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CONCEPT NOTE AND THE SCOPE OF THE INDEPENDENT AUDIT OF THE MALAWI ELECTORAL COMMISSION'S ELECTION MANAGEMENT SYSTEMS (EMS)

Background

Election auditing is an independent review of a process or system for managing elections to ensure compliance with election laws, policies, and standards. Election audits help ensure the election outcome is reliable and valid by providing evidence that the election is conducted properly, that only eligible voters participated, and that the outcomes are accurate. The foundation of a functioning democracy rests on the trust citizens place in the electoral process. Any perceived or actual vulnerabilities, manipulation, or interference can undermine public confidence in the fairness and accuracy of elections.

There has been an outcry by Malawians on the independence and credibility of the institutions charged directly with the responsibility of managing elections (Malawi Electoral Commission) or those, whose functions, contribute to the electoral process, such as the National Registration Bureau (NRB). Such outcries and concerns have been raised by main opposition political parties, the civil society, governance analysts, and Malawians in general.

Despite being well informed of the concerns, MEC and NRB have continued to operate without giving any meaningful attention to the issues; in essence ignoring everyone who has raised issues with the process. However, these concerns have continued to resurface.

MEC recently shared the voter roll register to all political party representatives. Despite the MECs insistence that all is in order, a quick review of the register reveals a lot of exceptions in form of duplicates, raising questions as to whether these can be attributed to those that presented themselves twice, or some fraudulent interference with the database.

On top of that, the Exception table in MEC system database reports voter details without biometrics such as photos of the voters that were captured during registration. In some cases, the photos have been replaced by voter certificates. MEC says they are investigating and will call the people to recapture their biometrics in form of eyes cornea photo details, raising questions of transparency and data integrity.

In view of the above, the undersigned political parties are requesting that MEC allows for Independent International Certified ICT Auditors to audit MEC Systems, without further excuses.

MEC, through its Chairperson has now requested the scope of the proposed independent ICT Audit. It must be put on record that had MEC listened, this process would have been at its final stages now. This record is important as any arguments against this proposal on the basis of time constraints may not be in good faith.

This document therefore outlines the proposed scope for the comprehensive audit of MEC's Election Management Systems (EMS), as requested by the Chairperson of the Commission.

Election Management System

Election Management System (EMS) is a set of processing functions and databases within a voting system that defines, develops and maintains election databases, performs election definitions and setup functions, format ballots, count votes, consolidates and report results, and maintains audit trails. It is used to facilitate the planning, administration, and execution of elections. It supports elections officials in managing every phase of electoral process with accuracy, security and transparency, and is usually designed to deliver credible outcome of elections.

While technologies can bring great benefits in accuracy, speed, efficiency and effectiveness to the process, they also pose challenges in the fields of security, costs, sustainability, transparency and vendor dependence.

In a fully electronic electoral management system, the entire electoral process – voter, party and candidate registration; verification of candidate support signatures; ballot production; electoral logistics; voter identification; voting in polling stations or remotely; vote counting; results transmission; and presentation of preliminary and final results of data—can all be performed by electronic and digital equipment and with very limited human intervention. So far, very few countries have achieved this level of automation, which, the Malawi Electoral Commission is insisting to use in the forth coming elections, leaving electoral stakeholders wondering readiness to use the technology amidst fears of transparency and data integrity issues.

Electoral management bodies (EMB) usually combine manual processes and electronic technology into a suitable hybrid system, which is influenced by a wide range of factors, and may arguably be considered unique in any given country.

