

DATE	2025 DRAFT EAP COMMENTS RECEIVED	SUBMITTED BY
18-Sep	<p>“Let’s start with the elephant in the room: registration drives. These things are a fraudster’s playground! You’ve got well-meaning groups—or maybe not so well-meaning—signing up whoever they can, and what’s the check? A signature? A postcard? That’s how we ended up with a dog registered to vote in 2021 and 2022, and it took until 2025 to slap some felony charges on that lady! And now, the EAP’s talking about more outreach and education—great, let’s hand out more opportunities for people to game the system! Where’s the beef? Where’s the mandatory voter ID or real-time verification to stop this nonsense before ballots even hit the mail?</p> <p>And don’t get me started on the timing! This plan acts like it’s some big fix, but it’s all about cleaning up the mess *after* the votes are counted. Post-election audits? Risk-limiting audits? That’s like locking the barn door after the horse has bolted! If some joker registers a fake name or a pet, and they cast a ballot, that vote’s in the pot until someone bothers to investigate—probably months later when the damage is done. The 2025 dog fiasco proves it: fraud slipped through, and we’re only fixing it after the fact. That’s not a solution; that’s a Band-Aid on a broken leg!</p> <p>Then there’s this accessibility obsession—ASL, Spanish, Tagalog, you name it. I’m all for inclusion, but when you’re bending over backwards to make sure everyone can vote without tightening the screws on who’s actually eligible, you’re begging for trouble! The EAP’s so busy patting itself on the back for multicultural outreach that it forgets the basics: verify the voter before you hand them a ballot! Studies say turnout might go up 5-10% with this stuff—yeah, and maybe 1% of that is Fluffy the dog casting a vote!</p> <p>Look, I get it, Orange County’s trying with this voter roll maintenance and security talk, but it’s all fluff without teeth. Using DMV data to update rolls? Fine, but what if someone slips through the cracks? No ID, no biometric check, no nothing—just hope they respond to a postcard. That’s not a plan; that’s a prayer! And with the hearing next week, they’re dangling this public input carrot like we can fix it—but unless we scream for real reform like voter ID pilots or pre-election roll audits, this EAP is just another layer of bureaucracy to kick the can down the road.</p> <p>So, yeah, I’m mad. Mad that we’re still playing whack-a-mole with fraud instead of building a fortress. Mad that the Registrar’s got a week to hear us out, and I bet they’ll nod, smile, and slap another Band-Aid on this bleeding system. If you’re with me, ██████████, let’s storm that Irvine City Hall on September 25 at 6 PM and demand they stop tinkering and start fixing—before the next election turns into a kennel club vote! Rant over—your move!</p> <p>(Feel free to tweak this or let me know if you want it dialed up or down—I’m here to channel your inner fire!)”</p> <p>@OCRegistrar Don’t ghost me on this topic <a href="https://t.co/PCxtH6DIAM">https://t.co/PCxtH6DIAM</a></p>	Gambler
25-Sep	<p>Hi EAP committee,</p> <p>I have attended many BOS meetings and actually attended the ROV meeting (2019?) where we all were vehemently opposed to the adoption of the VCA (Voter Choice Act). Why? Because we all knew then, and we have empirical evidence now, that voters feel disenfranchised when they can no longer go down the street to vote and see the same poll workers who know you, as we have done for 40 plus years. This experiment with large vote centers farther away (and impersonal) has discouraged many of my neighbors and friends and myself from voting because it is no longer convenient. Here is the most important civic duty we have, to vote, and you adopted a VCA system which makes you now drive to vote, and you're just a number, and usually there is a line.</p> <p>Now with several years of experience, I know you will try to convince us with "facts" that the VCA system still works, even though there is ample evidence of lost ballots, never arrive, people registered to vote at a residence they don't live at, multiple ballots sent out, no chain of custody of mail ballots, more expensive (per Bob Page) and we see election results overturned a few days after the vote. Hmmmm. Something fishy, wouldn't you say?</p> <p>So interestingly enough, San Bernardino, where Bob Page used to work, has a hybrid system where they opted OUT of the VCA and they have a few vote centers and 200 or so precinct stations. Perfect. And apparently, they have turnouts of 85-96% (over the last two elections). Why don't we adopt the same system, opt out of the VCA, so we have the flexibility to do what they did.</p> <p>You will "claim" that the VCA system has a high turnout too. But if many of those ballots are illegitimate, then you might see that result. Until we can do a forensic audit of the voter roll data can we accurately determine if that turnout is based on citizens who actually live here at that domicile.</p> <p>Bottomline: please put the VCA on the BOS agenda for Oct 14 so you can have a fair discussion of this.</p> <p>Thank you.</p>	Libby

