

**CLEAN ROLLS, SECURE ELECTIONS: REVIEWING
VOTER LIST MAINTENANCE STANDARDS**

HEARING

BEFORE THE

**COMMITTEE ON HOUSE
ADMINISTRATION**

HOUSE OF REPRESENTATIVES

ONE HUNDRED NINETEENTH CONGRESS

FIRST SESSION

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JULY 22, 2025
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**CLEAN ROLLS, SECURE ELECTIONS:
REVIEWING VOTER LIST
MAINTENANCE STANDARDS**

July 22, 2025

COMMITTEE ON HOUSE ADMINISTRATION,
HOUSE OF REPRESENTATIVES,
Washington, D.C.

The Committee met, pursuant to notice, at 10:34 a.m., in room 1310, Longworth House Office Building, Hon. Bryan Steil [Chairman of the Committee] presiding.

Present: Representatives Steil, Loudermilk, Murphy, Carey, Lee, Miller, Morelle, Sewell, Torres, and Johnson.

Staff present: Mike Platt, Staff Director; Rachel Collins, General Counsel; Abby Salter, Deputy General Counsel; Jordan Wilson, Director of Member Services; Kristen Monterroso, Director of Operations; Josh Weber, Counsel; Annemarie Cake, Professional Staff and Deputy Clerk; Jamie Fleet, Minority Staff Director; Khalil Abboud, Minority Deputy Staff Director; Sean Wright, Minority Chief Counsel; Nikolas Youngsmith, Minority Elections Counsel; and Owen Reilly, Minority Professional Staff.

**OPENING STATEMENT OF HON. BRYAN STEIL, CHAIRMAN OF
THE COMMITTEE ON HOUSE ADMINISTRATION, A U.S. REP-
RESENTATIVE FROM WISCONSIN**

Chairman STEIL. The Committee on House Administration will come to order.

The title of today's hearing is, "Clean Voter Rolls, Secure Elections: Reviewing Voter List Maintenance Standards."

I note that a quorum is present. Without objection, the chair may declare a recess at any time.

Also, without objection, the hearing record will remain open for 5 legislative days so Members may submit any materials they wish to be included therein.

Thank you, Ranking Member Morelle, Members of the Committee, and our witnesses, for appearing at today's hearing.

Today, the Committee on House Administration continues our oversight of Federal elections.

Voter list maintenance is crucial to election integrity. List maintenance adds new voters to rolls. It also removes ineligible voters, such as deceased, relocated, or duplicate registrants. Inaccurate voter rolls can open the door to election fraud and can hinder public confidence in our elections.

In the current world of mail-in voting, live ballots can be sent based on inaccurate or out-of-date information. That is a risk. How do you mitigate that risk?

For example, California has universal vote by mail, meaning they send every single registered voter in the State a ballot regardless of whether or not it was requested, which shows the significance of making sure the voter rolls are accurate. It means that a live ballot can be sent to a resident's former address if the voter rolls were not properly updated. That would be a live ballot. It would be illegal for someone to vote that besides the eligible voter, but it would be difficult to determine that after that ballot would be illegally cast.

The responsibility of maintaining voter lists is largely fulfilled by States.

In addition to State-specific regulations, Federal laws, such as the National Voter Registration Act, or the NVRA, includes voter list maintenance requirements. As it is currently written, the NVRA arguably has a low standard for compliance—a standard we are going to discuss today. Because of this, if States choose, they can largely avoid properly maintaining their voter rolls.

Litigation has shown that judges consider minimal maintenance compliance with Federal law. Lawsuits have alleged that States are failing to timely and effectively maintain their voter rolls.

This year, the Department of Justice filed a Statement of Interest asserting the Federal Government's interest in effective enforcement of the NVRA against Illinois. The DOJ there alleged that 34 counties in the State failed to disclose any data that would show Illinois conducted—the State of Illinois failed to disclose any data that would show Illinois conducts voter list maintenance.

Representative Mary Miller, I have a hunch, will have questions about that.

The lack of transparency in voter list maintenance undermines both legal compliance and voter confidence.

In addition to legal compliance, we will discuss today where States are obtaining data for proper voter list maintenance. States need access to accurate and timely data to effectively maintain their voter lists.

Accurate data can be exchanged between States and the Federal Governments. Some States, such as Virginia, have entered into MOUs with neighboring States to exchange voter data. This type of information allows States to determine whether a voter is registered in another State and if they are removed upon registering in their new State.

Also, as Chairman of the Committee on House Administration, I have worked to ensure that only U.S. citizens are voting in U.S. elections. It is critical that States are utilizing Federal citizenship verification resources that are available to them.

The U.S. Citizenship and Immigration Services recently announced enhancements to their citizenship verification system. The updated system allows States and local governments to access Federal data bases to verify voters' citizenship.

In conclusion, list maintenance requires efficient, effective, and accurate access to data, as well as thorough and routine updates. Proper voter list maintenance protects the security of our elections.

I want to thank our witnesses for being here today, and I look forward to our discussion.

I will now recognize the Ranking Member, Mr. Morelle, for 5 minutes for the purpose of giving his opening statement.

[The prepared statement of Chairman Steil follows:]

**PREPARED STATEMENT OF CHAIRMAN OF THE COMMITTEE
ON HOUSE ADMINISTRATION BRYAN STEIL**

Today, the Committee on House Administration is continuing its oversight of Federal elections. Voter list maintenance is crucial to election integrity. List maintenance adds new voters to the rolls and removes ineligible ones, such as deceased, relocated, or duplicate registrants. Inaccurate voter rolls can open the door to election fraud and can hinder public confidence in our elections.

In the current world of mail-in voting, live ballots can be sent based off inaccurate, out-of-date information. For example, California mails every single registered voter in the State a ballot, regardless of whether it was requested. This means live ballots can be sent to a resident's former address if the State has not updated its list. The responsibility of maintaining voter lists is largely fulfilled by the States.

In addition to State-specific regulations, Federal law, such as the National Voter Registration Act, or NVRA, includes voter list maintenance requirements. As it is currently written, the NVRA arguably has a low standard for compliance. Because of this, States can largely avoid maintaining their voter rolls. Litigation has shown that judges consider minimal list maintenance compliant with Federal law. Lawsuits have alleged that States are failing to timely and effectively maintain their voter rolls.

This year, the Department of Justice filed a Statement of Interest asserting the Federal Government's interest in effective enforcement of the NVRA against Illinois. The DOJ alleged that 34 counties in the State failed to disclose any data that would show Illinois conducts list maintenance. The lack of transparency in voter list maintenance undermines both legal compliance and voter confidence.

In addition to legal compliance, we will discuss today where States are obtaining data for proper voter list maintenance. States need access to accurate and timely data to effectively maintain their voter lists.

Accurate data can be exchanged between States and the Federal Government. Some States, such as Virginia, have entered into Memoranda of Understanding with neighboring States to exchange voter data. This type of information sharing allows States to determine whether a voter is registered in another State, and if they were removed upon registering in their new State.

As Chairman of the Committee on House Administration, I have worked to ensure that only U.S. citizens are voting in U.S. elections. It is critical that States are utilizing Federal citizenship verification resources that are available to them. The U.S. Citizenship and Immigration Services (USCIS) recently announced enhancements to their citizenship verification system. The updated system allows State and local governments to access Federal databases to verify voters' citizenship.

In conclusion, list maintenance requires efficient and accurate access to data, as well as thorough and routine updates. Proper voter list maintenance protects the security of our elections. I thank our witnesses for being here and I look forward to our discussion today.

**OPENING STATEMENT OF HON. JOSEPH MORELLE, RANKING
MEMBER OF THE COMMITTEE ON HOUSE ADMINISTRATION,
A U.S. REPRESENTATIVE FROM NEW YORK**

Mr. MORELLE. Good morning. Thank you, Chairman Steil, and thank you, certainly, to our witnesses for being here this morning.

For over 200 years, our Republic has marched toward a fuller, freer system of governance, expanding access to the ballot for more and more Americans. As we have seen time and time again—and the topic of today's hearing clearly indicates—House Republicans seem to want to retreat from that important promise.

States controlled by Republicans have recently engaged in systematic, illegal voter purges. A Republican candidate in North

Carolina sought to disenfranchise tens of thousands of voters because he did not like the outcome of the election.

This hearing comes on the heels of last week's news that the Department of Justice, under Donald Trump, is seeking voter registration lists of several States, representing data on millions of Americans, ahead of the 2026 midterms.

The Trump administration's dangerous, false rhetoric continues, going back to the 2020 election and continues, about non-citizen voting is eroding our democracy and threatens the voting rights of all Americans.

Clear evidence shows that voter de-registration efforts in Republican-led States have stripped thousands of Americans of the right to vote without due process.

Now, do not get me wrong. Voter list maintenance, when conducted properly and legally, ensures that our elections are secure and safe. Systematic voter purges, often illegally conducted in the run-up to Federal elections, pose a real threat to voters. Voter purges represent a coordinated effort by my friends on the other side of the aisle to manipulate elections—to, in effect, make American elections less American.

For years, Republican officials across the country have purged hundreds of thousands of voters, including eligible U.S. citizens. In Texas, for example, Republican officials have repeatedly tried to do this, but, each time, local officials discovered that Texas purges had incorrectly targeted United States citizens.

Republican cheating in Texas does not stop there. Recently, Donald Trump and his House Republican allies hatched a plan to gerrymander Texas's congressional map, letting Republican Representatives choose their voters rather than letting Texans choose their Representatives.

This is happening across the country. In North Carolina, the State election board recently caved in to Trump administration demands and pressure to illegally purge at least 200,000 voters.

The weaponized Department of Justice resurrected debunked conspiracy theories from the State's recent Supreme Court election to disenfranchise North Carolina voters. This is no accident. The broken Trump Justice Department has made voter disenfranchisement a priority, firing all but three lawyers in the Voting Section.

I think that leads us to ask: If Republicans are willing to kick American citizens off the rolls, if they are willing to manipulate congressional maps, if they are willing to gut the Department of Justice, what other illegal acts will President Trump and his allies take to enhance their own power or to enrich themselves?

We need to call out these actions for what they are: corruption, pure and simple.

I would welcome the opportunity to discuss the careful, legal process for maintaining accurate voter rolls and supporting the important work of local election officials. The Republican majority is more interested in promoting illegal and sloppy efforts to manipulate elections and deceive the American public.

Today, we will hear from Mary Kay Heling, a retired teacher and fitness instructor from North Carolina. After voting in the 2024 general election, Ms. Heling learned that her name was on a list of voters to be purged in response to a lawsuit by a losing Repub-

lican candidate for the State Supreme Court. Despite providing all necessary documentation, despite being an American citizen, North Carolina Republicans tried to strip Ms. Heling of her right to vote.

This was not a simple mistake. It was not a clerical error. It was part of a concerted effort to consolidate partisan power, because Republicans know that if every American citizen can vote in 2026, they will lose.

The American people are furious. They are furious that the “big ugly bill” by President Trump will steal health coverage from 17 million American citizens. They are furious at Republican deception about the Epstein files, all to protect the President, who either lied to the American people for years about the existence of the client list or is lying to them now. They are furious with rampant, partisan gerrymandering meant to decide the outcome of elections before a single vote is cast.

The Republican majority, Attorney General Pam Bondi, and the White House are trying to silence the American people. If we follow their lead, thousands of people, like Ms. Heling, will lose their right to vote.

If President Trump and Republicans have their way, we will retreat from our country’s storied history of voting-rights expansion. We will no longer have, in the words of President Lincoln, a Government of the people, by the people, and for the people. We cannot sit idly by and let that happen.

With that, I will yield back.

[The prepared statement of Ranking Member Morelle follows:]

**PREPARED STATEMENT OF RANKING MEMBER OF THE
COMMITTEE ON HOUSE ADMINISTRATION JOSEPH MORELLE**

For over 200 years, our Republic has marched towards a fuller, freer system of governance, expanding access to the ballot for more and more Americans. As we have seen time and time again and the topic of today’s hearing clearly indicates House Republicans seem to want to retreat from that important promise.

States controlled by Republicans have recently engaged in systematic, illegal voter purges. A Republican candidate in North Carolina sought to disenfranchise tens of thousands of voters because he did not like the outcome of the election. This hearing comes on the heels of last week’s news that the Department of Justice, under Donald Trump, is seeking voter registration lists of several States, representing data on millions of Americans, ahead of the 2026 midterms.

The Trump administration’s dangerous, false rhetoric, which goes back to the 2020 election and continues, about non-citizen voting is eroding our democracy and threatens the voting rights of all Americans.

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For years, Republican officials across the country have purged hundreds of thousands of voters, including eligible U.S. citizens. In Texas, for example, Republican officials have repeatedly tried to do this, but, each time, local officials discovered that Texas purges had incorrectly targeted United States citizens. Republican cheating in Texas does not stop there. Recently, Donald Trump and his House Republican allies hatched a plan to gerrymander Texas’s congressional map, letting Republican Representatives choose their voters rather than letting Texans choose their Representatives.

This is happening across the country. In North Carolina, the State election board recently caved in to Trump administration demands and pressure to illegally purge at least 200,000 voters. The weaponized Department of Justice resurrected de-

bunked conspiracy theories from the State's recent Supreme Court election to disenfranchise North Carolina voters. This is no accident. The broken Trump Justice Department has made voter disenfranchisement a priority, firing all but three lawyers in the Voting Section.

I think that leads us to ask: If Republicans are willing to kick American citizens off the rolls, if they are willing to manipulate congressional maps, if they are willing to gut the Department of Justice, what other illegal acts will President Trump and his allies take to enhance their own power or to enrich themselves? We need to call out these actions for what they are: corruption, pure and simple.

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If President Trump and Republicans have their way, we will retreat from our country's storied history of voting rights expansion. We will no longer have, in the words of President Lincoln, a Government of the people, by the people, and for the people. We cannot sit idly by and let that happen.

Chairman STEIL. The gentleman yields back.

Without objection, all other Members' opening statements will be made part of the hearing record if they are submitted to the Committee clerk by 5 p.m. today.

Today, we have one witness panel.

First, we have Christian Adams, who is president and general counsel of the Public Interest Legal Foundation.

Next, we have Justin Riemer, who is president and CEO of Restoring Integrity and Trust in Elections and partner at First Street Law.

Finally, we have Mary Kay Heling, a voter in the State of North Carolina.

We appreciate all of you being here with us today, and we look forward to your testimony.

I will now recognize you, Mr. Adams, for 5 minutes for the purpose of giving your opening statement.

STATEMENTS OF J. CHRISTIAN ADAMS, PRESIDENT AND GENERAL COUNSEL, PUBLIC INTEREST LEGAL FOUNDATION; JUSTIN RIEMER, PRESIDENT AND CHIEF EXECUTIVE OFFICER, RESTORING INTEGRITY AND TRUST IN ELECTIONS; AND MARY KAY HELING, VOTER

STATEMENT OF J. CHRISTIAN ADAMS

Mr. ADAMS. Thank you, Chairman Steil, Ranking Member Morelle, Members of the Committee. Thank you for the invitation to testify.

Here is a question Congress might ponder: What does Section 8 of the National Voter Registration Act mean when it requires that States must, quote, “conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters,” unquote?

According to Federal courts, unfortunately, now it means next to nothing. That is not what Congress intended in 1993. Courts have unfortunately interpreted the language passed by this Congress to find the mere existence of a list maintenance program is what matters, not the program’s effectiveness. Panels of the Sixth Circuit and the Eleventh Circuit Court of Appeals reached these conclusions.

In Florida, Broward County allowed non-citizens to vote and deferred the removal of ineligible registrants for years out of sheer incompetence.

The list maintenance requirements in the NVRA are gutted, particularly now in the Sixth and Eleventh.

It is ironic, since the NVRA owes its very existence to these same list maintenance obligations. Senator Bob Dole’s compromise list maintenance amendment in 1993 broke a filibuster that would have otherwise doomed the bill, just as previous versions of NVRA died by filibuster before 1993. The Republicans made a deal to let the NVRA through in exchange for meaningful list maintenance standards.

The Eleventh Circuit generally held that, if an election official makes an effort to clean voter rolls, no matter how shoddy, it is acceptable and that best practices are not required under the NVRA.

The proof is decidedly not in the NVRA pudding.

The Sixth Circuit has followed the Eleventh Circuit. There, Michigan’s Secretary of State, Jocelyn Benson, had over 25,000 dead registrants on the active rolls. A significant number of them had been registered decades after death—decades.

In litigation, however, the Sixth Circuit interpreted the language that Congress passed requiring a “reasonable effort” to mean this: quote, “a program that makes a rational and sensible attempt to remove dead registrants. A State need not, however, go to extravagant or excessive lengths in creating and maintaining such a program,” unquote.

Notice the court never says “successful” or “effective.” Results do not matter. The proof is not in the pudding.

I do not believe this is what Congress intended. I do not believe Republicans would have dropped their filibuster with this limp maintenance standard. A mere “rational attempt”?

Michigan's Secretary of State, Jocelyn Benson, gets an A for effort from the court, but she deserved an F for outcome: tens of thousands of dead registrants on active rolls.

Never mind if someone is registered multiple times. Never mind if a registration record is missing the date of birth. None of this matters under these court rulings. Only whether a State makes a rational effort. Results do not matter. This standard is not what the Republicans dropped the filibuster for in 1993.

Congress can fix this.

Many of the problems with American voter rolls occur at the point of registration, often by third-party groups. The voter may never know their record is botched, because they can still vote. Then something changes—they move, they change their name, they get married—and the process creates a duplicate registration, because the original mistake impairs a record match.

It can even be triplicate. I have seen duplications reach six active registrations for a single voter in Allegheny County, Pennsylvania—Rashawn Slade. You can see all of his simultaneous registrations in the appendix to my written testimony.

Some news: In Maine, we just found roughly 18,000 apparently deceased registrants, nearly 1,500 examples of intrastate duplicates, another 900 examples of interstate duplicates. The Public Interest Legal Foundation issued a detailed finding on this data this month.

Ironically, Maine passed a statute to fine the Public Interest Legal Foundation if we spoke about what we found on the voter rolls, including to you in Congress. The First Circuit struck down these speech penalties in a case that we brought under the NVRA.

Ranking Member Morelle, even in New York you find people that I describe in my written testimony registered multiple times, including one record we have right here. That means you are mailing extra campaign literature. You are wasting money on your campaign because of the state of the voter rolls.

Finally, one way to improve list maintenance is for States to use commercial credit data to clean voter rolls.

I am happy to answer your questions.

Thank you.

[The prepared statement of Mr. Adams follows:]

PREPARED STATEMENT OF J. CHRISTIAN ADAMS



**Testimony of
J. Christian Adams**

**Before the U.S. House of Representatives Committee
on House Administration**

July 22, 2024

J. Christian Adams
President and General Counsel
Public Interest Legal Foundation
107 S. West Street, Suite 700
Alexandria, Virginia
adams@publicinterestlegal.org

Chairman Steil, Ranking Member Morelle, Members of the Committee, thank you for the invitation to offer testimony in today's hearing.

List Maintenance Requirements of Section 8 of NVRA

Here's a question Congress might ponder: What does the Section 8 of the National Voter Registration Act mean when it mandates that states must "*conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters?*"¹ According to federal courts, unfortunately, it means next to nothing. That isn't what Congress intended.

Courts have unfortunately interpreted the language passed by this Congress in 1993 to find the mere *existence* of a list maintenance program is far more important than its *effectiveness*. Panels of the Sixth² and Eleventh³ Circuit Courts of Appeals reached these conclusions, despite, for example, Michigan having over 25,000 dead registrants – many dead for over two decades. In Florida, Broward County allowed noncitizens to vote and deferred the removals of ineligible registrants for years out of sheer incompetence.

The list maintenance requirements within the National Voter Registration Act (NVRA) of 1993 are gutted, particularly in the Sixth and Eleventh Circuits.

It's ironic, since the NVRA owes its existence to these very same list maintenance requirements of the NVRA. Senator Bob Dole's compromise list maintenance amendment in 1993 broke a filibuster that would've doomed the bill, just as a steadfast filibuster doomed previous attempts to pass NVRA in previous Congresses.