Main features/ Components of Electoral Management Systems

EMBs can use electoral technology in virtually all aspects of managing the electoral process including:

1. *Voter registration systems* for building and maintaining a voter register with personal details of all eligible voters in electronic format, in some cases also biometric information such as photographs or fingerprint scans.
2. *Voter identification systems* (electronic poll books) for checking the eligibility of each voter at the polling station level by comparing his or her personal details to a database of all eligible voters.
3. *Party and candidate registration systems*, for tracking the registration status of all political subjects for an election, checking any required support signatures and providing the data in appropriate formats for designing ballot papers and tally sheets, configuring voting machines, etc.
4. *Observer registration and accreditation systems*, for tracking the accreditation process for citizen and international observers and issuing their identification documents.
5. *Districting and boundary delimitation systems*, using geographical information systems to delimit political boundaries and distribute polling stations and catchment areas.
6. *Electronic voting and vote-counting systems*, various systems ranging from machine counting of paper ballots to voting machines used in polling stations and Internet voting systems; these speed up the counting process and eliminate human interference.
7. *Result tabulation and transmission systems*, for processing electronically captured turnout and results data, greatly speeding up related procedures and avoiding and detecting human error through automation and data cross-checks.
8. *Results publishing systems*, for presenting and visualizing election results in various formats including maps, charts, detailed results databases and overviews.
9. *Voter information systems* to provide voters and other electoral stakeholders with detailed data about electoral processes. Such systems include polling station locators allowing voters to easily find their polling station, legal

databases of regulations, information about parties and candidates running for election, databases allowing access to detailed election results and statistics, and continuously updated calendars with key events and deadlines.

10. E-learning systems, for the professional development of EMB staff.

All of these electoral information and communications technology (ICT) solutions employ a wide range of technologies, from simple mobile phones to private satellite links, from standard productivity and collaboration systems to specialized biometric databases, and from private intranet systems to public websites and social media channels.

Election of Technology Vendors

The products and services on offer can be of great help in organizing an election, but there are also several challenges related to this increased vendor involvement in elections. In this instance, MEC procured **Smartmatic solution** to management Malawi's 2025 electoral process. The scope of the audit should therefore address the following aspects:

1. ***Need Driven Approach*** - While vendors have an interest in the smooth conduct of the elections they are involved in, their primary objective is naturally to expand their business rather than to improve the electoral process. The starting point for evaluating technology should not be which technology to choose or how to implement it, rather, *first and foremost is to define which electoral problem needs to be addressed and which are the best ways to do so.*

2. ***Procurement*** - Elections are unique in each country, and elections technology needs to provide unique solutions for the country in question. Electoral procurement is expected to be conducted with a high degree of integrity, transparency and competitiveness. *It is therefore important to ensure that a competitive and inclusive procurement process is followed in procuring the elections technology and supplier.*

3. ***Vendor Lock*** - Where technology is proprietary to a vendor, where data formats are not open or relies heavily on a vendor for its electoral operations, MEC risks being locked into a particular vendor. *Any such tie to one vendor should be avoided to make sure MEC remains in control of the systems it uses, and the costs incurred.*

4. ***Open Source vs. Proprietary Systems*** - When the transparency of an electoral ICT application is important to stakeholders, they frequently request open-source software be used, which has source code that is accessible to all and comes with a software license that allows free usage and distribution. *Access to source code is one requirement for experts to understand exactly how an ICT system works.*

5. ***Commercial Off-the-shelf Systems vs. Customized System Development*** - A fundamental decision for electoral administrators is whether to obtain readymade ICT solutions or pursue the development of a custom-built system. *A ready-made system can usually only be adapted to a certain extent and may therefore require changes in the electoral process to match the system.*

Smartmatic Solution

The Malawi Electoral Commission (MEC) settled for Smartmatic Solution to manage 2025 elections. The solution is deemed to support every step of the election cycle—from voter registration and verification to results tallying, polling place innovation, centralized and precinct counting, electronic voting, and online voting. System functionality that informs the scope of audit is detailed below:

1) **Identity Management** - The identity management solutions combine biometric and biographic data to effectively prevent identity theft and election fraud. *Validate the integrity and accuracy of registered eligible voters and preserve the database for post-election reference. Data analytics should be employed.*

