

September 2024

Ms. Amy L. Rothstein  
Assistant General Counsel for Policy  
Federal Elections Commission  
Washington, DC

Dear Assistant General Counsel Rothstein--

I am writing today on behalf of myself, as well as on behalf of any and all human beings living in the United States who were not candidates for federal, state, or local office in the 2012, 2016, or 2020 election seasons. This message belatedly follows Federal Elections Commission (FEC) Notice 2016-11, but responds timely to FEC Notice 2024-18.

The issue of creating some separation between Federal elections activities, state elections activities, and local elections activities is of high importance to all human beings living in the United States, and an issue I have been reviewing in an ongoing matter to understand what levers we might be able to use to help stabilize United States elections at all three levels. We as humans and private citizens are living in a system of governance which functionally values the monetary contributions of non-human legal fictions more highly than it values the efforts and needs of human beings. This in and of itself raises concerns as to how our human rights are to be ensured.

Questions brought to light by Neil Reiff and Rachel Provencher on behalf of the Minnesota Democratic Farmer Labor Party (MN-DFL) in June 2016 are valued as part of the conversation of how we as a nation can ensure continued free, fair, and safe elections. From a process perspective, however, the FEC did not have an efficient public comment process during 2016, such that the comment period did not open for more than 111 days after first receipt of the Petition for Rulemaking, and the deadline for comments occurred after a change in administration. Fortunately, the FEC's efficiency appears to have improved this year, with the comment period opening less than 40 days after first receipt of the 2024 Petition for Rulemaking, and deadline for comments at least 30 days before election day. The FEC's process improvement will at least provide a different sampling method to the federal government regarding the same issues.

Regarding the specific items outlined in the 2024 request for comments:

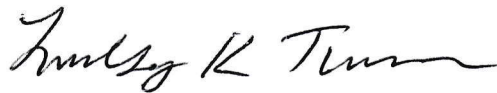
First, using consistent legal definitions for any given regulatory context is generally more efficient, and therefore preferred to help support U.S. citizens in understanding their rights and responsibilities. Referring back to Item 4 in the public comment from Reiff & Provender dated January 30, 2017, the example provided is not reasonably interpretable from the perspective of a voter interested in supporting elections integrity. Any human spending, say, thirty percent of their compensated time on state or local elections activity could still potentially be spending half of their compensated time on federal elections activity. The mere fact of allocating a portion of time to state or local elections does not imply absence of federal elections activity. Any changes the FEC proposes would need to be stated more clearly than Reiff & Provender did.

Second, a plain-language reading of "voter registration activity" and "get out the vote activity" aids interpretation. Longstanding MN-DFL members know what these activities are. Does the activity

relate to a candidate for federal office or an amendment to the U.S. Constitution? If so, the FEC has jurisdiction over the activity. A suggestion is that if over 30 min in any two-hour period is spent in human interactions to ensure voter eligibility for, or go to the polls to vote in, a federal election, the activity counts. The FEC could exclude itself from oversight in state and local elections in U.S. States & Commonwealths demonstrating competent self-regulation. (State of Georgia failed the self-oversight standard in its 2018 election cycle; State of Ohio also later failed the self-oversight standard).

Third, my volunteer experience in three separate federal elections and progressively decreasing standard of living is a reminder the FEC must take action to prevent abuse of volunteer labor by political parties. I refuse to support any changes in FEC regulatory standards which would result in further enabling political parties and Political Action Committees to tangibly benefit from uncompensated labor provided by persons with disabilities and/or persons who brought in/bring in less than \$39,000 in annual income during any thirty-six (36) month period during the present decade.

