



**Observation Report
on
Practices & Integrity
of Election Systems**

Sonoma County, California

**November 2024 Presidential Election
and
November 2025 Special Election**

*Prepared by the Sonoma County Republican Party
Election Integrity Committee*

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CONTENTS

1.0 Forward

2.0 Executive Summary

3.0 Introduction and Purpose

4.0 Approach and Methodology

5.0 Key Findings and Recommendations

6.0 Exogenous Factors Affecting Sonoma County Elections

7.0 Conclusion

Appendix One: 2025 Special Election Observer Report

1.0 FOREWORD

“[a]n election is a process whose fairness is meant to engender confidence in a democratically selected government. When the purity of the process is compromised in part, the corruption affects the integrity of the whole.”

US v Slone, F6th No. 03-6427 (2005)

Beginning in 2013, the California State Legislature passed a series of laws, effectively changing the rules under which elections are administered at the County level. The California state laws of concern, many of which were enacted within the last decade - and in advance of the 2016 Presidential election cycle, include:

- **Assembly Bill 60¹ (2013)** - directed the Department of Motor Vehicles (DMV) to issue a driver’s license to any California resident who is ‘eligible’, regardless of immigration status. This means that an applicant who is an undocumented alien resident can receive a driver’s license under AB60. However, it is not supposed to supersede federal voting regulations; and it is not supposed to authorize illegal aliens to vote in California elections. AB60’s motor vehicle licensing provisions essentially provided an expansion of the **1993 Motor Voter Law**, under which the DMV issues driver’s licenses with only a signature required to attest that these persons are a U.S. citizen; and there is no apparent oversight by either the DMV or California Secretary of State to verify signatures or citizenship status. AB 60 Driver’s Licenses are required to be clearly marked by DMV and bear the phrase "Federal Limits Apply.” The DMV website provides a checklist consisting of forms of documentation needed to qualify for an AB60 Driver’s License.²

It is not clear if the California Secretary of State’s Office distinguishes between AB60 Licenses and the Standard California Citizenship Driver’s Licenses when authorizing additions to voter rolls. Moreover, it is not clear whether or not all

¹ DMV website states: “AB 60 driver’s licenses are for individuals who are unable to provide proof of legal presence in the United States, but who meet California DMV requirements and are able to provide proof of identity and California residency.” <https://www.dmv.ca.gov/portal/driver-licenses-identification-cards/assembly-bill-ab-60-driver-licenses/>

² <https://www.dmv.ca.gov/portal/assembly-bill-ab-60-wizard/>

California counties are actively screening out individuals with AB60 Licenses when maintaining up-to-date voter rolls in advance of each election.³

See the additional revisions to the California Motor-Voter laws as described below under AB1461: “The California New Motor Voter Act.”

- **Assembly Bill 1921: amendment to Election Code §3017 (adopted 2016)** - prevents Registrars from disqualifying (harvested) ballots from being counted solely because it was returned - or mailed - *more than three days* after the designated person received it from the voter, so long as it is returned by the designee before polls close on election day.
- **“Voters Choice Act” - Senate Bill 450- (2016); and Assembly Bill 37 (2021)** which requires:
 - Mailing ballots to all persons on the voter rolls; however, the Act does not include specific requirements for the Registrar of Voters to maintain accurate voter rolls, or to officially verify accuracy on a consistent basis.
 - Extending the in-person voting period to 11 days before ‘Election Day’ and replacing many local precinct voting locations with 31 less accountable ‘Vote Centers’
 - Allowing ballots to be received up to *seven days after* Election Day, thereby delaying an already slow process of counting vote-by-mail ballots and the reporting and certification of election results. This provision also creates a serious vulnerability that fraudulent votes can be counted after the election day outcome is ostensibly known.
- **Assembly Bill 1921 (2016)** - Gov. Jerry Brown signed into law a change to Section 3017 of the Election Code that allows any person to collect a mail-in ballot from voters and turn in the mailed ballot to a polling place or the registrar’s office. Prior law restricted the practice to just relatives of, or those living in the same household as the voter. This is commonly referred to as

³ In a 2025 public meeting, sponsored by the California DMV and Secretary of State officials (“Motor Voter Task Force”), our representatives witnessed testimony by state government officials that the DMV automatically registers all license applicants to vote unless they specifically check a box on the application to “opt-out.” and they do not verify citizenship for anyone. Similarly, the Secretary of State representative announced that they do not question or verify citizenship records as sent to them by the DMV, for the purpose of maintaining the veracity and legality of California Voter rolls.

‘**Ballot Harvesting**,’⁴ enabling political campaigns to collect and return ballots from large numbers of “low propensity voters.”⁵

- **Assembly Bill 1461 - “the California New Motor Voter Act” (2018)** - is a revision to California Election Law providing for **automatic voter registration for U.S. citizens**, while also making voter registration easier for ‘*eligible citizens*’ when they interact with the California Department of Motor Vehicles (DMV). When a person applies for, or renews a driver’s license or state ID at the DMV, their information is automatically transmitted to the California Secretary of State for voter registration unless they check the ‘opt out’ box on the application. The Secretary of State is then supposed to verify eligibility (citizenship, age, residency, etc.) before adding the person to the voter rolls. It is supposed to be an “opt-out” voter registration system for ‘**U.S. citizens**’ who are eligible to vote. In other words, an applicant is automatically registered to vote unless they actively check an ‘opt-out’ box on the application form. However, in practice it is not clear that the Secretary of State staff actively checks for citizenship and eligibility prior to adding applicants to the voter rolls.
- **Assembly Bill 860 (adopted June 2018)** - which required the issuance of ‘*universal vote-by-mail ballots*’ in the 2020 Presidential Election. These pre-planned changes were justified by ‘Pandemic Emergency Powers’ as declared in mid-2020 during the campaign months leading up to the November Presidential election. In the post-pandemic era, the universal mail-in balloting system has been retained by the Legislature and characterized in the media as an improvement that increases the ‘convenience’ of voting, but the potential election security impacts are rarely discussed in a non-partisan fashion.
- **Assembly Bill 37 (2021)** - the practice of **sending vote-by-mail ballots to every registered voter** first began in California in 2020, as a safety measure to counteract pandemic-related disruptions, and was extended through 2021.

⁴ <https://www.egclegal.com/opinion/the-conversation/sd-what-is-ballot-harvesting-in-california-election-code-20181204-htmlstory/>

⁵ The term “low propensity voter” refers to individuals who are legally eligible to vote, but have a history of infrequent participation in elections, often skipping midterms and primaries, or even general elections (political dictionary.com)

AB37 instituted the following policy goals as permanent changes in California elections:

- Require all California voters to receive a mail-in ballot for elections.
- Expand the use of drop boxes for ballot collection across the state.
- Mandate that ballots be sent out at least 29 days before an election.
- Ensure that voters can track their mail-in ballots for transparency.
- Allow voters to request a mail-in ballot online, by phone, or by mail.
- Improve accessibility for voters with disabilities and language barriers

AB37 aimed to enhance voter access and streamline the voting process; but while offering a high degree of convenience to voters, it also created significant election security vulnerabilities which can potentially be exploited in a number of different ways.

Many voters questioned these dramatic changes to our State election system, as well as many other ‘election-related anomalies’ that were taking place in the 2019-2020 Presidential campaign season. These dramatic changes to election laws and standard practices have created justifiable and lingering doubts about election integrity. Moreover, the national dialogue regarding election integrity issues has increased doubts in the minds of a large proportion of U.S. citizens. For example, as the ‘Twitter Files’⁶ reporting uncovered, social media expressions of doubt (or satire) were routinely censored as “election disinformation,” and subsequently reported in mainstream media as “baseless claims.” The Congressional testimony of Meta CEO Mark Zuckerberg and Twitter CEO Jack Dorsey made it clear that certain highly influential elements of the federal government were exerting influence on social media platforms to censor open public criticisms of the election process. And, in an official letter responding to an inquiry of the House Judiciary Committee, Mr. Zuckerberg acknowledged that the White House pressured Facebook to suppress information related to the Hunter Biden laptop revelations that would have had a damaging effect on the Biden campaign in the run-up to the 2020 Presidential election.

⁶ The sixth installment of Twitter Files revealed details about the social media service's integrated relationship with the FBI and affirmed that Twitter was working as an agent of the government to actively censor and repress “election disinformation” <https://www.outkick.com/analysis/twitter-files-6-fbi-biden-administration-strong-armed-social-media-platform> <https://twitterfiles.substack.com/p/twitter-the-fbi-subsiary>

There are many more factual examples like these at the state and federal levels, that have sowed the seeds of doubt in the minds of a majority of the fair-minded, California electorate.⁷ In fact, in response to the widespread perception of the weakened election system that is currently in place, more than 1,300,000 signatures have been gathered to place a “Voter ID” initiative on the ballot in the next California state election cycle. Among other things, the initiative calls for maintaining accurate voter rolls, and verification of individual identification and U.S. citizenship.