2) **Voter Verification** - Verifies each voter's identity and eligibility on Election Day to ensure elections are conducted efficiently and accurately. *Systematic sampling of registered voters for identity validation and eligibility. Test applicability of one-person one-vote principle.*

3) **Election Intelligence –** The system collects, organize, and analyze election data, delivering actionable intelligence that empowers EMB to improve performance and make informed decisions—now and in the future. *Understand system architecture and data flow including transmission control protocols deployed and its effectiveness.*

4) **Automated Polling Stations -** Smartmatic automates key administrative tasks at polling stations, making it easier for voters to cast their ballots and for poll workers to carry out their duties efficiently. This reduces errors, shortens wait times, and accelerates the publication of results. *Test the processing integrity of automated polling stations including knowledge and performance of support service team.*

5) **Vote Counting (Precinct Scanning) - Enhancing Vote Counting at the Polling Station through** proven technology that speeds up vote counting and improves accuracy compared to hand counting—while still preserving the paper ballot for secure audits. *Test the processing integrity of precinct scanners*

6) **Results processing** - Protecting the Integrity of the Vote by delivering accurate, transparent, and verifiable manually counted results. Smartmatic provides reliable results processing technology that enhances the speed, accuracy, and transparency of elections that rely on hand-marked paper ballots—helping election officials deliver trustworthy outcomes with confidence. *Analyze system reporting format /pattern to ensure alignment with constituencies and polling stations that can easily be collaborated with manually counted results. Pretesting logic and accuracy to be considered at this stage.*

7) **Publication of Results (Reliable, Secure, and Visual Election Results) -** Smartmatic's secure, user-friendly software simplifies results management and enables the timely publication of election outcomes—immediately after polls close—while ensuring trust and clarity for all stakeholders. *System Vulnerability assessments and logical access controls test to be considered, including physical access controls to premises hosting the servers. Validate the defense-in-depth, least privilege, segregation of duties, zero trust, and transparency.*

Administrative and Operational Objectives

Maintaining MEC Oversight

Obviously, MEC is not able to manage all of the required elections technology by themselves, they will rely on the vendor to some extent. Where much of the electoral process is outsourced, the roles and responsibilities of MEC and that of the vendor need to be clearly delineated to ensure full oversight of the process. *A reasonable option is that the vendor's role is to develop and maintain electoral ICT systems, while MEC's role is to configure the system and operate it during the election.*

Accountability and Integrity

The lack of any tangible evidence of transactions in computer systems and the incomprehensibility of computer programming to the bulk of the population lead to a lack of transparency. This lack of transparency—combined with the risks of interference with data and widely publicized media reports of computer viruses, hackers and system malfunctions; and an increasing awareness of online surveillance—can affect MEC's credibility. When relying on computer systems for vital tasks such as voter registration, voting and vote counting, MEC is expected to be openly accountable for its use of technology.

To ensure the integrity of systems implemented to manage the elections, the following measures should be undertaken:

1. Rigorous pre-implementation testing of computer systems and public release of the results of the tests.
2. Robust ICT policies that cover all aspects of technology use, including acceptable access to and use of ICT equipment and data, physical security of ICT equipment, data security, back-up, retention, archiving and disposal, appropriate of use email and social media, and disciplinary measures for cases of deliberate or serious breaches
3. Regular auditing of computer systems, with particular attention paid to their security features.
4. Making test versions of source codes for computer systems available for public comment.
5. Independent, third-party certification of computer systems based on national and international standards, guidelines, recommendations and requirements to confirm that the system complies with prescribed technical requirements and standards; and
6. Holding an authenticated copy of the authorized codes in an independently controlled off-site location coupled with regular comparison of this with the code being used during the elections to detect and remove any unauthorized changes.

Inclusiveness

Technology tends to benefit the more affluent and educated citizens more than other, disadvantaged parts of society. Therefore, the introduction of new technology needs to be accompanied by measures that ensure equal access for the entire electorate, including voters with special needs, voters in rural areas with less access to infrastructure, elderly voters and those who feel less confident using technology.

