

2021-2022

Comprehensive Election Audit Report

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Overview

In 2021, the Texas Legislature enacted <u>Senate Bill 1</u> (87th Leg., 2nd Called Special Session), which included a provision requiring the Office of the Secretary of State to conduct audits in four randomly selected counties. <u>Section 127.351</u> of the Texas Election Code provides that the Secretary of State shall conduct an audit of the elections held in the preceding two years after the most recent November uniform election occurring in an even-numbered year. On July 28, 2022, the Secretary of State conducted a drawing to determine which counties would be audited for the 2021-2022 election period. In this drawing, Cameron County, along with Eastland, Guadalupe and Harris counties, was selected as one of the counties to be audited in the 2021-2022 election cycle.

Comprehensive Findings

The audit of all elections conducted for the 2021-2022 election period revealed, as cited in this report, both election-specific concerns and broader patterns within the administration of elections in Cameron County. These findings identify areas in which the county is consistently meeting legal requirements and areas of needed improvement.

Notable Findings

Training of Election Workers

Cameron County has developed an in-depth election worker training program that provides both legal and procedural training as well as hands-on training with all election equipment. The two-part training begins with the legal requirements for election documentation, legally required signage, and detailed explanations of county election procedures. The training also highlights safety protocols to ensure the safety of election workers and voters within the polling place and guidance on how to most effectively assist voters with disabilities. The final part of the training provides hands-on practice with the election equipment to allow the election judges and clerks the opportunity to familiarize themselves with the operation of the equipment. This portion of the training includes effective strategies to troubleshoot and resolve issues in case of equipment failure.

Additionally, the county training and instructional materials provided to all election judges and clerks include detailed explanations of all polling location forms and specific examples of how to complete the paperwork correctly. As a result of an effective training program, documentation was thorough, complete, and accurate.

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Election Security & Contingency Planning

Cameron County has established written policies and procedures related to the county technology and security services including an Incident Response Plan and an IT Continuity of Operations Plan. The technology team clearly articulated the efforts in place including data security protocols, network monitoring, and threat prevention for all offices in Cameron County. Additionally, the technology staff explained security measures currently in place to ensure a higher level of monitoring and security specifically related to the administration of elections in the county. The county completed an election security assessment and is working with several state and federal agencies to complete additional assessments of the county infrastructure and security posture. Furthermore, Cameron County has instituted numerous measures to ensure the physical security of all election facilities, voting equipment, and voted ballots.

As a result of their geographic location, Cameron County has extensive experience with natural disasters and unexpected events that can impact the election process. The county is in constant communication with other county offices, local law enforcement, as well as state and federal agencies to ensure successful operations of elections in emergency circumstances.

Voter Registration & List Maintenance

Cameron County uses a third-party vendor to operate the county voter registration system. All counties utilizing a third-party vendor are required to submit data to the state system daily and to conduct a system synchronization at least once a month to ensure accuracy between the two systems. Cameron County has consistently complied with these requirements.

As of November 2022, the county reported 227,694 registered voters¹ eligible to vote in the November 8, 2022 General Election resulting in a registration rate of 87.9% of the voting age population. During the audit period, the county saw a 3.4% increase in voter registration.

Both state and federal law require counties to continuously update their voter registration lists to ensure that only eligible voters are registered to vote in the county in which they reside. Cameron County consistently performs list maintenance activities and retains all required voter registration records in accordance with state law. During the audit period, the county cancelled 5,368 voter registrations following a county review of voters who may have been deceased and 197 voter registrations were cancelled due to non-citizenship. There was one cancellation due to felony conviction. A total of 6,816 voter registrations were cancelled for duplicate registration records for voters who may have moved to other Texas counties. The county cancelled 4 voter registrations following an effort to confirm residency in Cameron County.

Cameron County should continue processing voter registration applications and record updates in a timely manner. Likewise, the county should continue to prioritize all list maintenance activities to ensure that only eligible voters are able to cast a vote in Cameron County.

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¹ https://www.sos.state.tx.us/elections/historical/nov2022.shtml.

Areas for Improvement

Ballot by Mail Reporting

Beginning in 2022, Texas counties were required to report application for ballot by mail and subsequent mail ballot activity to the statewide system to allow voters the opportunity to utilize the Ballot by Mail Tracker to track the status of their application or ballot and, in certain circumstances, correct missing or incorrect personal identification numbers. Though Cameron County provided notice to the impacted voters and tracked these rejections and corrective actions at the county level, the county did not report the appropriate information to the statewide system for the rejected applications. Therefore, the rejected applicants were not offered the opportunity to check the status of their applications through the Ballot by Mail Tracker. Likewise, the county did not send the appropriate information to the statewide system that would provide the voters the opportunity to correct their ballots through the Ballot by Mail Tracker. A review of elections conducted since the audit period indicates that Cameron County is now in compliance with this reporting requirement.

Election-Specific Security Planning

Though the county has numerous security measures currently in place as previously referenced, the county does not have a comprehensive Written Information Security Plan (WISP) related specifically to supporting and securing elections in Cameron County. This plan should include incident response planning and continuity of operations considerations. Likewise, a vendor risk management plan should be in place with all vendors providing services for the county election office and accessing sensitive and confidential voter registration and election data.

Conclusion

Cameron County has implemented numerous election security measures and physical security protocols to support and secure the elections in the county. The county voter registration program and the election worker training program have proven effective across the elections in this audit period. Making necessary improvements, in the areas identified above, will not only further safeguard their elections but will demonstrate to the voters of Cameron County that they can have confidence in their election process and outcomes.

COUNTY OVERVIEW

Cameron County

Cameron County, the southernmost county in Texas, has a population of 426,710 residents.² The county encompasses a land area of 1,276 square miles and includes 162,087 households. The voting age population (VAP) of Cameron County, which includes all persons over 18 years of age, is 304,670 (71.4%).³

As of November 2022, the county reported 227,694 registered voters⁴ eligible to vote in the November 8, 2022 General Election, resulting in a registration rate of 74.7% of the voting age population. During the audit period, the county saw a 3.4% increase in voter registration.



Figure 1: Cameron County

Elections and voter registration in Cameron County are conducted by a county election administrator. The election office consists of 13 full time staff members and is located at the Cameron County Department of Elections and Voter Registration Office, 1050 E Madison St, Brownsville, TX 78520.



Figure 2: Department of Elections and Voter Registration

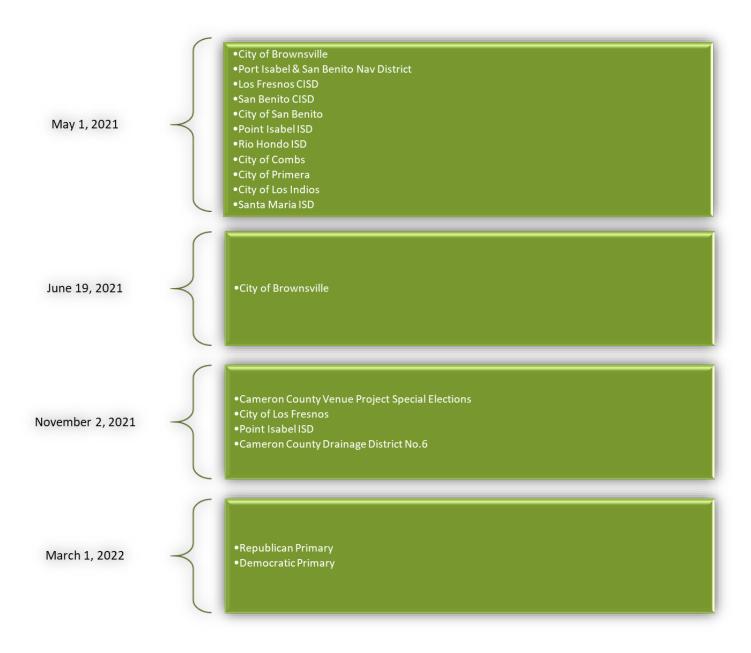
² United States Census Bureau, https://www.census.gov/quickfacts/fact/table/TX,cameroncountytexas/HEA775219.

³ United States Census Bureau, https://www.census.gov/quickfacts/fact/table/TX,cameroncountytexas/HEA775219.

⁴ https://www.sos.state.tx.us/elections/historical/nov2022.shtml.

Cameron County Elections

The Texas Election Code requires the Secretary of State to conduct an audit of the elections held in the preceding two years after the most recent November uniform election occurring in an even-numbered year. The following is a list of all elections conducted in Cameron County during 2021-2022.



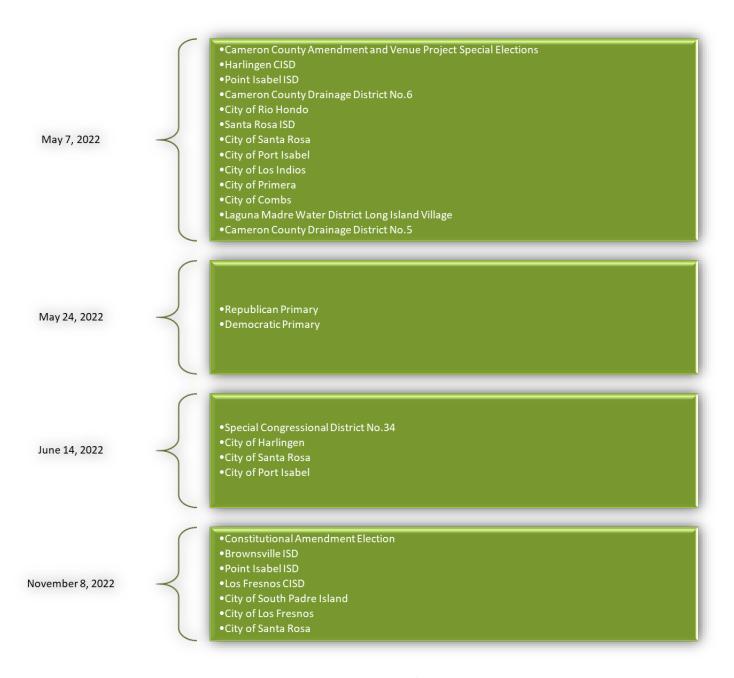


Figure 3: Cameron County Elections

Primary Election Administration

In Cameron County, the March 1, 2022 Primary Election and the May 24, 2022 Primary Runoff Elections for the Republican and Democratic parties were conducted as separate elections. Contractual agreements, dated February 21, 2022, were in place to clearly identify the responsibilities of the county and the party chairs.

Election Systems

In 2019, Cameron County acquired EVS 6000 developed by Election Systems and Software (ES&S). ES&S was certified by the Secretary of State on November 15, 2018. This voting system was in use for the 2021-2022 election cycle. Cameron County uses pre-printed voter marked ballots that are deposited in a precinct scanner. Ballot marking devices are available for accessibility purposes.

Voting Systems

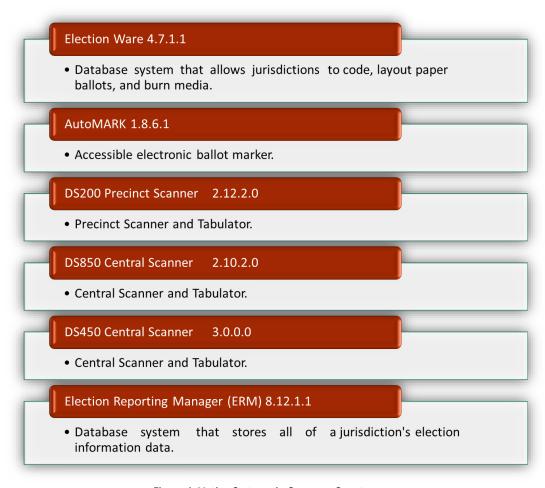


Figure 4: Voting Systems in Cameron County

It is the responsibility of the county election official to ensure that all voting system equipment is certified by the Secretary of State⁵ and being used in a manner consistent with the terms of the certification and in accordance with state and federal law.

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⁵ Tex. Elec. Code § 122.031.

Electronic Pollbook

Cameron County contracts with VOTEC Corporation for use of the VoteSafe Pollbook. The county, initially using Version 1.3.77, updated the pollbooks to Version 1.3.85 on September 1, 2022 for the November 8, 2022 General Election. This system was certified for use in Texas on September 1, 2022.



State Inspector Reports

The Secretary of State is required to appoint one or more inspectors for an election upon a written request from 15 or more registered voters. Additionally, the Secretary of State has the discretion to appoint an election inspector to any election.

State inspectors prepare an inspection report identifying any violation of law observed by the inspector to the Secretary of State following the election. During the audit period, the Secretary of State appointed state inspectors to observe election day polling locations in Cameron County for the following elections:

- March 1, 2022 Primary Election;
- May 7, 2022 Special Election;
- May 24, 2022 Primary Runoff Election; and
- November 8, 2022 General Election.

For the May 7, 2022 Special Election, both the Central Counting Station and the Early Voting Ballot Board were also inspected. In total, 42 polling locations were inspected during the audit period. The Secretary of State provided all of the state inspector reports to the county for review following the election.

⁶ Tex. Elec. Code § 34.001(b).

⁷ Tex. Elec. Code § 34.001(a).

⁸ Tex. Elec. Code § 34.002(c).

The state inspector reports cited the following concerns:

- Sample ballots available only upon request;
- Limited or no accessible parking;
- Inadequate privacy at voting machines;
- Machine troubleshooting issues; and
- Electioneering in restricted areas.

While in Cameron County, the audit team visited four (4) commonly utilized polling locations. From a visual inspection of the exterior of these locations, no immediate accessibility concerns were identified.



Figure 6: Various Polling Locations in Cameron County

Complaints

Any person who believes that a criminal violation of the Texas Election Code has occurred may file a complaint with the Secretary of State's office. In order to initiate the complaint process, a written and signed complaint must be filed with the Secretary of State.

The Secretary of State has no authority to order a new election, change an election result, or conduct a criminal investigation. However, the Secretary of State has the ability to refer election

complaints to the Office of the Attorney General.⁹ If, after receiving a complaint alleging criminal conduct in connection with an election, the Secretary of State determines that there is reasonable cause to suspect that the alleged criminal conduct occurred, the Secretary of State shall promptly refer the complaint to the Attorney General.

