

**TO:** Coppersmith Brockelman PLC  
**FROM:** Brad Nelson  
**DATE:** October 18, 2022  
**RE:** Report from the Administrative Review of the Pinal County August 2, 2022 Primary Election

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On August 17, 2022, the Pinal County Board of Supervisors (“Board”) directed the Pinal County Attorney’s Office (“PCAO”) to commission an administrative review (the “Review”) of the August 2, 2022 primary election (the “Primary”). To ensure objectivity, PCAO retained Coppersmith Brockelman PLC as outside counsel (“CB”). CB then retained Brad Nelson, an experienced Arizona election official, as a consulting expert to perform the Review at their direction.<sup>1</sup> What follows is Mr. Nelson’s report.

**I. Scope of the Review**

As directed by the Board, the Review focused on four principal topics:

- (1) What caused municipal contests to be either omitted or incorrectly included on some ballots?
- (2) What caused ballot shortages at certain polling locations?
- (3) Did county officials appropriately respond to and manage these issues?
- (4) What can the County do to avoid similar issues in the future?

To get the full benefit of Mr. Nelson’s expertise, PCAO also requested that Mr. Nelson consider additional but related issues during the Review, including whether the Pinal County Elections Department (“PCED”) had sufficient staff and physical space. This report includes Mr. Nelson’s findings and recommendations on these, and other topics.

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<sup>1</sup> Mr. Nelson’s qualifications are summarized in **Exhibit A** to this Report.

## **II. Information Considered for the Review**

To answer these questions, Mr. Nelson consulted the:

- Election Division of the Arizona Secretary of State;
- PCED, both Director Virginia Ross and staff;
- Director of the Pinal County Communications and Marketing Department;
- Pinal County Human Resources Department;
- Former PCED Director Michelle Forney and the former PCED Interim Director Stephanie Cooper;
- Municipal Clerks in Pinal County, including for the Queen Creek Town Clerk, the Apache Junction City Clerk, the City of Casa Grande City Clerk, City of Eloy City Clerk, and the Town of Mammoth Town Manager;
- Chairs of the Pinal County Republican Party and Pinal County Democratic Party;
- Five Pinal County poll workers who served on August 2, 2022 (“Election Day”); and
- CEO of Runbeck Election Services, Pinal County’s ballot printing vendor.<sup>2</sup>

Mr. Nelson also analyzed documents provided by several of these individuals. Those documents included the ballot order spreadsheet generated by the PCED for the Primary, the ballot order sent by Pinal County and received by Runbeck Election Services, the Election Day call logs from the Citizen Contact Center, and the Emergency Operations Center and Poll Worker Training Manuals used for the Primary.

Additionally, Mr. Nelson reviewed (1) video from each of the Board’s meetings since July 2022 where elections matters were discussed, (2) the “call to the public” during those meetings, and (3) the press conference regarding the Primary conducted by Chairman McClure and County Attorney Volkmer on August 3, 2022.

## **III. Overview**

The PCED is responsible for the administration of federal, state, county, and local elections on behalf of the Board. Its office, located at 168 South Main Street,

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<sup>2</sup> Mr. Nelson tried, but was unable, to interview David Frisk, the PCED’s previous Director.

Coolidge AZ, has around 6,675 square feet of office and warehouse space. The PCED's budget at the time of the Primary could support eight full-time employees, including the position of Election Director (the "Director"). Additionally, the PCED hires temporary workers during election cycles on an as-needed basis.

Michele Forney left the position of PCED Director in November 2020. Stephanie Cooper served as an interim Director until November 2021 when she left to serve as a county election director in Texas. The position remained unfilled thereafter until March 2022, when David Frisk was hired as the Director. In fact, except for one full-time employee, most of the budgeted positions within the PCED experienced significant turnover, and each position took approximately six to eight weeks to fill after an employee left. This turnover combined with the temporarily unfilled positions contributed to a substantial lack of institutional knowledge, which significantly impacted the administration of the Primary.