¹ 52 U.S.C. §20507(a)(4).

² *Pub. Int. Legal Found. v. Benson*, 136 F.4th 613 (6th Cir. 2025).

³ *Bellitto v. Snipes*, 935 F.3d 1192 (11th Cir. 2019).

These troubling court rulings will become the primary cause of voter rolls gathering deadwood.

Some more detail: The Public Interest Legal Foundation originally brought a list maintenance lawsuit against the Broward County Supervisor of Elections in the Southern District of Florida. Despite the law nearing its 30th birthday at the time, this case was *the first to have a full bench trial*. The evidence of Broward County's alleged failures to follow federal law included testimony about voters who moved away, voters who died, and a ratio of registered voters to eligible residents exceeding 100 percent, according to a method borrowed from the Justice Department.

This evidence survived a motion to dismiss, but the trial court and the Eleventh Circuit eventually rejected these theories. **The Eleventh Circuit generally held that if an election official makes an effort to clean rolls, no matter how shoddy the effort is, it's acceptable** and that best practices are not required under the NVA.⁴ The proof is decidedly not in the NVRA pudding.

The Public Interest Legal Foundation has since abandoned ratio theories – where more voters are registered than alive as a basis for liability - and instead focused on demonstrating **real world examples of failure to maintain voter rolls, real dead people on the rolls**. In early 2020, PILF built a database of nationwide voter rolls to identify likely deceased and duplicate registrations. We validated our findings by using the Social Security Death Index (SSDI), the National Change of Address (NCOA), and Experian commercial data systems.

Supplementing voter rolls with commercial data works. Commercial data tools let the Public Interest Legal Foundation effectively test American voter rolls for accuracy. **Commercial**

⁴ *Bellitto v. Snipes*, 935 F.3d 1192 (11th Cir. 2019)

data reveal problems on the rolls far better than ratios. Ratios yield a clue something might be wrong: Commercial data tell you specifically which records are wrong. PILF’s database doesn’t rely on incomplete data, snake oil, partial dates of birth, or rumors. We use the best possible means to detect dead and duplicates – commercial credit data.

We were surprised to learn that states like Arizona, Georgia, Michigan, and Texas had multitudes of deceased on their rolls. We briefed courts on the risks of relying on various states’ voter rolls if they moved toward all-mail elections in 2020.⁵ We gave election officials the results of our research.

Unfortunately, some, notably Michigan Secretary of State Jocelyn Benson, failed to act.

Despite positive trends in other states, the list of likely deceased registrants in Michigan only grew worse. A significant number of the **25,000 likely deceased Michigan registrants had been registered for decades after death. Decades.** Once PILF dug deeper in discovery into what Michigan was doing to keep rolls clean, and failing to do, the breakdowns became more apparent.

In litigation, however, the U.S. Sixth Circuit⁶ interpreted the language that Congress passed requiring a “reasonable effort” to keep the rolls clean means:

“[A] program that makes a rational and sensible attempt to remove dead registrants; a state need not, however, go to ‘extravagant or excessive’ lengths in creating and maintaining such a program.”

Notice the court never says successful, or effective. Results don’t matter. The proof is not in the pudding. I do not believe this is what Congress intended. I do not believe the

⁵ <https://publicinterestlegal.org/cases/>

⁶ *Pub. Int. Legal Found. v. Benson*, 136 F.4th 613 (6th Cir. 2025).

Republicans would have dropped their filibuster with this limp version of a list maintenance standard.

A mere “rational attempt” is the standard. Michigan Secretary of State Jocelyn Benson got an A for effort from the court, but she deserved an F for outcome. Tens of thousands of dead registrants on the active rolls. Never mind if someone is registered multiple times. Never mind if a registration record is missing the date of birth. None of this matters under these court rulings, only whether a state makes a “rational” and “sensible attempt” to get the job done. Results are irrelevant. An attempt is what matters to the courts.

That standard isn’t what the Republicans dropped a filibuster for in 1993. Congress might fix this.

Michigan and every other state might also consider the money they have wasted on the Electronic Registration Information Center (ERIC) to receive voter list maintenance data. ERIC makes big mistakes, as the Public Interest Legal Foundation’s recent lawsuit against Oregon demonstrated.⁷ **Oregon was removing *living registrants* from the rolls under ERIC’s mistaken data guidance** because, they thought, the registrants according to ERIC were *dead*. They weren’t; they were alive. ERIC was giving member states *garbage data* and member states were *removing living voters from the rolls*, and our lawsuit showed Oregon had to go back and reinstate voters from the grave.

Worst Practices & Why the Voter Rolls Stay Dirty

Failed list maintenance isn’t usually a political conspiracy to keep rolls dirty. It would be easier to fix if it were that simple. Instead, it is most often bureaucratic neglect and the inertia of government. It is a series of small decisions over years – inertia, failure to use all the tools

⁷ *PILF v. Read*, (D.OR. 2025).

available, unwillingness to listen to people with which they disagree, defensive crouches, and that familiar characteristic – simply being set in their ways. As in Broward, it was rank incompetence.

It is tragic to watch some organizations, and politicians, reflexively defend the broken status quo. What do I mean? Wagon circling, attacking reform efforts, and most commonly, ridiculing and smearing those who speak about the broken state of the rolls. Politicians who are more interested in grandstanding and attacking those with whom they disagree instead of fixing demonstrable failures are part of the problem.

A common failure is that a registrant's data is often improperly recorded at the point of registration. The voter may never know his or her record was botched if they can still cast a ballot. But when circumstances change, like name or address changes, quite often the record update process generates a duplicate registration because of the original mistake. Or triplicate.

I've seen duplications reach up to **being registered six times for a single voter in Allegheny County, Pennsylvania - Rashawn Slade.**⁸ Those who personally attack the people who monitor these problems cannot seriously defend the six voter registration forms submitted by Rashawn Slade and accepted by election officials in Pennsylvania in a short period of time.

⁸ See appendix to my testimony. The Third Circuit Court of Appeals recently held that PILF did not have standing to seek public records of this sort under Section 8 of the NVRA because this Congress, apparently, did not think discovering breakdowns in list maintenance like Rashawn Slade being registered six times was something that the NVRA was designed to uncover through the public inspection provision. The Third Circuit ruled there were no "downstream consequences" to PILF by not being able to obtain information about list maintenance breakdowns like Slade's six simultaneous registrations (and similar breakdowns) and providing this testimony to Congress. That wasn't enough for Judge Rendell, writing for the panel. The breakdown with six Slade registrations, along with thousands of breakdowns discovered by PILF, were all obtained through NVRA public inspection requests prior to the Third Circuit's opinion. After the opinion, it is hard to know how PILF or this Congress can get a complete look at the state of list maintenance, unless Congress were to take steps to undo the standing ruling in *PILF v. PA Secretary of the Commonwealth*. (Case No. 23-1590, Third Circuit, 2025). It is my position **the Third Circuit is wildly incorrect in its interpretation of *Transunion v. Ramirez*, 594 U.S. 413 (2021)**. PILF will seek certiorari in the Supreme Court.

Poor list hygiene is a reliable warning signal for future list maintenance problems. The Public Interest Legal Foundation discovered **nearly a quarter of the New York statewide voter roll was missing Social Security numbers.**⁹ Left alone, this meant roughly 3 million registered New Yorkers could not be directly compared to the Social Security Death Index to find a reliable match when needed.

New York is not an outlier. This year, the Public Interest Legal Foundation is reviewing a growing number of state voter rolls with a focus on fixable hygiene issues.

Just in **Maine, we found roughly 18,000 apparently deceased registrants; nearly 1,500 examples of intrastate duplicates; and another 900 examples of interstate duplicates between Maine and other states.** We issued a report on these findings this month.¹⁰

We have found voters **who registered after they died, like Judy Presto who registered to vote and voted in 2020 after dying in 2013.** I visited her grave and took the photo in Appendix 2 to my testimony.¹¹ If Pennsylvania had been using commercial data to screen voter rolls, this illegal vote would not have happened.

We also informed **New Jersey this month about more than 10,000 cases of intra- and interstate duplication,** usually due to placeholder data which can confuse officials during data entry.¹²

New Jersey, which has statewide elections this year, is consistently one of the worst states for inserting placeholder data in records, especially when officials fail to capture dates of

⁹ Rep. Claudie Tenney (NY-22); Congresswoman Tenney Sends Letter to Demanding DOJ Enforce Federal Help America Vote Act (October 6, 2022), <https://tenney.house.gov/media/press-releases/congresswoman-tenney-sends-letter-demanding-doj-enforce-federal-help-america>

¹⁰ PILF Letter to Maine SOS (July 8, 2025), <https://publicinterestlegal.org/wp-content/uploads/2025/07/7.8.2025-Maine-Data-Findings-Overview.pdf>

Her widower was charged. See, <https://www.wpxi.com/news/top-stories/south-park-man-charged-with-casting-ballot-behalf-dead-wife-after-claiming-mail-was-stolen/OZNXNHXBEWHOTOGDNLNGPPU/>

¹² PILF Letter to New Jersey SOS (July 16, 2025), <https://publicinterestlegal.org/wp-content/uploads/2025/07/7.16.2025-NJ-Data-Findings-Overview.pdf>

birth and registration. Twice now, since 2022, we've pointed to more than 15,000 records showing placeholders.¹³ This month, my team drew attention to more than 2,500 examples of intrastate duplication. Sixty-five percent of those duplicates contain placeholder dates of birth reading "1/1/1800" in the roll.

New Jersey demonstrates how bad hygiene creates more downstream voter roll maintenance problems. For example, voter registrations with missing data or small errors can mushroom into duplicate mail ballots scattered around the state.

Modeling Best Practices

It's not all bad news, though. Just because there isn't a private right of action under HAVA and courts are shrinking the effectiveness of the NVRA, there are still ready solutions and best practices.

During our New Jersey study, we sampled 10 random voter registration records with placeholder dates of birth. We triangulated the voter roll to Social Security and commercial credit records. We were able to find all the samples' missing birthdates in minutes. Seven of those ten are alive and still residing where the voter registrars last saw them. Two were found to be deceased and lingering on the active rolls for 20 years apiece. The tenth registrant moved to St. Lucie County, Florida, in 2017 and is still registered twice.

These commercial data tools are easy to use and are urgently needed in election offices around the country. I must give **Election Assistance Commissioner Don Palmer credit for urging the development of commercial data in list maintenance practices.** Careful and well-informed list maintenance practices will improve American voter rolls. Several states have

¹³ PILF; New Jersey: Tens of Thousands of Voter Registrations are Duplicated, Missing Critical Information (June 2022), <https://publicinterestlegal.org/reports/new-jersey-tens-of-thousands-of-voter-registrations-are-duplicated-missing-critical-information/>

adopted many of the best practices Public Interest Legal Foundation first helped promote in 2017.¹⁴ With credible data tools, registrars can experience this element of their work as if they were operating on easy mode.

Unequal Sovereignty and List Maintenance

One last thing. In 1993, Congress exempted six states from compliance with the National Voter Registration Act, including the transparency obligations.¹⁵ **The Public Interest Legal Foundation is challenging these obsolete exemptions as violations of Equal Sovereignty of the States** that the Founders made central to the formation of the Republic in 1787.¹⁶ These exemptions were justified in statute because those states had same-day voter registration – or for North Dakota – no voter registration in 1993. Since then, many other states have adopted same-day registration but are not exempt. The exemptions no longer match current circumstances and are obsolete. This matters, because **states like Minnesota and Wisconsin need not comply with the election transparency requirements of the NVRA and this hurts confidence in elections.** We simply cannot get the data we can get in 44 other states to see if election officials are doing their job. *Congress can fix this by updating the transparency statute to include electronic records and apply transparency to every state.*

I am bullish about the future, but what Senator Dole thought would clean the rolls was effectively wrecked by two federal courts. **Section 8 of Motor Voter won't get the job done unless Congress fixes these court decisions and makes elections transparent in every state.** Thank you for your invitation to testify.

¹⁴ PILF; Best Practices for List Maintenance (2017), <https://publicinterestlegal.org/reports/best-practices-achieving-integrity-voter-registration/>

¹⁵ The six states currently exempt are New Hampshire, Wisconsin, Minnesota, North Dakota, Wyoming and Idaho.

¹⁶ *PILF v. Simon*, (D.MN. 2024) and *PILF v. Wolfe*, (D.WI. 2024).

Respectfully submitted,

J. Christian Adams, Public Interest Legal Foundation

For more information: www.publicinterestlegal.org

Appendix 1 – Rashawn Slade Six Simultaneous Registrations

Number One of Six



Voter Registration Application/Solicitud de Inscripción de Votante
 Before completing this form, review the General, Application, and State specific instructions.
 Antes de llenar este formulario, vea las instrucciones generales, las instrucciones para llenar esta solicitud, y las instrucciones específicas de su estado.
 PLEASE PROVIDE YOUR RESPONSES IN ENGLISH. / PROPORCIONE SUS RESPUESTAS EN INGLÉS.

Are you a citizen of the United States of America? Yes No Will you be 18 years old on or before election day? Yes No
 ¿Usted es ciudadano de Estados Unidos de América? Sí No ¿Usted cumplirá los 18 años de edad para el día de las elecciones? Sí No

If you check "No" in response to either of these questions, do not complete form.
 Si respondió "No" a cualquiera de estas preguntas, no llene el formulario.
 Please see state-specific instructions for voter registration eligibility to register prior to age 18.
 (Vea también las instrucciones específicas de su estado sobre la posibilidad de inscribirse antes de los 18 años de edad.)

1	First Name / Primer nombre Slade	Last Name / Apellido Slade	First Name / Primer nombre Rashawn	Middle Name(s) / Segundo nombre	Check one / Marque una con un círculo A. S. I. II III IV
2	Home Address / Dirección donde vive 7438 Irvine St		City/Town / Ciudad / Localidad Pittsburgh	State / Estado PA	Zip Code / Código postal
3	Address Where You Got Your Mail / Different from Above / Dirección donde recibe su correo, si es diferente a la de más arriba		City/Town / Ciudad / Localidad	State / Estado	Zip Code / Código postal
4	Date of Birth / Fecha de nacimiento 11/14/96	5	Telephone Number (optional) / Número de teléfono (opcional) 412-515-7451	6	ID Number (see form for the instructions for your state) / Número de identificación (vea instrucciones de su estado)
7	Check all that apply / Marque todas las que correspondan N/A	8	Race or Ethnic Group (see instructions for your state) / Raza o grupo étnico (vea instrucciones de su estado) Black	1805	
9	I have reviewed my state's instructions and I hereby affirm that: / He leído las instrucciones de mi estado y juraría que: I am a United States citizen. / Soy ciudadano de Estados Unidos. I meet the eligibility requirements of my state and subscribe to any oath required. / Cumpló con los requisitos de mi estado y juré cualquier juramento requerido. The information I have provided is true to the best of my knowledge under penalty of perjury. / La información que he proporcionado es verdadera según mis mejores conocimientos, bajo pena de juramento. I am providing this information in good faith, and I am not providing it to anyone else. / Estoy proporcionando esta información de buena fe, y no estoy proporcionando esta información a nadie más. I am providing this information in good faith, and I am not providing it to anyone else. / Estoy proporcionando esta información de buena fe, y no estoy proporcionando esta información a nadie más.				

Date / Fecha: 11 / 16
 Month / Mes Day / Día Year / Año

Number Two of Six



Voter Registration Application/Solicitud de Inscripción de Votante
 Before completing this form, review the General, Application, and State specific instructions.
 Antes de llenar este formulario, vea las instrucciones generales, las instrucciones para llenar esta solicitud, y las instrucciones específicas de su estado.
 PLEASE PROVIDE YOUR RESPONSES IN ENGLISH. / PROPORCIONE SUS RESPUESTAS EN INGLÉS.

Are you a citizen of the United States of America? Yes No Will you be 18 years old on or before election day? Yes No
 ¿Usted es ciudadano de Estados Unidos de América? Sí No ¿Usted cumplirá los 18 años de edad para el día de las elecciones? Sí No

If you check "No" in response to either of these questions, do not complete form.
 Si respondió "No" a cualquiera de estas preguntas, no llene el formulario.
 Please see state-specific instructions for voter registration eligibility to register prior to age 18.
 (Vea también las instrucciones específicas de su estado sobre la posibilidad de inscribirse antes de los 18 años de edad.)

1	First Name / Primer nombre Slade	Last Name / Apellido Slade	First Name / Primer nombre Rashawn	Middle Name(s) / Segundo nombre	Check one / Marque una con un círculo A. S. I. II III IV
2	Home Address / Dirección donde vive 7438 Irvine St		City/Town / Ciudad / Localidad Pittsburgh	State / Estado PA	Zip Code / Código postal
3	Address Where You Got Your Mail / Different from Above / Dirección donde recibe su correo, si es diferente a la de más arriba		City/Town / Ciudad / Localidad	State / Estado	Zip Code / Código postal
4	Date of Birth / Fecha de nacimiento 11/14/96	5	Telephone Number (optional) / Número de teléfono (opcional) 412-515-7451	6	ID Number (see form for the instructions for your state) / Número de identificación (vea instrucciones de su estado)
7	Check all that apply / Marque todas las que correspondan N/A	8	Race or Ethnic Group (see instructions for your state) / Raza o grupo étnico (vea instrucciones de su estado) Black	1805	
9	I have reviewed my state's instructions and I hereby affirm that: / He leído las instrucciones de mi estado y juraría que: I am a United States citizen. / Soy ciudadano de Estados Unidos. I meet the eligibility requirements of my state and subscribe to any oath required. / Cumpló con los requisitos de mi estado y juré cualquier juramento requerido. The information I have provided is true to the best of my knowledge under penalty of perjury. / La información que he proporcionado es verdadera según mis mejores conocimientos, bajo pena de juramento. I am providing this information in good faith, and I am not providing it to anyone else. / Estoy proporcionando esta información de buena fe, y no estoy proporcionando esta información a nadie más. I am providing this information in good faith, and I am not providing it to anyone else. / Estoy proporcionando esta información de buena fe, y no estoy proporcionando esta información a nadie más.				

Date / Fecha: 11 / 16
 Month / Mes Day / Día Year / Año

Number Five of Six



Voter Registration Application/Solicitud de Inscripción de Votante
 Before completing this form, review the General, Application, and State specific instructions.
 Antes de llenar este formulario, vea las instrucciones generales, las instrucciones para llenar esta solicitud, y las instrucciones específicas de su estado.
PLEASE PROVIDE YOUR RESPONSES IN ENGLISH. / PROPORCIONE SUS RESPUESTAS EN INGLÉS.

Are you a citizen of the United States of America? Yes No Will you be 18 years old on or before election day? Yes No This space for office use only. / Este espacio sólo para uso de la oficina.

1 First Name / (Nombre en español) Last Name / Apellido First Name / Primer nombre Middle Name(s) / Segundo nombre Last Name / (Nombre en español) *Shade Rashawn*

2 Home Address / Dirección donde vive Apt. or Unit # / # of Dept. / Apto. City/Town / Ciudad/Localidad State / Estado Zip Code / Código postal *7438 irvine st Pittsburgh PA 15218*

3 Address Where You Get Your Mail / Different From Above / Dirección donde recibe su correo, si es diferente a la de más arriba City/Town / Ciudad/Localidad State / Estado Zip Code / Código postal

4 Date of Birth / Fecha de nacimiento Month / Mes Day / Día Year / Año *11/14/96*

5 Telephone Number (optional) / (Número de teléfono (opcional)) Number of Identification / (Número de identificación) *412-602-9552*

6 ID Number (See item 6 in the instructions for your state) / (Número de identificación (vea el ítem 6 en las instrucciones de su estado)) *1805*

7 Check if Party you wish to be inscribed for your state / Selección de partido político (vea el ítem 7 en las instrucciones de su estado) *N/A*

8 Race or Ethnic Group (see item 8 in the instructions for your state) / Raza o grupo étnico (vea el ítem 8 en las instrucciones de su estado) *Black*

9 I have reviewed my state's instructions and I swear/affirm that: / (Las instrucciones de mi estado y juramento que:
 I am a United States citizen. / Soy ciudadano de Estados Unidos.
 I meet the eligibility requirements of my state and subscribe to any oath required. / Cumpliré con los requisitos de mi estado y prometo cumplir juramento requerido.
 The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or if not U.S. citizen, deported from or refused entry to the United States. / La información que proporcioné es verdadera según mi mejor conocimiento, bajo pena de perjurio. Si proporcioné información falsa, se me puede multar, encarcelar o si no soy ciudadano de EE.UU., deportar de o denegar entrada a Estados Unidos.