25-Sep	<p>I appreciate the opportunity to participate in the community meetings and submit a public comment for this draft EAP. I learned a lot from the Registrar of Voters staff and from other members of the community. I have comments related to Vote Center operations, disability access, Voter's Choice Act Criteria, and comments by the Registrar himself and Registrar's Office Staff that do not match my lived experience as a voter.</p> <p><b>Vote Center Ballot Dropoff</b></p> <p>I recommend that the EAP add an express dropoff line for vote-by-mail ballots into the sample Vote Center design. This feature is absent from the Appendix J Vote Center Layout (Example) and the draft EAP description of a Vote Center. I believe that Vote Centers already operate an expedited dropoff; Vote Center staff have always invited me to skip the line when I return my vote-by-mail ballot. However, I have sometimes had to politely wait in line to avoid cutting the line in front of my fellow voters. I have also seen other voters unnecessarily join the line with a ballot return envelope in hand, due to a lack of a dedicated ballot dropoff line. Adding signs to designate an express line for ballot dropoff would help improve the voter experience by reducing unnecessary waits. In addition, these signs would reduce the burden on Vote Center staff to frequently check the voter line for ballot dropoffs.</p> <p><b>Remote Accessible Vote By Mail Ballot</b></p> <p>The Remote Accessible Vote By Mail Ballot is the weak link in Orange County's election system. The RAVBM system currently in use by the Orange County Registrar of Voters leaves low-vision and no-vision voters who lack the ability to visually verify their ballot selections as printed vulnerable to vote interference. The previous 2021 EAP and the draft EAP failed to specify disability access requirements that would make the RAVBM system accessible to low-vision voters.</p> <p>The RAVBM system relies upon the voter to have adequate vision to read and verify the printed RAVBM ballot. Election code Section 303.3 specifically states that "A RAVBM system shall not be connected to a voting system at any time" because the code recognizes a security distinction between the certified, air-gapped, tested, and security sealed County voting systems and the voter's own assistive technology. The election code recognizes that an election adversary could hack County's RAVBM system, hack the voter's assistive device, and/or hack the voter's printer to covertly modify the ballot. However, the RAVBM printed ballot guarantees vote integrity through an almost impenetrable security measure; if the ballot as printed does not match the voter's intent, the voter will surely refuse to cast the altered ballot. Low-vision and no-vision voters are the one exception to this security model, as these voters lack the ability to securely and privately verify the contents of their printed ballots. Having considered other alternatives, my best recommendation is for the Registrar's Office to disclose the security risks of the RAVBM ballot to voters with limited vision in its disability outreach. I am unable to identify a better option than to allow voters to make an informed decision on their balloting method. California Elections Code offers all voters the option to return an RAVBM ballot in order to protect the voting rights of disabled voters from legal challenges. In other states that impose qualifications on certain ballot return methods, voters have had their ballots challenged in post-election lawsuits. Since disabled voters may have limited access to voting options, challenges on the basis of balloting methods have a disproportionate impact on disabled voters. As such, the Registrar's Office may not impose a vision test to verify that the voter can read their printed RAVBM ballot.</p> <p>Bringing a mobile vote center to the address of every voter unable to securely cast a RAVBM ballot would likely be too costly. Even if the Registrar's Office were to somehow provide secure verification for printed RAVBM ballots, the verification system would have to maintain voter secrecy. A voter must not be allowed to verifiably prove how they voted to prevent elected officials from offering spoils in exchange for votes. These constraints make these options infeasible.</p> <p>The EAP should require the RAVBM system to implement accessibility requirements to serve low-vision voters. The absence of accessibility requirements is particularly notable for a ballot with an express accessibility purpose.</p> <p>The EAP should clarify the voter-verifiability requirements for the RAVBM ballot. The Registrar Of Voters himself seemed to lack knowledge on the RAVBM system when I showed him an example of an RAVBM ballot from a previous Orange County election. The Registrar and some staff accused me of bringing in a RAVBM ballot from a different county, despite the presence of my local city measures clearly proving that my ballot was from Orange County. The lack of knowledge on the RAVBM system by the Registrar Of Voters staff raises concerns, because the Registrar Of Voters staff are responsible for providing outreach to voters on the RAVBM ballot. The Registrar of Voters Office should require the RAVBM vendor to remove the QR code from the Orange County</p>	Grady
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RAVBM ballot. The Registrar himself and staff explained to me that RAVBM ballots would go through the ballot transfer process; the QR code is not in use in Orange County elections.