Thank you for your service to the People of the United States,



Dr. Lindsey K. Tuominen  
Sole Proprietor, L.K. Tuominen

# GEORGIA SECRETARY OF STATE ROBYN A. CRITTENDEN

GENERAL ELECTION

PROCESS  
EXAMPLE:  
ELECTIONS  
INTEGRITY AT  
STATE LEVEL

## Official Results

NOVEMBER 6, 2018  
TO JANUARY 14, 2019

ELECTION DAY:  
NOVEMBER 6, 2018

THIS 49 HR PERIOD  
IS A CRUCIAL PERIOD DUE TO THE

CONFLICT OF  
INTEREST

= THREE-PARTY  
ELECTION MODEL  
DESIGN

EMPHASIS ON K. TUOHIMENEN'S STANDARDS  
C. 2020

Governor \* 3-PARTY ELECTION

1978, 408  
- 1,923,685

THIS ELECTION  
SHOULD HAVE  
BODY

Counties/Precincts Reporting: 100 %

54,723

Percentage Votes

BRIAN KEMP (REP)

INCUMBENT SECRETARY OF  
STATE AND THE  
STATE OF GEORGIA

50.22%

SUBSTANTIAL  
TO A

1,978,408

STACEY ABRAMS (DEM)

48.83%

REMOVED 1,923,685

TED METZ (LIB)

0.95%

37,235

CONFLICT OF  
INTEREST EXISTED

3,939,328

COMPARISON AMONG THE THREE RESULTS WITH

Lieutenant Governor

LESS THAN THREE

Counties/Precincts Reporting: 100 %

EMULATES THE  
GOVERNOR'S MODEL

Percentage

Votes

GEOFF DUNCAN (REP)

51.63%

1,951,738

SARAH RIGGS AMICO (DEM)

48.37%

1,828,566

3,780,304

Secretary Of State

\* 3-PARTY ELECTION (PART A)

Counties/Precincts Reporting: 100 %

Percentage

Votes

BRAD RAFFENSPERGER (REP)

1,906,588

49.09%

1,906,588

JOHN BARROW (DEM)

- 1,890,310

48.67%

1,890,310

SMYTHE DUVAL (LIB)

16,278

2.23%

86,696

3,883,594

| Attorney General                    |            |                  |
|-------------------------------------|------------|------------------|
| Counties/Precincts Reporting: 100 % | Percentage | Votes            |
| CHRIS CARR (I) (REP)                | 51.30%     | 1,981,560        |
| CHARLIE BAILEY (DEM)                | 48.70%     | 1,880,807        |
|                                     |            | <b>3,862,370</b> |

| Commissioner Of Agriculture         |            |                  |
|-------------------------------------|------------|------------------|
| Counties/Precincts Reporting: 100 % | Percentage | Votes            |
| GARY BLACK (I) (REP)                | 53.08%     | 2,040,097        |
| FRED SWANN (DEM)                    | 46.92%     | 1,803,383        |
|                                     |            | <b>3,843,480</b> |

| Commissioner Of Insurance           |            |                  |
|-------------------------------------|------------|------------------|
| Counties/Precincts Reporting: 100 % | Percentage | Votes            |
| JIM BECK (REP)                      | 50.37%     | 1,944,963        |
| JANICE LAWS (DEM)                   | 46.99%     | 1,814,499        |
| DONNIE FOSTER (LIB)                 | 2.65%      | 102,163          |
|                                     |            | <b>3,861,625</b> |

*3-PARTY BLOTTED*

*DEFIZORING  
73%  
pts*

| State School Superintendent         |            |                  |
|-------------------------------------|------------|------------------|
| Counties/Precincts Reporting: 100 % | Percentage | Votes            |
| RICHARD WOODS (I) (REP)             | 53.02%     | 2,048,003        |
| OTHA E. THORNTON, JR (DEM)          | 46.98%     | 1,814,461        |
|                                     |            | <b>3,862,464</b> |

| Commissioner Of Labor               |            |                  |
|-------------------------------------|------------|------------------|
| Counties/Precincts Reporting: 100 % | Percentage | Votes            |
| MARK BUTLER (I) (REP)               | 52.46%     | 2,019,389        |
| RICHARD KEATLEY (DEM)               | 47.54%     | 1,830,061        |
|                                     |            | <b>3,849,450</b> |

Public Service Commission, District 3 - Metro-Atlanta

3-PARTY ELECTION (PART A)