Based on his interviews and research, Mr. Nelson believes that everyone involved in administering the Primary strived to conduct a well-run and error-free election. Importantly, Mr. Nelson found no evidence of any intentional wrongdoing or misconduct. But error-free elections are difficult to achieve even under the best of conditions. And the conditions surrounding the Primary were obviously not the best.

Mr. Nelson's findings and recommendations regarding the issues with the Primary follow.

#### **IV. Issue-Specific Findings and Recommendations**

##### **A. Ballot Issues: Municipal Contests Omitted or Incorrectly Included**

Under Arizona law, each municipality is responsible for conducting municipal elections. As the chief election officer for a municipality, the municipal clerk receives and processes (1) nomination petitions for municipal candidates and (2) petitions for municipal ballot measures. After petition validation (and the resolution of any litigation), the clerk establishes the certified list of candidates/contests to be reflected on the ballot. Municipalities in Pinal County have historically entered into an inter-governmental agreement ("IGA") with the Board to conduct their municipal elections on their behalf. For the Primary, the City of Apache Junction, City of Casa Grande, City of Eloy, City of Maricopa, Town of Mammoth, Town of Queen Creek, and Town of Superior executed IGAs with the Board. Under those IGAs, the PCED was responsible for printing those

municipalities' contests on the partisan ballots (where appropriate) and providing the municipal ballots for voters who wished to cast a non-partisan ballot.

As required by the IGAs, the municipal clerks provided a list of certified candidates/contests to the PCED well in advance of the Primary so it could lay out the ballot artwork. After the PCED completed the initial drafts of the ballots, the PCED sent a "snippet" of the ballot to each municipal candidate to ensure the candidate's name was reflected as prescribed on the candidate's nomination paper.

Once the candidates' names and overall ballot content is approved through the proofing process, the PCED must confirm that the appropriate contests are reflected on the appropriate precinct ballots. This can be a challenge because municipal boundaries do not conform to established election precinct lines. For example, Precinct 57 has a total of 2,735 registered voters, and 2,210 of those voters reside in unincorporated Pinal County while 525 of those voters reside in the City of Apache Junction. As another example, Precinct 86 has a total of 5,360 voters, and 4,881 of those voters reside in unincorporated Pinal County while 479 of those voters reside in the Town of Queen Creek. As a further example, Precinct 37 has 1,459 voters, and 268 of those voters are in unincorporated Pinal County, 1,190 of those voters reside in the City of Casa Grande, and 1 voter resides in the City of Maricopa. Moreover, like in all three of the above examples, many election precincts in Pinal County have incorporated and unincorporated land.

The State of Arizona, however, provides a resource to address these challenges. Election precinct boundaries and the boundaries of municipalities are reflected in the Arizona Voter Information Database ("AVID"). AVID provides detailed information about whether each registered voter in Pinal County is eligible to vote in a specific municipal election. Because the PCED had access to this detailed information from AVID, it could and should have known which municipal contests to include (or exclude) on specific precinct ballots. Moreover, a detailed proofing process would have confirmed this information to minimize the risk of errors.

Given the numerous issues with the ballots, we can presume the PCED did not engage in a detailed proofing process of the Primary ballots. But, due to the turnover and the former Director's refusal to return Mr. Nelson's calls, we do not know the method or extent of PCED's efforts to proof the Primary ballots. We do know that contrary to past (and best) practice, the PCED did not share the initial snippets/proofs with the municipal clerks in advance of the Primary.

We also know that the former Director admitted that the PCED's effort to proof the Primary ballots was insufficient. In early July 2022, voters who had requested an early ballot began to receive them. Almost immediately, voters questioned the absence or appearance of municipal contests on their ballots. To address the issues with the municipal ballots, the Board held a special session on July 12, 2022. During that special session, the former Director stated that (1) the precinct specific information provided by AVID was accurate for the Primary, and (2) human error and poor proofing by the PCED personnel caused the issues with the municipal ballots. The former Director further stated that, given these errors, the PCED established and experimented with a proofing process to be used in the future. But the former Director did not elaborate on that new process, and Mr. Nelson found no record of it.