Suppose that two very like-minded voters in the same precinct decide they both want to cast identical votes and to save on printing costs, they use scissors to cut one RAVBM ballot apart so that one voter submits the human-readable list of votes and the other places only the QR code into the return envelope. This thought experiment raises the question: where is the voter's intent on the RAVBM ballot? Would the Registrar be required to attempt to read the QR code to decode the voter's intent if the human-readable portion is spoiled? I

recommend that the Registrar of Voters Office solve this challenging election riddle by having the vendor OmniBallot remove the unused QR code from the Orange County RAVBM ballot.

#### Election Security

I recommend that the EAP clearly require that seals on election equipment and Vote Center dropboxes be visible to voters. While the primary purpose of these security seals is to defend against insider threats, the Registrar Of Voters Office brought a sample security seal to the community meetings because these security seals have an additional public purpose in an election context. These seals perform a part of the ceremony of democracy: a promise to the voter that their ballot will be safely delivered to the vote count. In my experience as a voter, these seals have not been publicly visible on the ballot dropboxes within Vote Centers. During the community meeting, the Registrar of Voters commented that ordinary voters like myself could request to inspect the security seal. Upon further reflection, I realized that this statement does not match my lived experience as a voter. I cannot recall a single instance when I have been permitted to inspect a security seal on a ballot dropbox, in any election since the County implemented the Voter's Choice Act. I clearly recall an instance when I requested to see a seal on a dropbox but the vote center staff refused, citing that only authorized Registrar of Voters staff were allowed near the dropboxes. I clearly recall when I requested to view the security seal on the Mobile Vote Center but the staff refused, citing that only authorized Registrar of Voters staff would be allowed within the area containing the seal. Refusing to display the seal on the Mobile Vote Center was particularly egregious because the dropbox was large enough for a Registrar of Voters to hide within and personally tamper with the ballots. Furthermore, requiring voters to request to view the security seal serves to discourage the average voter from viewing the seal, particularly in a county where elections staff have a history of refusing to display the seals. I would recommend that the EAP clarify how voters can view the security seals on election equipment. I recommend that the EAP specify that Vote Center staff be trained to handle ballots in a manner that demonstrates elevated integrity. During one election, a particularly exceptional Vote Center staff member handled my ballot with great integrity. I watched as the staffer held my ballot over his head, as a demonstration of integrity, as he walked to the dropbox. In several subsequent elections, I have had Vote Center staff fail to live up to this example, with their handling breaking my line-of-sight at times. In principle, the journey from when a ballot leaves the voter's hands to when the ballot safely lands within the ballot box presents a window of opportunity for an election adversary to tamper with the election. Vote Center staff should handle returned ballots so as to be above suspicion.

#### Election Security

I strongly recommend that the Registrar of Voters explicitly reject ineffective measures raised in the community meetings that have a high risk of impeding the right to vote. The draft EAP states that the community feedback has requested the Registrar of Voters Office to "Consider cameras at all ballot drop boxes to improve voter confidence and safety." During the community meetings, I asked the Registrar of Voters to consider releasing body camera footage to demonstrate the integrity of the collection process. The Registrar strongly disagreed with this suggestion, citing staff safety. The Registrar of Voters should consider the potential safety impact to the average voter from this suggestion. None of the community members who raised this concern also expressed an election integrity concern that would not be addressed by the ballot counting process. Several community members provided feedback in favor of having police check IDs at dropboxes. These community members described witnessing informal efforts during previous elections. The Registrar of Voters must clearly reject such efforts as inappropriate. First, these informal efforts, without the authorization of the Registrar of Voters, creates non-uniformity throughout the County. Having the election administration be different at polling places calls into question the fairness of the election process. Second, these efforts are not as effective as those community members would suggest. Those community members suggest that the informal ID check has a relation to one ballot per person.

However, the suggested solution would allow an election adversary to submit

one ballot per ballot box monitor, since the monitors are not sharing lists of IDs with each other. Collecting ID data at dropboxes throughout the county raises voting rights concerns. Third, this suggestion may violate California Election Law. At a Vote Center, a voter without proper identification would be provided with a provisional ballot. Refusing to accept a ballot at a dropbox without providing a provisional ballot appears to violate the right to vote under California law. Fourth, having police monitor dropboxes raises concerns about voter intimidation or the appearance of impropriety. Imagine if Orange County Sheriff deputies stood around dropboxes, deciding which voters could or could not vote in an election in which the incumbent Orange County Sheriff was seeking re-election. This situation would have an appearance of impropriety. Furthermore, this scenario would place the Registrar of Voters Office and its law enforcement partners in a situation that risks compromising the public's trust in the election. The public may perceive, correctly or not, that the policing of dropboxes disproportionately targets dropboxes located in language minority communities. The Registrar mentioned at the community meeting that one meeting with language interpretation had zero attendance, from which he inferred community fear.