Date / Fecha *10 / 5 / 16*
 Month / Mes Day / Día Year / Año

Number Six of Six



Voter Registration Application/Solicitud de Inscripción de Votante
 Before completing this form, review the General, Application, and State specific instructions.
 Antes de llenar este formulario, vea las instrucciones generales, las instrucciones para llenar esta solicitud, y las instrucciones específicas de su estado.
PLEASE PROVIDE YOUR RESPONSES IN ENGLISH. / PROPORCIONE SUS RESPUESTAS EN INGLÉS.

Are you a citizen of the United States of America? Yes No Will you be 18 years old on or before election day? Yes No This space for office use only. / Este espacio sólo para uso de la oficina.

1 First Name / (Nombre en español) Last Name / Apellido First Name / Primer nombre Middle Name(s) / Segundo nombre Last Name / (Nombre en español) *Shade Rashawn*

2 Home Address / Dirección donde vive Apt. or Unit # / # of Dept. / Apto. City/Town / Ciudad/Localidad State / Estado Zip Code / Código postal *7438 irvine st Pittsburgh PA 15218*

3 Address Where You Get Your Mail / Different From Above / Dirección donde recibe su correo, si es diferente a la de más arriba City/Town / Ciudad/Localidad State / Estado Zip Code / Código postal

4 Date of Birth / Fecha de nacimiento Month / Mes Day / Día Year / Año *11/14/96*

5 Telephone Number (optional) / (Número de teléfono (opcional)) Number of Identification / (Número de identificación) *412-518-7451*

6 ID Number (See item 6 in the instructions for your state) / (Número de identificación (vea el ítem 6 en las instrucciones de su estado)) *1805*

7 Check if Party you wish to be inscribed for your state / Selección de partido político (vea el ítem 7 en las instrucciones de su estado) *N/A*

8 Race or Ethnic Group (see item 8 in the instructions for your state) / Raza o grupo étnico (vea el ítem 8 en las instrucciones de su estado) *A 17*

9 I have reviewed my state's instructions and I swear/affirm that: / (Las instrucciones de mi estado y juramento que:
 I am a United States citizen. / Soy ciudadano de Estados Unidos.
 I meet the eligibility requirements of my state and subscribe to any oath required. / Cumpliré con los requisitos de mi estado y prometo cumplir juramento requerido.
 The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or if not U.S. citizen, deported from or refused entry to the United States. / La información que proporcioné es verdadera según mi mejor conocimiento, bajo pena de perjurio. Si proporcioné información falsa, se me puede multar, encarcelar o si no soy ciudadano de EE.UU., deportar de o denegar entrada a Estados Unidos.

Date / Fecha *9 / 26 / 16*
 Month / Mes Day / Día Year / Año

Appendix 2 – Judy Presto

Judy Presto registered to vote in 2020 in Pennsylvania.

Judy Presto voted in November 2020 in Pennsylvania.

Judy Presto’s grave National Cemetery of the Alleghenies.



Chairman STEIL. Thank you.
 The gentleman yields back.
 I now recognize Mr. Riemer for 5 minutes.

STATEMENT OF JUSTIN RIEMER

Mr. RIEMER. Thank you, Chairman and Committee Members.

This is a critically important topic and one that I have worked on extensively as a Virginia election official and as a lawyer for groups like Restoring Integrity and Trust in Elections, who are dedicated to ensuring robust list maintenance practices.

I will share three concerns: one, how the NVRA inhibits list maintenance; two, failures I have seen at the State level; and, finally, the erosion of a consensus on the need for clean voter rolls.

The NVRA undermines its stated purpose of protecting election integrity and maintaining accurate and current voter rolls. It imposes too low a floor by setting a lax “reasonable effort” standard States must meet to remove ineligible voters and a ceiling on removals that is unduly restrictive.

First, the floor. The NVRA merely requires States to use Postal Service National Change of Address, or NCOA, data to identify and cancel non-residents. Using NCOA data is necessary but insufficient, because it does not include some of the millions of Americans who move each year.

The NVRA does not require identifying non-residents by using undeliverable election mail, such as registration cards and mail ballots, or for States to exchange voter registration data with one another.

The NVRA also sets a restrictive ceiling on list maintenance by limiting cancellation of non-residents to two methods: when a voter requests removal, or after officials initiate a cumbersome confirmation mailing process and then wait through two Federal general elections.

Relatively few voters request cancellation. Nearly 70 percent of confirmation notices mailed to non-resident voters go unreturned, which means officials cancel most through the mail confirmation process.

We should encourage more direct voter cancellations. For example, courts have blocked States from treating a new registration as a request to cancel a previous out-of-State registration, but Congress could fix that.

Congress could also require registration forms to require a voter to list their prior registration address and a clear acknowledgment that the form will serve as a request to cancel the previous registration.

The NVRA could also require States to transmit this information to officials in the voter’s previous jurisdiction.

These reforms could significantly lower duplicate interstate voter registrations, the time it takes to cancel them, and save States money by decreasing the number of confirmation mailings.

The NVRA’s 90-day list maintenance blackout period before any Federal election is also a problem. In Presidential years, Virginia and other States hold three separate Federal elections, so the blackout freezes list maintenance for up to 270 days, especially when it comes to removing non-residents. Courts have also said

that States cannot cancel the registration of non-citizens during the blackout period.

Elections have changed significantly since the passage of the NVRA, particularly with same-day voter registration and provisional balloting, questioning the need for the blackout period. Congress should consider shortening or removing it, limiting it to general elections only, and exempting non-citizen removals.

I will also share a few thoughts from my time at the Virginia State Board of Elections.

First, processes on paper often do not match policy in practice. One memorable example: Comparing Virginia's voter registration list with the entire Social Security death file revealed 10,000 deceased registered voters—something that should have been caught by our predecessors had they been following agency procedures.

These types of problems are too common. A recent audit in Maryland revealed the State Health Department's refusal to provide complete death records to State election officials, citing an unexplained agency policy. Neither side accepted blame. This mirrors my experience with agencies like the DMV, who are interested in doing little more than the minimum to assist State list maintenance efforts.

Bureaucratic siloing and finger-pointing are all too common, and it is easy for officials with competing priorities to run list maintenance procedures on autopilot without realizing they are broken. These are just a few examples.

Even though the NVRA requires it, States resist publicly disclosing list maintenance records, making it harder to uncover more problems, but we know they exist because counties across the country have implausibly high voter registration rates.

Finally, it should be clear that only eligible voters belong on the voter rolls, but that consensus may be fading.

Take a Montana law that RITE helped defend that prohibits registered voters from keeping an out-of-State registration. The law was imperfect, but its goal of preventing duplicate registrations was sound. Yet progressive groups sued, arguing that there are a myriad of reasons for keeping multiple registrations, such as convenience and flexibility.

When we cannot agree on who should be voting and that only residents should be voting, it really calls into question whether we can find bipartisan consensus on list maintenance.

[The prepared statement of Mr. Riemer follows:]

PREPARED STATEMENT OF JUSTIN RIEMER



**Written Statement of J. Justin Riemer
President, Restoring Integrity and Trust in Elections &
Partner, First Street Law**

**Before the U.S. House of Representatives
Committee on House Administration**

July 22, 2025

Chairman Steil, Ranking Member Morelle, and Members of the Committee:

I am grateful for the opportunity to discuss voter registration list maintenance standards. This is a critically important topic that I have been immersed in for 15 years, first as an election administrator at the Virginia State Board of Elections, and now as an election lawyer representing organizations such as Restoring Integrity and Trust in Elections (“RITE”) who are dedicated to ensuring states keep current and accurate voter rolls.

Voter registration is the gateway to participation in America’s elections. When properly administered, our voter registration system ensures that eligible citizens can vote and those ineligible cannot. Therefore, maintaining accurate voter registration lists is foundational to the integrity of America’s entire electoral system. Inaccuracies not only risk disenfranchising voters and opening opportunities for fraud, but they also burden election officials, lead to longer lines to vote, waste taxpayer dollars, and erode public trust in the democratic process.

I want to briefly highlight three voter roll maintenance issues. First, the inadequate and overly restrictive federal requirements imposed by the National Voter Registration Act (“NVRA”), the principal federal law regulating voter registration. Second, common list maintenance failures I have observed at the state and local levels. And third, the erosion of a national consensus – at least in principle – on the importance of clean voter rolls, including the expectation that voters should be registered and vote only where they reside.

Although two of the NVRA’s stated purposes are to “protect the integrity of the electoral process” and “ensure that accurate and current voter registration rolls are maintained,” the law largely accomplishes neither.¹ The NVRA imposes on states too low of a floor by setting a laughably lax “reasonable effort” standard for maintaining accurate voter rolls, and a ceiling that excessively limits many state list maintenance activities.

First, the floor. The NVRA provides a “safe harbor” for states to meet the minimum requirement of making a “reasonable effort to remove . . . ineligible voters.”² For voters who have moved, states need only to rely on United States Postal Service (“USPS”) National Change of

¹ 52 U.S.C. § 20501(b)(3)-(4).

² 52 U.S.C. § 20507(a)(4), (c)(1).

Statement of J. Justin Riemer
July 22, 2025

Address (“NCOA”) data and initiate a lengthy cancellation process. While use of NCOA is certainly necessary, it is far from sufficient because NCOA fails to capture a sizable portion of the millions of Americans who move each year.³

The NVRA does not, for example, require officials to initiate cancellation procedures when USPS returns to them undeliverable election mail such as voter registration cards, absentee and mail ballots, and other informational mailings. Nor does the NVRA require states to exchange registration data with one another. This is wholly inadequate given the multitude of data sources available to election officials today.

To be clear, the NVRA permits states to go beyond the NCOA safe harbor, and many do. And to the NVRA’s credit, it does not explicitly restrict the data sources officials may use for list maintenance. Still, allowing for states to use NCOA data alone sets far too low of a legal bar for ensuring accurate and up-to-date voter rolls.

Not only are the NVRA’s minimum standards lacking, but the law also imposes an unreasonably low ceiling restricting states’ list maintenance activities. Notwithstanding its stated purposes to ensure accurate voter lists, the NVRA thwarts state efforts to do so.

Even when a state utilizes multiple data sources to identify ineligible registrants, the NVRA makes it unnecessarily difficult to remove them, especially for those who move. These individuals must request cancellation of their registration or officials have to initiate a cumbersome confirmation mailing process and then wait for two federal general elections before removing them.⁴ Unfortunately, too few voters request cancellation. The Election Assistance Commission’s 2024 *Election Administration and Voting Survey* (“EAVS”) found that “[n]early 70% of confirmation notices were not returned by voters.”⁵

Any proposed changes to the NVRA should set a clear standard for what constitutes a voter’s request for removal. Specifically, federal law should require, or at least permit, a state to consider a registration application from a voter who registers in a new state as a request for removal to the election official in their old state. Although some states have attempted to implement this common-sense approach, courts have ruled that the NVRA prohibits it.⁶

³ One direct mail industry publication estimates that “[a]s much as 40% of all address changes are not reported to the Postal Service[.]” Greg Brown, *Powering Correct Addresses: Going Beyond NCOA to Reach Elusive Customers*, Mailing Sys. Tech. (Mar. 23, 2023), <https://mailingsystemstechnology.com/article-5064-Powering-Correct-Addresses-Going-Beyond-NCOA-to-Reach-Elusive-Customers.html>.

⁴ 52 U.S.C. § 20507(d).

⁵ U.S. Election Assistance Comm’n, *The Election Administration and Voting Survey: 2024 Comprehensive Report* at iv (June 2025), https://www.eac.gov/sites/default/files/2025-06/2024_EAVS_Report_508c.pdf.

⁶ See *Common Cause Indiana v. Lawson*, 937 F.3d 944, 959 (7th Cir. 2019) (emphasis added) (The NVRA “forbids a state from removing a voter from that state’s registration list unless: (1) it hears *directly from the voter* via a “request” or a “confirm[ation] in writing” that the voter is ineligible or does not wish to be registered; or (2) the state goes through the statutorily prescribed process of (a) notifying the voter, (b) giving the voter an opportunity to respond, and (c) then waiting two inactive election cycles before removing a suspected ineligible voter who never responds to the notice.”).

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To streamline the cancellation process, Congress could require that voter registration applications for federal elections contain fields for registrants to list their previous registration address, along with an acknowledgement that completing the application constitutes a request to cancel their prior registration. Many states already have a similar field. Congress could also require states to transmit the information to election officials in the voter's previous jurisdiction. These changes would significantly reduce the number of duplicate interstate registrations and the backlog of inactive registrations that currently remain on the rolls for up to four years before cancellation. It would also save election officials money by reducing the number of confirmation notice mailings, most of which go unanswered anyway.

Another issue of which I have firsthand experience as a Virginia official is the impact of the NVRA's 90-day pre-federal election blackout period on systemic list maintenance activities, particularly for voters who have moved.⁷ In a presidential election year, Virginia and other states hold three separate federal elections: a general, a congressional primary, and a presidential primary. As a result, the NVRA can effectively halt most systemic list maintenance activity for up to 270 days of the year.⁸ Even more concerning, courts have applied the 90-day blackout to restrict states from cancelling registrations of those who were never eligible to vote in the first place, such as noncitizens.⁹

How can a state effectively maintain accurate voter rolls when federal law prevents it from doing so for significant portions of a federal election cycle, including during periods with the highest registration activity? Congress should consider either eliminating or modifying the 90-day blackout period by reducing its length and by applying it only to federal general elections, instead of both federal primary and general elections.

To be sure, safeguards are necessary to prevent officials from mistakenly removing voters on the eve of an election. But nearly half the states now offer some form of same-day registration, and many others have protections in place to ensure the few mistakenly removed voters can still vote.¹⁰ HAVA also guarantees the right to vote provisionally in these situations.¹¹ So what, exactly, are we really protecting against?

Next, I would like to share a few reflections on process breakdowns I observed as a Virginia election official that are typical of those I have also encountered in other states.

First, actual processes do not frequently track stated policy and the law, and looking under the hood can be a sobering experience. During my time at the State Board of Elections, we discovered that the previous administration had neglected various basic list maintenance activities, even basic annual NCOA confirmation mailings, and that there had been breakdowns in obtaining key data

⁷ 52 U.S.C. § 20507(c)(2)(A).

⁸ See Virginia Dep't of Elections 2024 election dates: Presidential Primary held on March 5, congressional primary held on June 18, and General Election held on November 5.

⁹ See *Mi Familia Vota v. Fontes*, 129 F.4th 691, 717 (9th Cir. 2025) (Ninth Circuit Court of Appeals "hold[ing] that H.B. 2243's periodic cancellation of registrations [of noncitizens] violates the 90-day Provision of the NVRA to the extent that H.B. 2243 authorizes systematic cancellation of registrations within 90 days before a federal election.").

¹⁰ Same-Day Voter Registration, Nat'l Conf. of State Legislatures, <https://www.ncsl.org/elections-and-campaigns/same-day-voter-registration> (last visited July 20, 2025).

¹¹ 52 U.S.C. § 21082.

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from other agencies. One particular egregious example occurred when we compared the state voter file with the entire Social Security Administration's Death Master File and identified approximately 10,000 deceased individuals who remained registered. For some reason, the agency had never identified these dead voters before even though the law required ongoing comparison with Social Security Administration data.¹²

Bureaucratic siloing, resistance, and finger-pointing – whether vertical, between local and state officials, or horizontal, across state government agencies – also happens far too frequently. I found that other state agencies, such as the Department of Motor Vehicles and those with vital statistics data, were simply uninterested in doing more than the bare minimum to assist election officials with list maintenance, notwithstanding state and federal laws requiring them to.

This is not just a Virginia problem. For example, a recent state legislative audit of Maryland's list maintenance activities found that the state Department of Health was providing state election officials with incomplete sets of death records, citing an unexplained "agency policy."¹³ Worse, the Department of Health refused to commit to providing the missing data even after the audit findings were made public.

Notwithstanding the NVRA's requirement that states allow the public to access records concerning list maintenance programs, they routinely resist disclosure.¹⁴ My organization, RITE, recently successfully sued Maryland for its efforts to stonewall public access, and other organizations have routinely brought similar litigation.

This type of behavior limits the public's efforts to monitor list maintenance, so it can be difficult to identify malfunctions in the system. But simply comparing the number of registered voters with the citizen voting-age population ("CVAP") reveals that there are implausibly high voter registration rates in counties across the country. That indicates at least some systemic failings. And as I observed in Virginia, it is easy for officials with multiple competing priorities to allow list maintenance procedures to run on autopilot without realizing they are broken.

Finally, it should be uncontroversial to say that ineligible voters should not remain on the voter rolls. Yet that consensus may be eroding. A clear example is a Montana law RITE helped defend that prohibits residents from maintaining multiple voter registrations, including in other states. Although the law was imperfect, its goal of preventing duplicative registrations was sound. Marc Elias, representing progressive groups, challenged the law, arguing that "[t]here are myriad reasons why maintaining a prior registration might be needed," such as "convenience," "flexibility," and other factors.¹⁵

¹² Wesley P. Hester, *10,000 Deceased Voters Found on Virginia Rolls*, Richmond Times-Dispatch (Aug. 9, 2012), https://richmond.com/news/10-000-deceased-voters-found-on-virginia-rolls/article_5459df20-18f5-5281-9dcf-62b37e9c49c8.html.

¹³ Office of Legislative Audits, State of Md., *Fiscal Compliance Audit: State Board of Elections (Dec. 3, 2018 – July 31, 2022)* (Oct. 31, 2023), <https://www.marylandmatters.org/wp-content/uploads/2024/11/SBE23.pdf>.

¹⁴ 52 U.S.C. § 20507(i).

¹⁵ *Mem. In Supp. Of Pl.'s Mot. For Prelim. Inj.*, at 20-21, *Mont. Pub. Interest Research Grp. v. Jacobsen*, No. 6:23-cv-00070-BMM-KD, at 20-21 (D. Mont. Nov. 6, 2023).

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The Montana case, along with similar efforts to undermine bona fide residency requirements, should be a warning sign. There should be no controversy about the historically agreed-upon concepts that voters should only be registered in one place at one time and vote where they live. When basic assumptions like this are challenged, it poses a serious obstacle to finding bipartisan solutions to improve list maintenance and raises broader questions about a national commitment to having accurate, reliable, and trustworthy elections.

Chairman STEIL. The gentleman yields back.
Ms. Heling is recognized for 5 minutes.

STATEMENT OF MARY KAY HELING

Ms. HELING. Good morning. Thank you, Mr. Chairman and Mr. Ranking Member and the rest of the Committee, for giving me the opportunity to testify today.

My name is Mary Kay Heling. I am a resident of Raleigh, North Carolina, a former teacher, a former Nash-Rocky Mount school board member in North Carolina, a retired fitness instructor, a U.S. citizen, and an unaffiliated registered voter in Wake County.

I moved back to North Carolina in late January 2016 and promptly registered to vote on February 19, using my name and the last four digits of my Social Security number. I have voted regularly since then.

In 2024, I voted in person in both the primary and general elections. My name was on the voter registration list. I showed my valid ID, my North Carolina driver's license with my photo and my current address. Never once did I doubt that my vote was valid.

After the 2024 election, I received a postcard in the mail stating that I could be on an incomplete voter registration list. I scanned the QR code and spent well over an hour trying to find my name. The site was difficult to navigate, and I had no luck. I chalked it up to a mistake since my husband and I registered at the same time and he did not receive one.

Weeks later, on a more searchable site, to my surprise, my name popped up. Needless to say, I was shocked and upset since I had voted regularly since 2016 with no issues by providing my valid ID and having it checked against the registration list.