### **Recommendations**

Inadequate proofing caused the municipal contest errors on the Primary ballots. Based on Mr. Nelson's decades of election administration experience with ballot preparation and familiarity with best practices, he makes the following recommendations:

- Involve more individuals with the ballot proofing process. Although one person should lead the ballot proofing process, the process should include multiple individuals who may catch any errors; avoid having the same individuals who input the initial ballot data also being responsible for proofing their own work.
- Test a sample of ballots against information from AVID. Spot-checking Primary ballots against the information from AVID would more likely than not have caught at least some of the errors with the ballots for municipal contests, which could have led the PCED to investigate further.
- Include municipal clerks (when there are municipal contests), candidates, political party chairs, county and local school superintendents (when there are school district contests), and language translation specialists in the ballot proofing process.
- Set a firm deadline by which those involved in the ballot proofing process must provide their feedback and suggested revisions. Always require those individuals to provide their feedback and suggested revisions in writing, not over the phone.

- Ballot proofing is an extremely detailed task, and not everyone has the skill or attention to detail to perform it. Make certain that the PCED personnel engaged in the ballot proofing process have the necessary skill/attention to detail.
- Control ballot versions; refrain from sending out additional ballot proofs until the latest version has been revised.
- Involve the ballot printing vendor in the process from the very beginning of laying out the ballot. The vendor needs to know how much paper to order and how to schedule the printing process to give the county the best service.
- After sending the printing vendor the final ballot artwork, have the vendor print a sample ballot for each ballot variation for the PCED to review.

#### **B. Ballot Issues: Ballot Quantities**

Because the former Director would not return Mr. Nelson's calls, the only information Mr. Nelson could review about the number of ballots placed at each polling location for the Primary was a spreadsheet the former Director used. Mr. Nelson confirmed with Runbeck, the County's ballot printing vendor, that the quantities of ballots identified on that spreadsheet matched the number of ballots that the PCED actually ordered for the Primary. Those quantities did not comply with what Arizona law requires.

As the current PCED Director Ross discussed at the Board's August 17, 2022 meeting, Arizona law (A.R.S. § 16-508) prescribes that the County provide ballots at each polling location for each precinct equal to the number of registered voters plus at least one percent. For example, if there are 1,000 registered voters in a precinct, the County must provide 1,010 ballots. The former Director, however, did not follow the statute. Rather, based on the spreadsheet he used for the Primary, it appears the PCED provided the number of ballots equal to the number of registered voters, less active early voters, plus 1 percent. This meant that for the Primary the PCED provided ballots equal to approximately only sixty-five percent of each precinct's active early voters. The formula used for the Primary did not conform to the clear statutory requirement. Thus, all polling locations received fewer ballots than were required by statute for the Primary, leading directly to the shortages experienced at several polling locations.

## Recommendations

PCED's failure to follow Arizona law caused the ballot shortages experienced in the Primary. Based on Mr. Nelson's decades of election administration experience providing a sufficient quantity of ballots, he makes the following recommendations:

- Comply with A.R.S. § 16-508 when ordering ballots for each polling location. This, however, is the minimum.
- Additionally, estimate voter turnout using historical references from previous elections to determine whether ordering more than the 1% excess might be warranted.
- Pay attention to the atmosphere in the community pertaining to voting early or at the polls. For example, Republican candidates have encouraged members of their party to vote in person on the day of an election. This suggests the PCED may want to exceed the 1% statutory minimum as a precaution.
- Provide or have on hand an excess number of "ExpressVote" unique paper ballots. The Primary was the first countywide election to use a new device known as an "ExpressVote" at the polling stations. The ExpressVote is a touchscreen voting device for use by disabled voters. Unlike the touchscreen voting device previously used in Pinal County, the ExpressVote requires a unique paper ballot (unlike the ballot that most voters cast). That unique paper ballot is blank until used in the ExpressVote device. Because they are blank until used, excess ExpressVote ballots can be stored and used in future elections in case polling stations run out of ballots.
- Relatedly, the County should consider (i) providing approximately 25-35 ExpressVote unique ballots at each polling location in case the polling location runs out of the regular ballots; (ii) providing ExpressVote ballots to the Election Day troubleshooters so they can deliver them to a polling location that runs out of regular ballots; and (iii) keeping a supply of ExpressVote ballots on hand and storing them between elections.<sup>3</sup>

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<sup>3</sup> Arizona law does not provide a formula or direction about how many of these unique ballots should be furnished at the polls.