During the audit period, the Secretary of State's Elections Division received thirteen (13) formal complaints for Cameron County. Specific concerns cited in the received complaints include:

- Ballot Irregularities;
- Eligibility for Public Office;
- Chain of Custody Documentation;
- Voter Registration Procedures;
- Residency Requirements;
- Polling Place Procedures;
- Candidate Filing Procedures; and
- Early Voting Ballot Board Processes.

Of the thirteen (13) complaints received, only one was referred to the Office of the Attorney General for further investigation. The details of this complaint are not considered public information until an investigation has been completed or the Attorney General has decided that the information referred does not warrant an investigation.¹⁰

⁹ Tex. Elec. Code § 31.006.

¹⁰ Tex. Elec. Code § 31.006.

VOTER REGISTRATION

Findings

- Cameron County maintains a voter registration system that is independent from the official statewide voter registration system. It is the responsibility of the county to ensure consistency and accuracy between the data contained in their county systems and the data reported to the statewide system.
- The Secretary of State has limited insight into the list maintenance process when counties are utilizing a separate county voter registration vendor.
- To ensure that the official list of registered voters includes only those that are eligible by Texas law, Cameron County should continue to addresses all list maintenance activities in a timely manner.

Voter Registration System

The Secretary of State is responsible for the implementation and maintenance of an electronic statewide voter registration system. This system serves as the single system for storing and managing voter registration information from all Texas counties and serves as the official list of registered voters (OLRV) in the state. ¹¹

Counties in Texas may elect to contract with a third-party vendor to operate the county voter registration system upon the approval of the Secretary of State. 12 Cameron County contracts with VOTEC Corporation for use of their VEMACS voter registration platform. VOTEC has successfully completed the state's limited certification process and their VEMACS platform is certified for use by county election officials in Texas.

System Synchronization

Counties using a certified third-party system have been required to complete synchronization at least once annually to ensure consistency of all voter registration records. However, in June 2022, the Secretary of State began requiring that the system synchronizations be conducted at least one time each month.

¹¹ Tex. Elec. Code § 18.061(a).

¹² Tex. Elec. Code § 18.012.

Cameron County has consistently conducted monthly syncs since June 2022. A review of the initial file submitted in early July 2022 reflected an initial inconsistency between the two systems of 223 voter records. A discrepancy identified during the sync process may be related to such activities as new voter registrations that are still pending, voters who have recently moved and the transfer of those records to a new county is still in process, and redistricting activities within the state and county voting precincts. It is important to note that such discrepancies do not indicate ineligible voters but indicate conflicting or missing information in the voter records between the two systems.

A final sync, conducted prior to the voter registration deadline for the November 8, 2022 General Election, reduced the number of discrepancies to approximately 80 voter records leading to a more consistent alignment of the data shared between the two systems.

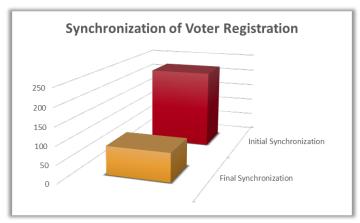


Figure 7: Number of Discrepancies Identified Prior to November 8, 2022 General Election

Voter Registration

A review of voter registration statistical information related to the elections included in this audit is reflected below.

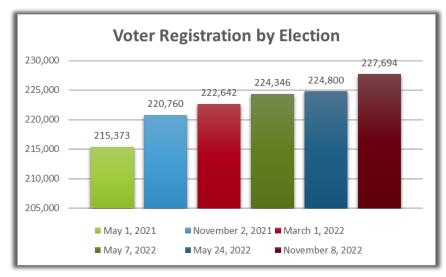


Figure 8: Cameron County Voter Registration by Election

Minor discrepancies between the Cameron County official reports and the number of registered voters reported to the statewide voter registration system were identified. As indicated above, the number of registered voters for the November 8, 2022 General Election as reflected in the statewide voter registration system was 227,694. However, the Official Reconciliation Report produced by Cameron County reflected a total of 227,750. The complexity of exact matching due to the timing and coordination of snapshots between the county vendor system and the statewide voter registration system, especially while voter registration is still occurring, leads to a disparity of the numbers between state and county voter turnout and statistical reporting. The responsibility to provide accurate and timely voter registration numbers and coordination of these data points rests on the county election official to ensure consistent reporting.

The county election staff thoroughly explained their daily procedures with regard to the processing of incoming voter registration applications and list maintenance notifications. The audit team reviewed the training resources available to all county staff working with the county vendor system and the state system. These procedures and the thorough training resources ensure that all policies and procedures are followed consistently and that voter registration applications are reviewed in a timely manner. Voter registration records are retained in accordance with state law.

Accuracy of Voter Registration List

The Texas Election Code enumerates the importance of maintaining accurate voter registration lists through defining the acquisition of data from other specified agencies, outlining the procedures and processes required of the Secretary of State and county voter registrars, and identifying the criteria used to match this information with the statewide voter registration list. ¹³ The Secretary of State is required to send this information to county voter registrars for further review. It is the responsibility of the county voter registrar to review these records on the grounds of eligibility and/or to eliminate duplicative records to ensure the accuracy and integrity of the county voter registration list. Additionally, if the county voter registrar has reason to believe that a voter is no longer eligible for registration, the registrar may use any lawful means to investigate a voter's continued eligibility to ensure an accurate list of registered voters. ¹⁴

The state has limited insight into county list maintenance activities for counties using a third-party system. Voter registration information is submitted to the state on a daily basis. However, the tracking of all correspondence, including list maintenance activities, is not available to the state. In most cases, only the final outcomes of county investigations related to voter eligibility and residency are reported to the state system.

¹³ Tex. Elec. Code §§ 18.068, 18.0681.

¹⁴ Tex. Elec. Code § 16.033.

Ineligibility Due to Death

In 2021, 2,117 strong matched records¹⁵ were cancelled by the state in Cameron County and 2,067 strong matched records were cancelled by the state in 2022. An additional 1,238 weak matched records were provided to the county for further review in 2021 and 2,195 weak matched records were provided to the county for further review in 2022. Of the records provided to the county for further review, 538 records were cancelled either on confirmation of a deceased status or for a failure to respond to an examination letter in 2021 and 111 records were cancelled in 2022. All notifications related to a possible death were reviewed by Cameron County based on the information provided to the state system.

Overall, a total of 2,655 voter registrations were cancelled by Cameron County in 2021 and 2,713 were cancelled in 2022 due to the notification of potential deceased voters from the state and subsequent investigations by the county. In 2021, 239 records were marked as resolved by the county. In 2022, that number was 1,438. The actions attributing to the resolution of these records are not available due to the limited information provided by the county vendor system.

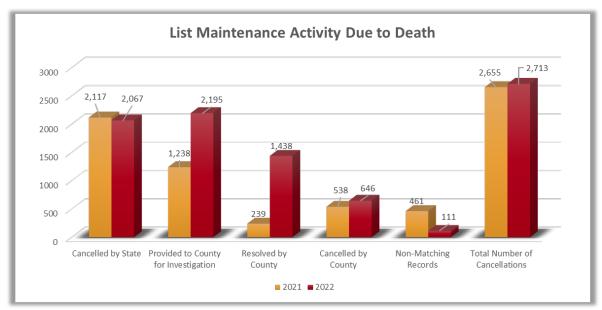


Figure 9: Cancellation of Voter Registration Due to Death

Ineligibility due to Felony Conviction

A review of cancellation reports indicated that Cameron County had no cancellations based on felony conviction notifications in 2021. In 2022, one (1) voter registration record was cancelled due to a felony conviction. ¹⁶

¹⁵ 1 Tex. Admin. Code § 81.6(a).

¹⁶ Tex. Elec. Code § 16.003.

Ineligibility due to Non-U.S. Citizenship

A review of county data indicated that 195 potential non-U.S. citizen voters were identified and provided to the county for further review in 2021.¹⁷ Notices were sent to all voters requesting proof of U.S. citizenship. Following the review period, 194 voter registration records were cancelled. The remaining voter record was marked as resolved. Only three potential records were provided to the county for review in 2022 and all were cancelled following the county investigation.

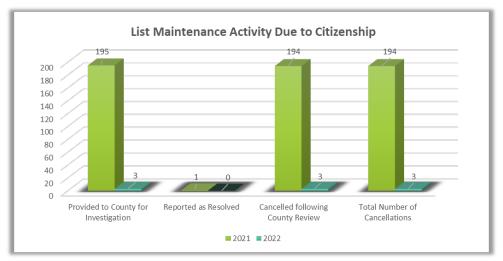


Figure 10: Cancellation of Voter Registration Due to Non-U.S. Citizenship

Duplicate Registration Records

In 2021, Cameron County cancelled 147 duplicate records within the county and 2,887 duplicative records were identified and cancelled for voters having a more recent registration in another county. ¹⁸ In 2022, 247 duplicate records were cancelled within the county and 3,535 duplicative records were cancelled for voters having a more recent registration in another county. In total, 6,816 duplicate registrations were removed from the Cameron County voter registration list during the period of this audit.

¹⁷ Tex. Elec. Code §§ 18.068, 16.0332; Tex. Gov't Code § 62.113.

¹⁸ Tex. Elec. Code §§ 15.022, 16.031(a)(1).

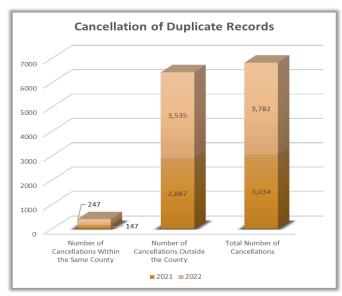


Figure 11: Cancellation of Duplicate Voter Registration Records

Residency

County voter registrars are tasked with ensuring voter eligibility based on current residency. If the registrar has reason to believe that a voter's current residence is different from that indicated on the registration records, or that the voter's residence address is a commercial post office box or similar location that does not correspond to a residence, the registrar shall deliver to the voter a written confirmation notice requesting confirmation of the voter's current residence.¹⁹

A review of cancellation reports indicated that a total of four (4) confirmation responses were received by Cameron County in 2021 and four (4) confirmation responses were received by the county in 2022. In total, eight (8) voter registrations were cancelled during the audit period based on confirmation responses indicating that the individuals no longer lived in Cameron County.

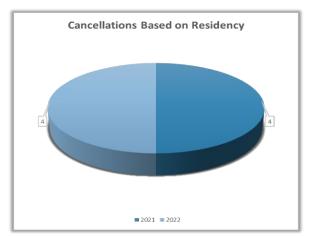


Figure 12: Cancellations Due to Receipt of Address Confirmation from Voter

¹⁹ Tex. Elec. Code § 15.051.

Volunteer Deputy Registrars

Cameron County publicizes information related to becoming a volunteer deputy registrar on their county website. This information includes qualifications, training material, and links to additional information on the Secretary of State's website as well as an official application. Online training is provided every Thursday at 3:30 and in person training is provided the last Thursday of each month at the county election office. All examinations must be taken in person at the election office.



Figure 13: Cameron County Volunteer Deputy
Registrar Program

ELECTION SECURITY

Findings

- The Cameron County Information Technology Department has written technology and security plans in place supporting all county departments including Incident Response Plans and a Continuity of Operations Plan. The county staff has established additional protocols to specifically support and secure the administration of elections. However, the county is compiling the written documentation related to election specific technology, election security protocols, and vendor risk management planning.
- Cameron County has effectively implemented industry standard best practices related to security of election equipment, electronic media, voted ballots, and supplies including controlled access points, secure and climate-controlled storage, and constant video surveillance of voting equipment and election records.

Policies & Procedures

County election officials are required to implement security measures to ensure that all devices with access to election data comply with the guidance adopted by the Secretary of State to the extent that funds are available. ²⁰ This guidance includes, but is not limited to, the <u>Election Security Best Practices Guide</u> ²¹ and the Texas Election Security Toolkit which provide county election officials with documentation templates, effective procedures and industry proven best practices.

Cameron County has its own information technology department, consisting of sixteen (16) full time employees, that services all county offices. The information technology department has established written policies and procedures related to the county technology and security services including an Incident Response Plan and an IT Continuity of Operations Plan. Written policies and procedures related specifically to supporting and securing elections in Cameron County are in progress. The IT team clearly articulated the efforts in place to monitor and secure elections and is prioritizing the completion of the written documentation to support their election efforts.

The county completed an election security assessment and is working with several state and federal agencies to complete additional assessments of the county infrastructure and security

²⁰ Tex. Elec. Code § 279.003.

²¹ Election Security Best Practices Guide, Texas Secretary of State Elections Division (April 2020), https://www.sos.state.tx.us/elections/forms/election-security-best-practices.pdf.

posture. The county has planned a data classification and security assessment to ensure that all confidential and sensitive data is protected.

The county did not have a written Vendor Risk Management Plan in place with all vendors providing services for the county election office and accessing sensitive and confidential voter registration and election data. However, the county has procedures in place to ensure that all data maintained in the county third-party voter registration system is saved locally to prevent any loss of data.

Cameron County has the historical perspective to understand the impacts of natural disasters and unexpected events that can impact the election process. During a tour of the Cameron County facilities, the election administrator thoroughly explained numerous contingency protocols in place including portable air conditioners, backup generators, battery backup capability for all election equipment, and inflatable tents to protect equipment from weather during transport. Additionally, the county remains in consistent collaboration with other county offices, local law enforcement, as well as state and federal agencies, to stand ready for the unexpected.

Cybersecurity & Infrastructure

The information technology staff discussed, in detail, the practices and protocols in place to ensure data security, network monitoring, and threat prevention for Cameron County. Additionally, the staff explained numerous security measures currently in place to ensure a higher level of monitoring and security specifically related to the administration of elections in the county. The representatives carefully monitor all system patching and infrastructure updating best practices and adhere to guidance provided by state and federal security advisories and notifications.

Physical Security

Physical security of voting systems, election equipment, election records, ballots and election workers are an essential part of securing elections and increasing voter confidence in the election process.

Access to General Offices

The Cameron County Elections Office has numerous measures in place to ensure the facilities are safe and secure. The office building was secured with cameras and a controlled access entrance separating the customer service functions of elections from the operations of the elections staff. Furthermore, all sensitive documents are locked in storage areas with additional controlled access.

The main warehouse and the secondary warehouse are gated and have locked doors with secure access points. There are security cameras at both of these locations. The main warehouse has an additional secure storage area within the facility with controlled access and an access tracking

log. This warehouse is staffed with full time employees and additional temporary workers assisting with election preparation.