Based on numerous surveys, polls, and public commentary conducted in recent election cycles, the California State voting laws and policies are out-of-step with the will of the large majority of the people. These laws and policies purport to make it easier to vote; but as a consequence - they also institutionalize serious vulnerabilities that make it more difficult to verify, observe, and audit elections. In short, *California state election laws make it easier to cheat.*

Our conviction, as the Sonoma County Republican Party Election Integrity Committee, is to encourage the restoration of a California-wide voting system that is beyond reproach. We are strong advocates for a revitalized voting system where it is...*easy to vote, but impossible to cheat.*

“The ultimate test of an election system is its ability to withstand intense public scrutiny during a very close election. Several close elections have taken place in recent years, and our election system has not always passed that test. We need a better election system.”

Carter-Baker Commission on Federal Election Reform, 2005

⁷ In one of the more bizarre, yet factual examples of voter fraud - a woman from Costa Mesa, California illegally registered her dog to vote by submitting a fraudulent voter registration affidavit (including the dog's name, address, birthdate, party preference, and a false U.S. citizenship certification under penalty of perjury). The “dog” voted in two elections in Orange County. https://grok.com/share/c2hhcmQtNA%3D%3D_eede0018-dba1-4f8f-a4c0-259417c8bde0

2.0 EXECUTIVE SUMMARY

‘First Rule of Fair Elections: If there is no transparency, there is no credibility...’

This document represents the fourth consecutive *Election Integrity Observation Report* prepared by the Sonoma County Republican Party Election Integrity Committee (SCGEIC). The SCGEIC is established as a ‘Community Partner’ with the Sonoma County Registrar of Voters (ROV) Office. We undertake county-wide election monitoring as part of our commitment to ensuring “free, fair, and verifiable elections”, and as an on-going, voluntary service to assist the ROV in evaluating the integrity of our election system. In this capacity, the Republican Party of Sonoma County strives to engage in non-partisan partnerships with all those entities who seek a high degree of election integrity in Sonoma County.

Our committee continued to find that the Registrar of Voters administered the 2024 elections according to the general parameters of California’s state-mandated election laws; and the ROV made some efforts to provide increased transparency to voters and election observers. However, the ROV is left to administer an election system that has been consistently weakened by serial acts of the California Legislature. Nevertheless, there are also certain significant areas where Sonoma County’s election procedures and policies can be improved. We offer these suggested improvements in *Section 5: Key Findings and Recommendations*.

One of the most striking “takeaway messages” that emerged from our 2024 Election Observation efforts was that it is not enough to observe the many aspects and activities that actually take place during the ‘*election season*’; but it is also important to identify election security measures and safeguards that are not currently in place - or remain functionally unobservable or, are otherwise insufficient to ensure the overall integrity of the voting process. While we have endeavored to include a description of several of these areas of deficiency, much more work needs to be done in this area.

(A) Key Findings Observed in the 2024 General Election

- **Logic and Accuracy Testing of Voting Machines is Unsatisfactory** (Table 1, Section 1)

Voting Machines (and all related computer-based operating systems) used in elections must be rigorously scrutinized and exhibit a high degree of compliance with certification, accountability, and validation requirements.

Prior to the Fall 2024 General Election, the Sonoma County ROV Office conducted a single, public Logic and Accuracy Test for typical machines used to tabulate the votes, and to ostensibly detect ballot marking errors or other anomalies. The scope of the Sonoma County ROV's Logic and Accuracy certification of voting machines was defined as: validation of the accuracy of the tabulator to count votes reflected on scanned ballots and an ability to detect certain anomalies on tabulated ballots.⁸ The ballots used for testing had been generated from the '**Dominion System**'. It is unclear whether or not all of the election hardware and software systems were certified in advance by the Election Assistance Commission (EAC Certified). All voting system providers (e.g., Dominion) should be ISO 9001 registered and their computer-based election management systems should be transparently accountable to county, state, and federal election monitoring groups, as well as qualified public watchdog groups.

- **Election Observability Does Not Meet Reasonable Expectations** (Table 1, Section 4)

All election facilities, processes, and procedures must include the reasonable integration of citizen-based observing activities, such that qualified, non-partisan observers can effectively assist the ROV in monitoring key aspects of the election process.

Our Observation Team experienced limited observability of vote processing, handling, and tabulating at the ROV office. This was due, in part, to: a) the

⁸ For the Fall 2024 Election, a Logic & Accuracy Test was conducted on October 11, 2024. Three ballot tabulators and a single touch screen voting machine were involved in the test procedure. Election law under the Voter's Choice act mandated that at a minimum of (3) Dominion touch-screen voting machines be deployed at each Vote Center in the County.

lengthy, multi-week voting and counting process, b) the layout of ROV office facilities, c) short advance notice of scheduled activities, and d) restrictions on observability of ballot-handling and machine-counting processes. At some of the observed vote centers, it was unclear whether the procedures for security of cast paper ballots were sufficient, and whether strict and transparent chain-of-custody measures were in place.

- **Timeliness and Availability of Election Data is Unsatisfactory**
(Table 1, Section 12)

A robust election data and public reporting system must offer the reasonable ability of qualified election observer groups (i.e., ‘Community Partners’) to access voter and election data in a timely and systematic fashion, including during the actual ‘voting period,’ as well as the pre-election and post-election time frames.

In the aftermath of the 2024 Election, it has not been easy or straightforward to identify and gather pertinent, useful data regarding *Sonoma County Voter rolls* and *Election Results Supporting Data*. Election data should be readily available to community partners. Sonoma County Republican Party has experienced significant delays in obtaining the “Cast Vote Record” file for the November 2024 election. We appreciate the effort of the ROV to respond to our requests; however, at the time of this report, our verbal and written requests for this data file have not produced the desired results.

- **Design and Operations of New ROV Election Facility Offers Opportunity to Improve Election Observability**
(Table 1, Section 3)

Facilities where ballots are being collected and processed must be designed and organized in a manner that facilitates observation opportunities by qualified community partners and trained, official observers. With the advent of a new Sonoma County ROV Office facility in 2025, opportunities exist to work with ‘Community Partners’ to improve Election Observability.

The existing ROV facility- used in the 2024 Election - was too compartmentalized which interfered with election observation. In 2025, Sonoma County hired a new Registrar of Voters (ROV) and built a new ROV facility. The Sonoma County Republican Party made a formal request to provide input into the design and observability features of the new ROV facility. Our request was ultimately unanswered. It is our expectation that the design of the new ROV facility has been built-out from the perspective of accommodating effective ballot processing, counting, *and observation* by trained, non-partisan community volunteers.

- **Increased Use of ICX Electronic Voting Machines Introduces Potential Election Vulnerabilities** (Table 1, Section 5)

Electronic Voting Machines⁹ must be tested, certified, and impervious to internal and external cyber-security threats or the potential, covert manipulation of the election management software. If these conditions cannot be consistently guaranteed, then Sonoma County should return to a paper ballot, hand-counted election system that is demonstrably more secure.

Election observations at numerous Vote Centers noted the expanded use of ‘**ImageCast X**’ voting machines that either were not put through Logic and Accuracy testing, or did not exhibit any form of visible Logic & Accuracy certification. These machines translate vote counts from the individual voter’s touch-screen choices into a QR code/computer algorithm that is extremely difficult or impossible to audit. Although these machines were originally intended primarily for disabled voters, observers noted several instances where poll workers *actively encouraged* the use of touch screen voting machines.¹⁰

As a general rule - all electronic machines used in the voting, tabulating, and reporting process must be subject to rigorous *Logic and Accuracy* testing protocols prior to being deployed for an election. In addition, records and copies of the election management operating systems and file logs must be secured at the

⁹ Electronic Voting Machines are proprietary products and services supplied by 3rd party vendors. At the County-level, there is no ability to oversee or validate the hardware or software systems employed.

¹⁰ Observations of the Fall 2025 “Special Election” indicated an *even more obvious and increased promotion for the use of ‘touch-screen voting machines’* on the part of poll workers at certain Vote Centers.

ROV level for later inspection and validation. Any electronic interventions to the election management software, machines, or sub-components must trigger a serious oversight inquiry and a formal re-validation process. All personnel involved in original programming or changes to voting system software must be certified, identifiable, and accountable for the accurate operation of electronic voting systems. If this necessary safeguard cannot be accomplished for any reason, the County should pursue a system that does not rely so heavily on “black box” computer voting systems (i.e., watermarked paper ballots, hand-counted).

Election management software constitutes an election record that must be auditable by qualified cyber-security experts at any point: before, during, and after elections. Furthermore, transparent records of the election management system codes must be secured throughout the voting and tabulation period to ensure that no software changes occur after Logic and Accuracy testing is run for each machine.¹¹ Finally, cyber-security measures must be put in place to ensure that voting machines are not connected to the Internet at any point in the voting process; and security procedures must ensure that no physical access or electronic tampering can occur from within the Local Area Network (LAN). A robust electronic monitoring, detection, and cyber-security capability must be demonstrated by the County to ensure no breaches of election data occur.

- **Chain of Custody Records and Batch Control Procedures are Not Evident to Election Observers** (Table 1, Section 6,11)

Secure elections must incorporate rigorous requirements for Chain of Custody procedures and records. The counting system must also include a method for ‘Batch Processing’ so that all ballots are able to be identified and traced in each step of the collection, handling, and counting process - back to the point of origin.