Selecting Appropriate Technology

The most advanced, high-tech solutions are not necessarily the most suitable technologies for use in the electoral process. *Appropriate technology is designed with consideration of its economic, social and environmental impact as well as its effect on the entire electoral process*. Simpler systems that still fulfil all requirements are usually more appropriate, require fewer resources and maintenance, and have a lower total cost of ownership.

Objectives and Scope of Audit

Aim and Objectives

Appropriate technology is designed with consideration of its economic, social and environmental impact as well as its effect on the entire electoral process. This audit is therefore designed to assess the integrity, security, transparency, reliability, performance and cost effectiveness of the election management system deployed by MEC in readiness for the September 16, 2025, polls.

Specifically, the audit is designed to achieve the following objectives:

1. Assess the security architecture and controls of all election-related digital systems.
2. Evaluate data integrity, voter registration databases, and transmission protocols.
3. Validate compliance with local and international standards for electoral technologies.
4. Detect and report vulnerabilities or weaknesses that could impact electoral credibility.
5. Recommend improvements to enhance system reliability, transparency, and public trust.

Scope of Audit

Governance

1. **Oversight and segregation of duties** - Delineation of roles and responsibilities of MEC and that of the vendor to ensure full oversight of the process
2. **Robust ICT policies** - covering all aspects of technology use, including acceptable access to and use of ICT equipment and data, physical security of ICT equipment, data security, back-up, retention, archiving and disposal, appropriate use of email and social media, and disciplinary measures for cases of deliberate or serious breaches
3. **Independent, third-party certification of computer systems** - based on national and international standards, guidelines, recommendations and requirements to confirm that the system complies with prescribed technical requirements and standards
4. **Pre-implementation Testing** - Rigorous pre-implementation testing of computer systems and public release of the results of the tests.
5. **Source Code Management** - Holding an authenticated copy of the authorized codes in an independently controlled off-site location coupled with regular comparison (Version Control) of this with the code being used during the elections to detect and remove any unauthorized changes.
6. **Auditing** - Regular auditing of computer systems, with particular attention paid to their security features.
7. **Audit Trails** – Availability of voter verified audit trails and log management
8. **Training and Expertise** – Capacity building and independence of MEC staff managing electoral process at all levels.

Selection of Electoral Management System (EMS)

1. **Need Driven Approach** - Define which electoral problem the Smartmatic Solution is addressing, and whether there are other better ways to do so.
2. **Procurement** - Whether the procurement of Smartmatic was conducted with a high degree of integrity, transparency and competitiveness.
3. **Vendor Lock** - Whether technology is proprietary to a vendor and data formats are not open.
4. **Source Code** - Access and validation of source code. Making test versions of source codes for computer systems available for public comment.
5. **System Customization** - Whether the system demands changes in the electoral process to match the system.

Electoral Process (Smartmatic)

1. **Identity Management** - Integrity and accuracy of registered eligible voters and preservation of the database for post-election reference.
2. **Voter verification** - Systematic sampling of registered voters for identity validation and eligibility. Test applicability of one-person one-vote principle
3. **Election Intelligence** - System architecture and data flow including transmission control protocols deployed and its effectiveness.
4. **Automated Polling Stations** - Test the processing integrity of automated polling stations including knowledge and performance of support service team
5. **Vote Counting** - Test the processing integrity of precinct scanners
6. **Results Processing** - system reporting format /pattern to ensure alignment with constituencies and polling stations that can easily be collaborated with manually counted results. Pretesting logic and accuracy to be considered at this stage.
7. **Publication of results** - System Vulnerability assessments and logical access controls test to be considered, including physical access controls to premises hosting the servers. Validate the defense-in-depth, least privilege, segregation of duties, zero trust, and transparency.

