



AITKIN COUNTY CHAIN OF CUSTODY PLAN

Version 1.0

Submission Date: June 1, 2026

Policy Statement

The recommendations contained in this document are intended for election officials who are responsible for ensuring the trustworthiness of local, state, and federal elections. The physical evidence of an election, including voted ballots and/or a voter verifiable paper audit trail, and voting equipment are the core elements of any election. Chain of custody documents provide evidence that can be used to authenticate election results, corroborate post-election tabulation audits, and demonstrate that election outcomes can be trusted. The recommendations and materials presented provide examples of how the chain of custody can be maintained before, during, and after an election.

Voting equipment may be in the possession of many individuals throughout the voting process, making the chain of custody a critical aspect of ensuring election integrity. Since materials must be transferred multiple times (i.e., to polling places/voting locations, to voters, or to elections offices), most election materials require at least two witnesses when being transferred, and often these witnesses must declare themselves as members of opposing political parties.

Scope and Applicability

This chain of custody plan, under the authority of Minn. Stat. 204B.182, applies to all county locations, municipalities, school districts, and special districts within Aitkin County for all state, county, municipal, school district, and special district elections held in Aitkin County.

A local plan is not required but is allowed for local elections not in conjunction with these. A local plan must include general chain of custody processes consistent with the county plan (such as documentation methods, materials, and recording touchpoints), but may include additional details specific to the local region, location(s), dates and events for the local election year, etc. If decided, a local election must be adopted and filed with the OSS at least 84 days before the first election when used.



Cross-county jurisdictions

Jurisdictions in multiple counties should work with both/all counties for a uniform plan.

General applicability

This plan requires election officials of all levels and elections in Aitkin County to document their plan for use of election-related materials, and by whom, including but not limited to ballots, voting equipment, databases, and documents containing sensitive information or voter data.

The administrative practices and procedures of how elections are conducted are defined by federal, state, and local statutes, administrative rules and regulations, formal agreements and practices defined by election officials. Elections also rely on multiple different agencies (e.g., United States Post Office, Cybersecurity and Infrastructure Security Agency), inter-governmental departments (e.g., centralized mail rooms, public works departments, centralized technology departments), private shipping companies, facility managers, third party contractors, voting system vendors and voters. With these operating procedures the scope of this document is to provide election officials clear guidelines for maintaining secure and documented processes for all election-related materials.

Authorities and References

- Responsible Authority: Auditor of Aitkin County
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Aitkin, MN 56431
(218) 927-7354
- Responsible Election Official: Designated Election Official of Aitkin County
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(218) 927-7354

LOCAL JURISDICTIONS WITHIN AITKIN COUNTY SUBJECT TO THESE REQUIREMENTS

- | | |
|------------------------|----------------------------|
| ○ City of Aitkin | ○ Wealthwood Township |
| ○ City of Hill City | ○ White Pine Township |
| ○ City of McGrath | ○ Williams Township |
| ○ City of McGregor | ○ Workman Township |
| ○ City of Palisade | ○ ISD #1 Aitkin Schools |
| ○ City of Tamarack | ○ ISD #2 Hill City Schools |
| ○ Aitkin Township | ○ ISD#4 McGregor Schools |
| ○ Ball Bluff Township | |
| ○ Balsam Township | |
| ○ Beaver Township | |
| ○ Clark Township | |
| ○ Cornish Township | |
| ○ Farm Island Township | |
| ○ Fleming Township | |
| ○ Fleming Township | |
| ○ Glen Township | |
| ○ Haugen Township | |
| ○ Hazelton Township | |
| ○ Hill Lake Township | |
| ○ Idun Township | |
| ○ Jevne Township | |
| ○ Kimberly Township | |
| ○ Lakeside Township | |
| ○ Lee Township | |
| ○ Libby Township | |
| ○ Logan Township | |
| ○ Macville Township | |
| ○ Malmo Township | |
| ○ McGregor Township | |
| ○ Millward Township | |
| ○ Morrison Township | |
| ○ Nordland Township | |
| ○ Pliny Township | |
| ○ Rice River Township | |
| ○ Salo Township | |
| ○ Seavey Township | |
| ○ Shamrock Township | |
| ○ Spalding Township | |
| ○ Spencer Township | |
| ○ Turner Township | |
| ○ Verdon Township | |
| ○ Wagner Township | |
| ○ Waukenabo Township | |