After that happened, I went to the Board of Elections to find out the problem, and evidently there was a problem with my name and the four digits of my Social Security number, even though I had filled out the form correctly. It was possibly a clerical error, I was told.

No one had ever notified me that there was an issue with my registration.

While there, I changed my registration, this time using my North Carolina driver's license. I double-and triple-checked it. This all took work and persistence. It was frustrating and time-consuming. Hopefully it is correct this time, but can I be sure? I thought it was the first time. How does anyone know their vote is safe?

Once the Griffin case was settled, my vote was counted. Phew, this ordeal was over—or so I thought. I was then made aware of the U.S. v. North Carolina Board of Elections case. Here we go again—only, this time, over 200,000 registered voters in North Carolina are having their registrations challenged as incomplete, be it missing North Carolina driver's license numbers or the last four digits of their Social Security number. I understand that my name is on that list.

I was born in Wisconsin in a family that discussed politics around the kitchen table. It was stressed, the importance of voting. Voting is not just a privilege or a right; it is a responsibility, your civic duty.

My vote is important. It is my voice in how our city, our county, our State, and our Nation is governed. I am here to represent all those North Carolinians whose voter registrations are being challenged.

Will all 200,000-plus voters be contacted, or will they find out next time they vote and can only receive a provisional ballot? How will you ever be able to contact that many people? How many will fall through the cracks?

If contacted, will they be able to navigate a system that is not always easy? Some may not have computer access or savvy or transportation to the Board of Elections office. Others may get frustrated and give up, because, believe me, it has been a long and frustrating ordeal.

When you go to vote and your name is on the registration list, you show your valid ID, which has your photo and your current address. You should feel confident that your civic duty has been completed and your voice has been heard.

There are voters like me who followed the rules, provided all the information election officials asked for when they registered to vote. Is it fair to make them go through this frustration? I do not believe so.

This process is threatening the voices of North Carolina voters and fracturing confidence in the Government. Please, do not remove the voices of registered North Carolina voters.

I thank you for your time.

[The prepared statement of Ms. Heling follows:]

PREPARED STATEMENT OF MARY KAY HELING

Chairman Steil, Ranking Member Morelle, and Members of the Committee:

Thank you for the opportunity to testify. I, Mary Kay Heling, am a current resident of Raleigh, NC in Wake County and an unaffiliated voter. I am a retired fitness instructor and previously served on the Board of Education in Nash County, NC. I am a US citizen and meet all the qualifications to vote in North Carolina. In 2016 I moved back to North Carolina and have lived at the same residence in Raleigh since. Upon moving back to North Carolina, I registered to vote on February 19 of that year and provided the last four digits of my Social Security number on my voter registration form. I have voted regularly since then without complications.

In 2024, I voted in-person in both the primary and general elections using my North Carolina driver's license. I also brought my voter registration card in case I needed it. My name was on the voter registration list. I never doubted that my vote was valid until shortly after the election when I received a post card from the campaign of Judge Griffin, who was running for a state supreme court seat, stating that I was on a list of allegedly "incomplete" voter registrations. After spending over an hour searching for my name on their site, I couldn't find my name, so I gave up and chalked it up to a mistake. Later, on another more searchable site I did locate my name. I was shocked and upset as I had been voting in Wake County since 2016 without issue and with proper identification.

After learning about this challenge, I visited the Wake County Board of Elections only to find out there was an issue with my Name/ Social Security number. I asked for a copy of my 2016 voter registration form. When they gave me a copy, it showed that I had correctly included my Social Security number. But I was still told my Social Security number was not on my voter registration record. Clerical error? Never once before this challenge was I notified there was an issue with my voter registration.

I submitted another voter registration form with my North Carolina driver's license number. Hopefully it is now correct in the system, but how can I be sure? If this happened to me, how does anyone know that their vote is safe? This whole process has been frustrating and time consuming.

Once the *Griffin* case was settled and my vote was validated, I breathed a sigh of relief thinking this fiasco was over. That relief didn't last long. I was made aware of the *US v NC State Board of Elections* case. It is my understanding that there is a list of over 200,000 allegedly "incomplete" voter registration records missing their North Carolina driver's license number or the last 4 digits of their Social Security number. I understand my name is on that list, despite the fact that I gave my Social Security number when I registered to vote in 2016, and I voted in 2024 using my driver's license as my ID. At no point in time has

anyone from the county or state ever given me notice that I must update my records or required me to present additional information.

I was raised in Wisconsin in a family that discussed politics and stressed the importance of voting. Voting wasn't just a privilege or right, it was a responsibility! My vote is important. It is my voice in how our city, county, state and nation is governed.

I am here to represent all of those North Carolinians whose voter registrations are at risk. Will all 200,000+ be successfully contacted or will they find out when they vote next that they will be given a provisional ballot? If contacted, will they be able to navigate a system that isn't always easy? Some may not have computer access or transportation to the Board of Elections. Others may get frustrated and give up. This has been a long and frustrating ordeal.

When you go to vote and your name is on the registration list, you show your valid ID, you should feel confident that your civic duty has been completed and your voice has been heard. There are voters like me who followed the rules and provided all the information election officials asked for when they registered to vote. Is it fair to make them go through this frustrating process?

This process is threatening the voice of North Carolina voters and fracturing confidence in the government. Please do not remove the voices of registered North Carolina voters.

Chairman STEIL. The gentlewoman yields back.

I appreciate your testimony.

I will now recognize myself for the purpose of questioning our witnesses.

I want to start with you, Mr. Adams, if I can. I think one of the questions is, what is the Federal standard and what is the role of the Federal Government in making sure that States are maintaining their voter rolls?

If we go back and look at Section 8 of the NVRA, States are required to, quote, "conduct a general program with reasonable effort," end quote, for voter list maintenance. Then the question will be how the courts interpreted "reasonable effort."

Can you give us a little color as to what is "reasonable effort" according to the judiciary?

Mr. ADAMS. Well, that is a terrific question, because, as it stands right now, it just means make an effort. You get a participation trophy, right? If you do something, you succeed.

Look what Congress passed after "reasonable effort." In the language of the statute, it says to "remove." There is actually an action verb, isn't there? It is not just make an effort; it is, you actually have to do something. I think that is what the courts have improperly focused on.

Chairman STEIL. Is it true, in a case that you were involved in litigating, the court came back and said that the "reasonable effort" is such a low standard that as long as one deceased voter is removed from the rolls they have met their Section 8 obligations?

Mr. ADAMS. I think it is worse than that. As long as you have a program and you are doing anything, you have satisfied what Congress tried to do.

Chairman STEIL. What should the standard be, knowing that the courts have effectively gutted out what I view as a reasonable standard? Should it be something more specific? How do we redefine this to make it so that States actually have to do their job of maintaining proper voter rolls?

Mr. ADAMS. Yes, the NVRA reads like a negligence statute, but in HAVA, the Help America Vote Act, there is strict liability. If you have any problems on the rolls, then you are violating Federal law. The problem is, only the Attorney General has the right to bring a lawsuit. There is no private right of action in the NVRA.

Chairman STEIL. I want to continue with you, Mr. Adams. In the NVRA, are there restrictions on who can be removed? If you have an individual, say, that is not a U.S. citizen—this has come up—what are the restrictions on States from removing someone that they deem to be ineligible, under the NVRA?

Mr. ADAMS. There really is not a restriction on the State to remove a non-citizen. They have that freedom under our Federalist arrangement.

The NVRA, however, does not reach non-citizens, meaning we cannot bring a case to remove non-citizens under the NVRA. We tried. We found out the hard way, it does not fit.

Chairman STEIL. So you do not have standing to go and do that. Who would have the standing to do that?

Mr. ADAMS. The Justice Department would, potentially, under HAVA, but Congress could expand the NVRA to reach non-citizens. That is easy. It is hard to imagine anybody would vote against that.

Chairman STEIL. Let us, then, maybe look at the State of Illinois. We know that, according to the DOJ, 34 counties in Illinois provided no evidence of voter list maintenance.

The DOJ can bring forward that claim, as they are in the Trump administration. If you did not have the Trump administration, it would simply be ignored, because no one else would have standing, knowing the State is unlikely to go after itself?

Mr. ADAMS. Correct. You need somebody with the power to do something about it.

Chairman STEIL. If you have a completely Democratic State like Illinois, they are not going to move forward on this. If you have a Democratic administration, or the Biden administration, they look the other way.

We could get into a gerrymandering discussion with my colleague that was referenced in the opening statement. If you want to look at a casebook study, I would recommend looking at the congressional lines of Illinois, led by a fully Democratic operation. That is not the point of the hearing today.

If we look at that, is it really but for, thank goodness, the Trump administration coming in and a Pam Bondi-led Department of Justice that, otherwise, the State of Illinois would not be under any sort of review?

Mr. ADAMS. Or make it the State of Michigan. That is the real-world example, where the Secretary of State there has done nothing for a long time.

Chairman STEIL. Well, we chatted with her in this exact hearing room not that long ago, specifically about the poor voter list maintenance in the State of Michigan, but you bring up a good point.

In what scenario can a State remove a voter who has moved?

Mr. ADAMS. Well, that is a tough one. Mr. Riemer talked about a bit, the NVRA has hurdles, statutory hurdles, that they have to go through, like waiting. It is all based on this technology from 1993, like the postman, right? The postman is given the power to keep our rolls clean or not. Really, there is technology out there that this Congress could address.

Chairman STEIL. Let me jump over to you, Mr. Riemer, if I can, in my time left. How about public access to voter rolls? In the State of Wisconsin, public access is available. Is public access available in Virginia or the other 49 States around the country?

Mr. RIEMER. Yes, Chairman, it is available in every State that is covered by the NVRA. I know Mr. Adams—

Chairman STEIL. Are there restrictions on people obtaining access to those voter rolls?

Mr. RIEMER. States impose restrictions that the NVRA prohibits.

Chairman STEIL. What would be an example of that?

Mr. RIEMER. Not disclosing records concerning their basic list maintenance activities. They put walls up, they delay, they try to charge you more—all of these things.

The NVRA was designed to allow the public to audit State list maintenance activities. That was absolutely contemplated when the law was passed. States just put up barriers.

Chairman STEIL. I think what we see is, time and again, States failing to do their job as Congress directed in the NVRA. We see courts weakening the standards of the NVRA. I think it is absolutely imperative that we improve the process in which voter list maintenance is occurring.

Cognizant of the time, I will yield back.

I will recognize the Ranking Member, Mr. Morelle, for 5 minutes for his questions.

Mr. MORELLE. Thank you, Mr. Chair.

I want to again thank the witnesses for being here.

Ms. Heling, you traveled all the way from Raleigh to be here with us today, which I appreciate. I also appreciate the perspective you bring to this and want to thank you for your dedication to your commitment to voting—a lot of people would have simply walked away from this—and, I think, fighting as hard as you have for the right to vote and your perseverance.

I know you said in your testimony, but how long have you been voting in North Carolina without any issues?

Ms. HELING. Since we moved back to North Carolina. That was in 2016. Prior to that, we lived in North Carolina for 20 years and moved away in 2005, then moved back in 2016, which we—I was a voter during all those years.

Mr. MORELLE. Prior to 2024, when was the last year you voted? Do you know?

Ms. HELING. I have voted in every election.

Mr. MORELLE. OK. Presumably 2023?

Ms. HELING. Yes.

Mr. MORELLE. Without any challenges to—

Ms. HELING. I was a regular voter since 2016—primaries, general—and I never had an issue. I just had to show my picture ID, my North Carolina license, against the registration on the form when I went in.

Mr. MORELLE. All right.

I was a little unclear. You said you utilized the last four digits of your Social Security. And——

Ms. HELING. Right.

Mr. MORELLE. You had done that originally and your voter ID? You used both?

Ms. HELING. No. I used my Social Security number——

Mr. MORELLE. The first time.

Ms. HELING [continuing]. the first time. And——

Mr. MORELLE. Which is one of the two acceptable ways, I assume, in North Carolina?

Ms. HELING. Exactly.

Mr. MORELLE. Then the Board of Elections suggested that they did not have the four digits?

Ms. HELING. They suggested that it might not match or—they did not know if it was a clerical error that put either my name or the last four digits in incorrectly. Never did I hear after that. I would think, if that was spitted out or whatever, I should have been notified that it was not correct.

Mr. MORELLE. You voted in 2024, just to be clear. You——

Ms. HELING. I sure did.

Mr. MORELLE [continuing]. went to the polling place, voted as you traditionally would.

Ms. HELING. I did.

Mr. MORELLE. You were notified after the fact that you were now being——

Ms. HELING. Yes.

Mr. MORELLE [continuing]. questioned about whether you were——

Ms. HELING. That was after Griffin contesting it, and I got a postcard in the mail.

Mr. MORELLE. Then you actually said in your testimony that you physically visited the Wake County Board of Elections?

Ms. HELING. I did.

Mr. MORELLE. This was after you had been determined that—this was to rectify the problem?

Ms. HELING. Yes.

Mr. MORELLE. Then you—so you thought everything was fine. Then you learned again now——

Ms. HELING. No. I do not know.

Mr. MORELLE. Oh.

Ms. HELING. I will check before the next election. I will verify it again. You should be able to register and not worry about this.

Mr. MORELLE. Right.

Ms. HELING. I will not be assured until I see it. I will visit the Board of Elections.

Mr. MORELLE. You said, “The relief didn’t last long. I was made aware”—oh, I see. You are simply aware that there is a list of over 200,000 allegedly incomplete—you do not know that you are necessarily on it.

Ms. HELING. I have been—I understand I am on that list.

Mr. MORELLE. Oh, you do?

Ms. HELING. Yes.

Mr. MORELLE. How do you—why do you feel that? Why do you—

Ms. HELING. Because I am in part of a lawsuit.

Mr. MORELLE. Is your—and how do you know that?

Ms. HELING. I have been told it.

Mr. MORELLE. Oh, you have been?

Ms. HELING. Yes. I have been told that—

Mr. MORELLE. By the Board of Elections or by—

Ms. HELING [continuing]. I am on that list.

Mr. MORELLE. Who shared that with you?

Ms. HELING. I am not sure at this point.

Mr. MORELLE. OK. So—

Ms. HELING. I just know that I understand I am on that list.

Mr. MORELLE. Got it. Got it, got it.

Well, I would be curious, just from the other witnesses, is there any reason that you think that you could share with Ms. Heling why she should not be allowed to vote?

Mr. ADAMS. Yes. Well, I do not think she should not be allowed, but I can explain all of this. She got railroaded by the county officials, is what happened, Ranking Member Morelle.

When you passed HAVA in 2002, HAVA requires all registrants have a unique identifying number. That is congressional statute. It is not complicated.

What happened was, North Carolina screwed up. When she registered in 2016, I think she said, in North Carolina, she gave them her number, as required by HAVA, and they did not put it into her record. That is what happened here. It is a typical incompetence.

Mr. MORELLE. She has now gone through and rectified it, and now she is still on a list of 200,000 voters that are being challenged.

Mr. ADAMS. Well, that litigation is over with. She is no longer being challenged. What has happened now is the United States has filed a lawsuit to get North Carolina in compliance with HAVA by going and harvesting those numbers for future elections.

It is a classic example of a screw-up by an election official hurting a voter. That is what happened here.

Mr. MORELLE. Yet your testimony is that you feel you are part of the 200,000 folks?

Ms. HELING. That is right.

Mr. MORELLE. You are still concerned that your vote may not count. You are clearly a U.S. citizen—

Ms. HELING. Not only that I am part of it, but there are 200,000-plus more that are going to have to go through what I did.

Mr. MORELLE. Yes.

I would just, as I yield back, Mr. Chair—I think there are a number of things we could do, including providing resources, which I do not think is anticipated here. I do not know how we do this important work without providing resources to local State boards of election.

With that, I will yield back, Chairwoman.

Ms. LEE.

[Presiding.] Thank you, Ranking Member Morelle.

Thank you to our witnesses for appearing here today.

When I served as the Secretary of State of Florida, one of my core responsibilities was to work with local election officials to ensure voter rolls were accurate and up to date.

Voter list maintenance is a critical part of ensuring election accuracy and building public confidence in our elections process. This is not and should never be a partisan issue. Maintaining accurate and reliable voter rolls is fundamental to election security and public trust.

That work is not suppression. That work is not a purge. It is an essential part of sound administration and public accountability and should be required both by clear laws and by any reasonable standard of public integrity.

As Members of this Committee, we have a responsibility to ensure that every State is using clear, consistent standards to maintain their rolls, and we should be promoting transparency, supporting data-sharing tools, and removing barriers that prevent States from performing these essential duties.

I was so pleased to see that President Trump's executive order on "Preserving and Protecting the Integrity of American Elections" supports these goals, including expanding access to tools like the SAVE data base, which helps identify voters who may no longer or may not be eligible.

I thank you all for bringing with you today ideas and testimony that relate to how we can support election officials in doing that better.

Mr. Riemer, I would like to return to your testimony about the NVRA and the 90-day blackout periods. I think that is an important thing for us to understand as we consider the way that law is written today and how it might be better.

You mentioned the blackout periods. Now, there are different types of removals, are there not? Some of which are affected by blackout periods; some are not. Would you please elaborate for us on what the law is now and how it could be improved?

Mr. RIEMER. Absolutely.

The blackout period applies to systemic list maintenance that takes place within 90 days of any Federal election as it relates to voters who have moved, and some courts have interpreted it to apply to removing non-citizens and other ineligible voters as well. It does not apply to removing deceased, and it does not apply to removing some other types of ineligible voters.

Individualized removals are permitted within the 90-day period, but anytime a State tries to do individualized removals, they get sued, saying that it is a prohibited systemic removal process.

Ms. LEE. As a former board of elections official, you helped Virginia establish data-sharing agreements with neighboring States. Would you tell us how effective—were those useful? Is it something that you recommend other States deploy to help ensure their roll accuracy?

Mr. RIEMER. Absolutely. It is absolutely essential, because the NCOA data does not have enough—it is missing—it is missing information. The best way is for States to talk to each other and to

share that information and to, you know, get these voters off the rolls.

I think one thing that I was emphasizing is, what we really need to do is skip this confirmation process—that you have to wait two Federal general elections—as much as possible, because it just does not work. It is too clunky.

Ms. LEE. Mr. Adams, I would like to return to you. One of the things you mentioned in your testimony was the third-party voter registration groups and the effect that they have on contributing in some places to inaccuracy or duplicate registrations.

Would you elaborate on what those groups are, how they work, and how they affect this problem?

Mr. ADAMS. Right. These are the people with clipboards at community events or at the grocery store. What we have found over and over and over again, the problems on the voter rolls are often traced back to third-party registrations, whether it is Rashawn Slade—which I would urge you to look in my written testimony in the appendix. He was getting registered to vote six times by third-party groups. Same with non-citizens in North Carolina. We traced those back, in those reports, to third-party registration groups.

Look, there is a different incentive structure. They want to get as many people registered as possible, so they do not do a lot of quality control.

Ms. LEE. I would also like for you to touch on, in your experience, some of the efforts and some of the lengths that elections officials go to in their communities to help ensure that voters are able to register and that registering to vote is an accessible and easy process for them.

Mr. ADAMS. Yes. It has never been easier in the United States to register to vote than it is right now today, and it has never been easier to vote than it is today.

That is in large measure because of the diligence of a lot of election officials, who pour a lot of time and money into making it easy to register and vote. That is why the registration and participation rates were so high in this last Federal election.

Ms. LEE. Thank you.

I now recognize the Ranking Member of the Elections Subcommittee, the gentlelady from Alabama, Ms. Sewell.

Ms. SEWELL. Thank you, Madam Chair.

I want to welcome all of our visitors here today and our witnesses.

As a daughter of Selma and the Ranking Member on the Subcommittee on Elections, there is nothing more important to me than making sure that every eligible American has access to the ballot box. Our vote is our voice, and everyone's voice should be heard in elections.

Voting is the most important way Americans participate in the political process, but far too often illegal voter purging occurs, removing eligible voters from the rolls and preventing them from exercising their right to vote.