Technical Considerations

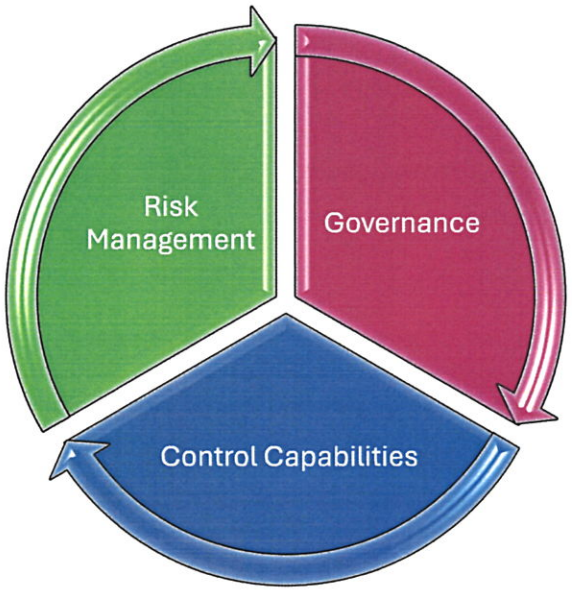
1. **Software Architecture** – including coding practices, source code integrity (if accessible), version control.
2. **Data Integrity and Validation** – checks for duplication, manipulation, and proper backups.
3. **System Security** – vulnerability assessments, penetration testing, intrusion detection and access control mechanisms.
4. **Infrastructure** – including servers, networks, databases, and disaster recovery/redundancy systems.
5. **Disaster Recovery Management** – analysis of backup protocols and disaster recovery mechanisms / redundancy systems
6. **Third-party Integrations** – such as biometric registration tools or external result portals and vendor systems
7. **Compliance with Legal Frameworks** – including Malawi's Electoral Laws, Data Protection Regulations, and international best practices (e.g., IFES, SADC guidelines)

Audit Process

Technical Approach

More than for any other electoral technology system, certifications and audits are of crucial importance for building trustworthy and credible voting and counting systems. Certifications and audits confirm the compliance of the e-voting system against a clearly defined set of functional and operational requirements, that include legal, technical, operational and functional aspects as well as key stakeholder needs.

The Audit should be designed to evaluate the **governance, risk management, and control capabilities** of electoral process to identify and manage operational-related risks in real time, covering security management, data integrity, electoral devise and software audit, operational process and compliance reviews.



Data Analytics: Better Insights through Data

The audit should incorporate data analytical techniques into the engagement to provide richer insights, enhanced risk monitoring, process efficiency and visibility on voter registration, transmission and reporting accuracy.

Audit Methodology

Pre-Audit Phase

a) Stakeholder consultations (MEC, political parties, civil society)

b) Review of system documentation (design documents, manuals, process flows)

c) Preliminary risk assessment • Review of contracts with ICT vendors

Fieldwork and Testing Phase

a) System walkthroughs and observation

b) Penetration testing and vulnerability assessments

c) Code review and version tracking

d) Data integrity analysis such as voter roll verification

e) Evaluation of access control and authentication systems

f) Interviews with system developers and MEC ICT personnel

g) Red team simulations for threat detection

Post-Audit Phase

a) Draft audit report

b) Stakeholder feedback

c) Final audit report and presentation to MEC, Key Stakeholders and other relevant oversight bodies

d) Implementation of roadmap and follow-up plan

Expected Deliverables

The following will be the key deliverables:

a) Inception Report outlining detailed audit plan and methodology

b) Weekly progress updates to the Chairperson and designated MEC officials

c) Preliminary Findings Report (Mid-Audit)

d) Final Audit Report with:

i. Summary of findings

ii. Risk rating per issue

iii. Recommendations for mitigation and remediation

iv. Compliance gaps and corrective action roadmap

Presentation of Audit Findings and Recommendations

The Independent ICT Auditors will present the Audit findings and recommendations to the key stakeholders. Specifically, the key stakeholders will include:

a) The Commission/Commissioners.

b) The Representatives of the Political Parties ie the Secretary General, Director of Elections and Director of Legal Affairs.

c) ICT experts as invitees of the political parties, who will also make observations and advise the parties amid the presentations;

d) The Independent ICT Auditors shall be required to answer questions, queries and provide clarifications to the Stakeholders;

e) The Representative of Centre for Multiparty Democracy (CMD).

f) Civil Society Organizations.

g) Religious Organizations; and

h) Development Partners.