Observations of the 2024 General Election indicated a break in the process of tracking batches through the voting system. Observers also found limited outward

¹¹ A technical term called “Trusted Build” has been identified as those changes to election management software that occur prior to, or during the election sequence. These software interventions are not under the control of county (or state) officials. Rather, they are independently conducted by the contracted, 3rd Party election machine vendors. On a nation-wide basis, great uncertainty exists regarding cyber-security because of the proprietary nature of control over elections on the part of the Election Machine vendors.

evidence of any rigorous chain-of-custody logs or record-keeping. This was particularly noticeable in the way ballots were received from the U.S. Post Offices and in the way ballots were processed at the ROV office as they progressed from the mail sorting room to the Dominion machine counting room, which was inaccessible during the periods when volunteer observers were in the ROV office.

- **Ballot Signature Checking and Manager Review was Questionable**
(Table 1, Section 7)

Ballot Signature Checking is an important quality control measure in every election. Signature checkers must be trained and certified. Rules for standard procedures and best practices must be posted and made available to election observers. The manager review process (for flagged ballots with questionable signatures) must be observable and reviewable.

It is unclear if the County's signature checking process is satisfactory due to: a) the relatively fast-pace of the checking procedure, b) questions about whether any party-affiliation or other personally-identifiable information is displayed on the ballot checking screens, c) the unknown number of ballots flagged for managerial review, and d) the ultimate disposition of manager-reviewed ballots. When observers inquired about the signature review procedures, it was explained that questionable signatures are brought to supervisory personnel for disposition, but no information was offered about how many signatures were flagged for review, and what was the ultimate disposition of the individual reviews. The manager review process takes place in a private setting and is not observable.

- **U.S. Postal Service's Role in Ballot Collection and Handling is not under Sonoma County's Control**
(Table 1, Section 10)

With the advent of the universal mail-in ballot policies by the State of California, the role of the U.S. Post Office in California's elections has been magnified. The working relationship between the Sonoma County Registrar of Voters and the county-wide leadership of USPS can and

should be improved. Qualified Observers should be allowed to inspect and observe Post Office's ballot collection, transportation, and handling activities.

Based on our previous election observation efforts, there appears to be no formal, professional relationship between Sonoma County's Registrar of Voters Office and the various U.S. Postal Service Offices in Sonoma County. Our limited observations of ballot handling at the post office did not reveal any clear evidence of rigorous ballot-handling security measures or chain-of-custody procedures. Our attempts to query some post office officials were largely unsuccessful, and did not produce any insights into how the post office assures election integrity in Sonoma County.

(B) Significant Prior Findings That Remain Unaddressed at the Sonoma County level

Based on election observation reports and analysis, the SCGEIC previously provided specific commentary and recommendations for improvement to the Sonoma County ROV. Some of the recommendations that have yet to be acknowledged and/or incorporated in the County election system are listed below.

- **Need 100% Signature Check of 'in-person voter signatures'** (Table 1, Section 7)

All United States Citizens, who are correctly registered and eligible to vote under existing federal election laws, must be verified by standardized signature-checking procedures at all times during the voting period, and at all voting locations.

In recent elections, it has been repeatedly observed that no signature-checking occurs for the ballots submitted by in-person voters. When voters appear at voting locations to vote in-person, it appears that the county's computerized voting systems are not configured to bring up voter signatures 'on-demand' (and effectively check them for veracity). In addition, it remains unclear regarding the effectiveness of the county's election system to detect whether any given 'in-

person' voter has also submitted a mail-in ballot.

- **Expanded Use of Touch Screen Voting Machines is Evident, a Potential Cyber-Security Vulnerability Exists**
(Table 1, Section 5)

All Election systems and procedures must be under the clear control of the Sonoma County Registrar of Voters. The Sonoma County Board of Supervisors must exert direct oversight and shared accountability for overall election integrity in Sonoma County.

Touch Screen Voting Machines were originally meant to be used in limited situations, e.g., to provide greater ease of voting for people with disabilities. Touch Screen Machines convert voter's selections into a computerized "QR Code" for tabulation by a third-party election management software- a process that Sonoma County neither controls nor fully understands. A serious cyber-security vulnerability exists when these machines are in widespread use.

- **Voting Equipment Certification Procedures are Unsatisfactory** (Table 1, Section 1)

All tabulating equipment must be certified by the EAC (U.S. Election Assistance Commission). Evidence of certification for every voting machine must be readily available to all qualified observers. Election officials must be accountable for certification of all vote counting machines.

In the 2024 General Election, ICX touch-screen voting machines were in widespread use, but numerous machines deployed in the county-wide 'vote centers' were not subject to observed or certified Logic and Accuracy testing. Use of non-EAC certified equipment for tabulating votes in Sonoma County reduces public confidence in elections.

- **Lack of Timeliness of Vote Counting and Official Certification Creates Opportunities for Post-Election Anomalies to Occur**
(Table 1, Section 12)

The Voting Process needs to be accomplished in a much shorter time frame. There is a lack of timeliness or sense of urgency around vote counting and certification in Sonoma County because State Law allows an extended period for certification after the nationally recognized “election day.”

In the 2024 General Election, California state law prohibited county registrars from certifying elections any earlier than 28 days after election day. The extended “voting season,”¹² along with lax counting schedules and certification deadlines, created possible opportunities for introduced human error, external electronic manipulation, or other anomalies.

Other States and Nations have demonstrated that voting and certification can be accomplished in a single day, given the right combination of effective laws, policies, and resources.

Subsequent changes to California state election law under Assembly Bill 5 (2025) requires county election offices to count ballots no later than 13 days after election day, but does not change the 30-day deadline for local officials to certify results.¹³

- **Birthdate Validation Policy for In-Person Voters Is Not Strictly Implemented at Vote Centers**
(Table 1, Section 9)

Procedures for Validation of In-Person Voters at Vote Centers must be strong enough to prevent fraudulent voting or double-voting via mail-in ballots. A system of checking voter identification and matching it with recently updated voter rolls is required to successfully validate the in-person votes.

A procedure that includes a request for a voter’s birthdate at vote center registration was ostensibly in place for the 2024 election, but our Observers noted instances where the procedure was not consistently followed by election workers in all vote centers; nor is it clear that such existing procedures are robust enough

¹² In California, due to the provisions of the 2016 ‘Voter’s Choice Act,’ the in-person voting period was extended to 11 days before election day, and mail-in ballots are accepted for several days after the nationally-recognized ‘Voting Day’.

¹³ <https://calvoter.org/content/california-voters-could-see-faster-election-results-under-new-state-law>

to accurately identify fraudulent vote attempts on the spot. Voter Identification is required to ensure only eligible citizens can cast a vote in Sonoma County elections.

- **Complexities of the California Election System Foster Lack of Confidence in the Outcome of Elections**

(Table 1, Sections 1-12)

California's Election System is overly complex and governed by a web of laws and policies that make voting, counting, and certification exceedingly difficult to understand and trust. A series of new laws and policies have been put in place over the past decade - raising an important question: why were so many fundamental changes deemed necessary and prudent by legislators and state election officials?

While Sonoma County cannot unilaterally change state election laws, it does have the ability to withdraw its support for the **Voter's Choice Act Election Model**.¹⁴ This Voter's Choice Act system has been employed in Sonoma County since 2021. It was originally designed to increase the convenience of voting, and thus increase voter participation, but our election observation experiences in five subsequent elections only confirm our judgment that -

...the value gained via the Voter's Choice Act - in terms of increasing the convenience of voting - does not justify the obvious election insecurity issues and election certification delays that it creates.

In light of our considered conclusion,

The Sonoma County Republican Party is in favor of a motion to remove our county from the Voter's Choice Act by an official action of the Sonoma County Board of Supervisors at the earliest possible opportunity.

¹⁴ The Voter's Choice Act Election Model was signed into law in 2016 by then Governor Jerry Brown on the condition that individual counties could decide whether or not to participate. See: <https://sonomacounty.gov/administrative-support-and-fiscal-services/registrar-of-voters/voters-choice-act>

3.0 INTRODUCTION AND PURPOSE

This Report is a product of the Election Integrity Committee (EIC) of the Sonoma County, California Republican Party. It is our fourth consecutive election monitoring report. This edition focuses on the *November 2024 General Election*, including the presidential race and all of the associated down-ballot races, plus ballot initiatives and measures.¹⁵

We provide herein a detailed summary of our observation efforts, along with our recommendations for election integrity improvements in future Sonoma County elections. We respectfully request that the ROV carefully review the contents of this Report; and, at some point in the near future, engage with us in a planned forum where an open dialogue can occur.

The objectives of our Election Observation Effort and this Report are to:

- (1) OBSERVE all critical phases of Sonoma County elections in a non-partisan, public-service fashion;
- (2) DETERMINE whether or not the County-run election system has vulnerabilities or inefficiencies;
- (3) IDENTIFY for the benefit of the Registrar of Voters, Sonoma County Board of Supervisors, and Sonoma County's informed citizen-voters - ways to improve the voting process, while reducing or eliminating election vulnerabilities;
- (4) PROVIDE commentary and context regarding the state-controlled election landscape by offering a limited critique of state election laws that impact the County's ability to guarantee, free, fair and verifiable elections.