**Voter's Choice Act Criteria: Access to Public Transportation**

The Registrar of Voters Office has unjustifiably limited its definition of public transportation for election purposes to only service provided by the Orange County Transportation Authority. The draft EAP provides no justification for this arbitrary limitation to a single agency. The Registrar of Voters Office has provided no reason that a municipal bus does not meet the definition of public transportation for election purposes. The Registrar of Voters Office has provided no justification for arbitrarily omitting public transportation service by other agencies as listed in the OCTA busbook. Excluding municipal and other operators from the definition of public transportation for election purposes unfairly decreases the suitability score for areas served by those operators. In a sense, municipal public transportation services reflect the will of the voters of the few cities in Orange County that operate municipal bus services independently from OCTA. The residents of these cities are entitled to benefit from the increased suitability score for a Vote Center in their communities. Collecting information from municipal bus operators does not pose an unreasonable burden on the Registrar of Voters Office. If the Registrar of Voters can administer city ballot measures for the purpose of raising funding for their municipal public transportation, the Registrar can also include the municipal public transportation for each city in its Voter's Choice Act Criteria map. The City of Irvine's IrvineConnect service provides one clear example of an inaccuracy on the access to public transportation criteria layer. The map shows a less than highest level of access to public transportation at both the previous IrvineConnect route in Woodbridge, with stops on Yale loop, and the current IrvineConnect route to Northwood, running down Yale Ave. The Registrar of Voters Office has provided no justification for why bus stops that are served by IrvineConnect but not OCTA do not qualify as a bus stop for calculating the distance to the nearest bus stop. Calculating access to public transportation for election purposes solely by distance from the nearest bus stop produces an unsound result that ignores the critical factor of service levels in public transportation. The Registrar of Voters has implicitly assumed that all bus stops provide an equal amount of access to public transportation. This model incorrectly assumes that access to public transportation radiates out from a bus stop like a wifi signal and that buses act like data cables that connect different stations. For example, the map shows that both the San Clemente Pier station and the San Clemente Metrolink station have the same highest level of access to public transportation. This rating ignores the fact that the San Clemente Metrolink station receives more than twice the amount of service as the San Clemente Pier station and ignores the fact that the service to San Clemente Pier only allows travel towards the station in the morning and away from the station in the evening. The fact that cities could game the system to obtain a more favorable rating on access to public transportation proves that the Registrar's method misses the essence of public transportation. Suppose that a city declared a site where it wants to receive a Vote Center to legally be a transit station, no different from the Irvine Transportation Center building or the ARTIC building. As a result, this fictional bus stop would score very highly in terms of distance from the Vote Center. However, nothing in the draft EAP requires the city to then follow through with setting up any bus routes to serve this fictional station. Nothing in the draft EAP suggests that a city must spend money to install a bus pole, sign, or bench to physically construct the bus stop. Even in this extreme scenario, on what basis could the Registrar of Voters Office decline to recognize the fictional bus stop, which obviously provides no access to public transportation? This thought experiment proposes a method to render the Voter's Choice Act access to public transportation criteria meaningless. The Registrar of Voters scoring system for access to public transportation for election purposes