Duration and Team Composition

The audit is expected to last four weeks (one month).

Team Composition

The team will include experts in:

a) Cybersecurity, software engineering, or digital forensics ➢ Cybersecurity, penetration testing and intrusion detection

b) Electoral technology and Smartmatic systems

c) Network architecture and data protection

d) Legal and regulatory compliance

e) Election process and integrity assessment

Confidentiality and Ethical Considerations

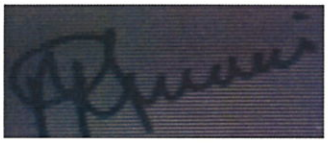
All audit activities will be conducted with strict adherence to confidentiality, legal compliance, and ethical standards. The team will operate under nondisclosure agreements and ensure that no data is leaked or misused during the audit process.

Signed

Peter Mukhito, DPP Secretary General

Lynda Limbe, AFORD Secretary General

Ben Chakhame, PP Secretary General



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28th May 2025

Alliance for Democracy

Democratic Progressive Party

United Democratic Front (UDF)

Peoples Party (PP)

UTM Party

Dear Secretaries General,

CONCEPT NOTE AND SCOPE OF THE INDEPENDENT AUDIT OF THE MALAWI ELECTORAL COMMISSION'S ELECTION MANAGEMENT SYSTEM

I refer to the above matter.

On behalf of the Malawi Electoral Commission (the "Commission") I would like to formally acknowledge receipt of the *Concept Note and Scope of the Independent Audit of the Malawi Electoral Commission's Election Management System (the "Scope")*. This was received on Friday, 23rd May 2025.

The Commission is reviewing the Scope and will make its position known to you in due course.

Sincerely,

Andrew Mpesi
CHIEF ELECTIONS OFFICER

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5th June 2025

Alliance for Democracy (AFORD)

Democratic Progressive Party (DPP)

United Democratic Front (UDF)

Peoples Party (PP)

UTM Party

Dear Secretary General,

CONCEPT NOTE AND SCOPE OF THE INDEPENDENT AUDIT OF THE MALAWI ELECTORAL COMMISSION'S ELECTION MANAGEMENT SYSTEM

I refer to the letter dated 28th May 2025 to which the Malawi Electoral Commission (the "Commission) formally acknowledged receipt of your *Concept Note and Scope of the Independent Audit of the Malawi Electoral Commission's Election Management System* (the "Scope") which was jointly presented to the Commission and received on Friday, 23rd May 2025. You will recall that the Commission stated that it was reviewing the Scope and would make its position known to you in due course.

Now, the Commission wishes to advise that during its meeting held on 5th June 2025, the contents of the Scope were carefully reviewed and that following an extensive technical, legal, and operational analysis, it has resolved not to permit or pursue the audit as proposed.

At the outset, it must be clearly understood that the Commission has been deliberate and forthcoming in providing relevant data, statistics and information including duplicate entries and photographic anomalies, which were flagged and disclosed to political parties by the Commission itself during

stakeholder consultations. Therefore, the narrative that stakeholders *discovered* these issues is factually inaccurate and this misrepresents the circumstances and cannot form the basis for an audit of the EMS.

In its report to the National Elections Consultative Forum (NECOF) of 30th April 2025, the Commission made it clear that a demand for an audit of Election Management System must be based on a clearly defined scope and anchored on specific irregularities or anomalies observed. The Scope does not point to any irregularities in the Commission's processes occasioned by the EMS.