### **C. Communications Issues: Election Day Operations/Response**

The Board's August 3, 2022 meeting included a "Call to the Public" during which numerous poll workers, candidates, municipal clerks, and voters described their experiences during the Primary. Chief among the complaints by poll workers and voters was the inability to contact the PCED with Election Day problems/questions.

Separate from the "Call to the Public," Mr. Nelson contacted several veteran poll workers who served on Election Day to discuss how they were instructed to contact the County with Election Day issues. Those poll workers explained to Mr. Nelson that they were instructed—both during their training session and in written training materials—to call the "311" County Contact Center with any questions or problems. But that instruction was not communicated to the County Contact Center personnel until August 1st—the day before Election Day. The County Contact Center personnel reached out to the PCED on August 1st to ask whom they should contact at the PCED if they received calls. The PCED did not respond to the County Contact Center until around 10:00 P.M. on August 1st to instruct their personnel to direct poll worker phone calls to either the PCED or the County Recorder. Notably, when giving that instruction, the PCED already knew about the issues with the early ballots. Logically, the PCED should have anticipated there would be more calls than usual on Election Day.

When the County Contact Center opened their phone lines at 6:00 A.M. on Election Day (August 2nd), there were already 20 phone calls from polling location inspectors. Based on the instructions provided in the late evening email noted above, the County Contact Center first attempted to route a call to the PCED at 6:01 A.M. on Election Day. The PCED staff answered the phone but stated that they did not have time to take any calls. From that point on, it appears that no one in the PCED answered calls from the County Contact Center. Because the PCED was unable to field phone calls from the polls, the County's Emergency Operations Center ("EOC") took the lead in attempting to resolve as many issues as they could.

Information Mr. Nelson received from his interviews suggests that the EOC was also unable to contact the PCED. But the EOC was able to contact the Election Day troubleshooters and direct them to the polling locations experiencing problems. The troubleshooters, however, were unable to remedy ballot shortages or



assist with questions relating to the electronic poll books and touchscreen voting devices.<sup>4</sup>

Veteran poll workers explained to Mr. Nelson that in past elections there was a list of different phone numbers they could call depending on the problem they needed to address. For example, the poll worker training manual for the November 2021 election in the Santa Cruz Valley Union High School District listed specific phone numbers for inquiries about poll worker duties, polling location questions, supply needs, etc. Those training materials also listed separate phone numbers for the poll workers to contact the Recorder's office.

### **Recommendations**

The PCED's failure to provide numbers for specific issues, train the County Contact Center how to direct calls, or answer Election Day questions substantially increased the confusion and uncertainty on Election Day. Based on Mr. Nelson's decades of election administration experience, he makes the following recommendations:

- Confirm how interdepartmental communications will be handled. If the County Contact Center and/or EOC is to be the initial point of contact for poll worker calls, let them know well in advance of Election Day and provide training and clear instruction about how to handle and route those calls. Moreover, the PCED *must* be prepared to accept calls routed to them as the subject matter experts.
- The PCED, the Recorder, the County Contact Center, and EOC should conduct a postmortem regarding what happened during the Primary and how things might be improved for the upcoming general election.
- Depending on the facility, poll workers may be able to begin partially setting up the polling location on the Monday evening prior to the day of an election. If they are able to do so, they may have questions then. Accordingly, the PCED should make knowledgeable staff available Monday evening before the day an election to answer poll worker phone calls until *at least* 6:00 P.M. They should also provide knowledgeable staff to assist poll workers and resolve as many issues as possible before the polls open the following morning.