4.0 APPROACH AND METHODOLOGY

This report includes observations by election observers during the November 2024 election at a variety of key locations, including the ROV office, selected voting centers, and certain ballot drop boxes and receiving centers where ballots

¹⁵ A supplemental section on the 2025 "Special Election" is included in Appendix One

and election materials from voting centers were consolidated regionally before being returned to the Sonoma ROV.

The Sonoma County Republican Party had in place a team of 32 observers over the course of the November 2024 ‘Election Season.’ Observers completed 67 discrete observation sessions at voting centers and the ROV central office. Observations were also made remotely via an online video observation broadcast at the ROV office. In addition, three of Sonoma County Republican Party’s representatives were present for a ‘Logic and Accuracy’ test of automatic vote tabulators, as well as a single touch screen machine, approximately one month prior to the nationally recognized ‘Election Day’.

The SCGEIC recruited volunteer observers and conducted formal training sessions for them, consistent with Observer Guidelines provided by the ROV office. A standard election observation ‘checklist’ was created by the EIC and provided to each volunteer observer to help guide them in their observation efforts. Observers were instructed to wear identifiable “Election Observer” badges and allowed to choose where and when to apply their efforts, according to their individual availability. Following the election, all checklists and election monitoring reports were turned into the EIC for compilation and preparation of the following “Key Findings and Recommendations.”

During preparation of this report, we worked cooperatively with the ROV management and staff to gather information about election system processes and election data. However, due to the 2025 “Special Election”, the ROV office became fully occupied with preparations for a previously unanticipated election. Therefore, our opportunities for interaction with the ROV staff were significantly curtailed.

In addition, questions posed directly to the ROV officials and staff over time, and their resulting responses, helped to inform the documentation and conclusions in this report. In retrospect, the observation team had limited opportunities or abilities to conduct any sort of in-depth probes; and it was apparent that there were many additional “takeaway questions” about the complex and convoluted Sonoma County election process. Nevertheless, our report does provide Sonoma County voters with some additional understanding of how local elections are

conducted as well as an assessment of the transparency of local election processes.

5.0 KEY FINDINGS AND RECOMMENDATIONS

This 2024 Election Observation Report is the culmination of a substantial, non-partisan, and voluntary effort organized by the Sonoma County Republican Party. The most prominent concerns regarding the 2024 General Election, as administered under authority of Sonoma County, are summarized below and detailed in Table 1.

- Insufficient Verification of **In-Person Voter Signatures** (Table 1, 7b)
- Increased use of uncertified (and potentially vulnerable) **ICX Digital Voting Machines**. (Table 1, 4a,b)
- No observable means to detect possible **Cyber-Security** breaches by internet-based hackers or the third-party vendor who controls the election management software, after voted paper-ballots are converted into electronic computer codes (Table 1, Section 1h)
- Sample design and statistical significance of the **1% post-election audit of ballots is unknown**, and no report was provided to our group by the ROV to document the result. (Table 1, Section 11a)
- **Mail-In Ballot Signature-Checking** is performed manually, using screens that appear to contain extraneous information.¹⁶ The prescribed distance between the observers and the signature checking screens was too far to facilitate effective observation of the process.¹⁷ Manager review of signature verification takes place in a private office and is not observable. Reports on the outcome of signature review have not been provided to the public.
- A clear **Chain-of-Custody** trail does not appear to follow the voted mail-in ballots as they travel from their origin to the ROV. If such chain-of-custody records exist, they were not readily noticeable by any observers, and were reflected in observer notes or commentaries only one time.

¹⁶ It was not clear if the ballot checking screens included any personally-identifiable information, such as political party affiliation. Also, a concern exists about the relatively rapid nature of the signature-checking process. A set of 4 signatures was displayed on each computerized checking screen. One observer noted that it typically took only 5-10 seconds for the signature checker to approve most sets of displayed signatures. Furthermore, it was not clear whether or not the signature checkers were professionals in this area, or if they were simply random volunteers who had undergone some form of training.

¹⁷ California Code of Regulations Title 2. Administration Division 7. Secretary of State. Chapter 8.2. Election Observation: Rights and Responsibilities. 20873 (a-n). Rights of Election Observers

- A robust relationship between **Sonoma County Postal Offices** and the ROV, that would provide citizens with confidence in the security of ballots traveling through the postal system, does not appear to exist, (Table 1, Section 9a)
- **Ballot Batch Control** procedures do not follow ballots through the entirety of the vote counting system. Batches of ballots are co-mingled upon exiting the mail sorting process, then re-batched for processing in the Dominion tabulation area. (Table 1, Section 5)

The election integrity observations and remedies highlighted in this Report are necessary to restore the voters' confidence that the results of local, state, and federal election races are accurate, fair, and verifiable. Voters must be confident that election fraud is not occurring due to any practices administered under the electoral authorities granted at the county level. Because some local elections are decided by very small margins, a minimal amount of fraud could alter the outcome of these races. Therefore, we request that the ROV seriously consider implementing the recommendations in **Table 1** below.

TABLE 1: Detailed Findings and Recommendations

	Observation Findings	Recommendations
1	Logic and Accuracy Certification	
a	The State of California used Dominion Democracy Suite 5.10 to drive the election from definition to results reporting. Dominion claims that the Democracy Suite products have been tested and certified by the US Election Assistance Commission (EAC) in accordance with federal Voluntary Voting Systems Guidelines (VVSG), however, version 5.10 is not listed on the EAC website as certified. According to a map listed on the EAC website there are no counties in the state of California utilizing a certified system.	Suggest Sonoma County ROV advocate for the use of a certified version of Dominion Democracy Suite in future elections
b	During verification, the tabulated vote count is reconciled against the control sheet to ensure accuracy. This verification failed during testing due to an operator accidentally introducing previously scanned ballots into the system a second time. As a result of the failed test, the procedure was repeated. While the verification passed on the second time around, the first test begs the question of how anyone would know if ballots were scanned into the system more than one time during live tabulation of an election?	<p>Provide written procedures for scanning ballots, including procedures to ensure each ballot is introduced into the system only one time.</p> <p>Reconcile the total number of votes tabulated to the number of votes received by the ROV.</p> <p>Suggest ROV inquiry with vendor to determine if machines are capable of determining if ballots are submitted more than once. Perform actual testing of machines, in presence of observers, to determine if ballots can be submitted more than once</p>
c	Dominion provides a logic and accuracy procedure for the State of California. It was observed that certain steps in this procedure were	Suggest creating a procedure checklist with official accountability signatures, including identifiable ROV staff signatures or initials and date column to

	skipped. While it is possible that certain steps were not applicable, it was not clear to observers which, if any, steps might not be necessary, or why.	provide objective evidence that the step was completed. If a step is not applicable to the testing, the reason should be indicated.
d	<p>Exception testing was performed on a very small sampling of ballots. The small sample size was insufficient to test the system and not all scanners/tabulators were tested.</p> <p>The vote counts from these ballots were not compared to the expected vote counts.</p>	<p>Add a step whereby Logic & Accuracy test results are compared to expected vote counts.</p> <p>Suggest expanding the sample size for exception testing and ensuring that all scanners/tabulators are tested.</p> <p>Suggest working with Community Partners to include them in the preparation of “test ballots” and the execution of the test procedures</p>
e	Certain steps in preparation for logic and accuracy testing, are completed prior to the testing itself. These steps could be of interest to the public review board.	Provide printed documentation of steps performed prior to logic and accuracy testing for review by the board.
f	Scanner/tabulator system settings were not viewable by the public review board.	Have a printout of scanner settings on hand for each scanner to assist the review board in ensuring that the settings are consistent across scanners.
g	After completion of testing, there was no indication of the testing status of the machine placed on the machine in a visible location.	<p>For machines passing the logic and accuracy certification process, labels indicating that certification is complete and no further modifications are allowed, should be placed in an obvious and viewable location.</p> <p>If a scanner fails certification a label indicating “Not Certified - Do Not Use” should be placed prominently.</p>
h	There was no observation of ballots generated by ImageCast X machines. More than sixty of these machines are deployed throughout	Perform logic and accuracy testing on each machine that is deployed for public use.

	Sonoma County. In-person voters are increasingly being offered or even encouraged to use this voting method as a way to cast their votes at Vote Centers.	Label ICX machines as “Certified” or “Not Certified” in a way that the public can see, allowing voters to make an informed decision as to which voting method is best for them.
i	The test deck of sample ballots used in logic and accuracy testing is generated from the Dominion system. It is inconsistent with the standards of testing that the same system being tested produces the test data to be validated.	Add a sufficient sized sample of manually generated test ballots.
j	An observer noted that an unmarked thumb drive was available for use to transfer data from a workstation to a laptop for printing purposes when the primary printer failed.	Ensure that all thumb drives entering the Dominion Room are labeled and logged as to use. If thumb drives are used for any purpose, they should be examined for potential malicious software contents or data transfer capabilities by an impartial election auditor. Data transfer vehicles should be strictly controlled within the Dominion room, and all electronic files and equipment should be subject to rigorous controls and post-election inspections.
k	Observers were not able to verify that all components of the system reflected the accurate date and time.	Add steps to the logic and accuracy procedure that would allow the board to verify that system time clocks are accurate and operational. Audit trails from the system should exist and reflect an accurate date and time stamp.
l	An observer found that the server used to house the folders for the election resided on a system that still obtained pre-existing folders for other either current or historic elections.	Ensure that, prior to each election, the servers housing the folders specific to that election are cleared of any and all prior historical or testing data. Document the server cleaning process with sign off procedures that include names, dates and signatures.