A few months before the November election, in my home State of Alabama, Secretary of State Wes Allen, who actually appeared before this Committee a few months ago, directed the Alabama Board of Registrars to remove individuals from the voter rolls that

were issued as, quote, “non-citizen identification numbers,” end quote, by the Department of Homeland Security.

Secretary Allen shared a list of 3,251 voters with the Alabama Attorney General, Steve Marshall, for potential prosecution. However, his office failed to implement the proper safeguards to ensure that eligible voters did not fall through the cracks. As a result, Secretary Allen’s purging initiatives removed more than 2,000 eligible Alabama voters, illegally, from the rolls.

One of these legally registered voters was my constituent Roald Ha—his name is Mr. Hazelhoff. He was a resident of Birmingham. He moved from the Netherlands to Alabama in 1988, and he gained his citizenship in a U.S. citizenship, immigration, and naturalization process in Montgomery on July 18, 2022.

In 2023, he obtained his STAR ID, which requires individuals, as we all know, to show up to show proof of citizenship. Eighty-four days before the election, he received a letter from the Board of Registrars informing him that he was removed from the voter rolls.

I would like to submit his testimony, his story, into the record. May I ask unanimous consent to do so?

Ms. LEE. With no objection, so ordered.

[The testimony of Roald Hazelhoff referred to follows:]

TESTIMONY OF ROALD HAZELHOFF

Voter Spotlight: Roald Hazelhoff of Alabama

**Committee on House Administration
July 22, 2025**

“Clean Rolls, Secure Elections: Reviewing Voter List Maintenance Standards.”

My name is Roald Hazelhoff. I live in Elmwood, Alabama in Jefferson County and I want to share with you my struggles to vote last year along with many other qualified American citizens swept up in Alabama’s illegal voter purge.

I was born in the Netherlands and moved to the United States in 1977 to study political science at Western Washington University on a student visa. I moved to Alabama in 1988 because I fell in love with the beauty of the state. I have focused my professional work on creating green spaces in Alabama where people can come together. I am the Executive Director of the Southern Environmental Center at Birmingham-Southern College and a visiting instructor in Environmental Health Science at the University of Alabama in Birmingham.

I raised my three children (who are all U.S. citizens) in Alabama. I became a legal permanent resident a decade ago and a naturalized citizen at a ceremony conducted by the U.S. Citizenship and Immigration Services in Montgomery on July 18th, 2022. I got my Alabama Star Driver License on October 6, 2023. The Star license requires proof of citizenship, meaning that the State of Alabama had this on file nearly a year before Secretary of State Wes Allen’s office determined I was ineligible to vote.

I am a proud U.S. and take my citizenship seriously, especially my right to vote. I have taught my children and grandchildren the importance of civic participation and a fundamental part of that is exercising the right to vote.

I was looking forward to voting in my first general election last November. But just 84 days before the election, Alabama Secretary of State Wes Allen implemented an illegal purge program that unfairly and wrongly targeted naturalized U.S. citizens like me.

On August 26th, I received a letter from Barry Stephenson, the Chairman of the office of Board of Registrar. It read:

Secretary of State Wes Allen has provided our office with information that shows you have been issued a noncitizen identification number by the Department of Homeland Security. You are also a registered voter in Alabama.

This letter is informing you that only eligible U.S. citizens that reside in Alabama may register to vote in the state. Therefore, your voter record has been made inactive and you have been placed on a path of removal from the statewide voter list.

*Please complete and submit the enclosed **Voter Registration Request form** to immediately be removed from the voter list and become compliant with state and federal law requirements.*

*If you are a citizen of the U.S., and are otherwise eligible to register to vote in Alabama, please complete and submit the enclosed **State of Alabama Voter Registration form**, and include your current Alabama driver license number or nondriver ID number, or the last four of your social security number (if you do not have an Alabama license).*

I was bewildered by the letter and frankly, outraged by the violation of my civil rights. Because of the timing of the letter, which led me to believe I could not vote unless the issue was somehow resolved, I did not vote in a special election for local city manager that was important to me. I also worried that I would miss voting in the November general election.

It turned out that just 84 days before the November election, Alabama Secretary of State Wes Allen implemented an illegal purge program that unfairly and wrongly targeted naturalized U.S. citizens like me.

This purge targeted over 3,251 voters. Soon after, Secretary Allen's office admitted that, at a minimum, more than 2,000 of those voters were citizens who had been wrongfully targeted for removal. Like many of those voters, I was included because I had **previously** been issued a noncitizen identification number (often called A-numbers) by the Department of Homeland Security. Secretary Allen's office knew that qualified voters like me would be swept up in the purge and made no effort to keep us from receiving these threatening letters and possibly being removed from the voter lists and having to re-register so close to election day.

Voter purges this close to an election are misguided, dangerous, and intimidating. They deny qualified American citizens like me our freedom to vote. They risk disenfranchising voters who may not even know we have been removed before they can be put back on the voter rolls prior to an election. And they risk deterring qualified voters from casting their ballots out of fear or confusion.

As you know, all voters are required to verify their citizenship status when registering to vote, including both U.S.-born citizens and citizens who immigrated here. Despite this, Secretary Allen implemented an illegal voter purge program. There are strict laws to protect the freedom to vote and our elections have numerous safeguards in place that are regularly analyzed and updated to make sure only U.S. citizens participate and election officials take this seriously.

After receiving the letter, I went to the office of the Jefferson County Board of Registrars to try to fix my voter registration status. Consistent with the letter I received, I was directed to re-register to vote by filling out the voter registration form again and providing the last four digits of my Social Security number, which I did. I was **not** told that I could now vote in the November election.

Outraged by this purge and the violation of my civil rights, I sued state officials including Secretary of State Allen for launching a voter purge program that systematically targeted

naturalized citizens, all within the 90-day window before the November 2024 election in which federal law bars systematic list maintenance. I sued alongside other affected individuals and civic participation groups and was represented by Campaign Legal Center, Fair Elections Center, and Southern Poverty Law Center.

The lawsuit focused on the state's reliance on faulty, outdated, and error-riddled data the state had used to seek to remove alleged noncitizens from its voter rolls. Even some U.S. born Alabamians were caught up in the purge, in addition to many naturalized citizens.

In addition to using a fatally flawed process to purge thousands of eligible U.S. citizen voters, the Secretary announced that he was referring all purged voters for criminal investigation and potential prosecution. This was beyond frightening.

On October 16th, 2024, a federal judge stopped this illegal and last-minute purge program. The decision held that Alabama could not operate their program that would have removed me and other Alabamians from the voter rolls in the 90 days before the general election. It effectively halted the purge program through November 2024 general election and required the state to reinstate the registration status of voters like me that were affected.

In March of this year, Secretary Allen totally abandoned this illegal voter purge program and so I along with the other plaintiffs withdrew our legal case. I do worry, however, if Alabama will try to do something similar in the future and whether my registration might be questioned again just because I am a naturalized citizen.

I tell my story because I am passionate about my right to vote as a U.S. citizen. This purge was illegal and unnecessary because all voters are already required to verify their citizenship status when registering to vote, including both U.S.-born citizens and citizens who immigrated here like me. It was clear that I, along with my fellow Alabamians, were caught up in a misguided purge that used outdated data. That should never happen again.

The right to vote is fundamental to American democracy and every American citizen has the right to vote regardless of where they were born. It is time we start saluting voters and making it easier to vote without the hurdles that Secretary Allen put in our way. I hope that no U.S. citizen should ever be questioned or denied the right to vote again. I hope all lawmakers will do what they can to ensure that in this democracy – every vote is counted.

Ms. SEWELL. My constituent Mr. Hazelhoff, who actually is an American naturalized citizen, was denied the opportunity to vote. He had to prove, even though he had already submitted his STAR ID, that he was actually a citizen. He showed that proof.

I know, like you, Ms. Heling, that so many people do not have the opportunity or the time or the patience to actually go to the Board of Registrars to prove, like you did, that you actually were illegally purged.

There are lots and lots of folks that go about doing that, and I wanted you to talk a little bit about how long it took you to actually get your name back on the rolls.

The second part of that question is, are you assured that in future elections that you will actually not be on such an illegal purged roll?

Ms. HELING. Well, when I received that postcard, I scanned the QR code. It was very difficult to follow, because you could only do it on your phone. I spent well over an hour trying to find my name. There was no easy way. You could not pull up your name and look for it. You just had to look.

After all that time, I said, "Oh, heck. My husband and I registered together. This has to be a mistake."

Ms. SEWELL. Was your husband's roll—he was not purged from the roll, but you were, even though you all registered—

Ms. HELING. I was the one challenged—

Ms. SEWELL. Yes.

Ms. HELING [continuing]. yes, even though we registered at the same time.

Ms. SEWELL. Uh-huh.

Ms. HELING. It took that time. Then I kind of did not worry about it until I saw another search engine and, all of a sudden, there was my name. Whoa, what happened?

I had to think about it, and I thought, "No, I have to go fix this"—

Ms. SEWELL. Yes.

Ms. HELING [continuing]. which is a drive. The Board of Elections used to be right downtown. It is now further out of the city. I did get there—

Ms. SEWELL. The point is that you took more than reasonable efforts to go about getting your name back on the rolls.

Ms. HELING. That is how I grew up.

Ms. SEWELL. Madam Chair, I agree with you that election integrity is a bipartisan issue. I think no one benefits when people are illegally purged from the voter rolls. One must maintain a voter list, and every effort should be made to make sure that the people on that voter list are legitimately not supposed to be. Therein lies the rub.

Ms. Heling, could you talk a little bit about what you think your advice would be to us to make sure that there is a balance, that we have a proper balance between maintaining rolls and making sure that we are not using it as a weapon to purge and to cause voter suppression?

Ms. HELING. I understand the importance of voters being registered. When we were registered and we gave all the information

that was asked of us and we provided that, with our photo ID, with our current address, should we not be able to continue to vote?

Why would we take 200,000-plus people—

Ms. SEWELL. That is just in North Carolina.

Ms. HELING [continuing]. and expect them to go through this?

Ms. SEWELL. Yes.

Thank you so much for allowing her to complete her sentence.

I want to thank you for actually coming to our Committee today to provide your own testimony, personal testimony, as to how so often these voter maintenance programs are used for voter suppression and actually do purge legitimate American citizens.

Thank you so much.

Ms. HELING. Thank you for having me.

Ms. LEE. I now recognize Mr. Loudermilk of Georgia for 5 minutes.

Mr. LOUDERMILK. Thank you, Madam Chair.

One week ago today, something absolutely incredible happened in my district: Major League Baseball played the All-Star Game at Truist Park in Atlanta. Why is that incredible? Because, in 2021, Major League Baseball pulled the All-Star Game from Atlanta based on false information and fear tactics spread about Georgia's election integrity bill.

Why did it come back? Georgia's election integrity bill is still the law today, as it was in 2021. Why? Because all the fear-mongering turned out to be inaccurate. In fact, in the 2024 election, a record number of minorities voted early. Why? Because exactly what we said that bill would do would make it easier to vote and harder to cheat.

This is an illustration of how misinformation and fear tactics hurt the majority of people who should be able to vote. Every time someone is—and part of the election integrity bill was to clean up voter rolls.

I remember, growing up in Georgia, there was a joke about a politician who would go into the local cemetery to practice his campaign stump speeches. He would go to one side of the cemetery and practice, and then he would go to another side. Somebody asked him, said, "Why do you walk all around the cemetery speaking?" He said, "Because the people on that side of the graveyard have just enough right to vote for me as the people on this side of the graveyard." I mean, that was a running joke, but it was based on reality.

That disenfranchises people who should be able to vote and should have influence in elections.

Mr. Riemer, what is the role of an election official in removing voters who have died? What steps did you take in Virginia to ensure that the deceased voters were no longer on the rolls?

Mr. RIEMER. Absolutely.

The role is really going to depend on whether you are at the State or local level. At the State level, you are really responsible for making sure that the local election officials have access to the death data, whether that is from Social Security Administration, whether it is from State vital statistics.

At the local level, they are the ones, typically, removing these deceased voters. In Virginia, the local registrars would actually go

through obituaries—like, the good ones would actually go through local obituaries or similar sources and remove voters that way.

It is really an all-of-the-above approach. You are not going to find every deceased person and remove them, but I think most States can certainly do better than they have. It just takes an all-of-the-above approach.

Mr. LOUDERMILK. What about States like Virginia and Georgia that have voter ID laws? How does that equate—you know, what is the link, what is the importance of cleaning the voter rolls there?

Mr. RIEMER. Sure. Well, if you do not have voter ID and you have somebody that is on the rolls that is no longer in the State or is no longer alive, obviously there is the chance that someone could go and vote on behalf of that person.

Or if someone has not been removed and they live in another State, they can vote in both States. We know that happens. It is a relatively common occurrence.

If you are not verifying the identity of that person, then someone could vote fictitiously in their name.

Mr. LOUDERMILK. Why is it important to clean the rolls within 90 days of an election?

Mr. RIEMER. Well, I think it is important to relax the blackout period, because oftentimes a lot of these issues do not even come—do not really emerge until closer and before the election.

Because the blackout period also applies to a primary, I mean, really, you are looking at, the entire Federal election year, you are stopped from doing anything to remove voters, at least those who are non-residents, at this point.

It is just—you have to sit on your hands and just, you know, be approaching an election and know there are ineligible voters on your voter file and not be able to do anything about it.

Mr. LOUDERMILK. Right.

You mentioned at the beginning of your response to my question some of the resources that can be used to verify voter identity. What are the most useful or the most effective that you have seen?

Mr. RIEMER. As far as list maintenance tools?

Mr. LOUDERMILK. Yes.

Mr. RIEMER. I certainly think data from other States is huge. Obviously, Americans are moving between States constantly, and it is really important that States are sharing data with one another.

I think Mr. Adams brought up toward the end of his presentation the use of commercial data. I think that is very important.

You know, we have always relied on the Postal Service, and let us face it, the Postal Service is not what it used to be. The NCOA data base is not what it used to be. You have to go outside those traditional sources of data and get creative. I think their use of commercial data is one that has a lot of promise.

Mr. LOUDERMILK. All right. Thank you.

Madam Chair, I yield back.

Ms. LEE. I now recognize Mrs. Torres from California for 5 minutes.

Mrs. TORRES. Thank you, Madam Chair.

Thank you to our witnesses for being here today.

I know that, some of you, it is not your first time here. Just like last year, it is important to put on the record, yet again, the con-

cerning actions taken by a witness testifying before us today, Mr. Adams.

Chairwoman, I ask for unanimous consent to submit to the record two articles: an NBC News article titled, "Vote Fraud Crusader J. Christian Adams Sparks Outrage"; and an ABC News article titled, "Americans accused of noncitizen voter fraud face doxxing and intimidation."

Ms. LEE. Without objection, so ordered.

[The articles referred to follow:]

Record Submission #1

NBC NEWS Vote Fraud Crusader J. Christian Adams Sparks Outrage

SHARE & SAVE — f X e ...

Vote Fraud Crusader J. Christian Adams Sparks Outrage

Before J. Christian Adams was appointed to sit on the election integrity commission, he accused thousands of fraud with questionable evidence.



Commissioner J. Christian Adams smiles during the first public meeting of the Presidential Advisory Commission on Election Integrity in Washington on July 19, 2017. Andre Chung / For NBC News

Aug. 27, 2017, 6:13 AM EDT / Updated Aug. 27, 2017, 6:13 AM EDT

By [Jane C. Timm](#)

J. Christian Adams claims there's an "alien invasion" at the voting booth.

Adams, a member of President Donald Trump's election integrity commission, is dedicating his life to cleaning up registration rolls around the country and trying to prevent non-citizens from casting ballots. To do so, he's spent years suing counties to force them to purge their rolls and he's published personal information online about thousands of registered voters he believes could have committed fraud.

Adams has turned allegations of sweeping, illegal voting into a career marked by frequent litigation and a bombastic media presence — [calling](#) critics who say that there's no widespread proof of voter fraud "flat-earthers."

"The voter rolls have serious problems that only a blind partisan could deny," Adams told NBC News in an email. "What motivates anyone who does a public service? It's the desire to make the system work better."

Election officials say Adams is a one-man wrecking ball, claiming fraud where there is no evidence of it, while voters whose information he has published online take exception to being accused of felonies.

"I was pissed," said Edmund Cochran, 35, of Fairfax County, Virginia, who had been tagged as a noncitizen voter (he was born in New Jersey) and found that his information was made public, including his full Social Security number.



Presidential Advisory Commission on Election Integrity members Alan King, left, and J. Christian Adams. Andre Chung / for NBC News

Adams turned his focus to his home state of Virginia in 2016. The group he runs, the Public Interest Legal Foundation (PILF), released a two-part report titled "Alien Invasion" that fingered 5,556 voters as non-citizens, because their voter registration had at one point been cancelled over citizenship concerns.

"Of these illegal registrants, 1,852 cast nearly 7,500 ballots in elections dating back to 1988," according to the May 2017 report.

But Virginia's election commissioner — and the voters themselves — dispute the findings.

In Virginia, after a voter has been noted as a possible noncitizen (which occurs either because a voter tells the Department of Motor Vehicles they're a noncitizen, or someone makes an error), election officials send the voter a letter asking the voter to confirm his or her citizenship. If the officials don't hear back in two weeks, county election officials cancel the voter's registration.

"Nothing in this process necessarily confirms non-citizenship — only that inconsistent information has been provided," Virginia Commissioner of Elections Edgardo Cortés wrote to a state legislator who inquired about PILF's claims.

Cortés noted that half the voters who had been called out are currently active voters who have fixed their registrations. "They (Adams and his group) were uninterested in the context — they had their own narrative that they wanted to tell," Cortés said.

When NBC News reached seven of the voters mentioned in the report, six said they were citizens. One removed voter said he is a green-card holder, not a legal voter; his registration was cancelled after 13 months on the rolls.

Reports PILF issued online included names, addresses and sometimes even complete Social Security numbers (which were later partially redacted) alongside the "felonies upon felonies" these people may have committed.

A Crusade Years in the Making

Adams has been working on the election system for years. In 2005, he was hired by the Bush administration's Department of Justice in the voting section.

Adams made headlines for bringing and winning the first-ever Voting Rights Act case in which he charged that blacks were suppressing the rights of white voters.

After the 2008 election, Adams investigated two members of the New Black Panther Party for Self-Defense who stood outside a polling place on Election Day. One had carried a nightstick. Adams recommended charges against the individuals, the New Black Panther Party and the party's president. Two years later, most of the charges were dropped, with the DOJ instead opting to narrow its focus to the man who carried the nightstick.

Adams resigned in protest in 2010. He claimed racial prejudice in the Obama Department of Justice and wrote a [book](#) about it. (An internal review later concluded the dismissal of some charges was "based on a good-faith assessment of the law and facts of the case" and found "no evidence that partisan politics was a motivating factor in reaching the decision.")

By the time Obama's second term was underway, Adams was acting as a self-appointed watchdog of the nation's elections.

Working with the nonprofit American Civil Rights Union, Adams filed his first voter roll maintenance lawsuits in the spring of 2013. He and his colleagues targeted counties they say have bloated rolls, demanding more aggressive voter roll purging.

After Adams and his colleagues at the ACRU filed at least nine suits calling for more aggressive purges, some — mostly in smaller counties in Texas and Mississippi — have been settled with consent decrees, in which counties agree to purge their rolls more frequently. While some counties simply agreed to basic voter roll maintenance, others accepted far more aggressive methods.

Voting rights advocates fear that counties carrying out aggressive purges under legal duress will push officials to purge eligible voters.

"In a lot of these settlements, the push to remove people from the rolls may result in a lot of mistakes," Cameron Bell, an attorney for the liberal think tank Demos, said after fighting a lawsuit in Broward County, Florida. "That's why Demos got involved, to make sure the parties weren't reaching settlements that would lead to mistakes that would disenfranchise eligible voters."

A Case Study

This spring, after Trump alleged without any evidence that widespread fraud cost him the popular vote in the 2016 election, Adams thought he'd hit pay dirt.