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<sup>4</sup> Poll workers interviewed by Mr. Nelson had nothing but praise for the Election Day troubleshooters and believe they did the very best they could under the difficult circumstances.

- Consider providing specific phone numbers to the polling locations for specific questions as has been done in previous elections.

#### **D. Training Issues: Lack of Hands-on and Other Training**

During the administration of the 2016 Presidential Preference Election, Pinal County debuted the use of an electronic poll book (e-poll book) known as the Poll Pad. The Poll Pad allowed poll workers to smoothly check in voters, including verifying the voter's registration, precinct, and specific ballot. It replaced the cumbersome hard copy signature rosters used in previous elections. Poll workers were given hands-on training with the Poll Pad in addition to their usual formal training.

Given their success, Poll Pads have been used in every major election in Pinal County since 2016. And each time, poll workers received hands-on training on the Poll Pads prior to serving at the polls. Yet there was no hands-on training for the Poll Pads before the Primary.

The PCED also failed to train poll workers on the ExpressVote device before the Primary. As discussed above, the ExpressVote is a touchscreen device that allows a voter with disabilities to vote independently and in private. Although the Primary was the *first* time the ExpressVote had been used in a countywide election, the machines were only discussed during poll workers training, and no hands-on training was provided.

This lack of hands-on training was mentioned often during the Calls to the Public after the Primary: poll workers stated that they did not receive hands-on training for and did not know how to operate "the machines" on Election Day.

#### **Recommendations**

The PCED's failure to provide hands-on training on the Poll Pads and ExpressVote machines added to the Primary's Election Day complications. Based on Mr. Nelson's decades of election administration experience, he recommends including hands-on training on the Poll Pads and ExpressVote machines in addition to the usual training provided for poll workers.

### **E. Staffing Issues: Fully Staff PCED, Including With Temporary Employees**

On August 17, 2022, PCED Director Ross presented to the Board a draft organizational chart proposing changes to the PCED and Recorder's Office staffing (copy attached as **Exhibit B**). Director Ross emphasized to the Board that the number of staff at the PCED had remained unchanged for years while the number of registered voters served by the PCED had increased from approximately 83,000 voters to 275,000 voters. The draft organizational chart proposed three new positions within the PCED to better serve the voters.

As of August 2022, there were eight full-time PCED employees, most of whom were hired within the previous 45 days. However, it appears that two of those employees are deputy county attorneys from the PCAO temporarily assigned to the PCED.

When interviewed, former Director Forney said the PCED would have benefited from additional personnel during her tenure. But the PCED facility would not have reasonably accommodated any additional personnel. Thus, approximately five years ago, former Director Forney expressed a need for additional space/an adequate facility to (what she described as) the "County Building Committee." Mr. Nelson was informed that the County then spent approximately \$400,000 to add space to the PCED's facility, including two offices, two cubicles, and a front counter. One of the two new offices, however, was temporarily occupied by the Board's staff. Former Director Forney said making sure the PCED has adequate space should be a priority and that only with additional space will the PCED be able to hire more personnel and provide an environment that allows for personnel to adequately perform their tasks. Until then, according to former Director Forney, the risk of employee turnover and associated errors will remain high.

Mr. Nelson also interviewed Randy Tracy, Pinal County's Interim Human Resources & Risk Management Director. Mr. Tracy also noted the high turnover of the PCED employees and suggested that the environment in the PCED office had been challenging for employees due to a single, now-former PCED employee. Mr. Tracy did not provide the employee's name or elaborate on the challenging environment but said the problem no longer existed due to that single employee's departure.<sup>5</sup>

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<sup>5</sup> Mr. Nelson also interviewed Stephanie Cooper, who as mentioned above, was an interim director of the PCED for a short period. No major elections were conducted during Ms. Cooper's tenure, and she had no input for Mr. Nelson regarding staffing/budget.