2	Machine Voting and Cybersecurity	
a	<p>One observer monitored existing WiFi signals that were detectable (via a personal cell phone) on two separate occasions during the election period. Two distinct Wifi signals were identified. No explanation for the origin or function of these two distinct signals was ascertained; nor was it clear whether or not the election management system was connected to the Internet at any point during the extended ‘election season.’</p>	<p>Recommend Sonoma County take proactive steps to ensure no external connections to the Internet (wireless or otherwise) are active at any point in the election process.</p> <p>Recommend Sonoma County evaluate the potential risks and vulnerabilities of entrusting elections to third-party election management vendors whose proprietary “black box” products are not transparent, and are impossible to audit under current policies and procedures.</p>
3	Lack of Privacy for Voters at Vote Centers	
a	<p>The Sonoma County Republican Party observed voters marking their ballots at open tables, with no privacy screens, in vote centers. In one instance, at the Finley Community Center, voters spilled out of the vote center into the atrium area to mark ballots. Our overall observation is that the privacy profile at the vote centers has changed as a result of the move away from precinct voting. A voter can seek out privacy if they wish, but the overall tone at the centers seems to embrace a new “open concept” with respect to ballot marking stations. In this area we observed the following:</p> <ul style="list-style-type: none"> 17 instances of open tables that were lacking privacy screens 6 instances of ICX machines facing outward, toward the public 2 instances of voters discussing ballots at tables 	<p>Provide privacy screens at all vote centers.</p> <p>Prior to election day, when traffic is slow, provide only voting booths for use by voters, with perhaps one small table with a privacy screen, in the event a voter needs to sit.</p> <p>If privacy cannot be assured, the county should consider exiting the Voters’ Choice Act in order to provide voters with the private, precinct level voting experience they want and deserve.</p>

	<p>With mass mail in balloting, it is expected that, if voters choose to do so, they can discuss their ballots as they are marking them. However, discussion of ballots should not take place in a vote center. A private voting experience should be the norm throughout the county.</p>	
4	Observability at ROV	
a	<p>Generally speaking, the Sonoma County ROV has not been set up for observers to observe for extended periods of time. The adjudication room accommodated observers well. Cameras were placed in key locations throughout the facility. And the ROV is very accommodating about providing tours. All of this is helpful. However, the work room offered no designated places for an observer to sit for an extended period of time. A single ROV employee has been required to be present in order for tabulation to be observed in person. And an observer was encouraged to move along after observing for 1-2 minutes in the mail sorting room. Given the lengthy ballot processing timeframe of roughly a month, it should be expected that observers would be present at the ROV for extended periods of time. Policies, procedures and facility requirements should be put in place to accommodate this.</p>	<p>At the new ROV location, ensure that space for observers is incorporated into every stage of ballot processing. The observation space should be situated in close proximity to the work being performed in order to allow the observer to view and hear the activity while not interfering with the work being performed.</p> <p>Train ROV employees to direct observers to a spot where they can situate themselves to observe activity taking place.</p>
b	<p>On the Sonoma County ROV web site, under the heading of Public Services on the About Us page, one of the services provided by the ROV reads as follows: “Conduct office tours upon request by schools, civic</p>	<p>Articulate on the web site, the Sonoma County ROV’s commitment to support of election observation throughout the election process from vote centers through ballot processing.</p>

	groups and clubs interested in a 'behind the scenes' view of elections. The web site does not make mention of accommodating observers throughout ballot processing during an election.	Accommodate both tours and observation sessions at the ROV office, while acknowledging the distinction between the two. Set correct expectations for both ROV personnel and citizen observers.
c	At times, during signature verification, observers are required to be too far away from a worker's screen to be able to see what is happening. If a worker happens to be sitting close to their screen nothing can be seen, making the process often difficult to observe.	Remove extraneous information from signature verification screens and provide observer screens in a fashion similar to the screens used in adjudication.
d	To date, the Sonoma County Republican Party has not observed manager review of adjudication or signature verification. The observation team has not seen this work taking place in the workroom during any time that observers were present.	Provide reporting on rejection rate for both signature verification and adjudication. Provide a response to indicate the number of ballots that required manager review; what was the nature of the review, and what was the outcome? Perform manager review in a public setting, such as the workroom, in order to make the process observable.
e	Currently, the work plan for the day is posted on paper on the door to the ROV building. It is time consuming for community members to have to physically drive to the ROV just to find out what the work plan is for the day. If observers are trying to be present for specific activities it requires someone driving to the ROV taking a photo of the paper containing the work plan and then communicating the plan out to the observation team. This paper driven process makes it difficult for observers to be intentional about what	Request an electronic form of communicating the daily work plan, posted or messaged the evening before. A daily or nightly email going out to community partners would suffice.

	they are observing and causes observers to use their time inefficiently.	
f.	Internet-based video observation of the ROV collection and counting facility does not provide the ability to preserve video sequences, or to identify time-stamped sequences for purposes of forensic auditing. The internet observation capability is not widely publicized to the general public	<p>Establish a more comprehensive system for video monitoring which includes video storage, time-stamping, and ability to scroll to particular segments with ease.</p> <p>Provide prominent notices and instructions to the public, on the ROV website and in other media communications, about the existence of video monitoring feeds, and disseminate user-information.</p>
5	Expansion of Image Cast X Voting Machine Use	
a	On the voting system page of the Sonoma County ROV web site the ImageCast X voting system was listed under the heading of “Accessibility”. The site referred to the system as “designed to provide privacy and accessibility to voters who are blind, vision-impaired, or have a disability condition that would make it difficult or impossible to mark a ballot in the usual way.” Although these systems are intended for disabled voters, Sonoma County Republican Party voters observed 32 instances of poll workers offering or even encouraging these machines to voters who did not express a need for accessibility.	<p>Incorporate Vote Center signage, clarifying to voters that the ImageCast X machines are intended for disabled voters.</p> <p>Train poll workers on the intended use of these machines and refer them to the web site language.</p>

b	<p>ICX machines were observed in the hallways of the ROV post-election. If these voting machines are intended for disabled voters, then they should be secured and locked away immediately after the election.</p>	<p>Return all ICX machines to a secure location immediately after election day.</p>
c	<p>At times the Sonoma County Republican Party observed lines at ICX machines while there were no lines at printers. Observers overheard poll workers making the following comments about the ImageCast X voting machines: “They are slick” “They are easier than paper” “Maybe one of these years it will all be electronic”</p> <p>If a voter requests this method of voting it seems reasonable to accommodate the request. However, given the lack of logic and accuracy testing on these machines, as discussed in the Logic and Accuracy section above, it is not appropriate for poll workers to guide voters to these machines or encourage their use.</p>	<p>We request a written statement of the ROV policy regarding the intended use of ICX machines</p> <p>Perform a thorough review of the use and potential vulnerabilities of electronic voting systems. Make an official report available for public review and comment.</p> <p>Include all ICX machines deployed in an election in logic and accuracy testing.</p>

6	Batch Control of Ballots Being Processed	
	<p>It was observed that once ballots pass through the mail sorting process and are sent to prepping for tabulation, the batch identification and control procedure that is in place during mail sorting is discontinued. Ballots come through mail sorting in bins that are numbered and identifiable. After mail sorting, all ballots are co-mingled upon entering the work room, eliminating the possibility of tracking batches of ballots through the entirety of the vote counting system. New batches are created for ballots as they are sent into the Dominion processing area. This creates a break in the audit trail and would make it difficult to know if ballots were inserted into the process between mail sorting and tabulation.</p>	<p>Maintain the integrity of batches throughout the receiving, mail sorting and tabulating processes, allowing for an audit trail that would capture the numbers of received, sorted, rejected and tabulated ballots, by batch.</p> <p>Provide written step by step procedures for ballot counting, including procedures to ensure ballots are not counted more than once.</p>
7	Signature Verification	
a	<p>Signature verification screens contain voter identifying information. For verification of signatures, it is not necessary to provide extraneous information on the worker’s screen. In order to determine whether or not the signature matches, the only things needed are the signatures from which comparisons are to be made. Extraneous information on the screen inserts the potential for a</p>	<p>Allow election observers to stand <i>sufficiently close</i> to the signature checking operations.¹⁸</p> <p>Remove extraneous information from the signature verification screen. Provide observers with screens from which they can observe, similar to the adjudication screens.</p>