The county has two additional large storage facilities for election supplies and historical election records. Both facilities are secured with controlled access entrances.

Voting Equipment and Media

Voting system equipment must be secured when not in use utilizing control keys or passwords.²² The use of an access control key or password must be witnessed by one or more authorized individuals and must be documented in an audit log dedicated for that purpose until the disposition of the equipment.

All voting equipment is stored in a large warehouse staffed with full time employees and security cameras. All equipment is stored in secure access-controlled areas. Unused ballots are maintained in a gated and locked area. Electronic media and election data are stored in a locked closet with security cameras monitoring the area at all times. Entrance in this area is recorded on an access tracking log.



Figure 14: Foyer of Elections Office



Figure 15: Metal Locked Ballot Boxes



Figure 16: Security Room with Voted Ballots

Cameron County elections staff maintains an electronic inventory database of all voting equipment. This information includes a listing of all voting equipment, respective serial numbers or asset tag numbers. The county tracks all movement of the equipment by documenting the seal numbers and destination location. Seal logs are maintained and updated when the equipment is returned to the election office.

Elections Supplies

Election supplies are well organized and locked at all times. Proper labeling was observed on all items to identify the content of storage boxes and folders. Security cameras monitor all areas where election supplies are stored.

²² Tex. Elec. Code § 129.053.

Cameron County has thorough procedures in place for the determination of needed equipment and supplies. Further, procedures are in place to monitor equipment needs and the inventory of supplies at polling locations during elections. Additional supplies are delivered when a need is identified. During the audit period, all polling locations for all elections were adequately supplied.



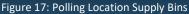




Figure 18: Locked Long-term Document Storage



Figure 19: Counted, Sorted and Stacked Ballots

Records Management

The election administrator indicated that all historical election records are maintained in compliance with legal retention requirements. Records are stored in the election office and in several climate controlled supplemental storage facilities for the required retention period of twenty-two (22) months and are only accessible by authorized election personnel. Security cameras monitor access to all sensitive voter registration and election information at all times. Following the required retention period, record destruction is performed by a contracted vendor. All records are shredded and disposed of in accordance with record retention policies.

Personnel

The general custodian of election records must ensure that a criminal background check is conducted for election officials, staff, and temporary workers who are engaged in pre-election programming, testing, and preparing of the voting system equipment.²³

Though it is not required by state law, the election administrator indicated that both temporary staff members and permanent employees are subjected to annual criminal background checks.

²³ Tex. Elec. Code § 129.051(g); Election Advisory No. 2019-23.

TRAINING ELECTION WORKERS

Findings

- Cameron County has developed an in-depth training program that provides both legal and procedural training as well as hands-on practice and troubleshooting guidance with all election equipment.
- The county provides a detailed training resource packet for all election judges and workers that includes the practical and procedural instructions, explanations for the purpose of each polling location form, and examples of how to accurately complete each form.
- Public notices for the election worker training were not provided consistently for all elections conducted with the audit period.

Training

County election officials are required to provide one or more sessions of training specifically for election judges and clerks appointed to serve in elections ordered by the Governor or a county authority. ²⁴ For election judges, the training must include procedures for opening and closing the polls, processing voters, and securing election equipment and voted ballots. Additionally, election workers that are assigned to the early voting ballot board and central counting station must have training specific to those requirements. For election clerks, the training must include procedures relating to the acceptance and handling of voter identification. The training is open to the public and the county is required to post a notice of the time and place of each session on the county's website.

Cameron County conducts training prior to each election. The 3-hour training is conducted at the election office and led by the election administrator. The training consists of:

- Election law changes;
- Voter identification requirements;
- Processing voters through the ePollbook;
- Opening, closing, and sealing voting system equipment; and
- Completion of required paperwork.

The training for Cameron County is divided into two parts. The first part is direct instruction that covers elections documents, legally required signage, as well as common policies and procedures. The county also includes information and best practices related to the ensuring the safety of the polling location and election workers as well as best practices related to assisting voters with

2.

²⁴ Tex. Elec. Code § 32.114.

disabilities. The training includes in-depth video presentations related to the polling location equipment, curbside voting, and closing procedures for the polling location.

The second part incorporates hands on practice with the election equipment. This section allows the judges and clerks to familiarize themselves with the operation of the equipment. This is also used as an opportunity to practice effective strategies to troubleshoot and resolve issues in case of equipment failure.

Cameron County provides notice of the election worker training to the public through the posting of this information on the county website and through social media. The election administrator acknowledged that some notices for training conducted during the audit period may not have been provided to the public for all elections.

Instructional Materials

The audit team conducted a review of all training materials provided by Cameron County to identify county procedures and to ascertain if those procedures were legally compliant. The review included a review of all training manuals, instructional presentations, and all supporting documentation.

All election workers were provided a copy of the training curriculum to use as a reference. The information includes detailed instructions on how to open and close the polling locations, operational instructions and troubleshooting for the equipment, and specific procedures on what and how equipment and supplies are to be returned after voting. Expectations and responsibilities related to the validation and placement of equipment seals are thoroughly discussed. Finally, the instructional materials include detailed explanations of all polling location forms and includes specific examples of how to complete the paperwork correctly.

Election Workers

In Cameron County, the chair of each political party provides a list of the election workers for each election. The county election administrator presents the information to the commissioners court for approval. Once appointed, the county works with each election judge to secure election clerks. All workers are notified in writing and by phone of the election workers training dates and times.

All election judges and clerks must complete an Oath of Election Judges and Clerks²⁵. Additionally, presiding judges, alternate judges, and early voting clerks must take the Constitutional Oath of Office and Statement of Officer.²⁶ In Cameron County, the Constitutional Oath of Office and Statement of Officer are administered verbally during the county training program. The official forms are then signed and dated. The Oath of Election Judges and Clerks is completed at the

²⁵ Tex. Elec. Code § 62.003.

²⁶ Article XVI, Section 1, Texas Constitution; Tex. Elec. Code § 1.016.

respective polling locations on the first day of their assignment. The form is then returned to the election office with all election supplies and documentation. This paperwork is maintained by the county election office.

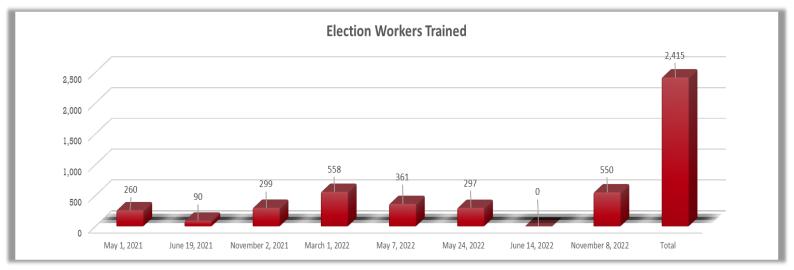


Figure 20: Election Judges & Clerks by Election

CHAIN OF CUSTODY

Findings

- Cameron County has implemented a set of chain of custody forms to securely document the transport of voting system equipment and supplies during an election. The county effort to improve these forms, including more specificity, was noted from beginning to end of the audit period.
- The county has a thorough check-in process for all equipment and supplies and review of required documentation at the conclusion of early voting and on election day. As a result, only a minimal number of forms did not contain the required signatures across all elections.

Overview

Establishing a detailed and transparent chain of custody documentation trail for election systems and ballots is critical to the security and integrity of the entire election process. Election officials must develop a procedure for tracking the custody of election system equipment and electronic storage media from storage location, to programming, through the entire election process, and final return to storage.²⁷

A thorough examination of the chain of custody documentation used by Cameron County during the audit period was conducted.

Methodology

For the purpose of this analysis, election activities have been grouped into six (6) categories. The chain of custody documentation provided by Cameron County was reviewed to ensure compliance with the law as well as the implementation of best practices related to election security to protect the integrity of voting system equipment, ballots, and election results.

The six (6) categories include:

- 1. Pre-Election Testing;
- 2. Distribution of Equipment & Supplies;
- 3. Opening the Polls;
- 4. Securing the Polls;
- 5. Closing the Polls; and
- 6. Return of Equipment & Supplies.

-

²⁷ Tex. Elec. Code § 129.051.

To conduct an in-depth analysis of the chain of custody protocols in Cameron County, an average ten polling locations for each election was reviewed.

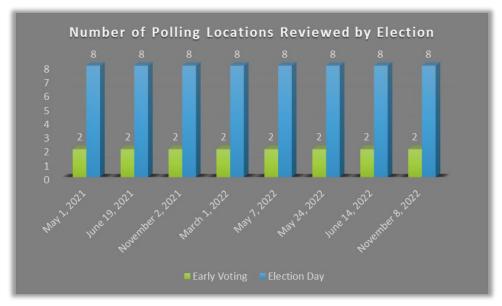


Figure 21: Number of Polling Locations Reviewed by Election

Reports and chain of custody documentation were inspected for all election equipment including:

- ES&S DS200 Ballot Scanner and Tabulator;
- ES&S AutoMark Electronic Ballot Marking/Tabulating Device; and
- VOTEC VoteSafe Pollbook.

Additionally, all polling location reports and forms that track the location and security of this equipment and supplies throughout the election process were reviewed including:

- register of official ballots/ ballot and seal certificates;
- seal logs;
- zero totals reports;
- results report;
- delivery tickets;

- audit logs;
- electronic media device reports;
- inventory/distribution of voting equipment; and
- all chain of custody forms.

1. Pre-Election Testing

A public test of logic and accuracy (L&A) must be conducted before all elections and must be completed no later than 48 hours before voting begins on the voting system.²⁸ This testing is intended to verify that votes cast for a given race, contest, or measure are tabulated to produce accurate results. This ensures that a selection made by a voter is counted as intended by that voter. During the public L&A test, the general custodian of election records is also required to

²⁸ Tex. Elec. Code § 129.023.

demonstrate, using a representative sample of voting system equipment, that the source code of the equipment has not been altered.²⁹ This software validation process occurs through hash validation.30

Cameron County completed logic and accuracy testing prior to all elections conducted during the audit period. The results were posted on the county website and on social media for all elections.

Once the testing is completed, a zero report is generated and a report of successful testing is completed and witnessed by those present.

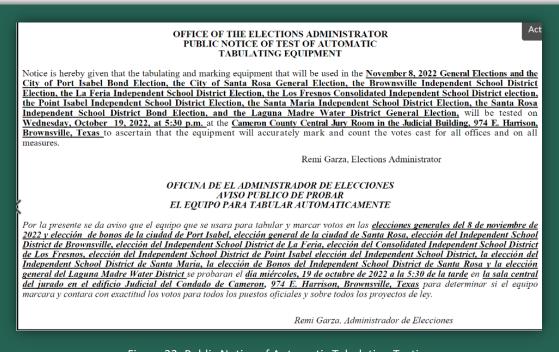


Figure 22: Public Notice of Automatic Tabulation Testing

²⁹ Tex. Elec. Code § 129.023.

³⁰ Hash Validation Procedures for Logic and Accuracy Testing, Election Advisory No. 2022-30 (Sep. 19, 2022), https://www.sos.state.tx.us/elections/laws/advisory2022-30.shtml.

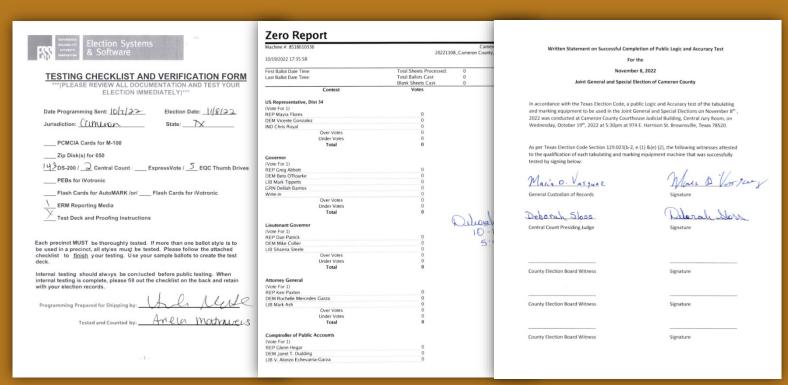


Figure 23: Testing Checklist and Verification Form

Figure 24: Zero Report for L&A Testing

Figure 25: Successful Completion of Public Testing

2. Distribution of Equipment and Supplies

Cameron County uses two distribution methods to ensure each polling location has all of the required equipment and supplies to conduct a successful election. Election office staff prepackage supplies for each polling locations. All supplies are counted multiple times by election employees prior to the designated distribution pick-up time.

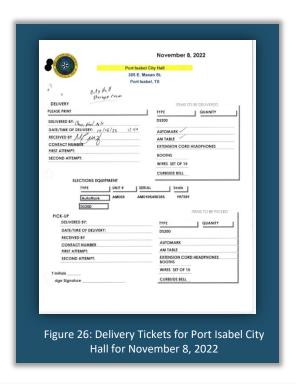
Election judges are responsible for picking up some of the election equipment and supplies from the election office. The supplies are verified again and signed by the election judge at the time of receipt. The same form is used to verify the return of all equipment following the election and is again signed by the election judge. These supplies include:

- election judge checklists and forms;
- seals;
- provisional ballot bag;
- ballot boxes;

- printed list of registered voters;
- ballot paper;
- polling location signage; and
- data transfer bag with seal.

Larger pieces of voting equipment are transported to the polling place by county personnel. The equipment transfers are supervised by elections office personnel to ensure the security of the equipment in transit and that all transfers are clearly documented on delivery tickets.

Cameron County keeps a detailed list of all assigned equipment for the election. Cameron County uses delivery inventory forms to document the transfer of all voting equipment. These forms detail the equipment type, unit number, serial number, and seal number, as well as the date and time the equipment is delivered to the polling location. The form is signed by an election worker, attesting to receipt of the equipment and that all seals were intact as well as the person delivering the equipment.