PILF supposedly had uncovered an "astonishing" example of fraud in Virginia: Maureen Erickson, with an address in Guatemala, was registered in Prince William County.

"Ms. Erickson voted in 14 different elections — most recently in 2008 — before her registration was cancelled," PILF wrote in a report.

Adams and his fellow PILF lawyers alleged that thousands of non-citizens were registered and voting in the state, "cancelling out the valid votes of American citizens."

The Washington Times picked up the story, describing Erickson as a fraudulent voter in an article published May 30.

But there was one problem. Erickson is a U.S. missionary living in Guatemala, lawfully voting absentee in Loudon County, she told NBC News.

"I thought my identity was stolen," she said from Antigua, where she works with families and children. The cancelled registration was an outdated record from a previous home, she said; she has been legally voting in another county for years.



Maureen Erickson teaches children. Courtesy Maureen Erickson

Privacy Concerns Mount

Cochran, the falsely accused legal voter, said he reached out to PILF over the publication of his complete Social Security number. In response, the group blamed the county for releasing the form without redacting it.

"I told them they had a moral obligation that they should fact-check, or contact me," Cochran said he told PILF.

Peter Swire, a privacy and cyber-security expert and a professor at Georgia Tech, said fingering someone for having possibly committed a crime without proof is questionable. "It's even worse if you include their sensitive, personal information," he said.

Adams defended his effort. "These are public records. You understand that when it comes to public records, they are public, right?" he wrote in an email. "The law makes the information public record."

Asked about citizens like Cochran branded as "aliens" in his organization's report, Adams said, "If they were in fact citizens," their removal is also "appalling."

"These were defective registration and removal procedures, procedures which must be improved," he said.

Taking the Fight National

Next year, Trump's voter fraud panel will likely propose legislation to modernize elections and prevent fraud.

Robert Popper, a former Justice Department official, suggested that Adams' interactions with counties over bloated rolls may help guide the commission in that regard. The "Alien Invasion" reports champion proof-of-citizenship requirements, something the fraud panel's vice chairman, Kansas Secretary of State Kris Kobach, has signaled he wants.

However, voting-rights advocates say those requirements can create undue barriers to the ballot box. In Kansas, in the first years with a proof-of-citizenship voter registration requirement in place, the Brennan Center for Justice found that between 8 and 14 percent of new registrants were barred from registering.

"There are ways to examine and reach the truth about our elections," Adams said at the fraud commission's first meeting, "without harming a single legitimate voter registration."



Jane C. Timm

Jane C. Timm is a senior reporter for NBC News.

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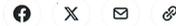
Record Submission #2



Americans accused of noncitizen voter fraud face doxxing and intimidation

Fact check: How many noncitizens vote in U.S. elections?

By [Devin Dwyer](#) and [Sarah Herndon](#)
 October 25, 2024, 5:17 AM



Protecting the Vote series: Doxxing the vote ABC News' Devin Dwyer reports on conspiracy theorists pushing unsubstantiated claims of widespread illegal voter registration and voting by noncitizens ahead of the 2024 election.

Americans accused of noncitizen voter fraud face doxxing and intimidation

Fact check: How many noncitizens vote in U.S. elections?

By [Devin Dwyer](#) and [Sarah Herndon](#)

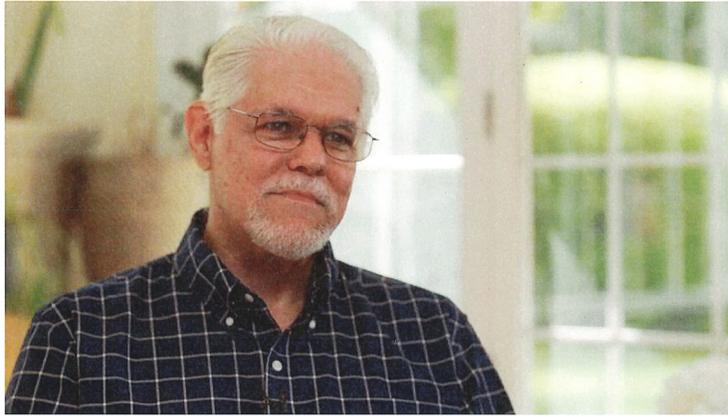
October 25, 2024, 5:17 AM

Eliud Bonilla, Brooklyn-born to Puerto Rican parents, is as American as they come. But in 2016, the father of two who works as an engineer on NASA's mission to reach the sun was abruptly purged from the voter rolls as a "noncitizen."

"I remember trying to make small talk with the clerk about what happened," Bonilla said of his visit to his county election office in Virginia to correct the record. "She just matter of fact said 'This happens a lot.'"

Bonilla later voted without issue, but the nuisance soon became a nightmare.

A conservative election watchdog group obtained a list of the state's suspected [noncitizen voters](#) and published it online, exposing Bonilla's personal information alongside the implication that he -- and hundreds of others -- had committed voter fraud.



Eliud Bonilla, an American citizen, was targeted as a suspected non-citizen voter in 2017.

ABC News

"My reaction was, 'How dare you?' Just, 'How dare you to make such a claim,'" Bonilla said of the Public Interest Legal Foundation's 2017 report "Alien Invasion II."

"I became worried because of safety," he said, "because, unfortunately, we've seen too many examples in this country when one person wants to right a perceived wrong and goes through with an act of violence."

Bonilla's story highlights a real-world impact of aggressive efforts to purge state voter rolls of thousands of potential noncitizens who have illegally registered. Many of the names end up being newly naturalized citizens, victims of an inadvertent paperwork mistake or the result of a clerical error, experts say.

[MORE: Republicans are ramping up election fraud claims ahead of November](#)

"We see large numbers of suspected noncitizens being identified and announced, but if you really get down into the details, you see that actually a lot of times these folks aren't noncitizens," said Sean Morales-Doyle, a voting rights advocate at the Brennan Center for Justice, a nonpartisan election law group.



Sean Morales-Doyle is a voter rights advocate with the Brennan Center for Justice, a nonpartisan election law group.

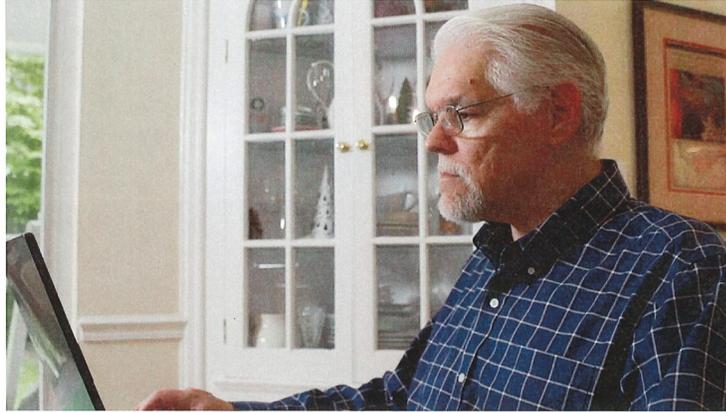
ABC News

"It happens because states are playing a little bit fast and loose with the data that they have available to them," he said. "A person who was a noncitizen green card holder when they got their driver's license years ago may no longer be. Thousands of people are naturalized in these states every year."

The Justice Department sued Alabama last month for allegedly purging dozens of native-born and naturalized citizens from the state voter list, and a federal judge stopped the effort.

In Virginia, the same state that wrongly purged Bonilla, DOJ is [suing to block a plan](#) to remove voters whose DMV records don't indicate U.S. citizenship.

Tennessee election officials [sent letters](#) to 14,000 residents in June threatening to purge them from voter rolls unless they proved their citizenship, but later, faced with a potential lawsuit, backed down.



Many American voters on state lists of suspected noncitizen registrants are newly naturalized, victims of inadvertent paperwork mistakes, or the result of a clerical error, experts say.

ABC News

Federal law prohibits noncitizens from voting in federal elections subject to up to a year in prison, deportation and denial of future legal immigration status. While there are confirmed cases of noncitizens illegally registering in every election, there is no evidence they cast ballots in significant numbers.

"This is a [vanishingly rare](#) phenomenon," said Morales-Doyle. "It is not happening at rates that are going to impact the outcome of our elections."

A Brennan Center [study](#) of the 2016 election found just 30 cases of suspected noncitizen voting out of more than 23 million ballots cast.

The conservative Heritage Foundation, which maintains a [database](#) of voter fraud cases, has identified fewer than 100 cases out of more than 1 billion ballots cast between 2002 and 2022.

A 2017 [audit](#) by Pennsylvania election officials found that a glitch in a state driver's license system may have allowed 544 noncitizens to register and cast ballots -- out of 93 million ballots cast over 18 years.

A recently completed audit in Georgia found that just [20 noncitizens](#) were registered to vote on list of more than 8 million voters, according to Secretary of State Brad Raffensperger. Those registrations were cancelled before ballots were cast next month.

After a fact-intensive trial earlier this year, Judge Susan Bolton of a federal court in Arizona [concluded](#): "The Court finds that though it may occur, noncitizens voting in Arizona is quite rare, and noncitizen voter fraud in Arizona is rarer still."



J. Christian Adams is president of the Public Interest Legal Foundation, a conservative election watchdog group that has been pushing states for greater transparency of voter rolls.

ABC News

Bonilla and several other voters whose personal information was exposed in the 2017 report sued the Public Interest Legal Foundation, claiming a "campaign of defamation and intimidation."

The group said in court that the list was a "public record" maintained by the state, and that it has a First Amendment right to speak out. It later apologized to Bonilla, revised portions of the report, and settled the suit.

J. Christian Adams, the group's president, said the effort was all well-intentioned.

"We know people are registering who are not citizens of the U.S. And they're telling the registrar that they're not citizens before they get registered," Adams said. "That's a problem. Nobody should be in favor of this, and nobody should stand in the way to fix it."

Critics of Adams' group and others say they're exaggerating the magnitude of the issue to preemptively cast doubt on the legitimacy of the 2024 election results, but he says that's not the objective.

MORE: In South Texas, the myth of noncitizen voting takes center stage

"This isn't about throwing an election. This is about having a system that works as best we can," he said. "If you can find a single voter that has been removed improperly from one of our actions, then you win \$1,000 of Omaha Steaks from me personally."

The Justice Department says similar efforts around the country have had that exact impact. Still, Republican groups are keeping the pressure on state election officials to purge suspected noncitizens from the rolls with at least 24 lawsuits still active before Nov. 5, according to the left-leaning legal group Democracy Docket.

Bonilla says election integrity is a "worthy" goal and that he fully supports enforcement of the law, but that exaggerated claims of noncitizen voting do more harm than good.

"When you go to the point of not looking at evidence and letting your biases take over and have the rhetoric become ugly, I think you've left the patriot side at that point," he said. "I tell everyone, you have to vote. If you don't vote, you don't count."

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Mrs. TORRES. In 2016 and 2017, the Public Interest Legal Foundation, a right-wing group known for suing States to delete voters off of their election rolls and making false claims of voter fraud, of which Mr. Adams is the president, published a two-part report titled "Alien Invasion" that, among other things, falsely accused American citizens of felony voting fraud.

Additionally, Mr. Adams's organization shamefully—shamefully—published the names, addresses, phone numbers, and, in some cases, Social Security numbers of those he falsely accused, doxxing law-abiding American citizens and threatening their privacy and security for the simple act of choosing their representatives.

As a result, a group of Virginia voters sued the organization, forcing Mr. Adams and his organization to apologize in the settlement.

Chairwoman, I ask unanimous consent to submit an article from Law and Crime titled "Fmr Trump Voting Commission Official Forced to Apologize for Falsely Accusing People of Voter Fraud (UPDATED)."

Ms. LEE. Without objection, so ordered.

[The Law & Crime article referred to follows:]

*Record Submission #3***LAW & CRIME**

Fmr Trump Voting Commission Official Forced to Apologize for Falsely Accusing People of Voter Fraud (UPDATED)

JERRY LAMBE | Jul 17th, 2019, 3:28 pm

263 comments

SHARE



A former commissioner on President **Donald Trump's** now-defunct Voter Fraud Commission reached a settlement this week with a group of Virginia voters who claimed they were subjected to false accusations of felony voter fraud.

The initial [lawsuit](#) was filed last year in Virginia federal court by voting rights groups and four individuals accusing the Public Interest Legal Foundation (PILF) and its president and general counsel **J. Christian Adams** of creating and distributing reports that falsely mislabeled them as non-citizens who illegally registered to vote — despite all of the plaintiffs being American citizens.

The PILF reports, titled "Alien Invasion in Virginia" and "Alien Invasion II," were released in 2016 and 2017 respectively, and stated that thousands of people had committed felonies by illegally registering to vote in Virginia. According to the complaint, Alien Invasion II contained information about many of the purported felons, including their names, addresses, phone numbers, and "in some cases social security numbers."

41. *Alien Invasion II* was published along with a roughly eight-hundred-page appendix containing voter registration forms, which included the names, home addresses, and telephone numbers of the alleged felons. The published appendix originally included several voter registration forms with social security numbers before Defendants redacted that information.

Adams told Law&Crime that "Social Security numbers were not listed in the reports."

"That is false," he said. "Fairfax County improperly published a number of government documents that contained a social security number and we linked to those documents. When we learned that Fairfax improperly published them, we removed them from our links and website immediately."

The plaintiffs claimed that the false accusations and releasing of their personal information amounted to voter intimidation and defamation.

In an email to Law&Crime, Adams dispute that characterization of the information as "private" or "personal." He said that federal law mandates that all of the information cited, with the exception of social security numbers, was public information.

"Congress had mandated that all of that information is public, period. Not only is it public, it is subject to physical inspection by any member of the public. To characterize names, addresses or even phone numbers in election list maintenance records as 'private' or words to that effect is inaccurate," he said. "To say PILF published 'private' or personal information is therefore doubly inaccurate."

"That issue has been settled by the 4th Circuit and the federal courts in Virginia and we have won that issue in litigation over and over," he added. "To claim that any of the information was private or personal information is flatly contradicted by both federal statute and controlling case authority."

Under the settlement agreement, PILF will be required to place an addendum at the front of the "Alien" reports which will read, "PILF recognizes that individuals in [the removed exhibits] were in fact citizens and that these citizens did not commit felonies. PILF profoundly regrets any characterization of those registrants as felons or instances of registration or voting as felonies."

Adams, a former attorney for **George W. Bush's** Department of Justice, must also provide a written apology to the plaintiffs on behalf of himself and the group, which is also required to remove any information of individuals purported to have illegally registered to vote from its current and future reports.

PILF released a statement Tuesday in which the group offered a "profound apology that it relied so heavily on the commonwealth election records, it seemed implausible that Virginia would be improperly removing American citizens from the voter rolls."

"The Foundation looks forward to discussing the vast resources behind those who oppose election integrity and engage in efforts to stifle any speech that raises awareness of the real vulnerabilities in the security of American elections," PILF said.

However, it should be noted that documents revealed through discovery appear to show that at the time PILF released the Alien reports, the group possessed internal emails from Virginia election officials who were worried about how the state's voting records were being misrepresented.

Case 1:18-cv-00423-LO-IDD Document 187-3 Filed 06/14/19 Page 2 of 9 PageID# 10645

From: Dianna Moorman [REDACTED]
 Sent: 2/15/2017 2:27:26 PM
 To: Noel Johnson [REDACTED]; Nate Greer [REDACTED]
 CC: Shawna Powell [REDACTED]
 Subject: RE: NVRA Request and Litigation Notice
 Attachments: Cancellation_Declared_Non_Citizen 2011-2017.pdf

Good afternoon

My sincerest apologies for not responding sooner. I have attached the requested report of non-citizens in James City County from January 1, 2011-February 15, 2017. Please note that many of these simply were because they failed to check the "Are you a US citizen" box on the voter registration application, not because they are actually a non citizen, and have since reregistered with an acceptable completed application.

Please let me know if there is anything else I can do for you.

Best regards-

-Dianna Moorman

Please note: our office has moved and all contact info has changed.

Dianna S. Moorman, VREO
 General Registrar and Director of Elections



Voter Registration and Elections
 5300 Palmer Lane
 Williamsburg, VA 23188

TDD: 711
jamescitycountyva.gov/vote

A month later, emails showed that in one instance that the DMV flagged 197 individuals as non-citizens, but that many of the people then verified that they were citizens — a "good number" of them "very rapidly because they have security clearances that could be at risk if there was some indication they were not citizens."

Reagan
 -----Original Message-----
 From: Hunt, Stephen M [mailto:stephen.hunt@dmv.virginia.gov]
 Sent: Thursday, March 30, 2017 6:48 PM
 To: Reagan George; von Spakovsky Hans [mailto:hans.von.spakovsky@dmv.virginia.gov]
 Subject: Re: [GRLIST] Declared Non-Citizen Hopper

Just talked to Cameron.

We received another 197 non-citizen notices from the DMV. These are from the September & October time frame. These seem to have started when the new system with the DMV was instituted in June of 2016. These folks all had transactions with the DMV. ELECT also set it up that every DMV transaction generates an on-line voter registration (original request or update). Consequently, if you go in to renew your driver's license, a new voter registration form was generated.

It is my guess that somehow either the person ignored the "Are you a citizen" block since they were renewing their driver's license so "who cared" or the system is capturing the wrong input. If the voter had actually checked that they are not citizens, then the new voter registration should never had been generated. This is a significant problem and the system should be shut down until it is investigated, identified and fixed.

This does not address the question regarding why these are just showing up now.

Steve

Many of the people who were identified as a non-citizen have verified their citizenship. A good number responded very rapidly because they have security clearances that could be at risk if there was some indication that they were not citizens. This causes me to believe that there are two issues. The first is what in the DMV system is causing mis identification of US citizens as non-citizens. The second is why did we not receive the information until now. The board has sent a letter to the State Board of Elections requesting an investigation into both of these issues.

I would be a little cautious in using the numbers as the number of non-citizens who have voted. In fact the 190 deduped down to 102. I will try to remember to let you know how many names we send to the commonwealth attorney.

Steve

In May, **Keith Damon**, an individual identified by Protect Democracy (one of the voting rights groups that brought the lawsuit) as a volunteer, wondered in an email if DMV was "really" providing a "list of actual non-citizens" or if the DMV "indicated that they are non-citizen regardless of their true status."

From: Keith G. Damon [mailto:keith.damon@protectdemocracy.org]
 Sent: Thursday, May 25, 2017 10:44 AM
 To: Reagan George
 Subject: List of self-declared

Reagan

I started to work on converting the pdf. I decided to look at the records of some of the people on the list. I just randomly picked non-hispanic surnames living in single family homes in Fairfax County. Based upon this analysis, I now wonder if this is really a list of actual non-citizens or rather a list of people who - via the DMV - apparently indicated that they are non-citizens regardless of their true status. In other words, while the list is real does it really prove that the people on the list are non-citizens.

One response to Damon's email:

Keith;

There is no way for you and I, or for that matter, Christian to investigate all of these identified non-citizens. They have all been removed from VERIS because they self-declared to the DMV (a government agency) that this was their status. If they did not understand the question, or they trying to make a political statement, or they were coerced into registering in the first place is not our job to determine.

Virginia Code 24.2 - 427.B1 requires the General Registrars to inform these people with a post card about why they are being removed. It is up to them to respond back to the GR and prove their citizenship. If they are indeed non citizens who voted, it is up to the FBI to investigate their participation in Federal Elections. PILF and VVA are just reporting information that is being hidden by the SBE/ELECT. We may also be uncovering that the GRs are not doing their job. That the DMV is more screwed up than we think it is. That the McAuliffe administration is incompetent or willfully not requiring SBE, ELECT, or GR to do their job. The main thing is all of this is government data, not ours. If it is wrong then the government needs to fix the problems, not us.

PILF Communications and Research Director **Logan C. Churchwell** also [appeared in the email chain](#) discussing potential "false positives."

All of the below traffic from those guys can be true and we still have the opportunity to convert pushback into official confusion to justify our call for top-down overhaul. The fog of war favors the aggressor here.