	<p>must include a measurement of the level of service provided by public transportation. Describing exactly how to calculate the suitability score may be outside the scope of a public comment so I must limit this to general factors that the Registrar of Voters should consider when determining the suitability score. All transit operators in Orange County collect ridership numbers per route. All other things being equal, a route with higher ridership provides more access to public transportation than a similar route with a lower ridership. I recommend that the Registrar of Voters use ridership on connecting bus routes as a baseline for assigning transportation access scores, instead of automatically assigning the maximum value to every transit stop regardless of service. However, ridership alone is not sufficient for election purposes because travel for the purpose of voting has requirements that are not present on ordinary travel days. I recommend that the Registrar of Voters scoring system for access to public transportation for election purposes score locations with consideration for the frequency, service span, and connectivity of public transportation to that Vote Center location. For frequency, I recommend the top score require at least two vehicles per hour, in both directions where applicable. For service span, I recommend that the top score requires transportation service to continue until the 8pm closing time of polls on election day. If a bus route ends service at 6pm, then the Vote Center effectively closes early at 6pm for public transportation dependent voters and should receive a lower suitability score. For connectivity, I recommend the Registrar of Voters analyze how many voters could use those actual public transportation routes as a fraction of the expected number of voters served by the location. In particular, the Registrar of Voters should consider how well public transportation reaches communities with low rates of household vehicle ownership and transit-dependent low-income populations</p>	
25-Sep	<p>I would recommend the Registrar of Voters Office ensure that applicants for Vote Center staff who rely upon public transportation are not disadvantaged in the hiring process. I would not be surprised to see that the Registrar of Voters Office requires an applicant to have a driver's license and a reliable vehicle; despite the Vote Centers being, at least according to the Registrar of Voters, accessible by public transportation. This invisible barrier also excludes applicants with a low-income background, since that is related to low rates of household vehicle ownership. I am concerned that invisibly exclusionary practices will result in a staff lacking the background in and connection to the communities that the Registrar of Voters Office serves.</p> <p>Having staff who take public transportation to the Vote Center will help the Registrar's Office better understand the reality of public transportation for voters in Orange County. For instance, some buses run reduced routes on weekends. The Registrar of Voters Office might notice a dropoff in weekend attendance and attribute that to community preference, instead of community inaccessibility. Having staff who raise the issue will help the Registrar of Voters Office understand if a Vote Center location has correctly received a high ranking on the access to public transportation criteria.</p>	Grady
26-Sep	<p>My husband and I absolutely support the VCA in Orange County. We appreciate the convenience and the security that the OC Registrar of Voters provides for all of us.</p> <p>We especially appreciate the work of Bob Page in resisting the inappropriate demands by the federal administration.</p>	Susan and Richard
29-Sep	<p>Redesign the envelope. The goldenrod/light orange tone the brand has been established by the ROV, consider firetruck red as an accent to grab attention. I see the ballot itself under a pile of papers or near a trashcan. The firetruck red color would be an additional visual to make voters see urgency.</p> <p>For Spanish language, in the past, Spanish translations content did not match candidate statement. Need more accurate Spanish translation of candidate statements.</p>	Jose

1-Oct	<p>Dear Registrar.</p> <p>I have been a registered voter in Orange County since 2012. I have been a huge fan of the implementation of the Voters Choice Act in Orange County the last approximately 5 years. They have made it more convenient to vote, which I believe has actually caused more people to vote. Vote Centers are infinitely easier to find and use than the old "figure out where there's a grammar school that's been shut down" game. They're better lit, seem to be better staffed, and never overly full - probably because, in addition, there are other ways to vote - by mail or by ballot box. I have voted at a Vote Center, but I've come to prefer using my local ballot box.</p> <p>I LOVE being able to sit at my dining room table, looking through the information sent by the state and the county, plus my own notes about candidates and issues, and THOUGHTFULLY fill in my own ballot. No rush, no worry about the machine, no pressure. I live a short drive from a ballot box, so that's usually where we take our ballots. However, I live an even shorter walk to a Voting Center, so we've also taken our ballots there, and even used our ballots as cheat sheets and voted on the machines once just to "check it out".</p> <p>The hours are set up for convenience at the Vote Centers - and I know you are looking at possibly changing the hours up a bit to make it more convenient for those who have to drive long distances to/from work. And the others for the Vote Centers and mail in voting - are totally open for our convenience.</p> <p>I was raised to believe that voting is both the greatest right and the greatest duty of American citizens. Thank you for all that you and the workers at the Registrar's Office and Voting Centers do.</p> <p>Please note that I don't know a single person who doesn't prefer that Voters Choice Act way of voting. Convenient. Obvious. Voter-centric. What more could we ask for?</p>	Deborah
30-Sep	<p>I am writing to you in support of the Voters Choice Act in Orange County. The reason for why includes: the convenience, the security, the many provisions that make voting easier and more accessible for all. My family living in Colorado had access to voting by mail years before we finally did in California. I am appalled that the Orange County Board of Supervisors would even consider removing the ability for voters to have this as an option. While I personally loved going to the individual polling locations to vote, I have been an active participant of the mail in voting, and know that it allows more people to vote: those who are working, those who can no longer drive or do not have a car, those who are intimidated. Voting is one of the most important action steps for us as citizens (I also am a vocal proponent of doing jury duty). Personally, I am extremely disappointed that we have members in our community who would even suggest this. Thank you for your consideration.</p>	Mark