## **Recommendations**

The ballot and other issues that affected the Primary were exacerbated by the PCED being chronically understaffed and its high turnover. Based on Mr. Nelson's decades of election administration experience, he makes the following recommendations:

- Due to how many issues were caused or exacerbated by staff turnover, the PCED should address succession planning and staff cross-training to avoid similar issues going forward.
- The new chart (Ex. B) reflects numerous managers and supervisors but too few entry level employees. The PCED should consider hiring four entry level personnel within the technology department to provide service and support in the following areas: tabulation programming, ballot layout and proofing, webpage administration, poll worker and polling location data base support and maintenance, ExpressVote device preparations and testing, poll pad preparation and testing, and logic and accuracy testing.
- Additionally, the PCED should consider adding one additional entry level full-time employee to assist and supervise temporary employees in the warehouse. Those temporary employees can assist preparing polling location supplies for the county's 100+ polling locations, administering the early ballots received from the Recorder, and serving on ballot duplication boards.

### **F. Space Issues: The PCED Requires Additional Space**

The PCED currently has approximately 6,675 square feet for both its offices and warehouse. Election office/warehouse utilization is almost always underestimated even when one considers the rate of population growth of a jurisdiction. That is true for the PCED, too.

Delivering supplies to each polling location from the PCED warehouse takes place over a five to ten-day period prior to Election Day and happens in reverse after Election Day as the precinct supplies are returned to the PCED warehouse where the PCED receives, inventories, repairs, and places the materials back in storage for the next election.

## **Recommendations**

Based on Mr. Nelson's decades of election administration experience, he makes the following recommendations regarding the space required for the PCED:

- The PCED facility should be sufficient to “stage” ballot delivery and receipt, with areas designated for each polling location with precinct specific supplies/materials. That will allow election materials to be assembled for specific delivery routes to each polling location. Warehouse personnel would organize the polling location-specific supplies by using a “pick list” unique to each polling location.
- Accordingly, the PCED warehouse should have: 1) warehouse space with a ceiling sufficiently high to accommodate a heavy-duty storage rack system like a Home Depot, Costco environment; 2) several loading docks accessible for delivery by tractor-trailers; 3) sufficient work space to accommodate 75-80 4x4x4 pallets; and 4) sufficient area for staging, checking, maintenance, loading, walkways, and forklift pathways.
- Based on the office and warehouse space in Pima and Maricopa County, Mr. Nelson estimates that a new PCED office/warehouse would require approximately 45,000 square feet of space with approximately 20,000 square feet used as finished office space and 25,000 square feet as the warehouse.
- Ideally, the PCED warehouse and office should be adjacent or close to the Recorder/Voter Registration Office.

## **G. Emergency Issues: Contingency Plans**

The Arizona State Election Procedures Manual addresses varied contingency plans. One such plan is a “Tabulation Contingency Plan” that requires a jurisdiction to file a written plan with the Arizona Secretary of State regarding how it will tabulate ballots if the Central Counting Center is unavailable due to a system failure, power outage, natural disaster or infrastructure failure, among other reasons. A second contingency plan pertains to how a jurisdiction will address/solve excessive wait-time at the polls. The manual defines a wait-time of 30 minutes or more as excessive and suggests a plan to lessen the wait. Such a plan might be to send additional booths and/or poll workers to a polling location with an excessive wait time.

The manual does not address, however, when a polling location does not open on time or when voting is interrupted prior to the official closing of the polls. The PCED should consider developing contingency plans for those issues.

### **Recommendations**

Based on Mr. Nelson's decades of election administration experience, he makes the following recommendations:

- If a polling location is unable to open on time, have the Inspector begin approaching voters to inform them of the delay and how long the delay might last. Voters may choose to wait for the delay to end. Other voters might not be able to wait. For those voters who choose to leave the polling location, the Inspector should get their names and phone numbers with the intention of calling them when the polls are again operational.
- If voting is interrupted at a polling location for a short period of time due to gas leaks, power failure, etc., the Inspector should, again, begin collecting the names and phone numbers of the voters who could not vote during the interruption and attempt to contact the voters once voting recommences.
- If a designated polling location must be changed at the last minute, poll workers should post signs at the "original" polling location informing the voters who arrive there where they should instead go to vote and a phone number those voters can call. If feasible, it would be beneficial to also assign a poll worker to stay at the original polling location to assist voters in finding the proper polling location.

Submitted this 18th day of October, 2022:



Brad Nelson

# **EXHIBIT A**

## **Biography**

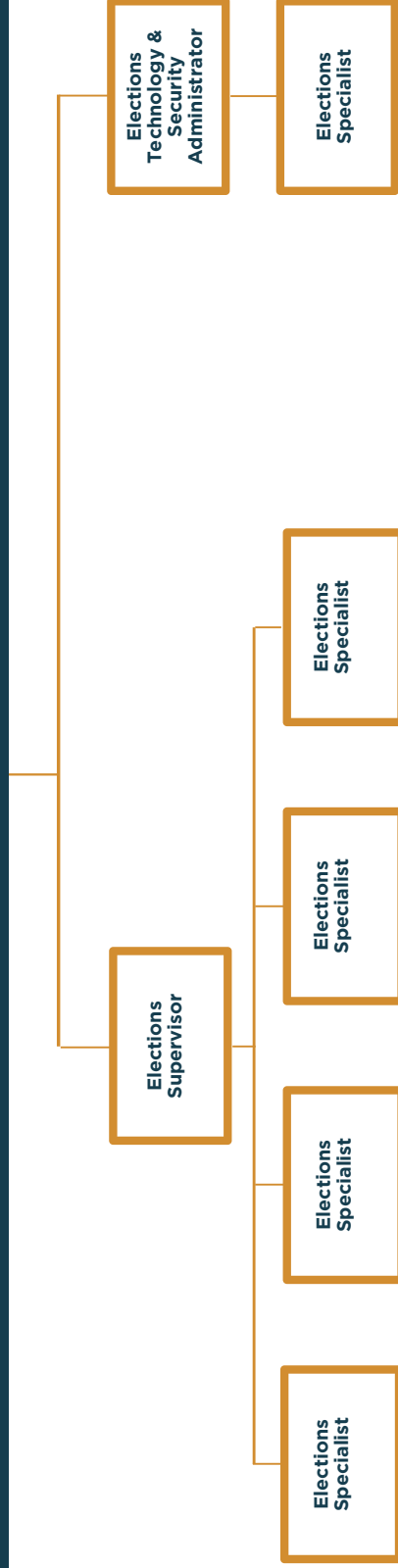
**Brad Nelson** recently retired after serving for over forty-five years in the field of Election Administration. Most recently he served as the Election Director in Pima County, Arizona where for nearly twenty years he was responsible for the administration of all Federal, State, County and local elections on behalf of the Pima County Board of Supervisors. During his tenure with Pima County, Mr. Nelson has improved the testing of election tabulation systems by conducting logic and accuracy tests in excess of those required by law. In Pima County, independent tests, separate from the State tests, are conducted by the local political parties to make certain that county and local level contests are reflected accurately on the ballot and votes for those contests are accurately counted. This same independent test is conducted in a post-election environment to better ensure the official count is accurate. Prior to serving in Pima County, Mr. Nelson served as the Election Director in Mohave County, Arizona and as the Election Office Supervisor in Jefferson County, Colorado. He started his long career with the Maricopa County Election Department in 1976 serving chiefly as the departmental liaison with the county's ballot printing vendor. He has been an Arizona State Certified Election Officer and has earned the designation of Certified Election and Registration Administrator per the requirements of the Election Center and Auburn University, Auburn Alabama. Mr. Nelson is a graduate of Arizona State University where he earned a Bachelor of Science degree in Business. He is a Vietnam-era veteran serving in the United States Air Force from 1972-1976. He is the proud parent of four great children and is enjoying life with his wonderful wife Ursula.