Counties/Precincts Reporting: 100 %

Percentage

Votes

|                       |          |        |                  |
|-----------------------|----------|--------|------------------|
| CHUCK EATON (I) (REP) | 197656   | 49.70% | 1,917,656        |
| LINDY MILLER (DEM)    | -1838020 | 47.63% | 1,838,020        |
| RYAN GRAHAM (LIB)     | 79636    | 2.67%  | 102,878          |
|                       |          |        | <b>3,858,554</b> |

Public Service Commission, District 5 - Western

3-PARTY ELECTION

Counties/Precincts Reporting: 100 %

Percentage

Votes

|                            |           |        |                  |
|----------------------------|-----------|--------|------------------|
| TRICIA PRIDEMORE (I) (REP) |           | 50.25% | 1,937,599        |
| DAWN A. RANDOLPH (DEM)     | DIFERENCE | 47.23% | 1,820,868        |
| JOHN TURPISH (LIB)         | > 3% opt  | 2.52%  | 97,203           |
|                            |           |        | <b>3,855,670</b> |

- ▶ STATE SENATE *J.K. TURNER*
- ▶ STATE HOUSE *SEPTEMBER 24, 2024*
- ▶ DISTRICT ATTORNEYS
- ▶ FEDERAL OFFICES
- ▶ STATEWIDE QUESTIONS

FIVE TOTAL ELECTIONS INCLUDING THE THREE-PARTY CONSON

Counties/Precincts Reporting

STANDARD

Completely Reported

Not Reporting

*State @ Minnsta*

*J.K. Turner*

*SEPTEMBER 2024*

*\* NEEDS A RUNOFF ELECTION*

PART B

# GEORGIA SECRETARY OF STATE ROBYN A. BRITTENDEN

GENERAL ELECTION RUNOFF

## Official Results

November 8, 2018 TO  
JANUARY 14, 2019

## RESULTS

| Secretary Of State <input checked="" type="checkbox"/> |       | Percentage | Votes            |
|--|-------|------------|------------------|
| Counties/Precincts Reporting: 100 %                    |       |            |                  |
| BRAD RAFFENSPERGER (REP)                               | 73% ( | 51.89%     | 764,855          |
| JOHN BARROW (DEM)                                      | )     | 48.11%     | 709,049          |
|  |       |            | <b>1,473,904</b> |

| Public Service Commission, District 3 - Metro-Atlanta <input checked="" type="checkbox"/> |       | Percentage | Votes            |
|---|-------|------------|------------------|
| Counties/Precincts Reporting: 100 %   |       |            |                  |
| CHUCK EATON (I) (REP)   | 73% ( | 51.75%     | 758,553          |
| LINDY MILLER (DEM)  | )     | 48.25%     | 707,267          |
|   |       |            | <b>1,465,820</b> |

Counties/Precincts Reporting

Completely Reported       Not Reporting  
 Partially Reported

RUNOFF BUREAU, MOETS STANDARDS

L.K. THUMMON

SEPTEMBER 20, 2024

PROCESS IMPROVEMENT  
ELECTIONS INTEGRITY

BETTER PRACTICES TO DEAL WITH CONFLICTS OF  
INTEREST SUCH AS THOSE WHICH AROSE AS A  
RESULT OF BRIAN KOMP'S RUN FOR GOVERNOR  
OF THE U.S. STATE OF GEORGIA IN 2018  
WHILE HOLDING THE OFFICE OF SECRETARY OF  
STATE IN THE U.S. STATE OF GEORGIA :

L.K. THUMMON  
SEPTEMBER 24,  
2024

- THOSE PARTY ELECTED ~~INDIVIDUALS~~
- OFFICE HOLDER(S) RESPONSIBLE FOR ELECTIONS  
OVERSIGHT MUST RESUME THE POSITION  
BY THE FIRST DAY OF EARLY VOTING  
IN THE ELECTION SEASON IN WHICH THE  
CHANGE OF OFFICE IS SOLICITED,

STATE OF GEORGIA