	November 8, 2022 Election Day Tuesday, January 31, 2023 11:42:57 AM													
ID	Site	Address	Е	City	Pct	D\$200	DS#	Thumbdrive	Seal 1	Seal 2	Automark	AM	AM Seal	Key \$N
66	Palmer-Laakso Elementary School	30515 Farm Road 1847		San Benito	66	DS200-066	DS0317350065	27597266	222266	222366	AM0105490377	AM066	222466	546366
67	Laureles Elementary School	31393 FM 2893		San Benito	65	D\$200-067	DS0317350022	27597267	222267	222367	AM0105490379	AM067	222467	546367
68	Laguna Vista City Hall	122 Fernandez St	EV	Laguna Vista	67	DS200-068	DS0317340244	27597268	222268	222368	AM0105490381	AM068	222468	546368
69	Port Isabel City Hall	305 E. Maxan St	EV	Port Isabel	1, 59, 83	DS200-069	DS0317350855	27597269	222269	222369	AM0105490385	AM069	222469	546369
70	South Padre Island Community Building	4501 Padre Blvd.	EV	South Padre Island	52	D\$200-070	DS0317340273	27597270	222270	222370	AM0105490390	AM070	222470	546370

Figure 27: Warehouse Inventory Tracking for Port Isabel City Hall for November 8, 2022

Additionally, the county tracks the distribution of ballot stock including the quantity, serial numbers, and seal numbers provided to each polling location.

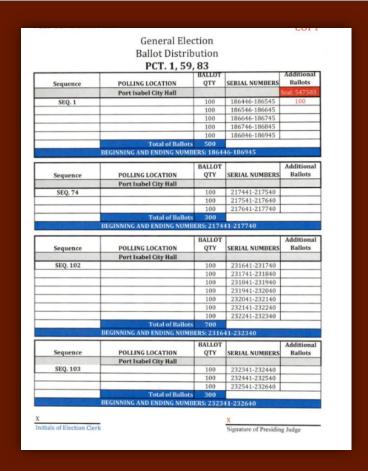


Figure 28: Ballot Distribution Form for Port Isabel City Hall for November 8, 2022

3. Opening the Polls

Prior to opening a polling location for voting, the election workers must set up all equipment, supplies, and required signage in the polling location. After breaking the equipment seals and verifying/recording the seal numbers, the voting equipment must be prepared for voting. Proper setup of equipment is essential to the operation of the voting system components.

Cameron County provides detailed checklists to remind the election judges of these responsibilities and procedures. The judges confirm each item on their list and then sign the supply list.

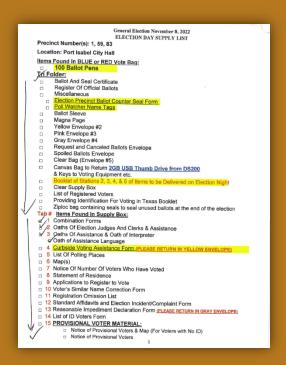




Figure 29: Election Day Supply List/Checklist for Port Isabel City Hall for November 8, 2022

Once the equipment is set up and prior to any ballots being cast, the presiding judge must print a report from the DS200 ballot tabulator to ensure that the counter is set to zero. This report, known as a "zero" report or tape, is printed on the first day of early voting and on election day. All tapes reviewed were printed and signed as required. Zero tapes were inspected for all polling locations for all elections in the audit period.

```
*** BALLOT STATUS ACCOUNTING REPORT ***
Unit Serial Number: 0317350855
Cameron County, Texas
20221108_Cameron County_General Election
0001 Port Isabel City Hall
Flection Date: November 08, 2022
Poll Opened Date: November 08, 2022
Poll Opened Time: 6:56 AM
Poll Closed Date: No
Poll Voting Report
Master Accountins:
    Total Blank:
    Total Overvote:
    Total Undervote: 0
Total Paper Sheets: 0
Ballots for Code 00074-01-01
Ballots for Code 00102-01-01
Ballots for Code 00103-01-01
Unit Serial Number: 0317350855
*** END OF REPORT ***
```

Figure 30: Ballot Status Accounting Report for Port Isabel City Hall for November 8, 2022

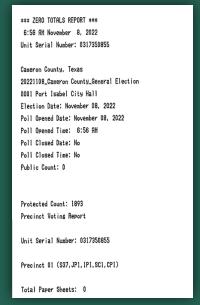


Figure 31: Zero Totals Report for Port Isabel City Hall for November 8, 2022

4. Securing the Polls

Cameron County has a comprehensive set of chain of custody forms in place to ensure the security of the voting process. All of the forms document an equipment identifier and the seal numbers during all phases of the election process. The forms require the signature of two election workers to verify the accuracy of the information.

All equipment and supply seals are tracked on transfer seal logs and are easily cross-referenced with the seal numbers listed on additional forms such as the Ballot and Seal Certificate.

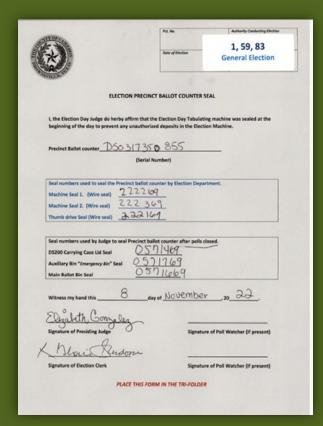


Figure 32: Election Precinct Ballot Counter Seal for Port Isabel City Hall for November 8, 2022

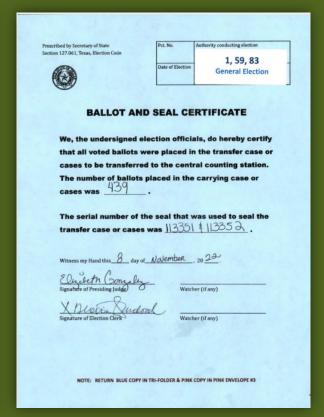


Figure 33: Ballot and Seal Certificate for Port Isabel City Hall for November 8, 2022

To ensure the security of all election equipment and supplies, all seals are validated and documented by the election judges through polling location documentation. Additionally, the county tracks all equipment and supplies through detailed serial number and seal tracking logs.

		SERIAL	SEAL	Carlinger.	
PCTS.	SITES	NUMBERS	CORRECTION	INITIALS	
1, 59, 83	Port Isabel City Hall	5055101	/	CR.	
2, 99	Las Yescas Elementary School	5055102	/	CR.	
3	Los Fresnos Community Building	5055103	/	OR.	
4, 89	Villareal Elementary School	5055104	/	CR.	
5,61	Hudson Elementary school	5055105	/	CR.	
6, 8, 9	C.C. Courthouse Judicial Complex	5055106	/	CR.	
7, 68	Rivera High School	5055107	/	CR.	
10	Cromack Elementary School	5055108	/	CR.	
11	Skinner Elementary School	5055109	/	CR.	
12	Russell Elementary School	5055110	/	CR	
13	Central Administration Building	5055111	/	CR	
14	Bob Clark Social Service Center	5055112	V	CR.	
15	R.L. Martin Elementary School	5055113	/	CR.	
16, 90	Villa Nueva Elementary School	5055114	/	CR	
17	La Encantada School	5055115	./	CK	
18	San Benito Fire Station 1	5055116	/	CR	
19	San Benito Community Bldg.	5055117	/	CR.	
20,81	Rio Hondo Civic Center	5055118	/	CR.	
21, 57, 101	Frank Roberts Elementary School	5055119	/	CR	
22	Sullivan Elementary School	5055120	/	CK.	
23, 43, 93	Bonita Park Community Bldg.	5055121	1	CR	
24	Santa Maria ISD Administrative Bldg.	5055122	/	CR.	
25	Los Indios Community Center	5055123		CR	
26, 55, 58	American Legion Hall	5055124	/	CK	
27	Maria Luisa Ruiz Guerra County Annex	5055125	1	CR	
28, 64	Primera Community Center	5055126	1	CP	
29, 85	Stuart Place Elementary School	5055127	/	CR	
30, 92	Harlingen Outreach Center	5055128	1	CR	
31, 41	Bowie Elementary School	5055129	1	CP.	
32,56	Vernon Middle School	5055130	1	CR.	
33, 39	Crockett Elementary School	5055131	1.	CR	
34	TSTC Cultural Arts Center	5055132		0/2.	
35	Austin Elementary School	5055133	/	CR.	
36	Harlingen High School South	5055134	/	CK	

Figure 34: Transfer Case Seals Tracking Log
for November 8, 2022

RECORD OF PROVISIONAL SEALS FOR THE GENERAL ELECTION TO BE HELD ON NOVEMBER 8, 2022 SERIAL NUMBERS PCTS. SITES 1.59.83 Port Isabel City Hall 2.99 Las Yescas Elementary School 3 Los Fresnos Community Building Villareal Elementary School 0326588 0237787 3 4, 89 5,61 6, 8, 9 7, 68 0291316 CR. CR. Hudson Elementary School C.C. Courthouse Judicial Complex 0237501 0235287 Rivera High School 0237509 Cromack Elementary School Skinner Elementary School Russell Elementary School 0241984 CR. CR. CR. CR. Central Administration Building Bob Clark Social Service Center R.L. Martin Elementary School 0235271 0339192 14 15 16, 90 0235188 Villa Nueva Elementary School La Encantada School 0339532 0339161 18 San Benito Fire Station 1 19 San Benito Community Bldg. 20,81 Rio Hondo Civic Center 21,57,101 Frank Roberts Elementary School 0237544 0326579 0339561 CK CK 0291084 22 Sullivan Elementary School 23, 43, 93 Bonita Park Community Bldg. 24 Santa Maria ISD Administrative Bldg. 0237522 0339531 0333442 0333499 0479707 0333485 Primera Community Center Stuart Place Elementary School Harlingen Outreach Center Bowie Elementary School 0339513 0339528 0339512 0479759 0479759 0479768 0339524 0334960 0237570 0339516 Vernon Middle School Crockett Elementary School TSTC Cultural Arts Center Austin Elementary School Harlingen High School South

Figure 35: Provisional Seals Tracking Log for November 8, 2022

All broken seals are returned to the elections office with the equipment and supplies. The seals are verified against the seal logs.



Figure 36: Returned Seals for Port Isabel City Hall for November 8, 2022

5. Closing the Polls

Once voting has completed, there are multiple steps required to accurately and securely close a polling location. These steps include completing and printing reports, securing the ballots for transport and securing the remaining equipment and supplies.

Results tapes were reviewed by the audit team. The results tapes for all elections and individual locations reviewed were printed and signed as appropriate. However, the results tapes for UTRGV (Clinical Education Building Auditorium) for the November 8, 2022 General Election was not located. Additionally, of the tapes reviewed two results tapes for the March 1, 2022 Primary Election were printed but did not contain a judge's signature.



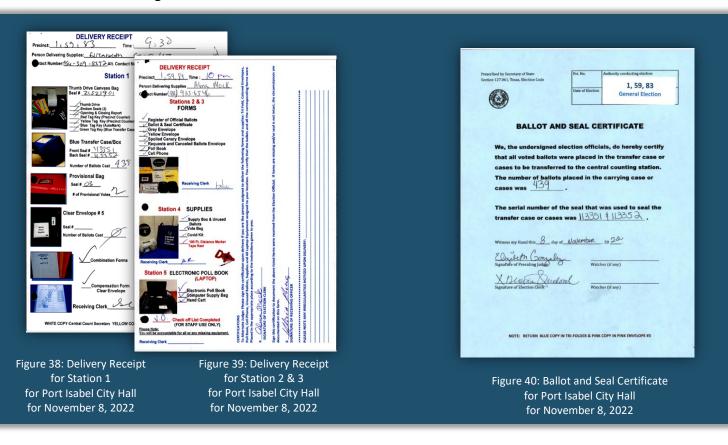
Figure 37: Voting Results Reports for Port Isabel City Hall for November 8, 2022

6. Return of Voting Equipment and Supplies

At the conclusion of early voting and on election day, the election judge is responsible for returning the election supplies to the central counting station. This includes all ballots cast at the polling place, any electronic media with records of votes cast, polling location forms, daily reconciliation forms, and election equipment and supplies as instructed by the election office.

Cameron County has two separate return areas for all voting equipment, voted ballots, and polling location forms. The presiding judge returns the electronic media, blue transfer case with voted ballots, provisional ballot bag and emergency clear bag to one designated area at the Central Counting Station. The alternate judge returns the pollbook, polling location forms, and unused ballots to a separate area at the same location. The equipment and supplies are, most often, transported in different vehicles. In the event of an issue with the return of the equipment or polling location forms, the presiding judge is contacted to report to the correct area to address the issue. In the event the presiding judge is no longer on the premises, the alternate judge resolves the identified concerns.

As mentioned in the Distribution of Equipment and Supplies section, Cameron County uses forms to document the check-out and check-in of equipment and supplies. The Judge's Inventory Form has a section to indicate what equipment and supplies were returned by the judge. The judge is issued a Receipt for Transfer Case form to document the voted ballots were delivered to the Central Counting Station.



VOTING BY MAIL

Findings

- Cameron County did not accurately report rejected applications for ballot by mail to the statewide system for all elections conducted during the audit period.
- The county did not accurately report defective or rejected carrier envelopes to the statewide system for all elections conducted during the audit period.
- Though Cameron County effectively documented the corrective action process for rejected applications for ballot by mail and carrier envelopes internally and offered all applicants and voters the opportunity to correct identified issues, the failure to accurately report this information to the statewide system prevented Cameron County voters from utilizing the Ballot by Mail Tracker as a method to electronically correct identified issues.

Applications for Ballot by Mail

According to data submitted by Cameron County, the audit team was able to identify and track the applications for ballot by mail for each election. According to data reviewed, a total of 17,585 applications for ballot by mail were submitted in Cameron County for the elections in this audit cycle.

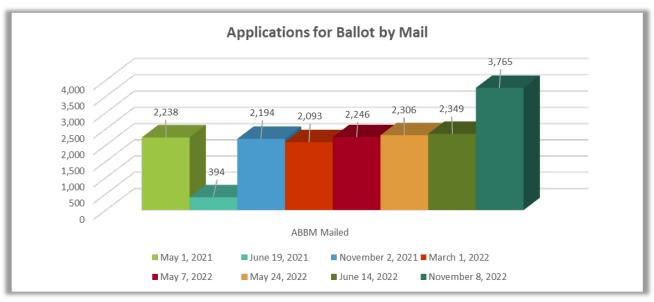


Figure 41: Applications for Ballot by Mail by Election

Accepted vs. Rejected Applications

Of the 17,558 applications for ballot by mail received, 17,271 applications were accepted after review by the county. 287 applications for ballot by mail were rejected by the county.