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Applicable Organization Policies

Aitkin County Election Officials and all Election Staff must adhere to Minnesota Election Laws and follow the guidelines set forth in each of Minnesota State Election Manuals. All Election Staff must remain current on required training hours as required by state statutes and rules for each election cycle. In addition to training, each Election Staff should be familiar, but not limited to the following guides and manuals:

- County Election Administration Guide
- Absentee Voting Administration Manual
- Election Judge Guide
- City Clerk Election Guide
- Township Clerk Election Guide
- School District Election Guide
- Mail Elections Administration Manual
- Campaign Manual
- Post Election Review Guide
- Presidential Nomination Primary Election Administration Guide
- Presidential Nomination Primary Election Judge Supplement Guide

Definitions and Acronyms

Adjudication: Process of resolving cast ballots to reflect voter intent. Common reasons that ballots require adjudication include write-ins, overvotes, marginal machine-readable mark, having no contest selections marked on the entire ballot, or the ballot being unreadable by a scanner.

Ballot: The official presentation of all the contests to be decided in a particular election. Either in paper or electronic format, the mechanism for voters to show their voter preferences.

Ballot Box: A sealed container that holds ballots cast by voters.

Ballot Marking Device: Device that permits contest options to be reviewed on an electronic interface, produces a human readable paper ballot, and does not make any other lasting record of the voter's selections.

Ballot Scanner: Device used to read the voter selection data from a paper ballot or ballot card.

Custodian: Authorized personnel responsible for handling election materials.

Chain of Custody: The documented process of transfer, receipt, and storage of election materials, ensuring accountability at each step.

Direct Recording Electronic (DRE): Vote capture device that allows electronic presentation of a ballot, electronic selection of valid contest options, and electronic storage of contest selections as individuals vote.

E-pollbook: Device that partially automates the process of checking in voters, assigning them the correct ballot style, and marking voters who have been issued a ballot. May be used in place of a traditional paper poll book.



Election Materials: Items needed to assist voters and conduct an election. Ballots, ballot counters and assistive voting devices (voting machines), voter registration lists, election results, and related documents.

High-sensitivity items

- Ballots, including blank ballot stock
- Ballot scanners/Ballot boxes
- Ballot marking devices (assistive voting devices)
- Voting machines and printers
- Electronic rosters
- Paper rosters
- Election administration forms
- Summary statements

In-person Voting: Voting before or on Election Day where the voter completes the ballot in person at a designated polling site, elections office, or vote center that is overseen by election officials or poll workers.

Memory Cartridge (smart card or removable drive): An electronic data storage device used for storing digital vote totaling information, typically using flash memory.

Overvote: Voting for more than the maximum number of selections allowed in a contest.

Polling Place or Voting Location: Facility to which voters cast in-person ballots.

Post-Election Tabulation Audit: A post-election audit that involves hand-counting a sample of votes on paper records, then comparing those counts to the corresponding vote totals originally reported as a check on the accuracy of election results, and to detect discrepancies using accurate hand-counts of the paper records as the benchmark.

Provisional Ballot: Ballot provided to individuals who claim they are registered and eligible to vote but whose eligibility or registration status cannot be confirmed when they present themselves to vote. Once voted, such ballots must be kept separate from other ballots and are not included in the tabulation until after the voter's eligibility is confirmed. In some jurisdictions this is called an affidavit ballot.

Roster: An official register of electors entitled to vote at an election, used to verify and check in voters prior to issuing them a ballot. Alternatively referred to as a Poll List or List of Voters.

Security Seal: A security mechanism using strategically placed serialized or tamperproof evident materials that alert officials if a device used in the elections process has potentially been altered or accessed without authorization.

Spoiled Ballot: Ballot that has been voted but will not be cast.

Voter Verified Paper Audit Trail (VVPAT) - Paper document containing evidence of a voter's contest selections as cast on a DRE voting device. Voters can review the printout prior to casting their ballots.

Voting Booth: An enclosed area in which a person stands for privacy while casting a ballot.

Voting Equipment: All devices, including the voting machine, used to display the ballot, accept voter selections, record voter selections, and tabulate the votes.



Voting System: The total combination of mechanical, electromechanical or electronic equipment (including the software, firmware, and documentation required to program, control, and support the equipment) that is used to define ballots; to cast and count votes; to report or display election results; and to maintain and produce any audit trail information; and the practices and associated documentation used to identify system components and versions of such components; to test the system during its development and maintenance; to maintain records of system errors and defects; to determine specific system changes to be made to a system after the initial qualification of the system; and to make available any materials to the voter (such as notices, instructions, forms or paper ballots).

Write-in: A vote for a candidate that was not listed on the ballot. In some jurisdictions, voters may do this by using a marking device to physically write their choice on the ballot or they may use a keypad, touch screen, or other electronic means to enter the name.

Roles / Contacts

Lead County Election Official Aitkin County Auditor – Kathleen Ryan

- Develops, implements, and maintains this plan
- Oversees training of county staff and all municipalities, school districts, and special districts responsible for complying with this plan
- Ensures compliance through internal controls, regular auditing methods, and program evaluation
- Clearly outlines and enforces all documentation methods for all custody transfers
- Responsible for locking the ballot and absentee ballot filing cabinets at end of day.
- Responsible for ballot design, printing, and distribution.
- Responsible for hiring and training poll workers and temporary staff.
- Responsible for hiring and training poll workers and temporary staff who will be operating voting equipment.

Deputy County Election Official Aitkin County Chief Deputy Auditor – Wendie

Bright

- Responsible for back up to the Lead County Election Official and assists in maintaining this plan
- Trains county staff and all municipalities and school districts to comply with this plan.
- Responsible and oversees Election Equipment and media
- Responsible for back up end of day locking and securing ballots procedures.
- Responsible for storing, maintaining, and distributing voting equipment.
- Responsible for media creation, equipment setup, and pre-election testing for all pieces of the voting system.
- Responsible for auditing voting equipment and systems.

Elections Office Staff

- Responsible for maintaining voter registration rolls and poll lists.
- Responsible for mailed (absentee) balloting materials, including ballot requests, signature matching, return envelopes, and other documentation.

Election Judges (Poll Workers)



- Follow all procedures in this plan as policy. Document all handling and transfers.
- Responsible for transporting materials to and from polling places or voting locations.
- Responsible for documenting who voted during an election and which ballots were issued.
- Responsible for verifying chain of custody documentation.
- Responsible for setting up voting equipment at polling locations or voting locations.
- Responsible for verifying seal and serial numbers of all equipment used.
- Responsible for qualifying and assisting voters to use voting equipment.
- Responsible for returning voting equipment to the elections office after each election

Designated Custodians:

- Responsible for secure storage and transfer of materials. This includes and is not limited to County, Township, City and School officials and trained Election Judges/Clerks.

Security Personnel:

- Support physical security measures during storage and transport.

Election Equipment Vendors:

- Ensure proper delivery and handling of all contracted equipment within their care and service.
- Responsible for initial development and ensuring that all voting equipment has been properly certified at the state and federal levels.
- Responsible for training election officials on how to use voting equipment.
- Responsible for providing software upgrades, hardware maintenance, and other critical aspects of the voting system.
- Responsible to provide secure and correctly programmed Election Media.

Additional Election Staff:

- Any staff in support of events or activities related to ballots, voting equipment, and official documents related to this chain of custody plan and operations are subject to these rules.

Preparation and Chain of Custody Operations

Equipment/Media plans

- Secure access to equipment areas, media programming sites, server rooms
- Only trained Election Staff/Clerks and Election Judges are allowed access in pairs of two.
- Access to Equipment Storage Rooms is tracked by key card entry. Electronic Access logs are maintained by Election Security IT. In addition, security cameras are active and monitor activity 24/7.
- Programmed media is stored in a secure room with access limited by access badges.
- Equipment and Media will be tracked per precinct, and a master tracking sheet will be used to monitor when media is received, tested, secured in machines, picked up by precinct election officials, verified when returned after election and returned to vendor.

Testing and public access

- Media and Equipment are tested with trained Election Judges in a secure room, where equipment is stored.
- A minimum of 2 Election Judges will track when Equipment is removed from secure storage and brought to the Public Accuracy Test location.



- Public Accuracy Testing occurs in a public meeting room within the Aitkin County Government Center. The Public Accuracy Test is performed and witnessed by trained Election Judges.
- The Election Conference administered by the Minnesota Secretary of State is attended by all Aitkin County Auditor's Office staff. Other election staff including judges and clerks are trained by the Aitkin County Auditor's Office following state statutes and rules.

Unvoted Ballots

Ballot inventory:

Inventory levels are based off prior election results. Each precinct must be provided with at least 100 ballots for every 85 individuals who voted in that precinct at the previous election for the same office or on similar questions, or 10% more than the number of votes expected to be cast in that precinct, whichever is greater. An additional order can be received in 1-2 days. Ballot Shortages—Unofficial Ballots: Under no circumstance should the last ballot at the polling place be given to a voter – keep it to use for making unofficial ballots. Make unofficial ballots by photocopying or otherwise reproducing ballots. Do not wait until all the ballots are gone before making unofficial ballots. Note on the Summary Statement how many were made. Do not keep voters waiting.

Unvoted Ballots:

Initial ballot order is received at the counter. Ballots are immediately taken to the secure Election Room and stored. All ballots are inventoried and verified with invoice numbers. A log will track when ballots are moved to the Absentee/Mail Ballot issuance area.

Inventory Control:

The Election Room can only be entered via an electronic badge where access is only given to Election Office Staff. Once ballots are present, policy requires two election staff from opposite parties must accompany each other while accessing the room. All ballots will be recorded on the ballot log. The log will record number of total ballots received, number transferred for Absentee/Mail Ballot issuance, dates and total number sent to precinct for election day.

Processing AB and Mail Ballots:

Once AB begins, unvoted ballots will be brought from the secure Election Room, counted and documented on the **Ballot Log** separated (by precinct) and filed into locked filing cabinets. As AB applications come in, either by mail, SVRS or in person, Election Staff will create an AB record in SVRS, print the labels and application. They will then apply the appropriate labels to the envelopes contained in either a Registered or Non-Registered AB or Mail envelope packet. The application and labels will direct the Election Worker as to which ballot is needed. A second, opposite party election worker, will verify the labels have been attached to the appropriate envelopes, that return address and postage is on the return envelope and verify just one ballot is being sent. The outer envelope is then sealed



and postage applied. All packets that are processed for mailing are stored in the locked front West filing cabinet in the second drawer until the mail is being picked up or an election worker is going to the post office. For those applications received over the counter (in person), election staff will prepare a ballot packet using the same two-person verification, minus the outer postage requirement. Only the registered voters are allowed to take their ballot packet. If a person, other than the voter, turns in the absentee ballot application, the packet will be prepared and mailed out. There is an exception for agent delivery 7 before the election. The absentee ballot applications are stored in a locked Elections Filing Cabinet. For voters that reside in Mail Ballot precincts, the initial mailing will be handled by the vendor. Voters that have moved into a mail ballot precinct or new registrants will be checked daily via SVRS notifications. Mail ballot packets will be mailed out using the same process as AB, less the printing of applications. Mail Ballot precinct voters do not need to include an identification number on their signature envelope so no need to print the screen.