Even better, the next report details the noncitizens admitting their status in their own words

Logan C. Churchwell

Sent from my iPhone

On May 25, 2017, at 15:55, "a@ [REDACTED]" <a@ [REDACTED]> wrote:

Fyi

From: a@ [REDACTED]
Sent: Thursday, May 25, 2017 6:45 PM
To: Keith G. Damon
Cc: 'Reagan George'
Subject: Re: Keith - more on your concern

Keith, it's the best data available. If the fact a registrant was a citizen, their own system reported otherwise and kicked them off the rolls. Nobody has better data than we do. If there are false positives, it's state data and procedures that made them false positives. That alone makes it imperative to expose even the glitches.

But I'll have that fight any day of the week when they are also registering people who marked "no" on the citizen check box. That graphic is in the report.

"All of the below traffic from those guys can be true," Churchwell wrote, referencing the concerns over the veracity of the data being used in PILF's 'Alien' reports. "We still have the opportunity to convert pushback into official confusion to justify our call for top-down overhaul. The fog of war favors the aggressors here."

Cameron Kistler, an attorney at Protect Democracy, praised the settlement as a win for democracy.

"Not only did it reaffirm that the Voting Rights Act and the Ku Klux Klan Act guarantee every eligible voter the right to vote free from intimidation, but the defendants also agreed to put in place safeguards to ensure that they never again injure innocent Virginians," Kistler said.

That sentiment was echoed by **Sean M. Tepe**, a lead pro bono counsel in the case.

"Our plaintiffs, and an undetermined number of other citizens, were wrongly caught up in Defendants' effort to create a voter fraud narrative and manufacture fear," Tepe said in a statement. "This settlement proves that facts still matter and that innocent people should not be used as pawns in others' political wars."

Editor's note: This article was amended post-publication to: add a response from Adams about social security numbers; to add a response from Adams disputing the characterization of information other than social security numbers as "private" or "personal"; to clarify what Churchwell was responding to in an email chain about the DMV's non-citizen notices, and to remove unnecessary editorialization about it; to clarify what internal PILF concerns were about and who was raising them.

[Image via YouTube screengrab]

###

Mrs. TORRES. Court documents also show that Mr. Adams's organization had emails where election officials raised concerns about how the records misrepresent information, yet the organization led by Mr. Adams still went ahead and published the report that falsely accused Americans of committing voter fraud and listed out names, addresses, and Social Security numbers.

[The email follows:]

p. 1

Case 1:18-cv-00423-LO-IDD Document 188-3 Filed 06/14/19 Page 6 of 7 PageID# 10711

Reagan

From: Keith G. Damon [mailto:██████████]
 Sent: Thursday, May 25, 2017 10:44 AM
 To: Reagan George
 Subject: List of self-declared

Reagan.

I started to work on converting the pdf. I decided to look at the records of some of the people on the list. I just randomly picked non-hispanic surnames living in single family homes in Fairfax County. Based upon this analysis, I now wonder if this is really a list of actual non-citizens or rather a list of people who - via the DMV - apparently indicated that they are non-citizens regardless of their true status. In other words, while the list is real does it really prove that the people on the list are non-citizens.

To cite just two people:

- ██████████: She registered to vote ██████████ and has voted consistently since then including the 2008 and 2016 Rep Presidential Primaries. Given the date of her registration, she would have gone through a DMV renewal prior to the recent one where she apparently said she was not a citizen. Maybe she incorrectly indicated citizenship at the earlier registration but equally possible is that she mistakenly indicated non-citizen on the recent registration. There is no way to tell

- ██████████: Removed ██████████. Both GOP Data Central and i-360 have a record for him but without any data. Given the timing of his removal and timing of updates for the two databases, I don't know what that means but something must have triggered removing his info prior to DMV removal (NCOA,??). There is no indication he voted since ██████████. He was born on ██████████. He apparently lives with (or is at least registered with) his parents who have owned their house at ██████████ prior to his birth). They have regularly voted. While this cannot be proved from records available to me, if his parents are citizens and he is a citizen regardless of whatever triggered his removal. The only way he would not be a citizen is if he were born outside the US and his parents were not US citizens. All of this cannot be proved one way or the other.

What I say above proves nothing except I am concerned that just accepting all of the people on the list as actual non-citizens may not be correct. If Christian puts out a press release indicating they are non-citizens, it might be a problem. Do you have any idea if he has researched these names?

Keith

Keith Damon
██████████

Mrs. TORRES. These reckless actions and the ones before make it clear to me that Mr. Adams and some of the Republican witnesses here today are not here to ensure that our elections run fairly but, rather, to make sure that elections favor one party—the Republican Party.

Time and time again, we see this play out from President Trump and my colleagues across the aisle pushing misinformation when it comes to election results and voter fraud. These actions have one goal: to sow distrust in our elections system, to suppress the vote, and to make it harder for Americans to have their voices heard.

Non-citizen voting is extremely rare, and it is already outlawed. Do you know what makes people question our elections? It is not how the voter rolls are administered; it is President Trump, organizations run by those like Mr. Adams, and the Republican Party pushing lies after lies after lies about voter fraud and election results.

We saw that in the 2020 election and the violent January 6th insurrection which happened because the President denied the results of an election. We are seeing it this year again, where Republicans tried to throw out 60,000 votes to overturn the North Carolina Supreme Court race they lost. It took nearly half a year for the Republican candidate to concede.

They forced many eligible American voters, like Ms. Heling, who is testifying here today, to jump through hoop after hoop to make sure her vote was counted. After the results did not go their way, the Trump-weaponized DOJ sued North Carolina, and now Ms. Heling and 200,000 people in her State are at risk of not being able to vote.

Last month, they sued Orange County, California, over voter records.

It is not a surprise that these are all areas that had competitive elections. This is happening while Trump is forcing Texas Republicans to redraw congressional maps so that he can try to maintain power and steal another election.

At the same time, Trump's illegal voting plan and the Republicans' SAVE Act will create huge burdens for every American, including nearly 70 million women who, like me, chose to take their husband's last name. It makes it harder for servicemembers who are trying to vote overseas.

I yield back.

Ms. LEE. I now recognize Dr. Murphy of North Carolina for 5 minutes.

Dr. MURPHY. Thank you, Madam Chairman.

You know, I have been in Congress a little over 5 years now, and I feel like it is kind of like a basketball game where the guy who does the wrong thing first and then the other person—maybe he fouls one player first, and the second player who responded—everybody puts the attention to the response rather than the primary problem to begin with. That is what it seems to be. We always scream at what the reaction is rather than the real problem itself.

Nobody is saying that our election system is perfect. Nobody is saying that. We live in a human society; we have human frailty. We are not saying that. Mistakes happen. That is why we have reform.

You know, it is very interesting, we are talking about the North Carolina Board of Elections and how Ms. Heling, you know, really got screwed by them, absolutely. I think I just want to point out that the North Carolina Board of Elections has been run by Democrats for many, many years.

I am happy to say that now the legislature has taken control of the North Carolina Board of Elections and turned it over to Republican control, and now the Republicans have begun the Registration Repair Project to ensure that all eligible voters have accurate, complete information on file.

Imagine that. We are actually running a system that works. The State Board of Elections has publicly announced that the project will not result in the removal of any eligible voters.

We had a horribly run Democratic system that Ms. Heling had the terrible experience of having to deal with, and now the adults have come into the room and said, we are actually going to run something right. That is great.

You know, look, we sat right here—you all sat at that table when the Michigan Secretary of State sat there and she would not allow the removal of over 22,000 dead people. How are we supposed to respond to that, Republican or Democrat? How you do respond to that? That is fraud, period, pointblank. And that is our job to ensure that those people are taken off the rolls.

We do not want any eligible voter removed. The experience that you went through, ma'am, was horrible. I am sorry for that, on the part of North Carolina. You know, damn, if we want our elections to be secure, it is OK that we look at this stuff. It is much worse if we have somebody voting who should not than somebody who, sadly enough, had to go through what you did.

I apologize for that. There is a new sheriff in town in North Carolina, and hopefully they will run it in a system that actually works, rather than having 200,000 people put on a roll where their voting rights are questioned.

I will turn back—Mr. Riemer, just a couple questions.

The Federal requirements for notifying voters before removing them from voter rolls, can you expand on those a little bit?

Mr. RIEMER. Absolutely.

Once an election official has reason to believe that a voter may have moved, for example, they are required to mail what is known as a confirmation mailing. That is sent to the address where the voter is registered, forwardable. If the voter has moved somewhere else, in theory, that piece of mail is supposed to go to their new address. That is how the process works.

When that mail does not come back to the election official or the voter does not return it, saying, "I have moved; cancel me from the voter rolls"—which is what happens only 30 percent of the time. The voters only request cancellation about 30 percent of the time, or notify the election official that they are still there and not to remove them. What happens is, those election officials, unless they hear from the voter, they have to wait for up to 4 years until they can remove that individual from the voter rolls.

Dr. MURPHY. Yes.

I mean, it just—you know, I had a former colleague, anesthesiologist, who—we were in the operating room talking one day, and he

was livid because he went to vote and someone had voted in his place. To say this stuff does not occur is absolutely wrong.

Then I have had patients who said, yes, I got mailed five ballots—five ballots—to my house.

To want to clean up this system is not wrong. It is not wrong. It is absolutely the right thing to do. I just—I am baffled that people want to fight that.

One other question.

Actually, Mr. Adams, thanks for being here today.

What is the best practice for States to share voter identification rolls with each other?

I will say this real quickly. Maybe my time might run out; I apologize. You know, Social Security has a great pension. If somebody dies, you get a notice pretty damn quick that you are not getting your benefits. Why can't we tie that to voter rolls? Wouldn't that be an interesting concept?

Anyway, I will let you answer your question.

Mr. ADAMS. The best is commercial data. Commissioner Don Palmer at the EAC has advocated for this. I am on the Board of Advisors of the Election Assistance Commission. We have advocated at Public Interest Legal Foundation, use Experian.

Commercial data is the most accurate. There is a cost, but we can figure this out.

Dr. MURPHY. Yes. All right.

Thank you, Madam Chairman. I yield back.

Ms. LEE. I now recognize the Representative from Texas, Ms. Johnson, for 5 minutes.

Ms. JOHNSON. Thank you, Madam Chair.

I am going to respond to Dr. Murphy.

You know, the thing is that election integrity is critically important. Democrats do not want people who are not eligible to vote to be able to vote, period, full stop. What we do want is that every eligible voter gets the chance to vote and that their constitutional rights are not infringed upon.

That seems to be a huge distinction. Dr. Murphy just said he was OK with a citizen not being allowed to vote if it prevented somebody who was not eligible to vote from voting.

The reality of it is, the Constitution of the United States is pretty clear on the matter. I have my little, pocket, handy-dandy Constitution. "The right of citizens of the United States to vote shall not be denied or abridged by the United States or by any State," period.

Ms. Heling, your constitutional rights to vote were abridged by the State of North Carolina, weren't they?

Ms. HELING. They were.

Ms. JOHNSON. That is unacceptable in this country.

I do not want dead people voting. I do not want people who are non-citizens or not eligible to vote to be able to vote any more than anybody else does. I damn sure want eligible citizens to be able to cast their ballot.

The problem is, Madam Chair, in this hearing, we are not talking about the ways to improve the system to make sure that we have inviolate guardrails in place to keep citizens from being prevented to vote.

In Texas, you know, Republicans have controlled Texas now for almost 30 years, and, you know, Greg Abbott, our Governor, tried to kick 95,000 people off the rolls in 2019, saying they were non-citizens, and it turned out—you know what? They were actually citizens. They were people who had been naturalized, who had gotten permission to swear their oath to the Constitution, pay their taxes, were United States citizens. They tried to deny them the right to vote. It took a lawsuit to reinstate them.

That is not acceptable in this country. That is not preserving election integrity.

Greg Abbott also tried to kick 1.1 million voters off the voter rolls in Texas, saying there was all kinds of fraud. Now, granted, he administers the Secretary of State's Office to allow these unauthorized people to vote that he supposedly now is saying, oh, we should not have voting. Again, that was proven, that it was full of legal U.S. citizens to cast their right to vote.

You know, there are all sorts of things we could talk about. Online registration. If every State had online registration, you could go in, update your registration, and it would update it. You would not have all these duplicate entries. You know what? Texas does not let online voter registration. To your point, Mr. Adams—human error—they do not allow the computer to work for you. Everything has to be done manually in our State, because they make it hard to vote.

Texas is the hardest State to vote in. I believe somebody said that—I think one of you said the United States is the easiest country to vote. I beg to differ, at least in my State. You cannot register online. You cannot register the same day. You have to print a ballot. Do you know how many young people do not even have access to a printer? Then you have to mail it and stamp it. They cannot even figure out their way to get to a post office. It is no wonder why young people are not voting.

We make it hard for people to register to vote. If we wanted it to be easy, everything would be able to be done online. We pay our taxes online; we do everything else online.

If we had a national voter registration system, then maybe all this interstate moving could be addressed.

There are things that we should be debating to improve the system, and I am here for that all day long. What I am not going to tolerate is this notion that we should deny citizens the right to vote, like you had, like what we are seeing in Texas, like what we saw in Georgia, like what we are seeing in States throughout this country under the name of cleaning a list. Because we are not ensuring the inviolate protection of citizens to cast their right to vote, as the Constitution requires.

Ugh. I wish—you know, the frustration—I am sick and tired of this insinuation that Democrats do not care about election integrity. That is false. What we do care about is making sure that people are not disproportionately targeted because of the color of their skin, their naturalized citizenship status, or anything of the matter.

Mr. Chairman, I ask unanimous consent to enter into the record an article from the Brennan Center for Justice titled, "Homeland Security's 'SAVE' Program Exacerbates Risks to Voters."

Chairman STEIL.
[Presiding.] Without objection.
[The Brennan Center for Justice article referred to follows:]

Homeland Security’s “SAVE” Program Exacerbates Risks to Voters

Bad data and a politicized overhaul could spread election fraud lies and disenfranchise voters.



Jasleen Singh



Spencer Reynolds

PUBLISHED: July 21, 2025

The Systematic Alien Verification for Entitlements, or “SAVE,” program was designed to help states verify the citizenship and immigration status of people applying for government benefits. Some state and local governments also use it to verify citizenship for voting. But SAVE’s results — sometimes based on incomplete or outdated information — have never been perfect. For that reason, the information gleaned from the SAVE program should be considered useful, but not definitive, in assessing an individual’s citizenship.

Recent developments with the SAVE program raise significant concerns. Working with DOGE, the Department of Homeland Security has expanded the range of personal data that agencies can access through SAVE. At the same time, DHS has allowed state and local election officials to search for hundreds of thousands of voters simultaneously. This increases the risks that state officials will carry out erroneous voter purges and disenfranchise eligible voters. SAVE could also mislead, either because it incorrectly identifies someone as a noncitizen or fails to con-

firm immigration status, fueling false conspiracy theories about the integrity of U.S.

Voting and the SAVE Program

Under federal law, only U.S. citizens are eligible to vote in federal elections. Multiple systems ensure that only citizens are registering and voting, and they have proven to be enormously effective. Voter fraud, including voting by people who are not citizens, is **extremely rare** [link-1]. Any person registering to vote in a federal election **must swear** [link-2] to U.S. citizenship under the penalty of perjury. Someone who falsely swears to citizenship could face severe **criminal consequences** [link-3] under both state and federal law, including fines or jail time. For people who are not U.S. citizens, penalties include possible deportation.

In addition, federal law **requires** [link-4] states to update and maintain voter lists regularly. Election officials reference **several databases** [link-5] to ensure voter roll accuracy, including cross-checking against jury lists where jurors provided their citizenship status and interstate data-sharing organizations like the Electronic Registration Information

elections.

Center, which **draws** [link-6] on a variety of state and federal data sources.

DHS's U.S. Citizenship and Immigration Service (USCIS) **operates** [link-7] the SAVE program primarily to give state governments an additional method to verify the citizenship and immigration status of people applying for government benefits, such as food stamps and Medicaid. DHS also permits states to use it to help determine eligibility to vote in elections. (The USCIS SAVE program is distinct from the SAVE Act, a now-stalled federal bill that has prompted a public outcry and would require documents such as a birth certificate or passport to register or re-register to vote, potentially blocking **millions of American citizens** [link-8] from voting.)

The SAVE program is not itself a data repository, nor does it contain a comprehensive record of citizens. Rather, it is a tool for querying various datasets.

In the past [link-9], it has largely only included information on noncitizens, naturalized citizens, and some children of U.S. citizens born overseas.

To access the SAVE program, an election office enters into a written agreement with

USCIS to establish policies and terms of use. The agreement requires offices to allow prospective voters to prove citizenship if SAVE should fail to verify it. Currently, at least 21 states and 32 county election offices have such **agreements** [\[link-10\]](#), according to a USCIS search tool. (Several states gained access to the SAVE program after its recent overhaul.)

Prior to the overhaul, user agencies would input an individual's DHS-issued immigration-related identification number, name, and birth date to do an initial verification.

The SAVE program performed an automated check against certain federal databases. The program allowed users to query the system for only one name at a time. SAVE then informed the requestor that the individual was a U.S. citizen, a noncitizen, or of unconfirmed status. If this initial step identified the person as a noncitizen or could not verify an immigrant's citizenship, agreements with USCIS required election offices to seek additional verification through a manual search of other federal databases.

Historic Problems with the SAVE Program

The Brennan Center, among others, has **identified** [\[link-11\]](#) some of the SAVE program's data sources as unreliable. These faulty sources increase the likelihood of errors and lack adequate safeguards for privacy, civil rights, and civil liberties. Those datasets **include** [\[link-12\]](#) U.S. Customs and Border Protection's Automated Targeting System (ATS) and TECS (not an acronym), and the State Department's Student and Exchange Visitor Information System (SEVIS).

There is little information about data quality in ATS, but DHS's inspector general urged the department to improve it amid a review of another program that relies heavily on the system. ATS itself in part relies on information from the FBI's terrorism **watchlist** [\[link-13\]](#), **which** [\[link-14\]](#) is full of **unreliable** [\[link-15\]](#) information — including mistaken identities — and is biased against certain religious, racial, and ethnic minorities. TECS — which **incorporates** [\[link-16\]](#) that same FBI watchlist information, as well as travel records and other data sources — has been used for **unlawful** [\[link-17\]](#) activities, including **retaliation** [\[link-18\]](#) against migrant rights activists' exercise of their First Amendment rights.

SEVIS's data about foreign students in the United States relies in part on the accuracy of information **provided** [\[link-19\]](#) by U.S. universities and the ability of decentralized school officials to **input it** [\[link-20\]](#) accurately.

The U.S. government and nonprofit groups have warned that overreliance on the SAVE program for the purposes of voter list maintenance can lead to errors, false negatives, and wrongful voter purges. A 2018 **report** [\[link-21\]](#) from the U.S. Commission on Civil Rights found that "SAVE is not a comprehensive list of U.S. citizens . . . [,] is not updated to include all naturalized citizens, and it does not include [all] derivative citizens born to U.S. parents outside the country." In 2012, the American Immigration Council **observed** [\[link-22\]](#) that the SAVE program's data was incomplete and that even DHS officials worried that data accessed by SAVE was not comprehensive enough for voter verification.

DHS has also failed to guarantee that election offices comply with the SAVE

program's prescribed verification processes. Those processes are critical. According to a 2017 Government Accountability Office report, DHS **claims** [\[link-23\]](#) that the SAVE process has a high, but still imperfect, degree of accuracy when second-stage additional verification is triggered. But the accountability office also **found** [\[link-24\]](#) in 2017 that USCIS did not have sufficient controls to ensure that state and local agencies initiated that additional verification when necessary.

While USCIS has since taken **steps** [\[link-25\]](#) to educate user agencies, including election offices, about the need to complete further verification when prompted by the SAVE software, there is little public information showing how successful that effort has been. This means the election offices that use SAVE could potentially strip eligible American citizens from the rolls without following all the steps required by USCIS to properly verify an individual's legal status.