¹⁸ “Sufficiently close” shall mean the distance determined by the elections official that enables an observer to observe and see the vote-by-mail identification envelopes and the signatures and dates, date stamps, or postmarks thereon and challenge whether those individuals handling vote by mail ballots are following established procedures, which includes all of the following: 1) Verifying signatures on the vote by mail ballot return envelopes by comparing them to voter registration information. 2) Duplicating accurately damaged or defective ballots. 3) Securing vote by mail ballots to prevent tampering with them before they are counted on election day. See: California Code of Regulations Title 2. Administration Division 7. Secretary of State. Chapter 8.2. Election Observation: Rights and Responsibilities. 20872. Definitions. Part (L)

	<p>worker or manager to make a determination on information other than the signatures themselves. The extraneous information also impacts the observability of this process because observers are required to stand several feet back from the screens, resulting in difficulty seeing the activity or, if the worker is sitting close to the screen, inability to see the screen at all. Every mail-in ballot goes through this manual process. There is no reliance on machine signature verification in Sonoma County. This large-scale use of human judgment increases the need for enhanced internal controls in this area.</p>	<p>If a signature is flagged for manager review, it is imperative that no personally identifiable information - <i>or information about how the ballot was voted</i> - is presented to the person reviewing the signature. Only signatures should be evaluated, not how a ballot was voted, or who voted.</p> <p>We request a screen shot of an unpopulated signature verification screen from the ROV for our review and evaluation.</p>
b	<p>In-person voting does not incorporate signature verification. Voters sign a sticker that is placed in a book, but nothing is done with the signature. This leads voters to believe that there is a procedure to verify in-person voting signatures, when, in fact, no such procedure exists.</p>	<p>Audit a sample of in-person voting signatures, ensuring that the signatures match with records on file.</p> <p>Upgrade the county voting system to provide a means by which signatures of in-person voters can be reasonably checked - either at the point-of-voting, or by sending all in-person ballots through a mandatory follow-up signature checking procedure.</p>
7	Voter Rolls and Cast Vote Records data	
a	<p>We observed two instances of voters indicating the address on file in the system at check-in was incorrect. We observed more than one instance of a voter having to vote a provisional ballot, several election cycles in a row.</p>	<p>We request that ROV provide the Sonoma County Republican Party with procedures related to voter roll cleanup and maintenance, including the operational schedule for this work.</p> <p>We request a follow-up report on signature rejection rate; and results of signature verifications.</p>

<p>b</p>	<p>In the aftermath of the 2024 Election, it has not been easy or straightforward to identify and gather pertinent, useful data regarding Sonoma County Voter rolls and Election Results Data. Election data should be readily available to community partners. One barrier has been a lack of familiarity by the Republican Party of what data files and reports are available from ROV. This is still a problem; but we anticipate that the barrier can be alleviated when the ROV further engages and works with our committee. A second barrier is the time that ROV can put into preparing files specifically for Republican Party. Files available to the public are also available to Republican Party, but additional data that the party requests may not get a timely response. The “surprise” 2025 ‘Special Election’ also cut into the time available for the ROV to respond to a community partner inquiry.</p>	<p>To increase the Election Integrity Committee’s knowledge and familiarity with available data and information resources, working meetings between ROV staff and our committee are recommended.</p> <p>Suggest Sonoma County Republican Party and Sonoma County ROV work together to create a “standing order” for this request to be fulfilled on a regular basis.</p> <p>The Election Integrity Committee is preparing a cover letter and a list of files to be submitted to ROV. This file list asks for data files and reports related to the 2024 election, and also serves as a template to be submitted to ROV for each future election.</p>
<p>c</p>	<p>Voter Roll Accuracy and Maintenance procedures were not observable or made available for review</p>	<p>Work with SC Republican Party (and any other interested community partners) to conduct a thorough review of procedures/practices for updating and maintaining accurate Voter rolls</p>
<p>9</p>	<p>Vote Center Registration</p>	
<p>a</p>	<p>Voters are required to provide their address at vote center registration. Seven instances of voters either not being asked this question or being allowed to hand their voter packet to the poll worker to provide this information were observed.</p>	<p>Re-emphasize, in poll worker training, that voters must provide their address verbally, and not by any other means.</p>

<p>b</p>	<p>A procedure has been added to the vote center registration process whereby voters are now asked to provide their birthdate. This procedure provides additional security around ensuring the voter is the person they say they are. While this is an important improvement in the registration process, and the Sonoma County Republican Party greatly appreciates the addition of this step, there were 11 instances of voters not being asked this question observed in the November 2024 election.</p>	<p>During poll worker training, re-emphasize this mandatory step. Work toward a software modification whereby the signature label would not be printed unless the birthdate is typed in by the poll worker.</p>
<p>c</p>	<p>We observed that veteran poll workers are not always re-trained each year. This can create a situation where poll workers are not up to date on the latest changes and current best practices.</p>	<p>Suggest every paid poll worker be required to attend training, prior to an election, in order to ensure that all workers are up to date and apprised of recent changes.</p>
<p>10</p>	<p>Security of Ballots at Post Offices</p>	
<p>a</p>	<p>Observer conversations with both the ROV and the Postal Service revealed a lack of coordination and communication between the ROV and Sonoma County Post Offices around securing ballots that are undeliverable. Ballots that are not secured at county post offices could potentially end up in the wrong hands.</p> <p>The transition to mass mail-in balloting has vastly increased the role of the US Postal Service in facilitating elections. The public is not informed about where accountability lies and who is responsible for ensuring transparency around securing in-transit ballots.</p>	<p>Suggest ROV establish a relationship with the postmaster(s) for the purpose of securing undeliverable ballots and ballots in transit.</p> <p>Suggest the ROV provide post offices with secure containers for the purpose of collecting undeliverable ballots.</p> <p>Inform the public as to where accountability for security of in transit ballots lies.</p>

b	An observer noticed a casual treatment of ballots when being picked up by the ROV at the local post office. Ballots were stored in open areas of the Post Office with no visible security measures.	Request that the ROV and Post Office be in close coordination, and establish a clear chain-of-custody of mail-in ballots. Accountability for all ballots traveling through the postal system and onto the ROV office should be established and documented.
c	An observer from the Sonoma County Republican Party made several attempts to meet with local postmasters. These efforts to meet were met with referrals to web sites which describe excellent rates of Post Office success in all aspects of ballot handling, and to a manager in Post Office Customer Relations who answered some questions over the phone but did not make herself available for an on-site meeting.	Suggest that the Sonoma County ROV, as part of its responsibility over the integrity of the overall voting process, establish a relationship with county postmasters for the purpose of ensuring that all aspects of the voting process are secure, and that there is transparency around procedures to secure all ballots traveling through the postal system.
11	Chain of Custody	
a	An observer witnessed the receipt of several medium-sized boxes of ballots at the ROV center. These boxes had been forwarded from the San Francisco Post Office. There was no chain of custody document attached, and no indication of why ballots were collected and forwarded to Sonoma County from other jurisdictions. The observer asked an ROV employee about this occurrence and was told that it is not unusual for ballots to come in batches from outside the county.	<p>Ensure that Chain of Custody documents are on hand and observable by observers for all ballots that enter the ROV office.</p> <p>Create a Chain of Custody form for postal or delivery workers to sign when delivering batches of ballots from outside the county.</p> <p>Provide further detail on any scenario where batches of mail in ballots enter the ROV through a route outside of the US Postal Service centers of Sonoma County, or any other unusual sources.</p>
b	An observer asked for the chain-of-custody document for ballots in the workroom. The chain-of-custody document was retrieved from another room.	Ensure that chain-of-custody documents are on hand and observable by observers for all ballots in process at the ROV.

		Keep chain of custody documents with ballots until the ballots are introduced into a system with batch controls.
12	Lack of Timeliness in Ballot Counting	
a	<p>California Elections Code § 15307 allows for a lengthy ballot counting period. While the law allows for results to be finalized weeks after the date of the election, it is not necessary, or even in the best interest of the Sonoma County voters, for the Sonoma County Registrar of Voters Office to take the maximum allowed amount of time to publish final results. Several observations by the Sonoma County Republican Party highlighted this <i>lack of a sense of urgency</i>.</p> <p>Sonoma County Republican Party observed workers having an “organizing day” the day after the election.</p> <p>On election night, workers were observed waiting idly for ballots to come in from the vote centers.</p> <p>With election night being an exception, it did not appear that the ROV operated with longer days or weekend hours in the days following the election.</p>	<p>Change Policies, Procedures, and Directives to reduce the amount of time it takes to accurately process and count ballots.</p> <p>Increase staff and/or material resources as necessary to expeditiously process ballots and ballot counting.</p> <p>Do not accept any mail-in ballots officially post-marked after election day.</p> <p>Redeploy resources from slow voting centers to the ROV prior to election day.</p> <p>Design new ROV facility for efficiency and improve ballot counting speed.</p> <p>Adopt an office-wide sense of urgency until all ballots are processed.</p> <p>Establish shift work protocols as necessary to facilitate timely counting of ballots.</p>
13	Post-Election 1% Tally of Votes	
a	A post-election 1% Tally , which is mandated by State election law, conducted at the ROV office, was open to observation as a small sample of ballots were being re-counted; but the procedures for selection of ballots	Engage SCGEIC in a workshop to share information about this aspect of the 2024 election

	<p>(and specific races) were not disclosed, and no final report of results was provided to our group</p> <p>ICX ballots are not included in the audit. How many ballots were counted by ICX machines and what percentage of the whole count did that represent?</p>	<p>Consider whether this measure is a statistically significant check of election accuracy</p> <p>Consider other means of post-election audits of votes that could be employed depending on prevailing circumstances of any given election.</p> <p>Explain any rules, regulations, or procedures that would apply to a full audit (recount) of any particular election.</p> <p>Report back on the numbers of ballots cast by ICX machines as a percent of the total count of ballots cast</p>
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6.0 EXOGENEOUS FACTORS AFFECTING SONOMA COUNTY ELECTIONS

‘Election Integrity’ is a topic of a major debate in California, as well as nationwide. Polls designed to measure voter confidence in elections have produced a variety of results, based on different political orientations and polling methodologies. But the controversy among the voting populace has only increased in recent years.

There can be no doubt that many of the changes to California’s election laws and procedures over the past two decades have contributed to an overly convoluted voting system that the County administers according to existing laws, but cannot completely verify. This situation fosters widespread skepticism in the minds of many voters.

It is beyond the scope of this observation report to fully critique all of the election laws and systems mandated by the State Legislature and related State Administrative Departments. However, it is our observation that these State election laws and policies play a dominant role in establishing conditions that decrease the integrity of elections in all of California’s county-wide elections. Therefore, following is a list of **exogenous factors** that continue to resurface with respect to the election integrity issue in California:

- Ubiquitous *Mail-In Ballots* and widespread *Ballot Harvesting* leads to potential for fraudulent voting outcomes that go completely unrecognized by county (and state) personnel
- *Voter Rolls*: insufficient requirements for assuring accuracy, timely maintenance, and transparency
- *Proof of Citizenship*: insufficient safeguards or assurances at the state and county levels that only U.S. citizens are allowed to vote as mandated in federal election laws and the California State Constitution.
- *Motor-Voter Registration*: insufficient oversight and a lack of accountability that tacitly permits illegal voting by non-citizens or otherwise unqualified voters
- Lack of sufficient Voter Identification Verification
- Increased Use of “*Touch Screen Voting Machines*” that translate votes into electronic “*QR codes*” which are controlled by proprietary software and operating systems from 3rd Party Vendors. Despite abundant evidence of the potential for nefarious and nearly undetectable computer hacking of software systems in today’s high technology environment, Sonoma County accepts as an article of faith that election software and electronic tabulations are accurate and unaltered once a voter has submitted a ballot.
- Extended Voting Season and Post-Election Certification Window
- Extended post-election acceptance and counting of ballots introduces the possibility that fraudulent ballots, or electronic manipulation of vote counts, could be introduced to affect the outcome of certain elections
- *Widely Dispersed Voting Centers* and *24-Hour Drop Boxes* are not observable to any high degree of certainty
- Lack of mandated, secure Chain-of-Custody Procedures
- Lack of demonstrated Logic & Accuracy Testing of all Electronic Voting Systems used in Sonoma County Elections, and no way to detect any software code manipulations over the full course of the ballot-casting, counting, and certification period.
- The U.S. Post Office's role in collecting, transporting, and delivering ballots to the ROV is not easily observable, and our inquiries with local post office managers have been rejected. While it is recognized that Sonoma County officials have no control over Federal Post Office procedures, they also have not demonstrated any desire to assess the U.S. Post Office role in Sonoma County elections, or to engage in a dialogue on the subject. It should be made clear to the public exactly who is accountable for ballots “in-transit” in the mail system.

- Although the state has made mail-in ballot harvesting legal, ballot stuffing (with fraudulent ballots) is not legal; therefore, due vigilance must be used when monitoring ballot ‘Drop Boxes.’ These boxes are scattered throughout the county, and to our knowledge there is no camera monitoring, or other security system that could detect ballot stuffing. Ballot drop boxes are not practically observable.¹⁹ Similar concerns apply to the public mailboxes under the jurisdiction of the Sonoma County postmasters.

All of the vulnerabilities identified herein make Sonoma County’s Election System potentially subject to anomalies, inaccuracies, or possibly even election fraud. These vulnerabilities could be exploited over time (e.g., during the extended ‘voting season’) via multiple different pathways. Any one of the identified modes (or a combination of multiple modes) could theoretically alter the outcome of particular elections, including at the local levels where the voting margins are typically much smaller.

It has been said that California’s attitude toward election integrity is to rely on the “honor system”- meaning that virtually all votes received shall generally be presumed valid according to state election law, and therefore shall be counted without question. There are some procedures in place to facilitate ballot counting and validation, but these measures appear to be inadequate given the nature and scale of the operation. Moreover, California has placed ultimate faith in a 3rd party vendor of *election management software* without any ability to detect or deter electronic vote fraud. Instead of relying on the honor system to secure our elections, Sonoma County officials should join with other Counties in voicing the legitimate concerns of its citizen-constituents by engaging the state in a serious dialogue aimed at *Comprehensive Election Reform*.

Following is a partial list of reforms that have been proposed by numerous election integrity groups in the State and Nationwide:

- National Same-day Voting, Counting, and Reporting
- National/State Holiday to Facilitate Election Day Voting
- Abolish Electronic Voting Machines, except for documented voters with specific disabilities or special needs

¹⁹ Twenty-eight states, including California and the District of Columbia explicitly permit drop boxes in statute. Twelve states explicitly prohibit drop boxes, or list approved methods of ballot return that do not include drop boxes, in statute. Certain other U.S. states have instituted camera surveillance in the past to monitor drop box activity on a 24-7 basis

- Hand-Counted, Paper Ballots with Security Watermarks
- Expanded Ability to Provide Meaningful Election Observations
- Voter ID requirements: Only U.S. Citizens who are eligible and properly registered are allowed to vote
- Restricted Mail-In Balloting Rules; exceptions granted for ‘Just Causes’, not simply convenience or expediency²⁰
- Mandated, Ongoing, and Transparent Maintenance of Voter rolls
- No Consideration for Future Mobile Phone Voting Proposals

While Sonoma County is bound by legal and legislative constructs to administer state election laws, the amount of concern over election integrity compels the County’s elected leaders and public servants to take a hard look at the entire context that leads to distrust among a large percentage of qualified voters. To ‘pass the buck,’ by simply declaring that nothing can be done about changing state election laws, is to abdicate the fiduciary responsibility entrusted to government officials by the citizenry.

7.0 CONCLUSION

What can be done here in Sonoma County? We know that our state election system has serious vulnerabilities that can only be corrected through comprehensive state-wide election reform. We also know that, due to the complexity and scale of voting activities and the length of time required to observe, it is not possible for citizen-observers to effectively observe and endorse the entire election process. Therefore, based on our ‘Findings and Recommendations’ reported herein, we conclude that it could be possible to cheat in Sonoma County elections - and the County may not have the comprehensive oversight capability or quality control systems to prevent it.

Nevertheless, in spite of the many circumstances beyond the control of the Registrar of Voters, there are some tangible steps the County can take to improve election integrity in the short run. (see Section 5.0, Key Findings and Recommendations, above)

With respect to the elements that are currently beyond local control, we encourage County officials to engage with our committee - and other interested community partner groups who are seeking election integrity improvements - at the earliest possible

²⁰ One example of “Just Cause” warranting Mail-In Ballots is the facilitation of secure and timely voting by military personnel stationed overseas

opportunity. The purpose of such a dialogue would be to: 1) share perspectives of the many challenges facing Sonoma County elections, 2) develop plans and protocols to assist non-partisan observer programs to access key information and voting processes, 3) help educate the voting public about the status of our County-wide elections, and opportunities to effect improvements in future elections, and 4) educate community partners about the limits to ROV authority and resource limitations, so that partners can collectively advocate for any necessary human resource and budgetary allocations.

The November 2024 election was run in a professional way in Sonoma County. However, it is our opinion that it would be possible for cheating to occur at a level that could alter a local election, and contribute to a faulty outcome in state and federal elections and ballot initiatives. Indeed, some races have been decided by fewer than 20 votes in recent years.

Over the course of our last four election observation cycles, we have developed the impression that the attitude of the Sonoma County ROV Office seems to be that no cheating occurs as an article of faith. We respectfully question that assumption - and we invite the new Registrar of Voters to engage our committee in discussions about our findings and recommendations; and to sincerely undertake tangible efforts to implement the recommendations found in this Report, which are within the Registrar's jurisdiction.

We also recommend that the Sonoma County Board of Supervisors, and the mayors of our cities, use their considerable influence and lobbying resources to encourage the state legislature to correct the serious material weaknesses in our state election systems. Ultimately, if the weaknesses introduced by recent state legislative action cannot be adequately addressed, this committee will advocate for Sonoma County to withdraw from the easily exploitable and costly "Voters Choice Act" election model at the next opportunity.

Clearly, people are concerned. We have a long way to go before California voters can have confidence again in our elections. It is our hope that all government leaders, and the fair-minded citizen-voters in Sonoma County, will take notice of the obvious systemic flaws in our current state election system, and become active in lobbying for legislative and policy changes that will restore the integrity of our California State voting systems.

Appendix One

Additional Observations from the 2025 Special Election

In surprise fashion, the California state government called for a “Special Election” in November 2025.

Despite the rushed and unanticipated nature of the event, notable discourse about the administration of this special election took place, one item in particular, making the national news. An aspect of the election that received a great deal of scrutiny and criticism was related to the blue envelope used to return the ballot to the Registrar of Voters. The return envelopes contained holes that were described by the California Secretary of State as features that would assist visually impaired voters with providing their signatures. If the ballot was folded a certain way, it was possible for a “NO” vote to become visible to anyone handling the envelope. Massive numbers of mail-in ballots traveling various routes to get to the ROV offices and onto mail sorting are touched by many unknown hands. This unfortunate situation contributed to eroding confidence in the integrity of California’s elections.

Table 2: Detailed Findings and Recommendations - 2025 Special Election

	Observations and Findings	Recommendations
1	Increasing Use of ICX Machines	
a	As described in the 2024 Detailed Findings and Recommendations section of this report, (Table 1, 4a) the ImageCastX machines were initially deployed to facilitate voting for disabled voters. Based on conversations with ROV personnel and observations of poll worker training, the Sonoma County Republican Party assumes that it is the operating policy (either overtly or	<p>Ensure that the public is properly informed, in a transparent way, about the intended use of ImageCastX machines by updating the Sonoma County ROV web site to describe the use of these machines in a manner that reflects actual use.</p> <p>Inform the Sonoma County Republican Party as to where the policy of offering</p>

	<p>tacitly) of the Sonoma County ROV to offer these machines to each voter that enters a Vote Center. The aspect of these machines being placed in service for disabled voters is not highlighted, which is inconsistent with the Sonoma County ROV web site. As of the 2025 Special Election the Sonoma County ROV web site described the ICX machines as being for the purpose of accessibility for disabled persons.</p>	<p>ICX voting machines to all voters is coming from.</p> <p>Consider whether paper ballots, hand-counted is a more secure and verifiable system for Sonoma County in the future.</p>
<p>b</p>	<p>While ICX machines are offered and even sometimes promoted to voters, there is no disclosure to voters about the fact that these machines are not subjected to logic and accuracy testing.</p> <p>The Sonoma County Republican Party observed voting traffic being driven to ICX machines by poll workers who offered this voting option to all voters and in some instances promoted the use of these machines. An increase in promotion and use of ImageCastX machines comes with a responsibility to increase transparency, logic and accuracy testing and reviewing of audit trails for this type of voting.</p>	<p>Either include each machine in logic and accuracy testing or label machines as either “Certified” or “Uncertified” in a visible manner that can be seen by voters. Any “Certification” designation should include sign-off by the person performing certification.</p>
<p>c</p>	<p>As noted in the 2024 General Election, The Sonoma County Republican Party observed several instances of poll workers encouraging the use of ImageCastX machines. This practice only increased in the 2025 Special Election. Following are some of the poll worker statements that were observed:</p>	<p>Ensure that election workers are trained to never influence the manner in which a voter chooses to vote. If a Vote Center worker does not respect this requirement, they should be immediately removed by the Vote Center Inspector.</p>

	<p>“Do you want to try it? It’s easy.” ““The machines give you a paper ballot.” ““We’ll show this printer who’s boss. We won’t use it all day.”</p>	
d	<p>Three ICX machines are placed in each vote center. This means that dozens of these machines are out in the field being used by voters throughout the in-person voting period. However, only a small fraction of these machines, if any, are tested for logic and accuracy. As a result, the observation of the Sonoma County Republican Party is that use of ICX is being offered more directly, and sometimes encouraged, while at the same time there is limited effort to submit these machines to logic and accuracy testing.</p>	<p>Suggest that each and every ICX machine that is placed in service for administration of an election go through logic and accuracy testing.</p> <p>Ensure that time clocks are installed on ICX machines to support an audit trail for machine activity and software changes.</p>
e	<p>QR Codes convert touch screen votes into computer codes for tabulation and reporting of votes. Procedures for reconciling the number of votes brought into the ROV from Vote Centers each day to reports from the ICX machines are not known by the Sonoma County Republican Party. Logic and accuracy testing of ICX machines was limited in scope. The Sonoma County Republican Party did not observe any testing of ICX ballots, to ensure that the QR code would generate a vote that matches what is indicated on the ballot for the voter to read.</p>	<p>Include any and all computer voting systems deployed in an election in logic and accuracy testing, including each ICX (ImageCastX) machine placed in service.</p> <p>Provide the Sonoma County Republican Party with procedures used to reconcile ICX ballots received from each Vote Center with reporting from the machines at those sites.</p>
2	Observability	

a	<p>Required distance observers are asked to abide by is sometimes far away from activity, which can impede observation.</p> <p>Observers are sometimes placed 25 or more feet away from check in, which makes it difficult to hear what questions are being asked.</p>	<p>With the understanding that observers are required to be close enough to be able to see the activity, provide a written policy of minimum distance for observation at Vote Centers.</p>
b	<p>Because of the possibility of viewing personal information of voters, observers are required to stand several feet back from election workers when observing signature verification at the ROV.</p>	<p>Provide a print-out of an unpopulated signature verification screen to facilitate understanding of data fields connected with this issue. Implement software changes to remove these fields from the signature verification screen.</p>
c	<p>Sonoma County Republican Party requested input in design and layout of observer areas at the new ROV facility. The request was denied by the ROV.</p>	<p>Request tour of new facility for all community partners.</p>
d	<p>Inspectors at polling stations are generally helpful, professional, and they appear to have a plan to accommodate observers by providing them with a place to sit.</p>	<p>The Sonoma County Republican Party thanks the ROV for providing a professional and courteous environment for election observers at Vote Centers.</p>
e	<p>While the ballot processing period at the ROV has increased to hundreds of hours for each election, warranting increased observer time at that site, there is no designated place for observers to situate themselves in the workroom. Observers are not often offered a place to sit and observe, but if they know to ask, a spot will be provided. Sometimes an activity is happening and the observer is able to sit and observe for a period of time. In other instances, observers have</p>	<p>Ensure that a designated observer area is created at the new ROV site.</p> <p>Train ROV personnel to assume that observers are there for the purpose of observing for a period of time and establish a routine for accommodating that need.</p>

	commented that their experience observing at the ROV feels more like a tour than an observation session. The expansion of mail-in ballots being processed at the ROV office necessitates establishment of protocols to accommodate robust observation efforts at that site.	
f	At the ROV, manager review and final determination of signatures that are questioned by election workers takes place in the managers’ offices, outside of the workroom. As a result of this work being performed in a private area of the ROV, this important step in ballot processing is not observable by the public.	Perform all manager determinations of signature validity in the workroom or other public space where election observers can be present. Provide statistics on the number and percentage of ballots rejected due to signature not matching. records.
3	Privacy	
a	The system of providing secrecy folders to voters as they cast their ballots at vote centers is effective and provides voters with assurance that Sonoma County respects the importance of a voter’s right to privacy as votes are being cast.	The Sonoma County Republican Party thanks the ROV for efforts to protect the voters’ right to privacy as they cast their votes.
b	The number of vote centers was reduced for the 2025 Special Election, as compared to the 2024 General Election. This contributed to more crowded spaces on Election Day. Many voters cast their ballots at crowded open tables. When compared to the precinct voting days in the past, one can see that the environment in which a voter casts a live vote has shifted from one of	Provide privacy screens for tables. Offer privacy booths to voters, in the same way that voting methods are offered. Place signage indicating “Quiet Area” in the private voting area at Vote Centers.

	<p>expected privacy to one that is noisy and not at all private.</p>	
4	AB 626 Voting	
a	<p>Voters are now able to bring in their mail in ballots and vote them in person by dropping their ballot into the teal-colored canvas ballot box, with no secrecy envelope. In order to do this the voter must check in at the registration table. In this instance the voter can cast a vote by mail ballot without the ballot going through signature verification. At the Petaluma City Hall Vote Center, a poll worker observed that when the vote center became very busy on election day it was not possible for the poll worker manning the teal canvas box to see if the voter checked in. In this case the environment creates a situation where it would be very easy for someone to cast an AB 626 ballot, bypass signature verification, and skip the registration process.</p>	<p>Suggest adding cards that say “Check In Complete” at the registration table. AB 626 voters would then provide the card to the poll worker manning the teal ballot box.</p>
5	Changing Vote Center Locations and Voter Confusion About Where to Vote	
a	<p>It was observed that voters were confused by a shift in the Vote Center locations.</p> <p>Vote Center locations were shifted from large centrally located sites to "satellite locations" sometimes on the outskirts of town. In fact, the City of Sonoma did not have any Vote Centers with city limits. This confused some voters and made voting more difficult</p>	<p>Establish a consistent, centrally located site that voters can rely on as they go to location for in person voting.</p> <p>If this is not possible then re-establishing precinct level polling places by exiting the Voters Choice Act should be considered.</p>

	for many voters within Sonoma County.	
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