Thanks Dave. Greg, can you please add this response and the attached allocation plan to the record on this item?

Best,
Rebecca

Rebecca Noecker │ Saint Paul City Councilmember, Ward 2

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From: Triplett, David <david.triplett@co.ramsey.mn.us>
Sent: Wednesday, November 12, 2025 8:42 AM
To: Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>
Cc: Dan Stahley <Dan.Stahley@ci.stpaul.mn.us>; West, Tracy M <tracy.west@CO.RAMSEY.MN.US>
Subject: RE: Letter for RES 25-1746

Think Before You Click: This email originated **outside** our organization.

Hello Councilmember Noecker,
Attached is the compliance plan the City of Saint Paul approved in September allowing the County to use RCTab. We met with the Minnesota Secretary of State's office this past summer and they informed us that their responsibility is to certify voting systems to meet State Law and that it's the city's responsibility to determine if the ranked voting system is acceptable, which the city did in September.

Cc'ing Tracy West, Ramsey County Auditor, for her awareness.

Let me know if you have further questions.
Take care,

David Triplett
Deputy Director | Property Tax, Records and Election Services
651-266-2206
90 West Plato Boulevard, St. Paul, MN 55107

To: Shari Moore, City of Saint Paul, City Clerk.
From: David Triplett, Ramsey County, Deputy Auditor.
Date: September 4, 2025
Subject: Plan for Automating the Reallocation Process for City Elections.

This memo serves as notice to the City of Saint Paul, of our plan to automate the reallocation of votes, if needed, for the upcoming Mayoral election held on November 4, 2025. I am asking for the city to confirm this plan is permittable to implement ahead of the next city election.

The automatic reallocation of votes for city elections held in the City of Saint Paul is permitted under Chapter 31 of the city's code of ordinances, subject to strict compliance with testing, transparency, and technical capability requirements. Neither Minnesota Election Statutes nor the Minnesota Secretary of State's office provide any guidance on the administration of Ranked Choice Voting. Therefore, Chapter 31 is our only authority to follow.

Below are the legal conditions found within Chapter 31 that we believe are required to automate the reallocation of votes for city elections:

1. Ballot design supports ranking & error detection, *Sec. 31.03*
2. Capabilities of voting system, *Sec. 31.09(a)*
3. Compliance with reallocation logic, *Sec. 31.05(d)*
4. Meet pre-election system testing requirements, *Sec. 31.09(a)*
5. Preparations to fall back to manual process if testing fails, *Sec. 31.09(a)*
6. Transparent tabulation center, *Sec. 31.04*

There will be no costs associated with implementing this plan. During our testing, we found the automated reallocation for a citywide race takes between 5 to 15 minutes to generate an accurate, verifiable result that strictly follows Saint Paul's reallocation logic.

If we are unable to implement this plan, we will proceed with a hand-reallocation, if needed, beginning on Monday November 10, 2025. We anticipate it will take three days to complete the hand-reallocation and cost the city around $33,000.

Below is a description of how we've met and are compliant with the legal conditions found within Chapter 31 to proceed with an automated reallocation:

1. **Ballot design & format requirements (Sec. 31.03)**
   a) Ballot allows ranking of at least six (6) candidates (if ≥5 candidates are running).
   b) Ballot includes a write-in option.
   c) Ballot includes clear instructions on:
      1. How to rank candidates
      2. How to avoid overvotes or skipped rankings
      3. How to correct mistakes

d) Ballot format supports electronic tabulation of all rankings, if feasible.

e) System can detect and notify of first-rank overvotes and all other rankings.

f) Ballot design and voter instructions are published ≥8 weeks before the election.

2. Capability of voting system (Sec. 31.09)

a) System is authorized for use by the county auditor under *Minn. Stat. § 206.58*.