Recent Changes Amplify the Risk of Errors and Privacy Breaches

DHS and DOGE recently **announced** [\[link-26\]](#) a **dramatic ov** [\[link-27\]](#)erhaul of the SAVE program. Sweeping changes implemented in May allow user agencies to search SAVE using just social security numbers, names, and dates of birth, which expand the search universe beyond people who had gone through the DHS immigration system or had applied for a citizenship certificate. DHS and the Social Security Administration have given the SAVE program access to information about vast numbers of citizens born in the United States in the administration's central social security number database. And DHS now permits user agencies to query SAVE for information about hundreds of thousands of voters in a single search. Previously, searches could only be conducted for one individual at a time.

USCIS **claims** [\[link-28\]](#) that access to social security information will help root out fraud in voter registration, but this claim is misleading. The Social Security Administration's central social security number database, **Numident** [\[link-29\]](#), does not provide definitive citizenship in-

formation in every instance. Only in 1972 did Congress **first require** [\[link-30\]](#) the Social Security Administration to establish the citizenship of applicants for social security numbers. The agency only began asking for and maintaining citizenship information for all applicants **in 1978** [\[link-31\]](#). As such, the database does not have comprehensive citizenship information for Americans born before 1978. Naturalized citizens may also not have updated citizenship information in the Social Security Administration database if they **did not take action** [\[link-32\]](#) to notify the agency of their naturalization.

These changes follow DOGE intrusions into other federal data systems — those of the **Department of Labor** [\[link-33\]](#) and the **Internal Revenue Service** [\[link-34\]](#), among others — that have prompted widespread consternation about DOGE's access to and handling of Americans' personal data. They also occur amid revelations that DOGE has **fudged or mishandled** [\[link-35\]](#) data to falsely inflate the perceived significance of its activities.

States that collect full social security numbers can conduct bulk SAVE searches with social security numbers in their voter file. But **few states currently collect** [\[link-36\]](#) full social security numbers as part of voter registration, rendering this option

moot for those states for the time being. Searches in SAVE may also generate a large volume of non-matches because of missing, outdated, or inconsistent citizenship information in the Social Security Administration database and DHS immigration records. In recent guidance, USCIS itself **appeared to acknowledge** [\[link-37\]](#) that SAVE's use of outdated Social Security Administration information may result in non-matches.

Moreover, if a voter cannot be identified using their social security number, the user agency **is prompted to resubmit** [\[link-38\]](#) the search using a DHS-issued identification number or direct the voter to the Social Security Administration to update their record. This puts the user agency back in the same position it was in prior to the SAVE program overhaul, or it puts the onus on voters to correct federal records when they are likely already eligible to vote.

Additional Privacy and Oversight Challenges

Beyond its tendency to provide false information, the updated SAVE program raises privacy concerns. Depending on how DHS and DOGE use or disclose data obtained

from the Social Security Administration, it may run afoul of federal law, including the Privacy Act and the Administrative Procedure Act. As of publication of this article, the new access to social security data comes without any new or updated system of records notice, **required** [\[link-39\]](#) by the Privacy Act to explain to the public how agencies use their data. The Privacy Act also prohibits federal agencies' **unauthorized disclosure** [\[link-40\]](#) of citizens' and permanent residents' personal information — a concern in **other instances** [\[link-41\]](#) involving DOGE access to similar data. The Administrative Procedure Act, meanwhile, **guards** [\[link-42\]](#) against federal agency action that is “contrary to law,” such as a violation of the Privacy Act.

Further exacerbating risks for voters and the election process, oversight of programs like SAVE — and the data that feeds them — is ineffective, with many agencies overseeing themselves. As the Brennan Center has previously **explained** [\[link-43\]](#), internal oversight offices within these agencies can serve to sideline DHS's main civil rights, civil liberties, and privacy offices instead of fostering accountability in their own programs.

Recent government decisions further undermine oversight. In a unilateral move, the administration largely **shut down**

[\[link-44\]](#) the USCIS ombudsman and the DHS Office for Civil Rights and Civil Liberties, potentially in **violation** [\[link-45\]](#) of statutory obligations. In doing so, it cast aside approximately 600 civil rights **investigations** [\[link-46\]](#), review of intelligence activities, and **training** [\[link-47\]](#) for state and local police. This office, alongside privacy and legal advisers, partici-

pates in a **council** [\[link-48\]](#) that oversees data transfers. With the new changes, the board's fate remains unknown. So too do the impacts on USCIS, SAVE, and similar programs. But what is clear is that weakened oversight can only hinder steps to ensure data quality, unbiased use, and constraints on inappropriately expansive applications.

What the Public Should Watch For

When DHS, USCIS, and DOGE announced the overhaul of the SAVE program, they **explicitly linked** [\[link-49\]](#) the effort to a campaign to combat the “taint” of noncitizen voter fraud, a long-standing claim tied to the lie that the 2020 presidential election was stolen. By all appearances, the administration is poised to use the SAVE program to prop up these false claims, and sympathetic local officials may deploy SAVE to concoct evidence. This move

poses serious risks to voters and elections. Here are three potential scenarios.

False Assertions About Widespread Voter Fraud

In recent years, some election officials have falsely claimed that noncitizens are registering and voting at a large scale. In 2024, for example, several state election officials **claimed** [\[link-50\]](#) they had identified large numbers of potential noncitizens on their voter rolls. Thousands of eligible American citizens were swept up in these spurious claims, based on premature findings. Eventually faced with evidence of their errors, at least two states **completely** [\[link-51\]](#) **abandoned** [\[link-52\]](#) plans to purge the voters they identified,

while others acknowledged that their findings may include U.S. citizens.

Now SAVE program flaws and gaps in Social Security Administration data risk enabling a weaponization of the tool to spread the sort of falsehoods that ran rampant in the aftermath of the 2020 presidential election. The public should be highly skeptical of any claims of widespread voter fraud arising from searches in the overhauled SAVE system.

Improper Voter Purges

Election officials who fail to exercise caution or misunderstand the nature of SAVE's overhaul risk undermining American citizens' freedom to vote.

USCIS [guidance](#) [\[link-53\]](#) released since the SAVE program overhaul recommends that election offices notify registered voters whose citizenship cannot be verified that they may contact the Social Security Administration to update their records. This is a departure from the previous practice of requiring election officials to pursue additional verification for all searches where citizenship could not be verified at the first step. Because of notable gaps in the Social Security Administration's citizenship data, purging voters based solely

on initial search data would likely be an unconstitutional denial of the right to vote in at least some cases.

Election officials may also violate the right to vote if they purge voters without following proper protocol in other circumstances. Where a requestor institutes additional verification and the SAVE program still cannot verify citizenship, USCIS generally requires election officials to contact the voter and provide the opportunity to present proof of citizenship. That notice is critical since SAVE lacks comprehensive citizenship information. But even with notice, the SAVE program's failure to verify citizenship may impose hardships on voters who may then be required to prove their citizenship.

Twenty-one million American citizens [\[link-54\]](#) do not have easy access to common citizenship documents like passports or birth certificates, so large numbers of eligible voters risk being disenfranchised altogether.

Improper Investigations into Election Officials

There is a grave risk of investigations or prosecutions of state or local election officials based on false claims that they per-

mitted noncitizens to register to vote. This is no mere speculation: The federal government has **threatened to prosecute** [link-55] election officials, **targeted** [link-56] some officials who refuse to endorse

the lie that the 2020 election was stolen, and **filed litigation** [link-57] seeking voter list maintenance records regarding noncitizens.

Conclusion

Congress **authorized** [link-58] the **SAVE** [link-59] program to help states ensure eligibility for public benefits applications, not to block American citizens from voting. With substantial new changes to the SAVE program, there is even more reason for election officials to exercise caution when using the system and interpreting its results. SAVE is a tool for verifying citizenship. Like other large-scale data sources, it has flaws, exacerbated by an aggressive overhaul. To mitigate the risk of improper disenfranchisement, officials that elect to use the SAVE program should do so with great care. States have a variety of other tools at their disposal to help ensure that only eligible citizens are registering and voting. Meanwhile, Congress and the federal government should improve the underlying databases and their quality

checks and transparency, as outlined in other Brennan Center **analyses** [link-60].

The public should approach any false allegations of widespread fraud that may arise from changes to the SAVE program with skepticism, keeping in mind the program's pitfalls, the extensive evidence that this sort of fraud in our elections is vanishingly rare, and a **long history** [link-61] of false and exaggerated findings about alleged noncitizen voting. Lawmakers, officials, and advocates must remain vigilant and defend against improper or unlawful voter purges. Election officials must be fastidious about observing important protocols for using SAVE that may be jettisoned or downplayed by the Trump administration. Without unified action to combat exploitation and misuse of the SAVE program, eligible voters stand to lose.

Links

link-1: extremely rare <https://www.brennancenter.org/our-work/research-reports/noncitizen-voting-vanishingly-rare>

link-2: must swear https://www.eac.gov/sites/default/files/eac_assets/1/6/Federal_Voter_Registration_ENG.pdf

link-3: criminal consequences <https://www.brennancenter.org/our-work/analysis-opinion/noncitizens-are-not-voting-federal-or-state-elections-heres-why>

link-4: requires <https://www.brennancenter.org/our-work/research-reports/attacks-voter-rolls-and-how-protect-them>

link-5: several databases <https://www.ncsl.org/elections-and-campaigns/voter-registration-list-maintenance>

link-6: draws <https://ericstates.org/how-does-it-work/>

link-7: operates <https://www.dhs.gov/sites/default/files/publications/privacy-pia-uscis006c-save-july2020.pdf>

link-8: millions of American citizens <https://www.brennancenter.org/our-work/analysis-opinion/save-act-would-hurt-americans-who-actively-participate-elections>

link-9: In the past <https://www.federalregister.gov/documents/2020/05/27/2020-11390/privacy-act-of-1974-system-of-records>

link-10: agreements <https://www.uscis.gov/save/about-save/save-agency-search-tool>

link-11: identified <https://www.brennancenter.org/our-work/policy-solutions/overdue-scrutiny-watch-listing-and-risk-prediction>

link-12: include <https://www.govinfo.gov/content/pkg/FR-2020-05-27/pdf/2020-11390.pdf>

link-13: watchlist https://www.dhs.gov/sites/default/files/2024-12/24_1210_priv-pia-cbp-automatedtargetingsystem006-appendixupdate.pdf

link-14: which https://www.cair.com/press_releases/cair-issues-report-on-secret-government-watchlist-calls-on-president-biden-to-take-action/

link-15: unreliable https://www.cair.com/press_releases/cair-issues-report-on-secret-government-watchlist-calls-on-president-biden-to-take-action/

link-16: incorporates <https://www.brennancenter.org/media/11828/download/BCJ-152%20Risk%20Assessment.pdf?inline=1#page=7>

link-17: unlawful <https://protectdemocracy.org/work/court-rules-that-dhs-illegally-targeted-pastor-kaji-dousa-for-ministering-to-migrants-and-refugees/>

link-18: retaliation <https://www.nbcсандiego.com/news/investigations/u-s-border-agents-suspected-pastor-performed-sham-marriages-for-migrant-caravan-members/2240500/>

link-19: provided <https://www.ice.gov/sevis/data-integrity>

link-20: input it <https://studyinthestates.dhs.gov/2016/06/maintaining-accurate-sevis-records-when-request-correction-or-data-fix>

link-21: report https://www.usccr.gov/files/pubs/2018/Minority_Voting_Access_2018.pdf

link-22: observed <https://www.americanimmigrationcouncil.org/fact-sheet/using-systematic-alien-verification-entitlements-save-program-voter-eligibility/>

link-23: claims <https://www.gao.gov/assets/gao-17-204.pdf>

link-24: found <https://www.gao.gov/assets/gao-17-204.pdf>

link-25: steps <https://www.gao.gov/products/gao-17-204>

link-26: announced <https://www.dhs.gov/news/2025/04/22/dhs-uscis-doge-overhaul-systematic-alien-verification-entitlements-database>

link-27: dramatic ov <https://www.uscis.gov/newsroom/news-releases/uscis-deploys-common-sense-tools-to-verify-voters>

link-28: claims <https://www.uscis.gov/newsroom/news-releases/uscis-deploys-common-sense-tools-to-verify-voters>

link-29: Numident https://aad.archives.gov/aad/content/aad_docs/rg047_num_faq_2022July.pdf

link-30: first require <https://www.ssa.gov/policy/docs/ssb/v36n3/v36n3p3.pdf>

link-31: in 1978 <https://www.ssa.gov/policy/docs/ssb/v69n2/v69n2p55.html>

link-32: did not take action <https://www.theguardian.com/us-news/2025/jun/03/social-security-program-quietly-frozen-musk-immigrant-claims>

link-33: Department of Labor <https://www.npr.org/2025/04/15/nx-s1-5355896/doge-nlrp-elon-musk-spacex-security>

link-34: Internal Revenue Service <https://taxpolicycenter.org/taxvox/how-doges-access-irs-data-puts-taxpayer-information-risk>

link-35: fudged or mishandled <https://www.nytimes.com/2025/02/21/upshot/doge-musk-trump-errors.html>

link-36: few states currently collect <https://www.ssa.gov/data/havv/>

link-37: appeared to acknowledge <https://www.uscis.gov/save/current-user-agencies/guidance/voter-registration-and-voter-list-maintenance-fact-sheet>

link-38: is prompted to resubmit
<https://www.uscis.gov/sites/default/files/document/brochures/SAVE%20Tutorial%20rev.%207-17-2025.pdf>

link-39: required <https://www.justice.gov/opcl/overview-privacy-act-1974-2020-edition/agency-requirements>

link-40: unauthorized disclosure <https://www.law.cornell.edu/uscode/text/5/552a>

link-41: other instances <https://www.brookings.edu/articles/privacy-under-siege-doges-one-big-beautiful-database/#:~:text=DOGE%E2%80%99s%20efforts%20to%20access,equally%20sensitive%20personal%20data.>

link-42: guards <https://www.law.cornell.edu/uscode/text/5/706>

link-43: explained <https://www.brennancenter.org/our-work/policy-solutions/holding-homeland-security-accountable>

link-44: shut down <https://www.npr.org/2025/03/21/nx-s1-5336738/homeland-security-rif-cuts-dhs>

link-45: violation <https://www.nytimes.com/2025/04/24/us/politics/lawsuit-firings-oversight-dhs.html>

link-46: investigations <https://www.propublica.org/article/homeland-security-crcl-civil-rights-immigration-border-patrol-trump-kristi-noem>

link-47: training <https://www.dhs.gov/security-intelligence-and-information-policy-section>

link-48: council <https://www.dhs.gov/sites/default/files/2022-06/privacy-pia-dhsall076-datamanagementhub-appendixupdate-june2022.pdf#page=10>

link-49: explicitly linked <https://www.dhs.gov/news/2025/04/22/dhs-uscis-doge-overhaul-systematic-alien-verification-entitlements-database>

link-50: claimed <https://www.brennancenter.org/our-work/analysis-opinion/debunking-lies-about-voting-and-citizenship>

link-51: completely <https://campaignlegal.org/press-releases/alabama-voters-are-no-longer-threatened-illegal-voter-purge-program-targeting>

link-52: abandoned <https://www.brennancenter.org/our-work/analysis-opinion/debunking-lies-about-voting-and-citizenship>

link-53: guidance <https://www.uscis.gov/save/current-user-agencies/guidance/voter-registration-and-voter-list-maintenance-fact-sheet>

link-54: Twenty-one million American citizens <https://www.brennancenter.org/our-work/analysis-opinion/213-million-american-citizens-voting-age-dont-have-ready-access>

link-55: threatened to prosecute <https://www.brennancenter.org/our-work/analysis-opinion/whats-next-elections-under-project-2025-agenda>

link-56: targeted <https://www.whitehouse.gov/presidential-actions/2025/04/addressing-risks-from-chris-krebs-and-government-censorship/>

link-57: filed litigation <https://www.justice.gov/opa/pr/justice-department-files-suit-against-orange-county-california-registrar-voters-refusing>

link-58: authorized <https://www.uscis.gov/save/about-save/save-governing-laws>

link-59: SAVE <https://www.ssa.gov/policy/docs/ssb/v36n3/v36n3p3.pdf>

link-60: analyses <https://www.brennancenter.org/our-work/policy-solutions/overdue-scrutiny-watch-listing-and-risk-prediction>

link-61: long history <https://www.brennancenter.org/our-work/research-reports/resources-voter-fraud-claims>

Chairman STEIL. The gentlewoman's time has expired.

The gentleman from Ohio, Mr. Carey, is recognized for 5 minutes.

Mr. CAREY. I want to thank the Chairman. I want to thank the Ranking Member.

I do have some questions, but I want to use a little point of personal privilege.

In Ohio, we have two Democrats and we have two Republicans that serve on our board of elections. We lost one of the great ones. She was on the opposing side of me. Seventy-two years old, found out she had a brain cancer, and just passed away.

Kimberly was somebody that I got to know when I first got elected, but I just wanted to take this opportunity to read the comments that our Republican board chairman said about Kim. He told The Columbus Dispatch that he was very saddened and that she was a very decent person. For many years, he said, he served with Kim. "While she was always a loyal Democrat, she was first and foremost a loyal public servant."

I just wanted to say that in memory of her today.

You know, the maintenance for voter lists is critical for ensuring secure, fair elections across our Nation. I read with interest all your testimony. Accurate voter rolls drive down administrative cost, prevent fraud, and reassure the general public that the voting process is trustworthy.

To safeguard these vital processes, the Federal Government previously took action by enacting the National Voter Registration Act and the Help America Vote Act.

I want to highlight some of the things that our Secretary, Frank LaRose, from Ohio has done. In Columbus, the Secretary and his team annually audit the statewide voter registration data base, frequently monitoring for voter inactivity, and reviews voting history from other States to identify double voters.

Additionally, efforts by county boards of elections include regularly updating rolls to check for changes in addresses, possibly deceased voters, and the removal of duplicate registration.

To ensure the transparency for Ohioans, the statewide voter registration data base is actually posted weekly on the Secretary of State's website, and the public can view the daily voter registration snapshots to see which registrations were added, updated, or removed.

Mr. Adams, I know there is a lot of information here, but why is transparency when conducting voter list maintenance important?

Mr. ADAMS. Well, that is what Congress put into the NVRA so we could look. We brought cases—we won a case in the First Circuit Court of Appeals for transparency. We just have a case in the Fourth Circuit on appeal where we beat South Carolina, because they actually do not let anyone look at the rolls unless you are a registered voter, which totally violates the NVRA.

Without transparency, you cannot know what is going on, and that is why it is so important.

Mr. CAREY. Let me ask you, do the jurisdictional differences in list maintenance practices ever become troublesome when looking at efforts from a legal standpoint?

Mr. ADAMS. Oh, my gosh. There is a huge gulf between what States are doing. Some very innovative Secretaries of State—for example, yours—are using data sets that they will not even think of in other States. There are wide differences across the country in what they do.

Mr. CAREY. Now, I know what our Secretary of State would say if I asked him this question, but I am going to ask you. Should more States adopt Ohio's method of voter roll maintenance?

Mr. ADAMS. Well, I can name, Michigan ought to start. There is the top list.

Mr. CAREY. Yes.

Mr. ADAMS. There are other States that desperately should get up to Ohio's standards that are not even close.

New York. Look, New York has enormous numbers of people without Social Security numbers or the HAVA-mandated number in their data base. That is why I said the Ranking Member is going to have to mail campaign material, wasting money, because the voter rolls are messed up over a simple error.

Mr. CAREY. Well, I want to thank you.

I want to thank all the witnesses for traveling here.

With that, Mr. Chairman, I will yield back.

Chairman STEIL. The gentleman yields back.

The gentlewoman from Illinois is recognized for 5 minutes.

Mrs. MILLER. Thank you, Mr. Chairman, for holding this hearing today on the critical issue of maintaining the integrity of our voter rolls or, in the case of Illinois, restoring the integrity of our voter rolls.

Ensuring that voter rolls are accurate and contain only eligible voters is essential to the public's confidence in our elections. For far too long, States like Illinois have failed to uphold the law and carry out their responsibilities under the National Voter Registration Act.

I was pleased to see that the Department of Justice recently filed a Statement of Interest in Judicial Watch's lawsuit against the Illinois State Board of Elections. As noted in Judicial Watch's lawsuit, