

Problems with the Republic of Korea's public official election management system and ways to reform it

Professors' Solidarity for Freedom and Justice (PFJ)

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I. Introduction

Since the introduction of the early voting system and the electronic counting system, widespread, substantive, and continuous allegations of election fraud have been raised in South Korea. In particular, nearly half of the constituencies of the 2020 April general election faced legal challenges, but their trials and ruling have been delayed indefinitely for more than a year, which is far beyond the 180-day deadline for handling election lawsuits. Lawsuits challenging the election results and calling for invalidation have been filed from a wide range of constituencies across the country. Even though election-related lawsuits should be dealt with within 180 days of the election, the deadline already has passed. This itself means that the public's trust in the integrity of the electoral democracy of the Republic of Korea has been broken.

- In short, confidence in election administration has collapsed since the April 15 general election. Suspicions of election fraud itself are also a problem, but relying on public opinion instead of transparently and actively resolving these suspicions is also a serious problem. One could even say the reason for the existence of the National Election Commission (NEC) has disappeared.

This situation is not just a matter of the operation and management of the electoral system. It can lead to a national crisis in which the systematic legitimacy of liberal democracy, the unity of the democratic republic, and the essence of the sovereign rights of the people are undermined. The current suspicion of

election fraud in South Korean society means that it is not just a matter of the operation and management of the Public Official Election Act and the NEC's regulations. It means that the following key issues should be studied and that improvements, including the fundamental abolishment of the early voting system and the electronic counting system are needed.

- In particular, the statistics of the early voting results showed an unacceptable degree of possible artificial manipulation, and suspicions related to the electronic voting system are reasonably supported by various evidence, so major reform of the system is urgently needed. There is also a lack of a post-election validation mechanism for the process and the outcome of elections. There is institutional backwardness that relies entirely on the pre-modern approach of stakeholder litigation.

Fundamental reform of the overall election management system is urgently needed to prevent election fraud, which is becoming increasingly sophisticated and secretive with the development of IT technology.

II. Problems with the early voting and the electronic counting systems and ways to reform

1. Officially prohibiting the use of QR code on the early voting ballot paper

Article 151, Section 6, of the Public Official Election Act, mandates that the ballot papers should be marked in the form of a bar code, referring to a code marked in the shape of a bar. Currently, a QR code, instead of simple serial numbers, is used in the early voting ballot papers. It is clearly illegal.

- It is technically impossible to observe and monitor by the naked eye since they are using QR codes, instead of bar codes, which can be easily identified.

*Current Public Official Election Act

<Article 151 (6): Notwithstanding paragraphs (1) and (5), the Gu/Si/Gun election commission shall instruct the official in charge of early voting management to produce ballot papers to be distributed at early voting polling stations with a ballot paper printer at early voting polling stations. In such cases, the serial numbers printed on the ballot papers shall be marked in the form of a bar code (referring to a code marked in the shape of a bar for recognition by computer), and such bar code may contain the name of the election, the name of the constituency, and the name of the competent election commission.>

Given that the unauthorized use of QR codes is a matter of fundamental trust beyond a matter of technology, it is necessary to comply with the election law that specifically mandates the use of bar codes (The NEC also acknowledged the illegality of this). The current law should be amended and clarified as follows in order to recover this trust.

* Proposal to amend Article 151, Section 6, of the Public Official Election Act

< Notwithstanding paragraphs (1) and (5), the Gu/Si/Gun election commission shall instruct the official in charge of early voting management to produce ballot papers to be distributed at early voting polling stations with a ballot paper printer at early voting polling stations. In such cases, the serial numbers printed on the ballot papers shall be marked in the form **of a bar code (referring to a code marked in the shape of a bar for recognition by computer), and the form of a QR code is not allowed**, and such a bar code may contain the name of the election, the name of the constituency, and the name of the competent election commission.>

2. Transition to a manual counting system to rule out electronic manipulation

Detailed and accurate manual counting, which should be conducted after a ballot counting status table is made by going through the ballot sorting machines, is not being carried out at all.

It is desirable to remove the ballot sorting machines and only count votes manually.

- If they have to use the ballot sorting machines, the counting procedures should be in the following order: ballot sorting machine -> manual counting -> calculating machine.

3. Disclosure of every program related to the source code of the ballot sorting machine

There is a strong concern that the results of the vote can be manipulated during the sorting process through program manipulation and external communication, as the programs installed in the ballot sorting machine have not been disclosed.

It should publicly be verified that they are safe from hacking and other [interventions] by disclosing all programs related to the ballot sorting machine. Without public verification, people cannot dispel strong concerns that program manipulation is possible by external communication.

4. Specifying what is subject to the preservation of evidence for digital materials and equipment

The current election law had no concerns or willingness for improvements regarding the controlling system that came with the introduction of the electronic administration. They introduced the electronic system for administration purposes but those subjected to the control of the law are limited to the previous analog-type "documents." This is legitimizing passive responses from the NEC and the court.

*Current Public Official Election Act

<Article 186 (Keeping Ballot Papers, Ballot-Counting Records, and Election Records, etc.): Each Gu/Si/Gun election commission shall keep the ballot papers, ballot boxes, voting records, ballot-counting records, election records, and all other documents related to the election during the term of the elected candidates; the City/Do election commission shall keep the totalization records and the

election records and all other documents related to the election; the National Election Commission shall keep the election records and all other documents related to the election.

Article 228 (Examining Evidences) (1): Any political party (limited to the party which has nominated a candidate) or candidate may file an application for preservation of the ballot boxes, ballot papers, voting record with the district court or its branch court having jurisdiction over the area, for the purpose of preserving the evidence when an election litigation is raised after the ballot counting is closed.>

Considering the nature of election management and its inseparability from the use of electronic devices, the technical possibility and ease of manipulating election results, the existence of areas of election fraud that cannot be identified by manual counting, and the need to confirm fundamental reasons behind [the court's] final decisions, and the need to preserve electronic materials and equipment as evidence ~~is~~ are important.

- In order to solve this uncertainty, Article 186 and Article 228 need to be amended as follows.

* Proposal to amend the election law

<Article 186 (Keeping Ballot Papers, Ballot-Counting Records, and Election Records, etc.): Each Gu/Si/Gun election commission shall keep the ballot papers, ballot boxes, voting records, ballot-counting records, election records, and all other documents related to the election during the term of the elected candidates; the City/Do election commission shall keep the totalization records and the election records and all other documents, **including electronic devices and programs**, related to the election; the National Election Commission shall keep the election records and all other documents **as well as electronic devices and programs** related to the election.

Article 228 (Examining Evidence) (1): Any political party (limited to the party which has nominated a candidate) or candidate may file an application for preservation of the ballot boxes, ballot papers, voting records, **and electronic devices and programs** with the district court or its branch court having jurisdiction over the area, for the purpose of preserving the evidence when an election litigation is raised after the ballot counting is closed.>

5. Conducting forensics verification of all National Election Commission servers shortly after the election

The NEC's servers, which have all the data related to controlling and supervising the entire election process, should go through a forensics verification process conducted by a third-party auditing institution. This procedure must be carried out quickly and accurately before the term of office of the elected person begins.

Article 151, Section 4, of the election law allows the election commission to use a printed seal instead of an official seal. This makes it difficult to verify ballot papers that might have been created fraudulently.

Article 158 mandates election officials affix their seal on the ballot paper used in the early voting. However, the NEC's regulations allow election officials to use a printed seal.

*Current Public Official Election Act

<Article 151 (4):A ballot paper shall bear the official seal of the competent Gu/Si/Gun election commission as prescribed by the National Election Commission Regulations. In such cases, the official seal may be substituted by a printed seal.

Article 158 (3): The official in charge of the early voting management shall print ballot papers for the relevant election with a ballot paper printer, affix his/her seal on the blank for "official in charge of early voting management", and give a ballot paper to an eligible voter without cutting off the serial number, along with an envelope for return.>

This prevents transparency and verification of elections by allowing ballot papers with images of seals to be issued anytime, anywhere, which is a direct violation of the spirit of the election law. The enforcement of rules that arbitrarily violate the parent law should be clearly amended as follows.

* Proposal to amend the election law

<Article 151 (4):A ballot paper shall bear the official seal of the competent Gu/Si/Gun election commission as prescribed by the National Election Commission Regulations. In such cases, the official seal **cannot be** substituted by a printed seal.

Article 158 (3): The official in charge of the early voting management shall print ballot papers for the relevant election with a ballot paper printer, affix his/her seal on the blank for "official in charge of early voting management" **at the polling station**, and give a ballot paper to an eligible voter without cutting off the serial number, along with an envelope for return.>

7. Issuing a unique serial number for each ballot paper printing machine at the early voting polling station

Early voting ballot papers are printed by ballot paper printing machines after checking voter identity through the integrated voter list. Such ballot papers should have a unique serial number indicating which printer was used. The management of the ballot paper should be strict and the fraudulent production of early voting ballot papers should be prevented.

- According to the NEC, personal information (a serial number showing when an individual voter voted at a certain constituency) that can identify an early voter is deleted before the counting process. Thus, there is no concern about personal information leakage.

8. Disclosure of key statistics and voter list

A. Public disclosure of citizens participating in early voting by polling station

The NEC publishes on its website the number of people who participated in the early voting by time and region.

- The number of voters who participated in the early voting by “polling station” should be disclosed as well for transparency.

B. Disclosure of the integrated voter list

Public suspicions are being raised about “ghost votes,” which are considered to have been cast by voters who did not vote. In order to resolve this, releasing the integrated voter list (serial numbers, early voting date, and locations only) right after the early voting process is needed so that the public can verify participants in early voting in each constituency.

C. Disclosure of counting tables

The Republic of Korea’s elections have a centralized structure controlled and managed by the NEC. All ballot counting tables managed by the front-line election commission should be disclosed, and the original data of the ballot counting data, which is only disclosed in digital numbers, should also be disclosed and verified.

III. Problems with the election management and procedure and ways to reform it

1. Polling station management

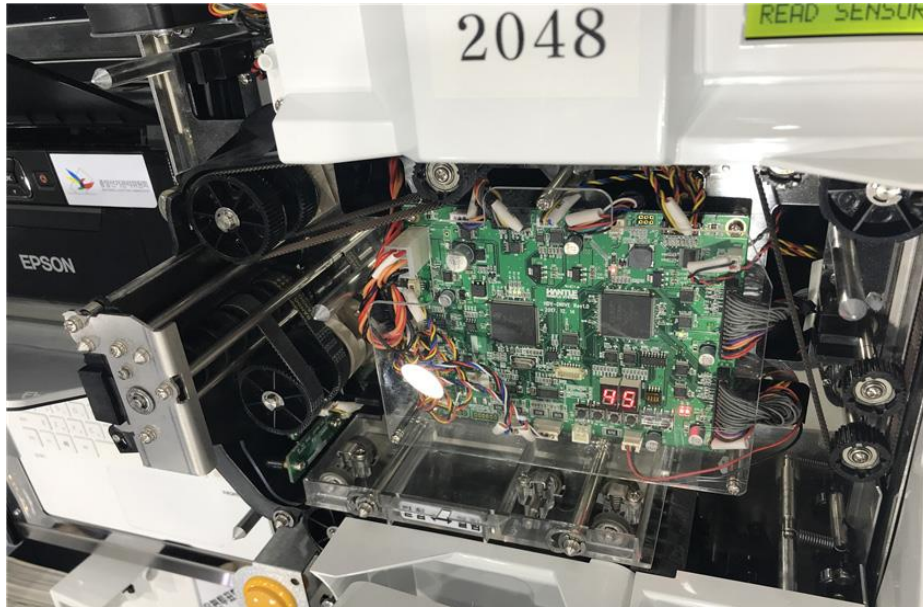
The ballot sorting machine is equipped with external connection ports, allowing for internal and external penetration through the USB port.



The laptop used in the ballot counting machine is vulnerable to fraud as it can be equipped with a wireless LAN and counting manipulation program.



A verification process is needed to find out whether it is possible to equip the ballot counting machine with a wireless chip.



Problems with the management of ballot boxes (sealing, storing, and transportation) for early voting (inside-jurisdiction, outside-jurisdiction, mail-in voting) and election day voting

- CCTV installation is necessary for areas where early voting ballot boxes are stored.
- Securing transparency in managing outside-jurisdiction voting papers, including how they are managed and moved to counting stations, is urgent.
- Currently, the seal paper used on ballot boxes is made of a material that is easy to attach and detach and it does not leave much residue when detached. It should be changed to a more fragile material that can be easily torn.
- The security of the ballot paper boxes should be guaranteed by having voting observers sign multiple areas on the seal paper.



Problems with malfunctioning ballot sorting machines

- Malfunctions of the ballot sorting machines are occurring too often and too many votes need to be checked again because they were not sorted correctly.



Problems with manipulation from using software programs and sorting machine

- The current ballot sorting machine uses a laptop, and the counting process can easily be manipulated with installed programs. It should be changed to make the machine only count and sort.

Not allowing election observers to verify the votes that came out of the sorting machine

- Election workers count and bundle 100 ballots from the sorting machine with a counting machine, but observers are not allowed to verify this process.

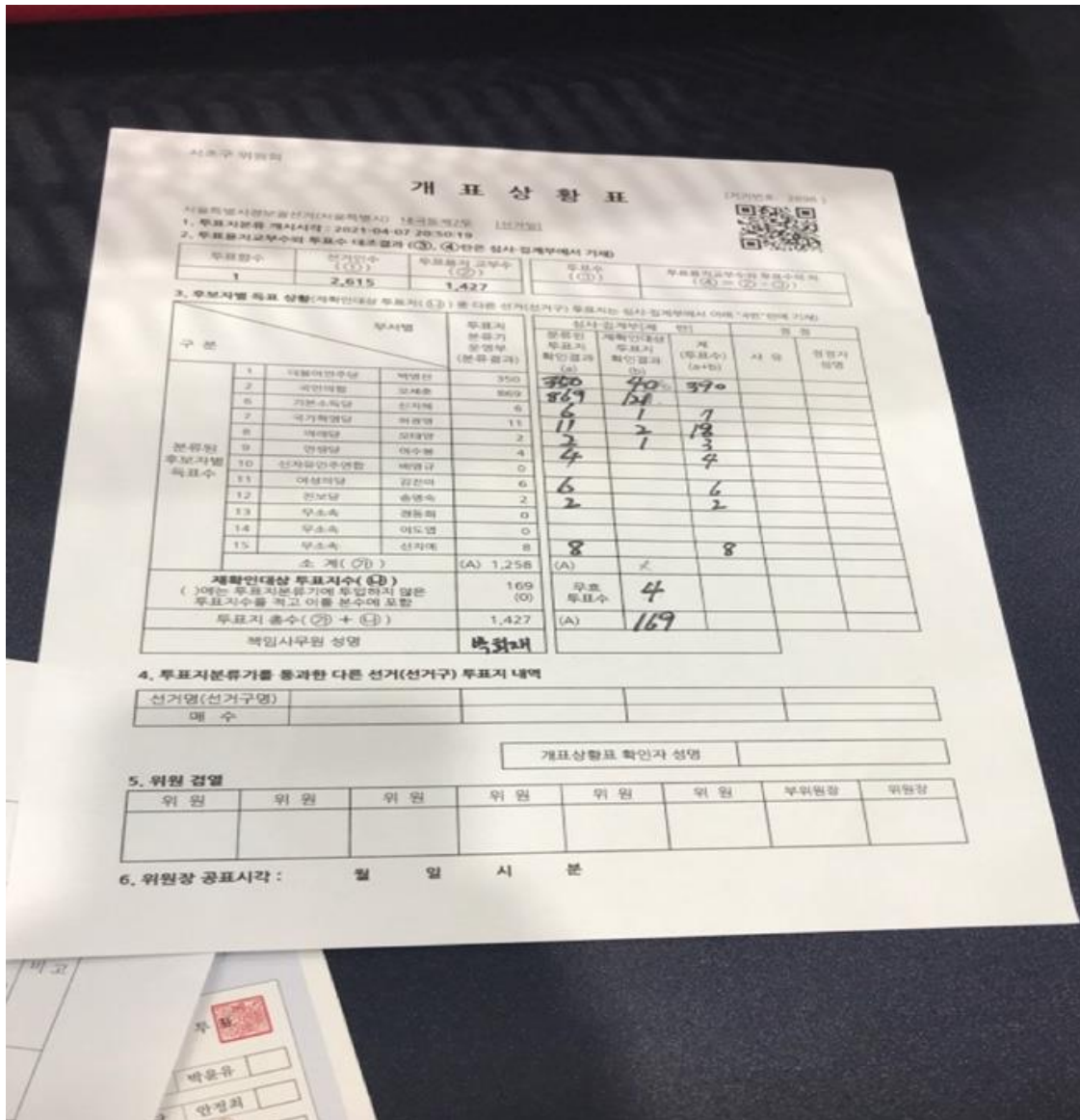
Bringing in external goods (extra ballot papers, documents, and others)

- In particular, extra ballot papers and ghost votes are being brought into the ballot counting station.



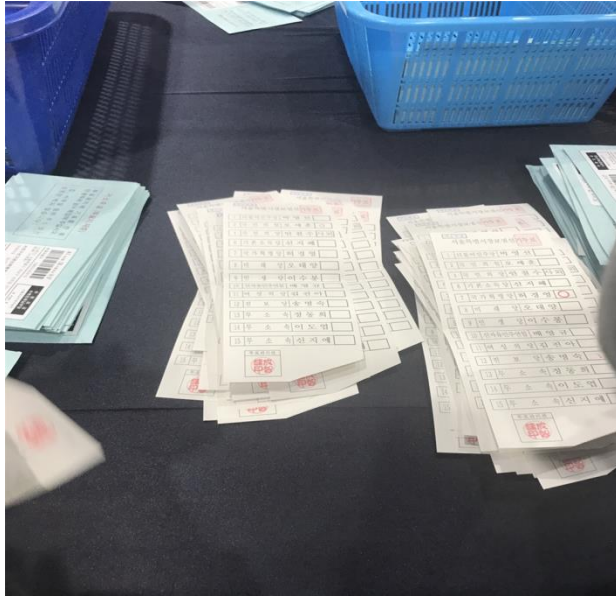
Filling in the ballot counting table

- A ballot counting table can be inflated or omitted during preparation, and it is necessary to thoroughly manage it. As a solution, procedures are needed to ensure observers check and sign the counting table.



Problems with managing mail-in votes

- Verifying the identification of voters is required.
- A proper management process is required for moving and storing mail-in ballot boxes.
- Currently, voters are allowed to use various marking tools, including ballpoint pens and stamps. It requires a unified voting method.



The high-handed attitude and illegal behavior of NEC staff is a serious issue, making observers feel threatened.

It is imperative to secure transparency (nationality, confirmation of whether they are from a certain organization) in the hiring process of ballot counting assistants (part-time employees at ballot counting stations).

2. Management of election day voting

There is a problem of poor management of ballot papers, such as removing the part of ballot papers that has a serial number in advance.

There is a lack of capability and will toward election monitoring, including unprofessionalism and a bystander attitude.



3. Management of early voting

Having observers inside the early voting polling station is essential.

- In the by-elections held on April 7, 2021, there was a severe difference in voter turnout and votes depending on whether observers were present or not.

CCTV in polling stations is essential.

It is urgent to secure transparency in the process of transporting outside jurisdiction ballot papers.

CCTV must be installed in the storage area of the early voting ballot boxes and must be managed to prevent damage or replacement of ballot boxes.

- Early voting papers should be kept at a safe place where security is protected, such as the relevant local court, until at least the beginning of the counting process.

4. Others

It is necessary to secure the expertise of election commission members. Currently, there is a problem with the expertise of election workers, and election management is a mere formality.

The organizational management and training of election-related professionals should be conducted.

- The management and training of political parties, private observers, civic groups, and individuals should be conducted.

It is necessary to promote and educate the public on various election management issues.

- The serial number showing which voting station an individual is voting at should be ripped off in front of that individual.

- People need to check if someone is using another person's identification.

- People should be aware that the influx of supporters to a certain faction to early voting is an anomaly.

The legal responsibility of management (storing and moving) of the ballot box should be clarified.

- It is necessary to clarify who is legally responsible for managing mail-in votes and who is responsible for managing and storing the ballot boxes.

IV. Problems with the post-election verification and ways to reform it

1. Problems with the absence of a formal post-election verification system

The election system of the Republic of Korea does not have a formal post-election verification system and the integrity of an election can only be challenged through the courts. This is a very vulnerable system when it comes to preventing election fraud.

- While there are many kinds of election laws and large amounts of provisions, there is a lack of a post-election verification system for universal election integrity in the modern election system.

Developed countries such as the United States institutionalized a post-verification process to require sampling and verification of all components of elections, including voter identification confirmation, voting, and related facilities. This also means confirming the election results, but it also serves to give citizens faith in the electoral system.

In particular, with the possibility of external hacking through the various electronic equipment that exists due to the development of IT technology, there is always room for cheating despite thorough election management.

The validation of election results by the filing of election lawsuits by stakeholders is not a sufficient verification method. There are cost-bearing issues, the limitations of verifying every individual case, a possible delay in verification, and the judiciary branch's incompetence and the possibility of bribes.

2. Proposal for implementing an official post-election verification process

A. General principles

A post-election verification process should be established to focus on essential parts of the electronic voting system.

Post-election verification should be conducted in two categories: "Procedure and Management System Verification," which verifies the adequacy of election management and monitoring procedures, and "Election Results Verification," which verifies the accuracy of the ballot counting results.

The subjects of the verification should be electoral management procedures and related devices, such as the integrated voter list, ballot papers, voting equipment (hardware), related programs (software), the movement of ballot papers, the monitoring of ballot papers, as well as others.

The selection of the verification targets should be made by a certain percentage of random sampling, and may also be made at the request of the judge in charge of the constituency where the dispute has been raised.

The verification period should specify the start and end dates.

The verification should be conducted by an agency independent of the NEC, and it should exercise full authority during the election verification process. The verification agency should be comprised mainly of politically neutral groups of domestic and foreign authoritative experts in areas including election devices, software, forensics, election administration, law, and others.

The verification should be conducted under the principle of personal protection of voters and should be accompanied by appropriate measures to ensure the confidentiality of sensitive information obtained by all persons participating in the process.

Measures must be taken to protect the verification system from all attempts to alter or delete all records subject to verification, and these attempts should be severely punished.

Equipment or facilities for verification should be prepared with logical, technical, and adaptive equipment. The information and communication technologies used for the verification process should be inspected and certified in advance to see whether they meet these requirements. The government should try to adopt certification systems used by the international community.

B. Procedure and Management System Verification

Verify whether the process and procedures of the election were in accordance with the regulations.

Verify the system that collects information openly, comprehensively, and actively about potential problems and threats over the course of the election process and management.

Time, incidents, and actions should be verified, including the following:

- Verification of all voting-related information management systems, including the number of voters, ballots, invalid votes, counted votes, recounted votes, and others.
- In case of outside-jurisdiction early voting, official postal records, including the sender, the post offices of origin, transit, and delivery, should be verified.
- Verification of all obstacles to the operation of electronic voting systems or telecommunication facilities, including checking all CCTV footage throughout the period that the ballot boxes were stored.
- See the required verification element table below for system failure, malfunction, and other threats.

C. Election Results Verification

Confirm the accuracy of the election results and the authenticity of all relevant individual votes, and verify whether they were accurately reflected on the final results.

- Check the voting and non-voting status of individuals and potential duplicate votes by comparing the data with the integrated voter list.

Specific procedures for the verification of results are as follows.

- The constituencies subject to post-election verification should be randomly selected and announced through transparent procedures within 48 hours of voting.

- The verification process should be initiated within two days after the selection of constituencies and should be completed within 14 days.

- The first verification process will be manually counted by using a random sampling method for votes equivalent to 1 to 3 percent of the total votes in the target constituency. If the first verification process reveals a problem, the second verification may be conducted by increasing the sampling rate to 5 percent.

- The results of verification through manual counting are final and binding, and reports containing the verification results will be released.

- The final verification report should include the following.

*The number of votes and invalid votes for each candidate that was recorded during the initial counting process

*The number of votes and invalid votes for each candidate found in the verification process

*Differences between the two and explanations for the differences

- If problems are found as a result of verification, measures such as corrective orders, recounts, invalidation of counting results, and a re-election may be taken according to the election verification committee's decision.

Required verification element

Inside-jurisdiction early voting verification

- A certain percentage of the inside-jurisdiction early voting stations should be randomly selected to check whether the number of voters on the integrated voter list matches the actual number of votes.

- A certain percentage of the integrated voter list should be selected and checked against the list of inside-jurisdiction early voters to determine whether votes were cast and whether there were duplicate votes.

- Check the CCTV footage throughout the period that the ballot boxes were stored.

Outside-jurisdiction early voting verification

- A certain percentage of the outside-jurisdiction early voting ballot papers should be randomly selected to check official postal records, including the sender, the post offices of origin, transit, and delivery.

- A certain percentage of the outside-jurisdiction early voting ballot papers should be randomly selected to verify the record of the delivery status by checking recipients, post offices responsible for delivery, transit to the post office, and movement to the counting stations.

Election equipment and software program verification

- All equipment and programs used in the counting process should be kept sealed for a period of time for post-election verification.

- A certain percentage of ballot counting stations should be randomly selected to determine whether the sealed ballot counting equipment matches the order and manufacturing specifications.

- A certain percentage of ballot counting stations should be randomly selected to check whether sealed ballot counting equipment and programs are disconnected from the outside and the possibility of manipulation from the inside.

D. Establishment of the Election Verification Commission

Establish an Election Verification Commission (EVC) to verify election procedures, the management system, and the results.

The EVC should have superior status and authority to other government agencies, including the NEC, within the scope of its duties related to post-election verification. A person who disagrees with a decision made by the EVC may file an election lawsuit with the court.

- When requested by the EVC, the NEC should provide a list of the nationwide electorate and voters, and that of each constituency and polling station.

- When requested by the EVC, the NEC and the Post Office should provide ballot papers, equipment and computer programs used for ballot counting, the CCTV footage, registered mail records, and others.

The EVC will be composed of commissioners recommended by each political party with a negotiation group in the National Assembly and others recommended by the Speaker of the National Assembly and the Chief Justice of the Supreme Court. The Chairperson is elected by commissioners.

Establish a subcommittee under the EVC that will be in charge of the actual verification process.

- The subcommittee should be comprised of domestic authorities in each field, such as voting equipment and operation programs, forensics, election administration, and law.
- Overseas institutions and individuals, such as internal authoritative public and private institutions and scholars, may participate in the subcommittee.

After the post-election verification process is over, the EVC should prepare a final report on its verification results and release it to the public.

V. New legislation and proposal for systematic improvement

1. Compliance with the statutory deadline for dealing with election lawsuits

The current Public Official Election Act stipulates that election lawsuits must be dealt with within 180 days. A lawsuit can be filed within 30 days of election day (Article 222) and the law says that the ruling should be delivered through the single-trial system by the Supreme Court. Although they are explicit enforcement provisions, they are considered nominal provisions because of the court.

*Current Public Official Election Act

<Article 225 (Settlement of Lawsuit, etc.): Any petition or lawsuit on an election shall be decided or judged promptly in preference to other litigations, and in a lawsuit, the court which has accepted it shall settle it within 180 days after it is filed.>

Considering that it is virtually impossible to take criminal responsibility for forcing compliance with the legal deadline, this could induce indirect coercion of the court in charge by asking for state responsibility through the implementation of a compulsory payment system.

* Proposal to amend Article 151, Section 6, of the Public Official Election Act

<Article 225 (Settlement of Lawsuit, etc.): Any petition or lawsuit on an election shall be decided or judged promptly in preference to other litigations, and in a lawsuit, the court which has accepted it shall settle it within 180 days after it is filed. **If the deadline is passed, a compulsory payment of X Korean won should be paid to the plaintiff every day until the date of decision or sentence.**>

2. Securing the political neutrality of the NEC

In the case of the superintendent of education, there is a regulation that bans political party membership for one year as of the start of the candidate registration application process to ensure political neutrality. The neutrality of the NEC is far more important than that of the superintendent, and the term of each commissioner is 6 years. There is no regulation to limit consecutive terms.

Currently, Article 4, Section 1, of the Election Commission Act, states the following.

<The National Election Commission shall be composed of three members appointed by the President, three elected by the National Assembly, and three members nominated by the Chief Justice of the Supreme Court. In this case, the members shall be so appointed, elected, or nominated after going through a confirmation hearing by the National Assembly.> A proviso clause should be inserted to clarify that a candidate should be someone who was not involved in a political party for three years from the date of appointment or nomination.

3. New legislation

A. Adoption of early registration for early voting

Many foreign countries have early registration procedures.

The NEC should keep the list of people registered for early voting so it can be verified during election litigation.

It will be easier for those who registered in advance to vote on the actual election day.

B. Signing a pledge for outside-jurisdiction and mail-in voters.

In Germany, people sign the back side of the voting instruction sheet saying that he or she is the one who actually voted and acknowledges that it is punishable to provide false information. They send their ballots with the signed pledge.

The ballots of outside-jurisdiction early voters will only be counted valid if they send their signed forms through the mail.

The NEC can save the signed forms separately, which can solve problems related to the integrated voter list.

C. Reintroduction of the procedures for announcing the names of voting and counting officials

These procedures were abolished in 2018 on unreasonable grounds.

It is necessary to maintain these procedures to secure public transparency in election affairs.

D. Establishment of the Public Official Election Act Improvement Committee

The current Public Official Election Act has been amended 49 times since its enactment in 1994, or twice a year on average.

While there is growing public suspicion about the neutrality and independence of the NEC, there is virtually no accountability on the Public Official Election Act and subordinate statutes, which are mainly administered by the NEC.

The National Assembly is also not totally independent from this issue since its members are stakeholders.

Currently, the NEC has a committee system, but it is not possible to expect expertise and political neutrality from non-permanent members. A permanent committee comprised of civil experts and members from the NEC and the National Assembly should be established to ensure fairness and trust in the rules of the game in a democratic country.

VI. Summary and conclusion

Early voting system and electronic voting and counting system reform

1. Ban the use of QR codes on early voting ballot papers through legislative measures.
2. Switch to a manual counting system to rule out electronic manipulation.
3. Disclose every program related to the source code of the ballot sorting machine.
4. Include digital data and equipment on the list subject to the preservation of evidence.
5. Conduct forensics verification of all NEC servers immediately after the election.
6. Explicitly prohibit the practice of replacing election officers' official seals with printed seals.
7. Provide a serial number unique to the ballot paper printing machine to prevent fraudulent production of early voting ballot papers.
8. Disclose citizens who participate in early voting by polling station, the integrated voter list, and all ballot counting status tables.

9. Remove communication functions such as external connection ports, wireless LANs, and wireless chips from the ballot counting machine and laptop.

Election management and procedure reform

10. Correct all loopholes in the management of the ballot box for both early voting and election day voting.

11. Switch to a simple sorting and counting method to prevent malfunctions and manipulation possibilities.

12. Arrange for observers to check the ballots processed by the sorting machine.

13. Make it possible to transparently check items from outside before entering the counting station.

14. Have the election observer personally check and sign the ballot counting status tables.

15. Check the identity of mail-in voters and transparently manage the transportation and storage of mail-in ballot boxes.

16. Strictly punish NEC officials for their high-handed attitude and illegal activities, and appoint ballot counting assistants transparently.

17. It is necessary to deploy observers and install CCTVs in the early voting stations and fundamentally strengthen the security of the storage area of the early voting ballot boxes.

18. Implement measures to strengthen election officials and observers' expertise.

Adoption of the post-election verification system

19. Prepare the post-election verification system as an integral part of the public official election system. To this end, adopt a "Procedure and Management System Verification System," which verifies the adequacy of election management and monitoring procedures, and an "Election Results Verification System," which verifies the accuracy of the counting results.

20. The verification agency should be organized as a specialized agency independent of the NEC and exercise full power in the field of the election verification process.

21. Establish the "Election Verification Committee" to verify election procedures and management systems and verify results.

New legislative and systematic reform

22. Ensure compliance with the legal deadline for dealing with election lawsuits and introduce a compulsory implementation penalty system.

23. Introduce a requirement to ban party membership for a certain period of time to strengthen the political neutrality of the NEC.

24. Proceed with adopting an early registration system for early voting, mailing signed pledge forms with ballots for mail-in voters, and toughening signing guidelines for voting and counting officials.

25. Establish a permanent committee comprised of civil experts and members from the NEC and the National Assembly to improve the Public Official Election Act in a democratic and transparent way, and punish those who violate election-related laws.