Temporary Tribal Voting Location: If Aitkin County receives a request from a federally recognized Indian Tribe the county will work with the Tribe to provide a temporary voting location for one day, located at a mutually agreeable site that is accessible by public road. All voters in the County of Aitkin are allowed to vote early at the temporary location. Two Election Judges of opposite parties will bring the necessary election supplies to conduct early voting at the agreed upon location and times. The Election Workers will have a laptop to verify registered voters. Voting will be handled using the absentee ballot packets. Process will follow in office Absentee procedures.

Voted ballots

Ballots return by mail are either retrieved from the mailbox or at the counter from the postman. Two Election Office Staff of opposite parties will determine if the quantity of returned envelopes received warrants processing immediately or if they should be placed in the secure front counter ballot box.

Two party balanced Election Judges will open the Returned Envelopes and remove the Signature Envelopes. The Signature Envelopes are then date stamped. Both Election Judges will verify the outer envelopes are empty and will place them in a "Shred" box in the secure, Election Room. Two Election Judges will begin processing the signature envelopes following the Minnesota OSS accept/reject procedures. Ballots will be separated into two piles, Accept and Reject. Both piles will be given to an Office Election Worker to scan as received into SVRS. In addition, designations of either Accept or Reject are entered into SVRS. **Accepted ballots** are given back to the two Election Judges to be filed by precinct into the secure Election Room and further locked into file cabinets for storage until the date the ballots will be opened and counted.

Rejected ballots will need to be Spoiled and Reissued in SVRS. New AB packets will be sent out along with a Replacement Ballot Letter explaining why the initial ballot was rejected and the new one is being sent. After the replacement ballot is



prepared for mailing, the Rejected ballots will be taken back by the two Election Judges to be filed in a locked separate drawer in the secure Election Room.

Ballots placed directly in the tabulating machine, are removed daily, ballot count is reconciled with SVRS and ballots are stored in the secure Election Room. All ballots are

handled and verified by two election judges of opposite party affiliation. Daily ballots will be sealed in envelopes with a daily record of count and the election judges who handled the ballots.

Overstock unvoted ballots will be stored in the secure Election Room. When inventory is needed, two party balanced, Election Judges will retrieve the required ballots, count the ballots and record the number of ballots and precinct info in the Ballot Log. The date, time and names of Election Staff will also be recorded.

Election Day Ballots

Ballots and election materials must be stored in a secure location with access only granted to at least 2 election judges. There must be an access log, recording all people accessing the location while election materials and equipment are present. Ballots must be kept in a secure location during the time that the ballots are in the care, custody and control of the precinct. The Auditor's Office will maintain an official log of all ballots sent to precincts. This log will record when precincts pick up election materials, who picks up the materials, count and other required/necessary details.

The retention period of voted ballots is 22 months as required by Minnesota law. Sealed ballot boxes and sensitive election materials are stored for the 22-month required retention period in the secure Election Room located on the second floor of the Aitkin County Judicial Center.

Retention, data requests

All returned Election materials and equipment are locked in a secure room. This room can only be accessed by approved Election Staff on a 2-person (opposite party) system. These materials are kept in this location during the contestability timeline. After the timeline has passed, all material and election equipment is brought upstairs to the second floor secure Election Room in the Judicial Center. All materials and equipment are transported by 2 or more Election Staff (party balanced pairs). Non-voted ballots are set aside for immediate shredding. Unused Election Forms and supplies are removed from the bags and filed for future elections.

Election Media is returned to the vendor for download and secure 22-month storage and preparation for the next election. Sealed ballot boxes and sensitive election materials are stored for the 22-month required retention period in the upstairs secure Election Room. Spoiled ballot envelopes, duplicated ballot envelopes and Incident logs are placed into sealed boxes and stored with the voted ballots.

Guidance for Local Plans:



All cities, towns, and school districts must follow the basic rules within this plan related to proper documentation of chain of custody practices in storage, transportation, risk management within public areas, and proper retention with access only to authorized personnel. Aitkin County will provide all forms to be used for election processes, providing instructions for use of these forms in clerk training and related communications/resources by the county.