# **EXHIBIT B**

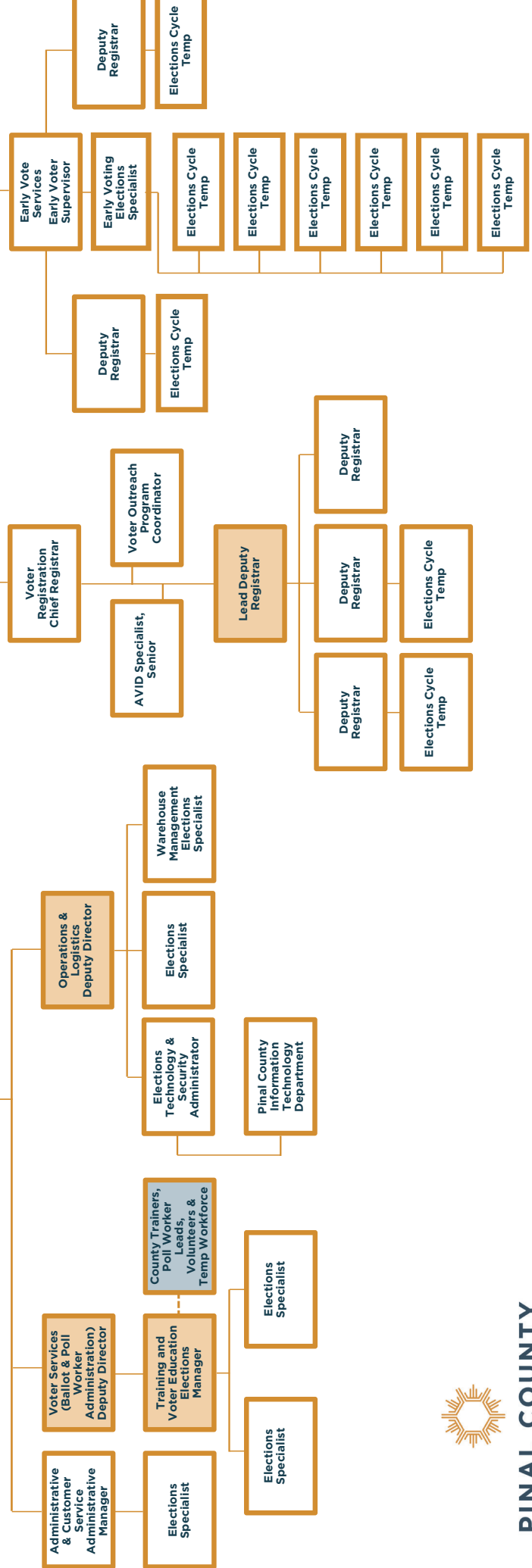
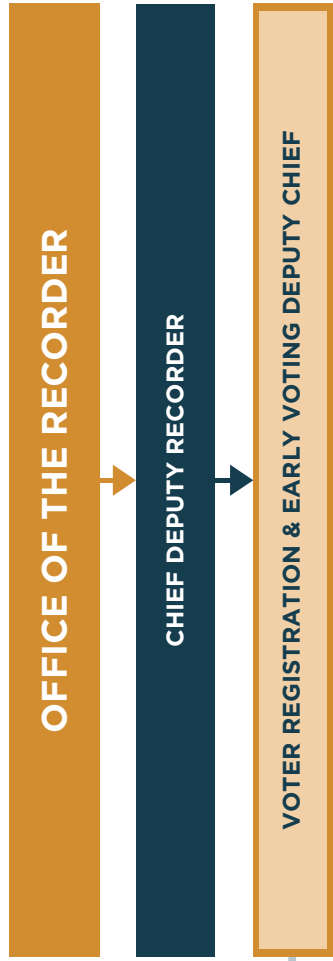


## ELECTIONS DEPARTMENT DIRECTOR





# PINAL COUNTY RECORDERS & ELECTIONS ORGANIZATION CHART DRAFT



**PINAL COUNTY**  
WIDE OPEN OPPORTUNITY