person meeting.

**EIPCa Board member and Solano County Coordinator Colleen Britton provided this description of today's in-person meeting:**

At the last minute, realizing there would be no "call in" testimony allowed at the SOS hearing which prevented Linda Paine from testifying, I decided to attend in person to represent **Election Integrity Project**<sup>®</sup>*California* (EIPCa) as best I could.

The hearing was set up in a **small** multi-purpose room **with about 30 chairs**.

- Only about 15 people were in attendance - I suspect mostly aides.
- The moderator, Robbie Anderson and two aides were at the head table.

**Obviously they were not expecting a big crowd.**

After reading the Hearing Guidelines aloud, including the **4-minute time limit** and **the non-fact that....**

“Many people from all over California  
have come here today to make their comments,”

**... it was announced that only one person had filled out a speakers card.**

**ME! Go Figure!**

**I was the ONLY member of the public who attended! Not surprising since no one could read the document.**

Because a provision for call-in testimony was not put in place for citizens and relevant organizations such as Election Integrity Project® California, **transparency was NOT attained and input from citizens and relevant organizations were effectively denied an opportunity to testify in person during the hearing.**

**Fortunately, EIPCa spent days**

- deciphering the SOS’s unformatted document,
- reformatting it into a coherent outline and
- making important, constructive comments to protect both observers and election officials

**...so that all of you would have time to read the regulations and send in your written response.**

**Written comments, including those sent by mail, facsimile, or e-mail  
must be received by Secretary of State  
by 11:59 p.m. on November 13, 2023.**

**Questions or comments should be directed to**

- Robbie Anderson at [aanderso@sos.ca.gov](mailto:aanderso@sos.ca.gov)
- Rachelle Delucchi at [rdelucch@sos.ca.gov](mailto:rdelucch@sos.ca.gov)

[https://www.eip-ca.com/articles/election\\_observation\\_rights.pdf](https://www.eip-ca.com/articles/election_observation_rights.pdf)  
[https://www.eip-ca.com/articles/election\\_observation\\_rights.pdf](https://www.eip-ca.com/articles/election_observation_rights.pdf)