The submitted Scope resembles a structured forensic investigation rather than a professional ICT assurance review exercise. The Scope presumes irregularities or systemic failure without presenting any evidence of such. Moreover, the Scope contains numerous technical misconceptions. For example: It makes reference to technologies and processes such as automated polling stations, electronic voting and automated vote counting, that the Commission has, on numerous occasions, stated are not part of the 2025 General Election electoral process. These elements are not components or modules of the current EMS configuration in use by the Commission. The analysis conducted by the Commission revealed that the said technologies and processes were drawn from generic documentation on *Smartmatic* systems or practices. However, the Commission's EMS is custom developed in all aspects, including the Election Management Devices. The Scope, therefore, has failed to accurately reflect the actual design, capabilities, and operational functions of the Commission's EMS.

Further, the Scope is proposing an audit process which is seeking access to and scrutiny of the Commission's core systems and infrastructure in a manner that would compromise system security, institutional control, and the Commission's ability to safeguard the integrity of the electoral process. The Commission is of the considered view that to allow such an audit would be setting a dangerous precedent suggesting that a stakeholder can set aside or usurp the Commission's constitutional and legal independence.

In accordance with section 76 (4) of the Constitution of the Republic of Malawi (the "Constitution"), the Commission is required to exercise its powers, functions, and duties independent of any direction or interference by other authority or any person. Additionally, under section 76 (2) (c) and (d) of the Constitution, the Commission is bestowed with the following duties—

(i) to determine electoral petitions and complaints related to the conduct of any elections; and

(ii) to ensure compliance with the provisions of *the* Constitution and any Act of Parliament;

The Commission has not been presented with any petition that alleges any irregularities in the electoral processes that have been implemented so far. On the matters observed in the voters' register, the Commission made an undertaking that it will put in place measures to remedy the anomalies. There

is no statutory or legal authority to mandate the Commission to submit to an externally imposed audit of its internal systems without it being based on a complaint or petition alleging irregularities or other illegalities in the Commission's electoral processes.

As mandated by sections 20 and 21 of the Presidential, Parliamentary and Local Government Elections Act, 2023, (the "Act"), the Commission opened up the voters' register for inspection by voters, representatives of political parties, independent candidates and observers for purposes of verification that all records and entries in the voters' register are accurate. The voters register for each registration centre was posted at the registration centre where registration took place for three days. In addition, the Commission placed the entire voter's register at the Regional Offices of the Commission for inspection during working hours. Most importantly, on 12th May 2025, the Commission shared an electronic copy of the entire voters' register with all registered political parties to allow the political parties an opportunity to audit the voters register, identify anomalies and irregularities, and petition the Commission to provide a remedy to such anomalies and irregularities.

The Commission wishes to record that at the closure of the period which the Commission prescribed for the inspection and verification of the voters register and indeed by the date of this letter, none of the political parties had submitted a complaint or petition alleging any irregularity upon which a demand could be made that there should be an audit of the EMS. If such anomalies or irregularities were to be highlighted and presented, the Commission would be duty bound to resolve the irregularities, in a manner it deems fit, as a matter of law.

In view of the foregoing, may you be advised that the Commission, having considered the Scope in its entirety, finds it to be structurally flawed, technically misinformed, legally unsound, and operationally unfeasible. The Scope, and assumptions presented in the document have been deemed insufficient to form the basis for an externally commissioned audit of the EMS.

Therefore, the Commission will not proceed with, nor approve, the proposed audit. The Commission wishes to assure you that it retains full authority and control over the design, use, and review of its electoral systems. Internal assurance activities will continue to be undertaken by the Commission, through its own mechanisms, and in accordance with the law and relevant standards of electoral integrity.

We trust that this position shall be clearly understood and respected.

Yours sincerely,

Justice Annabel Mtalimanja
CHAIRPERSON