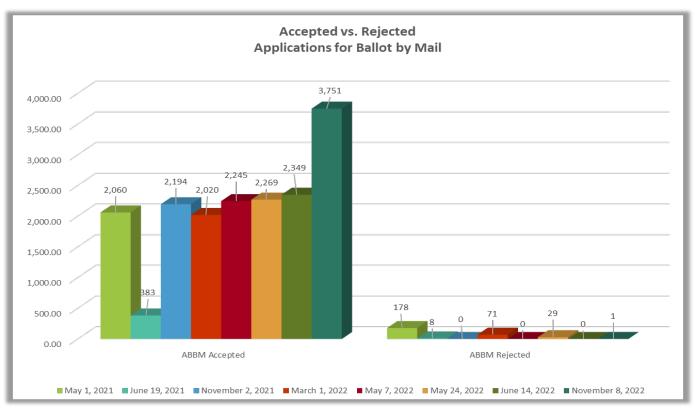


Figure 42: Accepted vs. Rejected Applications for Ballot by Mail by Election

Cameron County tracks internally all rejected applications for ballot by mail that may be corrected. The county reviews all applications and clearly indicates on each application the reason for rejection. The county generates letters and sends the defective notices to the applicants. The county retains a copy of the letters and stamps the letters when the applicant has corrected the reason for the initial rejection. All of this correspondence is retained as part of the voter file and maintained in accordance with the record retention policy.

Beginning in 2022, Texas counties were required to report this information to the statewide system to allow voters the opportunity to utilize the Ballot by Mail Tracker to track the status of their application or ballot and, in some circumstances, correct missing or incorrect personal identification numbers. However, Cameron County did not include the appropriate information in the statewide system for the rejected applications. Therefore, the rejected applicants were not offered the opportunity to check the status of their applications through the Ballot by Mail Tracker.

Reasons for Voting by Mail

The audit team reviewed the reasons associated with the requests to vote by mail. The applications revealed that the largest reason for voting by mail is on the basis of age.

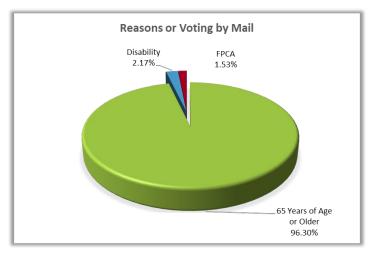


Figure 43: Reason for Voting by Mail for All Elections

Ballots by Mail

Cameron County mailed 17,271 ballots for all the elections in this audit cycle.

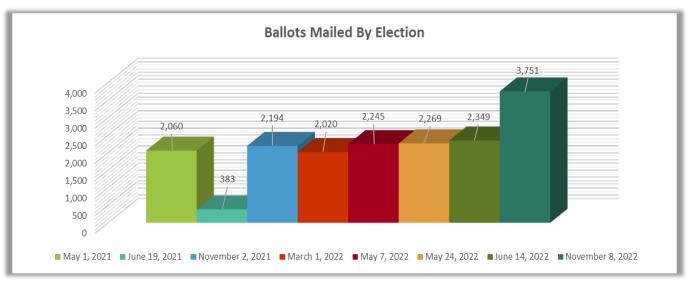


Figure 44: Ballots Mailed by Election

Ballots Received

Of the 17,271 ballots mailed to voters, 13,718 of those ballots were returned by voters resulting in a return rate of 79%.

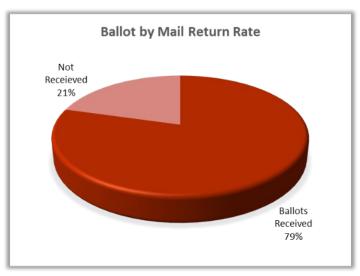


Figure 45: Ballot by Mail Return Percentage for All Elections

Returned Undeliverable Mail Ballots

Though voters complete the application for ballot by mail process and counties mail the balloting material, some mail ballots are returned by the U.S. Postal Service to the early voting clerk as undeliverable. The statewide report for Cameron County indicates 266 ballots marked as undeliverable for elections included in this audit.

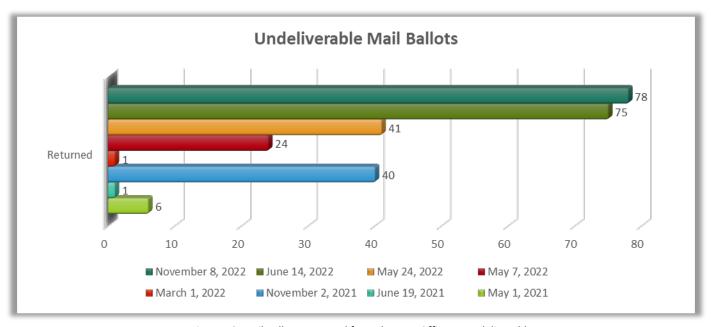


Figure 46: Mail Ballots Returned from the Post Office as Undeliverable

Surrendered and Cancelled Mail Ballots

A voter may cancel their application for a ballot to be voted by mail by submitting a written request to the early voting clerk to cancel their mail ballot application or may surrender the ballot that the voter received by mail, complete a cancellation request, and vote a regular ballot in person at a polling location. Cameron County had a total number of 257 mail ballot cancellations during the audit period.

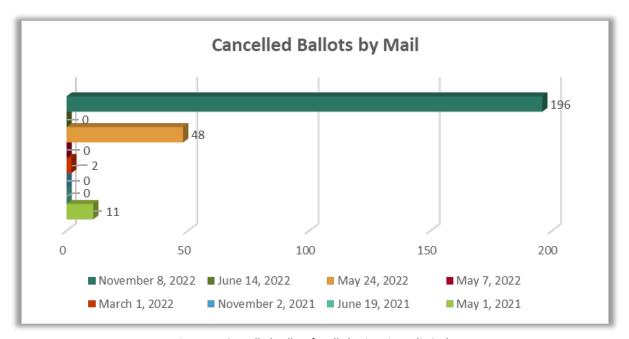


Figure 47: Cancelled Ballots for all Elections in Audit Cycle.

Signature Verification Committee (SVC)

The signature verification committee is charged with comparing the signature on each carrier envelope with the signature on the application for ballot by mail to determine whether the signatures are those of the voter.³¹ If a signature verification committee is appointed to serve, the early voting clerk must issue a written order.³² Cameron County was compliant with the posting of these notices during the audit period.

The early voting clerk must deliver all received mail ballots to the signature verification committee.³³ Delivery of the ballots may only be made at times scheduled in advance by the early voting clerk and a notice of delivery of the mail ballots must be posted prior to each delivery.

³¹ Tex. Elec. Code § 87.027(i).

³² Tex. Elec. Code § 87.027.

³³ Tex. Elec. Code § 87.027(h).

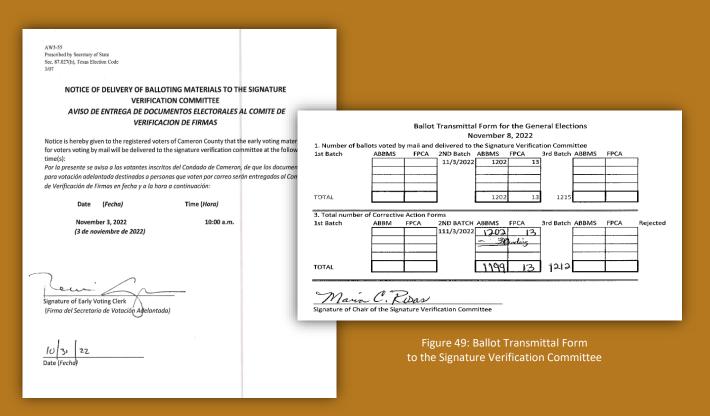
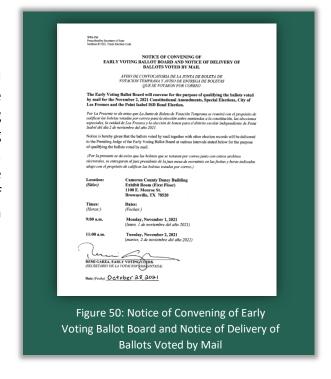


Figure: 48: Notice of Delivery of Balloting Materials to the Signature Verification Committee

Early Voting Ballot Board (EVBB)

Prior to convening the early voting ballot board (EVBB), a county must post a public notice of the date and time of the meeting. Additionally, the early voting clerk must post notice ³⁴ at the main early voting location of each delivery of balloting materials. Cameron County provided public notice for the convening of the board and notice of the transfer of balloting materials for all elections in accordance with state law.



38

³⁴ Tex. Elec. Code § 87.0222(b).

Opportunity to Correct Certain Defects

If the early voting ballot board reviews a carrier envelope that does not comply with the applicable requirements, the board must send the voter a notice of the defect and a corrective action form.³⁵ For certain defects, the board must permit the voter to correct this information using the Ballot by Mail Tracker developed by the Secretary of State.³⁶

Cameron County reviews all received carrier envelopes and clearly indicates the reason for rejection. The county generates Notice of Defective Carrier letters and sends the notices to the voters. All of this correspondence is retained as part of the voter file and maintained in accordance with the record retention policy.

However, Cameron County did not send the appropriate information to the statewide system that would provide the voters the opportunity to correct their ballots through the Ballot by Mail Tracker.

Accepted Ballots by Mail

Following the review by the early voting ballot board and the corrective action process deadline, the information submitted by Cameron County indicates that 13,687 mail ballots were accepted for all elections in the audit cycle.

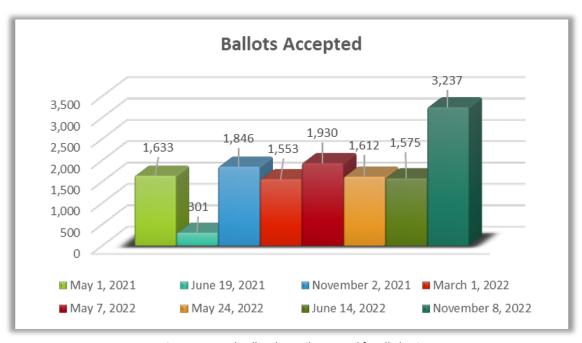


Figure 51: Total Ballots by Mail Accepted for all Elections

³⁵ Tex. Elec. Code § 87.0411.

³⁶ Tex. Elec. Code § 86.015.

Rejected Ballots by Mail

Additionally, the Cameron County submitted data indicated that 281 mail ballots were rejected after review for all elections in this audit cycle.

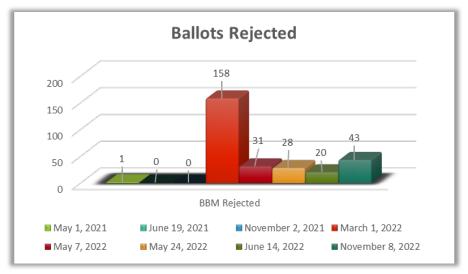


Figure 52: Total Ballots by Mail Rejected for all Elections in this Audit Cycle

Delivery of Mail Ballots to Central Counting Station

The early voting ballot board delivered all accepted mail ballots to the central counting station to be counted by automatic tabulating equipment. ³⁷ Ballot transmittal forms showing the number of accepted mail ballots being transferred to the Central County Station were generated and posted for all elections.

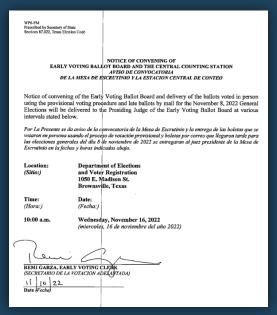


Figure 53: Notice of Convening of Early Voting Ballot Board and the Central Counting Station

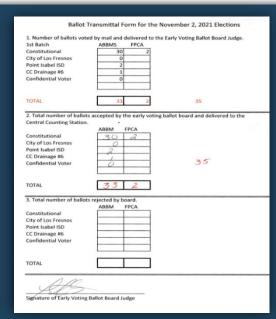


Figure 54: Ballot Transmittal Form

VOTING IN PERSON

Findings

- Early voting in person is the most common method of voting across all elections in the audit period, accounting for 67% of the total votes for the November 8, 2022 General Election.
- Precinct election records were complete, accurate, and thorough which is reflective of a strong comprehensive training program for election workers.

Overview

Voting in person during the early voting period was the most common method of voting utilized in Cameron County for all elections conducted during the audit period. For the November 8, 2022 General Election, based on the official reconciliation report, of the 77,958 voters, 51,862 (67%) appeared to vote in person during the early voting period while 22,805 (29%) appeared to vote in person on election day. Overall, 96% of the voters voting in the election appeared in person to cast a ballot while 4% of voters chose to vote by mail.

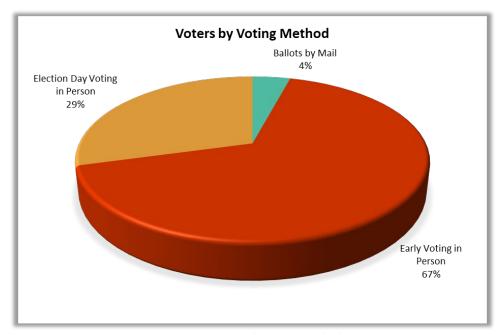


Figure 55: Voters by Voting Method

Polling Locations

Voters in Texas may vote at any polling location within their county of residence during the early voting period. For election day, Cameron County uses traditional precinct-based voting. The county is required to post notice of all polling locations for each election. Cameron County provided notice of all polling locations for all elections conducted during the audit period as required.

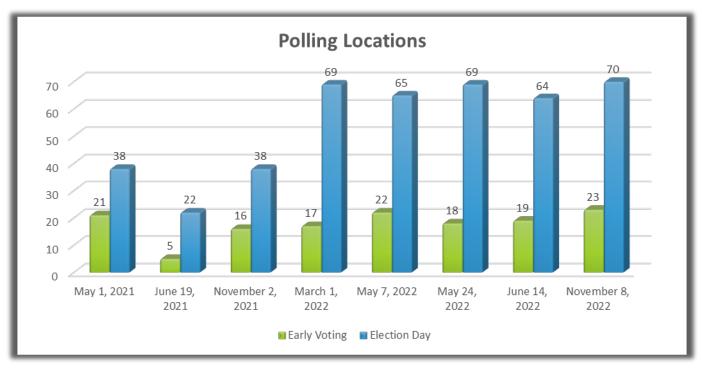


Figure 56: Cameron County Polling Locations by Election

Early Voting

Cameron County consistently posts required notices related to early voting polling locations including the date, location, and available hours of operation for voting.

larty unting by paragonal an	opens one will be conducted at the	e following locations, dates, and times:	
LOCATION	ADDRESS	DATES	
	Cameron County Courthouse	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pr
Main Early	Judicial Complex	Saturday, Oct 29	8:00 am to 7:00 pt
Voting Place	954 E. Harrison St.	Sunday, Oct 30	10:00 am to 5 pm
-	Brownsville, Texas	Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 p
Brownsville	2600 Central Blvd.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 p
Public Library	Brownsville, Texas	Saturday, Oct 29	8:00 am to 8:00 pr
		Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 p
		Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pa
BISD Administrative Bidg	1900 E. Price Rd Brownsville, Texas	Saturday, Oct 29 thru Sunday, Oct 30 Monday, Oct 31 thru Friday, Nov 4	10:00 am to 5 pm 8:00 am to 8:00 pm
Administrative Blog	Brownsville, Texas	Monday, Oct 31 Inru Friday, Nov 4	8:00 am to 8:00 p
Southmost	4320 Southmost Rd.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pr
Public Library	Brownsville, Texas	Saturday, Oct 29 thru Sunday, Oct 28	10:00 am to 7:00 pm
· concentration	Diominorno, rendo	Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pr
Cameron Park	2100 Gregory Ave.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 p
Community Center	Brownsville, Texas	Saturday, Oct 29 thru Sunday, Oct 20	10:00 am to 5 pm
(El Centro Cultural)	Diomiornic, recus	Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pr
Harlingen County	3302 Wilson Rd.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pr
Annex Bldg.	Harlingen, Texas	Saturday, Oct 29	8:00 am to 8:00 pr
	1 1	Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pr
San Benito	210 E. Heywood St.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pr
Community Bldg.	San Benito, Texas	Saturday, Oct 29	8:00 am to 8:00 pr
	1	Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pr
Port Isabel	305 E. Maxan St.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pr
City Hall	Port Isabel, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 p
American Legion Hall	219 E. Commercial Ave.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pr
	La Feria, Texas	Saturday, Oct 29 thru Sunday, Oct 30 Monday, Oct 31 thru Friday, Nov 4	10:00 am to 5 pm 8:00 am to 8:00 pm
		Munuay, Oct 31 INTU FROBY, NOV 4	6.00 airn to 8:00 p
	204 N. Brazil St.		
Los Fresnos Community Center	Los Fresnos, Texas	Monday, Oct 24 thru Friday, Oct 28 Saturday, Oct 29 thru Sunday, Oct 30	9:00 am to 7:00 pr 10:00 am to 5 pm
Continuing Conter	Los Frestivo, rexas	Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pr

	to be he	ld on November 8, 2022	
LOCATION	ADDRESS		
New Horizon	191 E. Price Rd.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Medical Center	Brownsville, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm
Harlingen Cultural	576 "76" Dr.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Arts Center	Harlingen, Texas	Saturday, Oct 29 thru Sunday, Oct 28	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm
Rio Hondo	121 N. Arroyo Blvd	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Municipal Center	Rio Hondo, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm
Santa Rosa	116 Santa Vista Ave.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Maria Luisa Ruiz Guerra	Santa Rosa, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
County Annex Bldg.		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm
UTRGV	1 West University Blvd	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Interdisciplinary Academic	Brownsville, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
Bldg (BNAB)		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm
Los Indios	309 Heywood St.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Community Center	Los Indios, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm
Town of Rancho Viejo	3301 Carmen Ave.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
City Hall	Rancho Viejo, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm
Bob Clark	9901 California Rd.	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Social Service Center	Brownsville, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm
Santa Maria ISD	Board Room	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Administrative Bldg.	11119 Military Hwy 281 Santa Maria, Texas	Saturday, Oct 29 thru Sunday, Oct 30 Monday, Oct 31 thru Friday, Nov 4	10:00 am to 5 pm 8:00 am to 8:00 pm
	oenta mana, rexas	munually, Oct 31 thru Friday, Nov 4	e.Ju am to e:JU pm
South Padre Island	4501 Padre Blvd	Monday, Oct 24 thru Friday, Oct 28	9:00 am to 7:00 pm
Community Center	South Padre Island, Texas	Saturday, Oct 29 thru Sunday, Oct 30	10:00 am to 5 pm
		Monday, Oct 31 thru Friday, Nov 4	8:00 am to 8:00 pm

Harlingen City Hall Fown Hall Meeting Room	118 E. Tyler Ave Harlingen, Texas	Monday, Oct 24 thru Friday, Oct 28 Saturday, Oct 29 thru Sunday, Oct 30 Monday, Oct 31 thru Friday, Nov 4	9:00 am to 7:00 pm 10:00 am to 5 pm 8:00 am to 8:00 pm
San Ignacio de Loyola Iglesia Catolica	Parish Hall 24380 W US Highway 281 San Benito, Texas	Monday, Oct 24 thru Friday, Oct 28 Seturday, Oct 29 thru Sunday, Oct 30 Monday, Oct 31 thru Friday, Nov 4	9:00 am to 7:00 pm 10:00 am to 5 pm 8:00 am to 8:00 pm
Laguna Vista City Hall	122 Fernandez St Laguna Vista, Texas	Monday, Oct 24 thru Friday, Oct 28 Saturday, Oct 29 thru Sunday, Oct 30 Monday, Oct 31 thru Friday, Nov 4	9:00 am to 7:00 pm 10:00 am to 5 pm 8:00 am to 8:00 pm
		monag, out of dEU FRagy, NOV 4	0.00 am to 0.00 pm

Figure 57: Cameron County Early Voting Schedule

Election Day

Cameron County consistently posts information related to election day voting polling locations including the date, precinct number, location, and available hours of operation for voting.

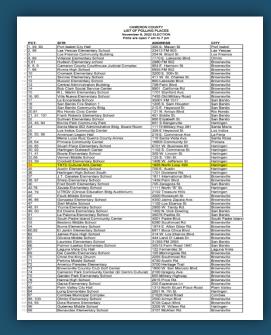


Figure 58: Cameron County Election Day Schedule

Curbside Voting

During interviews conducted by the audit team, Cameron County confirmed the procedures related to the provision of curbside voting. ³⁸ Cameron County provides a handbook for all election workers with instructions on curbside voting as well as a training video on how to assist a curbside voter. Signage is placed at all polling locations with a button to push to notify poll workers that a curbside voter needs assistance. After qualifying the voter, the judge takes all balloting materials to the curbside location to allow the voter to cast a ballot.

Curbside voting accounts for approximately 3% of the total votes cast in person across all elections in Cameron County during the audit period.



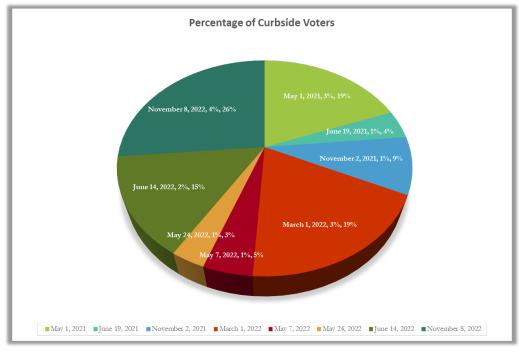


Figure 60: Percentage of Curbside Voters

Oaths of Assistance

When a voter requests assistance in marking a ballot, two election officers must provide that assistance.³⁹ Additionally, a voter may request to be assisted by someone of their choosing

³⁸ Tex. Elec. Code § 64.009.

³⁹ Tex. Elec. Code § 64.032.

except that it may not be their employer, an agent of their employer, or an agent of a labor union to which the voter belongs. If assistance is provided by a person of the voter's choice, that person must complete an Oath of Assistance form.

Cameron County provided the oaths for all elections conducted in the audit period. The county had 1,666 oaths of assistance and 256 oaths of interpreters. Though the completion of these forms is covered in training and examples are provided in the training manuals, some election workers did not consistently fill in the form in its entirety. Additionally, the audit team identified a small percentage of forms that were not signed by the election judge.

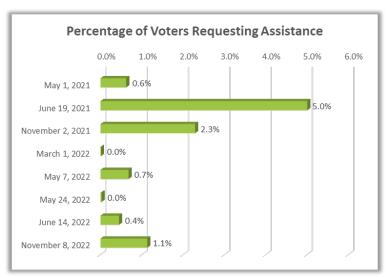


Figure 61: Percentage of Voters Assisted by Election

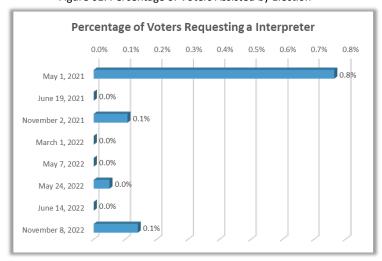


Figure 62: Percentage of Voters Assisted by an Interpreter by Election

Spoiled Ballots

If a voter mismarks, damages, or otherwise spoils a ballot in the process of voting, the voter is entitled to receive a new ballot by returning the spoiled ballot to the election officer.⁴⁰ The

⁴⁰ Tex. Elec. Code § 64.007.

election officer must maintain a register of spoiled ballots at the polling location that includes the voter's name and the spoiled ballot number.

The audit team reviewed the process in place in Cameron County and inspected all ballots that were spoiled during elections held in the audit period. Based on the documentation provided, Cameron County had a total of 1,382 spoiled ballots across all elections.

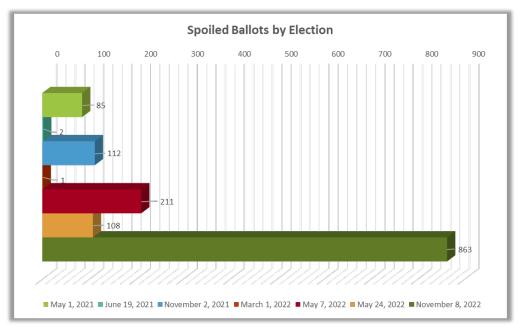


Figure 63: Spoiled Ballots by Election

The audit team identified the following reasons for the use of spoiled ballots in Cameron County across all elections.

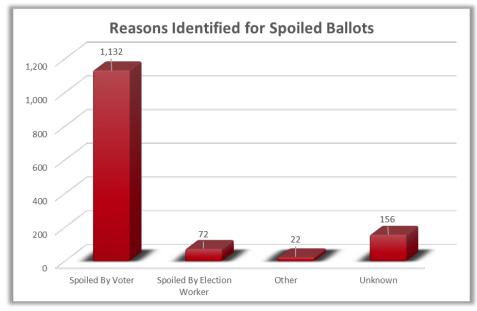


Figure 64: Reasons Identified for Spoiled Ballots

Reasonable Impediment Declarations

If a voter does not possess one of the forms of acceptable photo identification, ⁴¹ and cannot reasonably obtain such identification, a voter may execute a Reasonable Impediment Declaration. ⁴²

Cameron County provided a report of the number of reasonable impediment declarations that were completed during the audit period. There were 276 reasonable impediment declarations submitted across all elections.

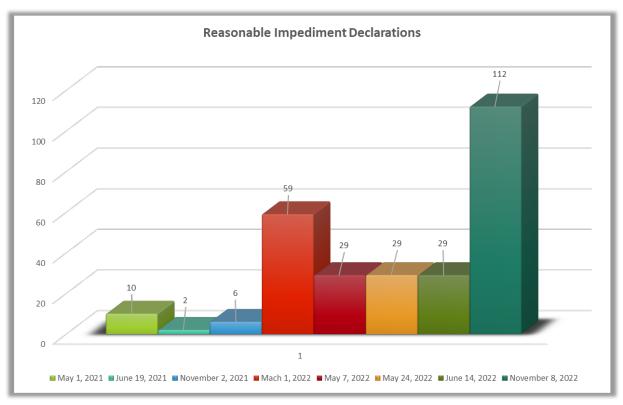


Figure 65: Total Reasonable Impediment Declaration for Cameron County

An analysis of the data revealed the following reasons necessitating the use of a Reasonable Impediment Declaration in Cameron County.

⁴¹ Tex. Elec. Code § 63.001(b).

⁴² Tex. Elec. Code § 63.001(i).

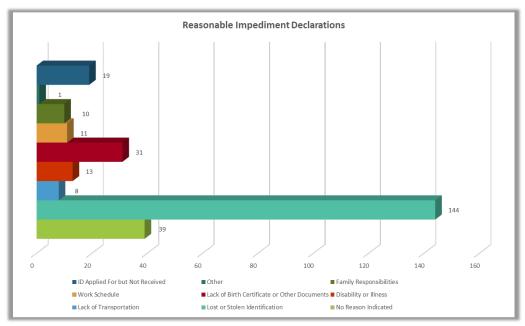


Figure 66: Reasons Necessitating a Reasonable Impediment Declaration for Cameron County

Statements of Residence

Cameron County receives Statement of Residence (SOR) forms on election night in designated envelopes. They are then processed by the voter registrar and a new voter registration certificate is sent to the voter reflecting the updated information. The forms are retained in the registration records retention files. Based on a review of submitted documentation, there was a total of 3,019 statements submitted during the elections conducted in the audit period.

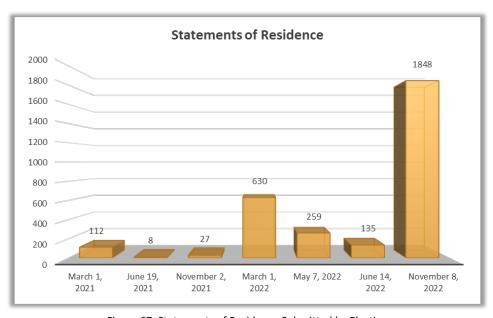


Figure 67: Statements of Residence Submitted by Election

Limited Ballots

A registered voter who has moved from the Texas county in which he or she is registered, to a new county of residence in Texas, and who will not be registered to vote in the new county on or before election day, may be eligible to vote a limited ballot.⁴³

The audit team conducted a review of the limited ballot applications for all elections held during the audit period. Of the elections being audited, only three (3) elections included the use of a limited ballot.

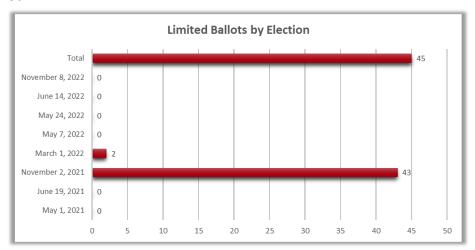


Figure 68: Limited Ballots in Cameron County by Election

A review of the limited ballot applications revealed a breakdown of the counties of former residence for applicants which includes at least eighteen (18) Texas counties.

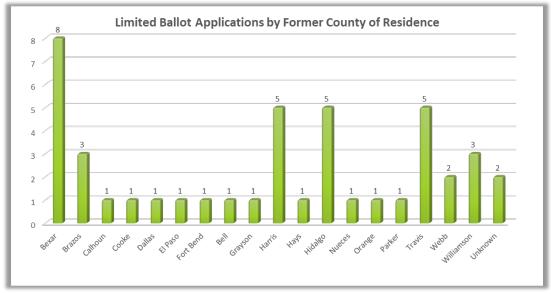


Figure 69: Limited Ballot Applications by County of Former Residence

4.

⁴³ Tex. Elec. Code § 112.001.

Provisional Ballots

Cameron County provided a list of provisional voters during the early voting period and on election day for all elections in the audit period. In total, Cameron County provided documentation on 553 provisional ballots cast. Of those, 142 were accepted and 411 were rejected by the county.

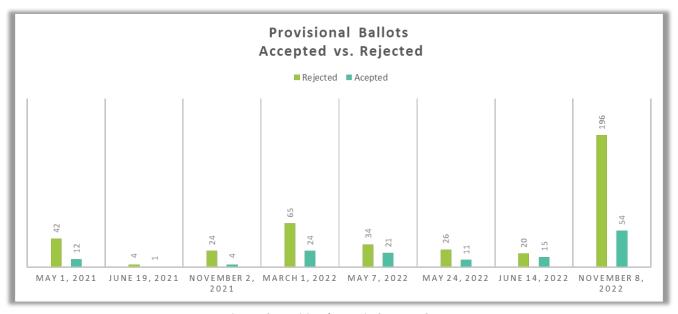


Figure 70: Provisional Votes in Cameron County

As part of the county training program, elections judges are provided step-by-step instructions on the processing of a provisional voter at a polling location. Cameron County encourages the election workers to thoroughly explain the provisional ballot process to each voter prior to casting a ballot.

ELECTION RESULTS

Findings

- Cameron County has developed a Central Counting Station Plan that provides detailed legal, operational, and reporting requirements in compliance with law.
- The county is compliant with all election results reporting requirements and publicly displays those reports on their county website for current elections as well as all historical election data and reporting.

Central Counting Station Compliance

A central counting station (CCS) ⁴⁴ is a location where ballots are counted, vote totals are accumulated, and unofficial election results are generated on election night.

Notice Requirements

Cameron County posted documentation for the convening of the central counting station for all elections in the audit period.

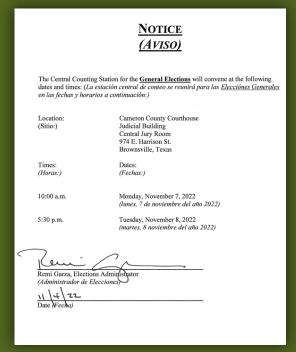


Figure 71: Notice of Central Counting Station for the November 8, 2022 Election

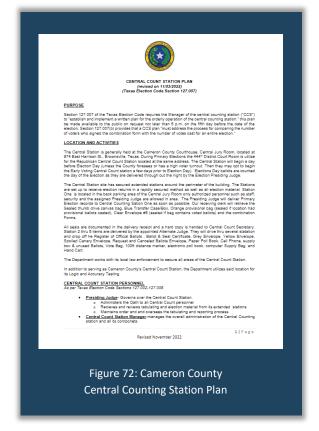
51

⁴⁴ Tex. Elec. Code § 127.001.

Central Counting Station Plan

The manager of the central counting station is required to develop a written plan⁴⁵ for the orderly operation of the central counting station.⁴⁶ A review of the Cameron County Central Counting Station Plan for the November 8, 2022 General Election indicated compliance with all required elements and inclusion of best practices as prescribed by the Secretary of State. The plan includes:

- location of Central Count;
- key personnel and associated duties;
- poll watcher procedures;
- L&A testing procedures;
- ballot duplication procedures;
- intake process for ballots, media, and supplies;
- reconciliation of election night results;
- printing of required precinct results; and
- reporting results to the state.



Testing of Tabulation Equipment

The automatic tabulating equipment used for counting ballots at a central counting station must be tested immediately before the counting of ballots with the equipment begins.⁴⁷ The testing must be repeated immediately after tabulation has been completed. ⁴⁸ A review of the documentation shows compliance with all testing requirements of the county's automatic tabulating equipment. Cameron County produces a Statement of Successful Completion form and Zero Report Tapes from the final two tabulation tests.

Livestreaming Requirements

A county with a population over 100,000 must establish a video recording and live streaming system that captures all areas containing voted ballots from the time they are delivered to the signature verification committee, early voting ballot board, or central counting station until the canvass of the election.

⁴⁵ Tex. Elec. Code § 127.007.

⁴⁶ Tex. Elec. Code § 127.007.

⁴⁷ Tex. Elec. Code § 127.093(b)

⁴⁸ Tex. Elec. Code § 127.093(d).

n Statement on Successful Completion of Public Logic and Accuracy Test For the November 8, 2022 Joint General and Special Election of Cameron County In accordance with the Texas Election Code, a public Logic and Accuracy test of the tabulating and marking equipment to be used in the Joint General and Special Elections on November 8th 2022 was conducted at Cameron County Courthouse Judicial Building, Central Jury Room, Wednesday, October 19th, 2022 at 5:30pm at 974 E. Harrison St. Brownsville, Texas 78520. As per Texas Election Code Section 129.023(b.2, e $\{11.8(e) (2),$ the following witnesses attested to the qualification of each tabulating and marking equipment machine that was successfully tested by signing below: Maria D. Vasquez General Custodian of Records Delarah Sloss Deborah Sloss Central Count Presiding Judge County Election Board Witness County Election Board Witness Signature County Election Board Witness Signature

Figure 73: Statement of Successful Completion of Public Logic & Accuracy Test

Figure 74: Zero Test Report from the 3rd Tabulation Test

Precinct Returns

Cameron County provided a copy of the precinct results report⁴⁹ as part of this audit. The county election administrator confirmed that all precinct results reports are generated and signed by the presiding judge to certify the accuracy of the returns, as required.⁵⁰

⁴⁹ Tex. Elec. Code § 65.014.

⁵⁰ Tex. Elec. Code § 127.131.

PREC REPORT-GROUP DETAIL	General E Cameron Count	y, Texas		UN	OFFICIAL RESUL	TS
Run Date:11/16/22 04:45 PM	November	8, 2022		Re	port EL30A Pag	e 0001-01
0001 Precinct 01 (\$37,JP1,IPI,SC1,C						
REGISTERED VOTERS - TOTAL	OTES % ,282 621 0 48.44	EV 422 0	MAIL. 25 0	ED 174 0	PROV 0 0	
US Representative, Dist 34 (VOTE FOR) 1 Mayra Flores (REP) Vicente Sonzalez (DEH) Chris Royal (IND) Total Over Votes Under Votes	237 39.63 348 58.19 13 2.17 598 0 23	155 246 8 409 0	3 21 0 24 0	79 81 5 165 0	0 0 0 0	
Governor (VOTE FOR) 1 Greg Abbott (REP), Beto O'Rourke (CPH), Mark Tippetts (LIB), Del'ilah Barrios (GRN) MITE-IN, Total Over Votes Under Votes	234 38.81 358 59.37 4 .66 7 1.16 0 603 0	160 247 1 4 0 412 0	4 20 0 0 0 0 24 0	70 91 3 3 0 167 0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
Lieutenant Governor (VOTE FOR) 1 Dan Patrick (REP), Mike Collier (DEM) Shama Steele (LIB) Total Over Votos Under Yotes	227 38.74 329 56.14 30 5.12 586 1	156 231 13 400 1 21	3 20 1 24 0	68 78 16 162 0	0 0 0 0 0	

Figure 75: Precinct Results Report

Unofficial Results

A review of all elections during the audit period confirmed the consistent and compliant transmission of election night returns⁵¹ to the Secretary of State on election night. As an example, for the November 8, 2022 General Election, Cameron County reported all early voting totals at 7:55 p.m. on election night. The county's final unofficial vote totals for one hundred two (102) precincts and seventy-one (71) polling locations were submitted on November 8, 2022 at 11:24 p.m. The data, as submitted through the statewide system, reported a total of 77,095 votes cast and 33.86% voter turnout.



Figure 76: Cameron County Election Unofficial Results for November 8, 2022 General Election

⁵¹ Tex. Elec. Code § 68.034.

RECONCILIATION

Findings

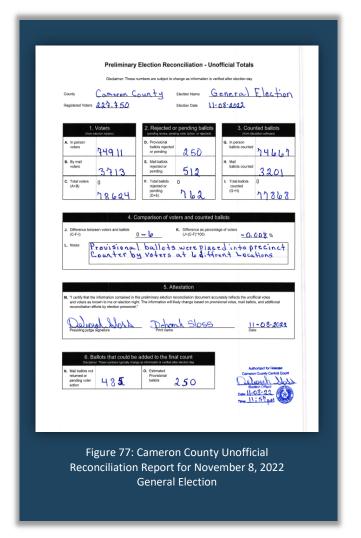
- No discrepancies of more than one percent of the total number of cast votes for any election were identified in the reconciliation of election results.
- Cameron County maintains detailed reports for reconciliation purposes consistent with the reconciliation procedures outlined in the Central Counting Station Plan and includes additional information related to any identified discrepancies.

Preliminary Reconciliation

The presiding judge of the central counting station must attest to an unofficial written reconciliation of votes and voters at the end of the tabulation process on election day. ⁵² Likewise, the presiding judge must attest to an official reconciliation after the inclusion of any late arriving or provisional ballots following the canvass.

Preliminary reconciliations were posted on the Cameron County website for all applicable elections.

For the November 8, 2022 General Election, the unofficial reconciliation report reflected a discrepancy between the number of voters voting and the number of ballots of -6 (.008%). The county indicated 485 mail ballots had not yet been received and 250 provisional ballots were pending review. The presiding judge indicated that provisional ballots were placed by mistake into the precinct counter by voters at six different locations which could contribute to the discrepancy.



⁵² Tex. Elec. Code § 127.131(f).

Final Reconciliation

The presiding judge must attest to an official reconciliation after the inclusion of any late arriving or provisional ballots following the canvass.⁵³ Consistent with the unofficial reconciliation report, Cameron County posts all final reconciliation reports on their county website.

For the November 8, 2022 General Election, the final reconciliation report reflected the discrepancy between the number of voters voting and the number of ballots of -7 (.009%). As previously noted, provisional ballots were deposited in scanners by mistake and an additional reference was added related to spoiled ballots. The final report includes a statement related to this issue by the presiding judge.

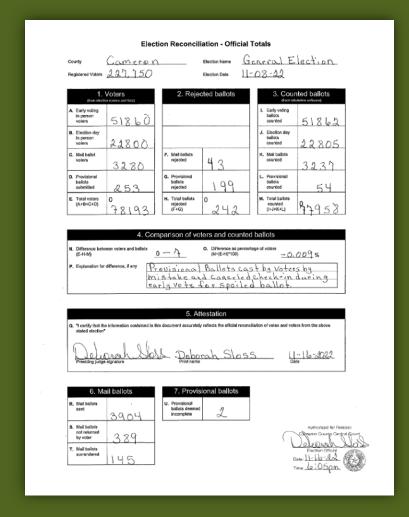


Figure 78: Cameron County Official Reconciliation Report for November 8, 2022 General Election

56

⁵³ Tex. Elec. Code § 127.131(f).

Votes Cast vs. Votes Counted

An analysis of Cameron County data was conducted to validate the reconciliation of the number of voters who checked in to vote at each polling location compared to the number of votes reported by each polling location for all elections. This reconciliation included a detailed analysis of several reports produced by the VOTEC Vote Safe Pollbook and the ES&S System as well as the Cameron County Final Reconciliation Reports. The reports used included the:

- 1. ES&S Audit Log Reports;
- 2. VOTEC VoteSafe Voter Check-in Reports;
- 3. Cameron County Reconciliation Reports; and
- 4. Canvass Reports.

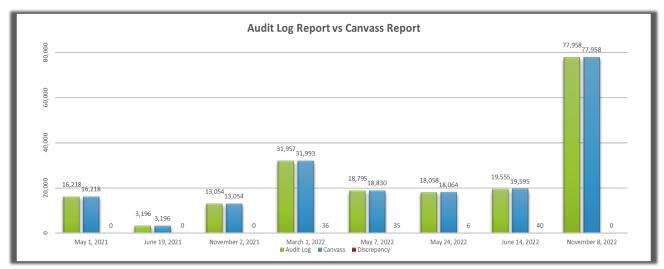


Figure 79: ES&S Audit Log Report vs. Cameron County Canvass Report

In comparing the ES&S Audit Log Report to the Cameron County Canvass Report, several small discrepancies were identified between the two reports. The March 1, 2022, May 7, 2022, and June 14, 2022 elections all show an increase of more than 30 cast ballots from the Audit Log Report to the finally submitted Canvass Report. This increase is consistent with the addition of accepted late arriving mail ballots and accepted provisional ballots.

To look more closely at each election, the audit team compared the total number of voters as listed on the ES&S Audit Log Report to the VOTEC VoteSafe Voter Check-Ins Report. For this comparison to be effective, the audit team removed the mail ballot totals from the audit report.

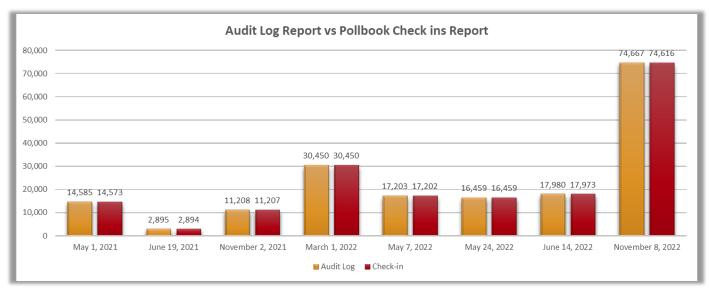


Figure 80: ES&S Audit Log Report vs. VoteSafe Pollbook Check-Ins Report

The ES&S Audit Log Report, as compared to the VOTEC VoteSafe Voter Check-Ins Report, similarly reflected minor discrepancies. These discrepancies are consistent with the addition of accepted late arriving mail ballots and accepted provisional ballots.

Discrepancies

Overall, across all elections included in the audit period, no election produced a discrepancy of more than one percent between the VoteSafe Pollbook Check-in Report or the ES&S Election Audit Log Report. The discrepancies are consistent with the inclusion of late arrive mail ballots and accepted provisional ballots which were added to the audit log and would not have been reflected in the check-in report.

March 1, 2022 Primary Election

The precinct results report for the March 1, 2022 Primary Election listed the date of report as 2017. Cameron County explained that during the tabulation of results, an internal battery for the operating system was failing. When the computer was turned off or disconnected from a power source, the computer would reset to 2017 following a reboot of the system. This required the county to manually update the clock each time.

Further, the county identified as part of their reconciliation efforts, that when an election day poll was reopened to include ballots that were not counted at the individual polling location but were reviewed and approved at the Central Counting Station, the technician inadvertently overwrote the previous numbers for one precinct causing a discrepancy of approximately 320 votes.

To resolve this issue, the county had the election results management (ERM) system transported back to the Central Counting Station to reload all precinct results. Following the reload of the

precinct results, the election results reconciled. However, prior to printing the final precinct results report, the necessary report date correction was inadvertently overlooked.

POST-ELECTION REPORTING

Findings

 Cameron County was compliant with all post-election reporting requirements including the timelines for submission of each report.

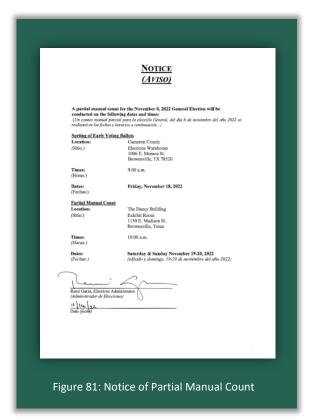
Partial Manual Count

To ensure the accuracy of the tabulation of electronic voting system results, the general custodian of election records must conduct a partial manual count of selected races in at least one percent of the election precincts or in three precincts, whichever is greater, in which the electronic voting system was used.⁵⁴

Counties are required to post a notice of the date, hour, and place of the count. ⁵⁵ A review of documentation submitted by Cameron County included the public notice for all elections during the audit period.

Additionally, Cameron County submitted electronic results of the partial manual count for all elections conducted during the audit period through the statewide portal as required.

The precincts used for the partial manual count for the November 8, 2022 General Election were precincts 1, 24, and 88. The race selected for the manual hand count was the Lieutenant Governor race.



No discrepancies were identified between the tally sheets and the summary report completed by Cameron County. However, there were discrepancies between the final vote count for precincts 24 and 88 as compared to the Precinct by Precinct Summary Report and the final Canvass Report for early voting. In precinct 24, there was a one vote difference for Dan Patrick. In precinct 88, there was a one vote difference for Mike Collier. No discrepancies were identified in precinct 1.

⁵⁴ Tex. Elec. Code § 127.201.

⁵⁵ Tex. Elec. Code § 127.201(c).

Precinct	Candidate	Early Voting Tally Sheets	Early Voting Summary	Precinct Results Report	Canvass Report	PMC Submssion
24	Dan Patrick	125	125	126	126	125
24	Mike Collier	199	199	199	199	199
24	Shanna Steele	9	9	9	9	9
24	Undervote	81	81	81	81	81
24	Overvote	0	0	0	0	0
88	Dan Patrick	303	303	303	303	303
88	Mike Collier	349	349	350	350	349
88	Shanna Steele	24	24	24	24	24
88	Undervote	15	15	15	15	15
88	Overvote	0	0	0	0	0

Figure 82: Early Voting Partial Manual Count Results

The summary report and the totals submitted to the Secretary of State reconciled for ballot by mail and for election day totals.

No discrepancies were identified in the submitted totals for any other election conducted during the audit period.

Canvass

The county clerk or election administrator is required to prepare county election returns including the total number of votes received for each candidate or measure on the election ballot. ⁵⁶ The official results must be submitted to the Secretary of State following the local canvass.

Cameron County was compliant with canvass reporting for all elections. For example, the election administrator submitted the county official canvass for all races included in the November 8, 2022 General Election on November 22, 2022. The documents were signed by the election administrator and included the county seal as required.

The report indicated a total of 77,958 total votes cast including 54 accepted provisional ballots. This information matches the final reconciliation form submitted by Cameron County as part of the audit documentation.

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⁵⁶ Tex. Elec. Code § 67.007.



Figure 83: Cameron County Canvass Report for the November 8, 2022 General Election

Precinct by Precinct Report

After each election, the county clerk or election administrator must prepare a report of the number of votes received in each precinct for each candidate for each of those offices. ⁵⁷ Cameron County was compliant with the submission of the precinct by precinct report ⁵⁸ for all elections, as applicable, during the audit period.

Voting History Report

Cameron County submitted all final voting history reports as required for all elections conducted in the audit period as required.⁵⁹ A comparison of the voting history report to the canvass report for the November 8, 2022 General Election indicates a difference of thirty (30) between the number of votes cast as reflected in the canvass report and the number of voting history files entered in the statewide system by Cameron County. It is assumed that these were associated

⁵⁷ Tex. Elec. Code § 67.017.

⁵⁸ Tex. Elec. Code § 67.017.

⁵⁹ Tex. Elec. Code § 18.069.

with voters that may have cancelled or surrendered a mail ballot. The exact cause was unable to be determined.

Additional Vote History Reporting

The early voting clerk must maintain a roster of voters who vote by mail, in-person during the early voting period, and on election day. ⁶⁰ Additionally, for general elections for state and county officers, this information must be submitted to the Secretary of State to be posted on the Secretary of State's website by 11:00 a.m. the following day in a downloadable format.

Early voting and election day rosters are submitted to the Secretary of State through the statewide system. Therefore, all counties must submit updated voting history records within 24 hours after receipt of a mail ballot and within 24 hours after a person has cast a ballot during the early voting period or on election day.

Information displayed on the Secretary of State's website is dependent on the provision of accurate and timely information by each county. For counties directly using the statewide system, the information is entered on a daily basis and is presented for public review. For counties using a third-party vendor, the information is submitted each evening as is available the following morning.

Cameron County personnel uploads the voting history report at the conclusion of each day of early voting and on election day. The statewide election administration system confirms that the county was compliant with all voting history submissions.

Voting Participation Review

The Secretary of State, in collaboration with other states, conducts a thorough review of voters who may have voted in more than one state or jurisdiction as well as those who may have been deceased at the time of the election. The voter participation review for the November 8, 2022 General Election did not identify any potential deceased voters or voters from Cameron County who may have cast a ballot in another state or in another county within Texas.

⁶⁰ Tex. Elec. Code § 87.121.

CONCLUSION

Following the comprehensive review of the elections conducted in Cameron County during the 2021-2022 audit period, the audit team identified the following areas of needed improvement across all elections.

Training of Election Workers

Cameron County has developed an in-depth election worker training program that provides both legal and procedural training as well as hands-on training with all election equipment. The two-part training begins with the legal requirements for election documentation, legally required signage, and detailed explanations of county election procedures. Additionally, the county training and instructional materials provided to all election judges and clerks include detailed explanations of all polling location forms and specific examples of how to complete the paperwork correctly. As a result of an effective training program, documentation was thorough, complete, and accurate.

Election Security & Contingency Planning

Cameron County has established written policies and procedures related to the county technology and security services including an Incident Response Plan and an IT Continuity of Operations Plan. Furthermore, Cameron County has implemented numerous measures to ensure the physical security of all election facilities, voting equipment, and voted ballots. As a result of their geographic location, Cameron County has extensive experience with natural disasters and unexpected events that can impact the election process. The county is in constant communication with other county offices, local law enforcement, as well as state and federal agencies to ensure successful operations of elections in emergency circumstances.

Though the county has numerous security measures currently in place as previously referenced, the county does not have a comprehensive Written Information Security Plan (WISP) related specifically to supporting and securing elections in Cameron County. This plan should include incident response planning and continuity of operations considerations. Likewise, a vendor risk management plan should be in place with all vendors providing services for the county election office and accessing sensitive and confidential voter registration and election data.

Voter Registration & List Maintenance

Cameron County should continue processing voter registration applications and record updates in a timely manner. Likewise, the county should continue to prioritize all list maintenance activities to ensure that only eligible voters are able to cast a vote in Cameron County.

Ballot by Mail Reporting

Beginning in 2022, Texas counties were required to report application for ballot by mail and subsequent mail ballot activity to the statewide system to allow voters the opportunity to utilize the Ballot by Mail Tracker to track the status of their application or ballot and, in certain circumstances, correct missing or incorrect personal identification numbers. Though Cameron County provided notice to the impacted voters and tracked these rejections and corrective actions at the county level, the county did not report the appropriate information to the statewide system for the rejected applications. Therefore, the rejected applicants were not offered the opportunity to check the status of their applications through the Ballot by Mail Tracker. Likewise, the county did not send the appropriate information to the statewide system that would provide the voters the opportunity to correct their ballots through the Ballot by Mail Tracker. A review of elections conducted since the audit period indicates that Cameron County is now in compliance with this reporting requirement.

Conclusion

Cameron County has implemented numerous election security measures and physical security protocols to support and secure the elections in the county. The county voter registration program and the election worker training program have proven effective across the elections in this audit period. Making necessary improvements, in the areas identified above, will not only further safeguard their elections but will demonstrate to the voters of Cameron County that they can have confidence in their election process and outcomes.

LOCAL ENTITY ELECTIONS

Findings

- Local entities reported that they have written policies and procedures in place for the administration of their elections. Additionally, election records are retained in compliance with state law.
- Local entities reporting providing local training and utilizing the Secretary of State online training and resources for training election workers in state law and polling place procedures.
- Local entities rely on voting system vendors for support in the programming and managing voting system equipment.
- Local entity response largely indicate compliance with all legal requirements related to the security of voting system equipment, electronic media, and election supplies.

Overview

As part of the audit process, the Secretary of State compiled a list of all known political subdivision in each county. Specifically, the list was focused on cities, schools, and water districts. An initial inquiry was sent to each identified political subdivision requesting information related to all elections conducted during the 2021-2022 audit period. The following list contains entities that responded to the Secretary of State inquiry and reported that they conducted their own elections. Below are the responses provided summarizing how each entity administers their election.

May 1, 2021 Uniform Election

Harlingen Independent School District (ISD)

May 7, 2022 Uniform Election

City of Palm Valley

Policies & Procedures

May 1, 2021 Uniform Election	Written Election Policies & Procedures	Written Security Plan	Access-Control to Voting Equipment	Retention of Election Records for 22 months	Central Counting Station Plan
Harlingen ISD	Yes	Yes	Yes	Yes	Yes
May 7, 2022 Uniform Election	Written Election Policies & Procedures	Written Security Plan	Access-Control to Voting Equipment	Retention of Election Records for 22 months	Central Counting Station Plan
City of Palm Valley	Yes	Yes	Yes	Yes	Yes

Election Worker Training

May 1, 2021 Uniform	Election Worker Training	Secretary of State	Number of Trained
Election	Provided by Entity	Training Used	Election Workers
Harlingen ISD	Yes	Yes	36
May 7, 2022 Uniform	Election Worker Training	Secretary of State	Number of Trained
Election	Provided by Entity	Training Utilized	Election Workers
City of Palm Valley	Yes	Yes	4

Ballot Preparation

May 1, 2021 Uniform Election	Ballots Programmed by Entity	Ballots Programmed by Vendor	Vendor	Logic & Accuracy (L&A) Test Conducted
Harlingen ISD	No	Yes	Cameron County Elections Office	Yes
May 7, 2022 Uniform Election	Ballots Programmed by Entity	Ballots Programmed by Vendor	Vendor	Logic & Accuracy (L&A) Test Conducted
City of Palm Valley	No	Yes	ES&S	No

Inventory of Equipment & Supplies

May 1, 2021 Uniform Election	Inventory of Equipment & Supplies	Tracking of Electronic Media	Inventory of Voting System Equipment	Review of Supplies, Equipment, & Polling Location Forms
Harlingen ISD	Yes	Yes	Yes	Yes
May 7, 2022 Uniform Election	Inventory of Equipment & Supplies	Tracking of Electronic Media	Inventory of Voting System Equipment	Review of Supplies, Equipment, & Polling Location Forms
City of Palm Valley	Yes	No	Yes	Yes

Voting Equipment

May 1, 2021 Uniform Election	Voting Equipment	Accessible Voting Equipment	Electronic Pollbook	Pollbook Programmed by Vendor
Harlingen ISD	DS200	AutoMark	No	N/A
May 7, 2022 Uniform Election	Voting Equipment	Accessible Voting Equipment	Electronic Pollbook	Pollbook Programmed by Vendor
City of Palm Valley	AutoMark	AutoMark	No	N/A

Ballot by Mail

May 1, 2021 Uniform Election	Number of Ballots Mailed	Number of Ballots Received	Number of Ballots Accepted	Number of Ballots Rejected	Early Voting Ballot Board
Harlingen ISD	653	491	491	0	Yes
May 7, 2022 Uniform Election	Number of Ballots Mailed	Number of Ballots Received	Number of Ballots Accepted	Number of Ballots Rejected	Early Voting Ballot Board
City of Palm Valley	16	16	16	0	Yes

Voting in Person

May 1, 2021 Uniform Election	Number of Early Voting Polling Locations	Number of Election Day Polling Locations	Early Voting Ballots Cast	Election Day Ballots Cast	Provisional Ballots Counted
Harlingen ISD	1	10	2057	1237	0
May 7, 2022 Uniform Election	Number of Early Voting Polling Locations	Number of Election Day Polling Locations	Early Voting Ballots Cast	Election Day Ballots Cast	Provisional Ballots Counted
City of Palm Valley	1	1	245	69	0

Post-Election Audit

May 1, 2021 Uniform Election	Conducted Partial Manual Count
Harlingen ISD	Yes
May 7, 2022 Uniform Election	Conducted Partial Manual Count
City of Palm Valley	Yes