    1. The tabulation and generation of the Cast Vote Record (CVR) are done on the Hart InterCivic 2.5.2 voting system.

        a) The automated reallocation will be done by analyzing the CVR using RCTab, open-source software that meets the federal VVSG 1.0 standards.

b) System supports the full reallocation logic described in *Sec. 31.05(d)*.

    1. RCTab is compliant with the process, described in #3 below.

c) Election Administrators and election judges will complete a capability test at least 10 days before the election. The date and time of this test will be published on the official election notice and on Ramsey County's public calendar.

    1. If test fails, system is not used for reallocation; manual process is required.

3. Compliance with reallocation logic (Sec. 31.05(d))

a) Precincts can report all first-rank totals on election night.

b) Chief election official computes threshold and determines if any candidate meets it.

c) If no winner, system can resume counting no later than Monday after election day.

d) The automated reallocation follows multi-round process:

    1. Batch elimination of candidates mathematically eliminated

    2. Reallocation of their votes to next highest continuing candidate

    3. Single candidate elimination (lowest total) in next rounds continue until:

        a) One candidate exceeds threshold, or

        b) Two candidates remain — higher total wins

e) Rules for vote interpretation are implemented, including:

    1. Overvotes, undervotes, skipped rankings

    2. Repeated rankings for the same candidate

    3. Exhausted ballots

4. Meet pre-election system testing requirements, Sec. 31.09(a)

a) We will publicly demonstrate the capability of the automated reallocation process at least 10 days before the election. This demonstration will include:

    1. A prepared set of ballots to test the logic and accuracy of the tabulation and generation of an electronic cast vote record. These test ballots will include:

        a) At least 5–6 candidates

        b) A mix of overvotes, undervotes, skipped rankings, and repeated rankings

        c) Ballots that will trigger:

- o Batch elimination
- o Single elimination rounds
- o Ties
- o Exhausted ballots
    - d) Includes write-in candidates
    - e) Includes ballots that should mathematically eliminate certain candidates
2. Testing Setup
    - a) Load test ballots into the system using the same method as actual elections (e.g., scanning).
    - b) Document test ballots and expected outcomes by round.
3. Testing Execution
    - a) Record first-choice totals.
    - b) Check if threshold is correctly calculated and applied.
    - c) Confirm that:
        - o Batch eliminations are accurate
        - o Transfers are correct
        - o Skipped rankings and exhausted ballots are properly handled
        - o Tie-breaking by lot can be triggered and resolved
4. Verify:
    - a) All reallocation logic follows Sec. 31.05(d)(1)–(5)
    - b) Final results match expected winner
    - c) Summary report reflects all rounds accurately
5. Error Handling Check
    - a) Overvotes = ballot ignored for that ranking
    - b) Undervotes = ballot moved to next valid ranking
    - c) Skipped ranking = system does not misread intent
    - d) Repeated rankings = only highest valid one counts
6. Certification & Documentation
    - a) Results of the test are documented
    - b) Signed certification that system passed all reallocation steps
    - c) If any step fails, system is disqualified for automation under 31.09(a), and manual tabulation must be used

5. **Preparations to fall back to manual process if testing fails, Sec. 31.09(a)**
    - a) We are prepared to implement the manual reallocation process used for all previous city elections.

6. **Transparent tabulation center, *Sec. 31.04***
    - a) Ranked Voting Tabulation Center is:
        1. Designated by the County Auditor
        2. Open to the public during counting
    - b) System generates:
        1. Precinct summary (first-choice totals)

2. Round-by-round tabulation log including:
   a) Transfers
   b) Eliminations
   c) Exhausted ballots
   d) Final election abstract

If this plan is permittable, we would like to coordinate with the city the timing and process for officially releasing the reallocation results. Please provide any feedback or guidance you may have on this plan by September 22, 2025.

Thank you for this consideration,

David Triplett
Deputy Director | Property Tax, Records and Election Services
651-266-2206
90 West Plato Boulevard, St. Paul, MN 55107

RAMSEY COUNTY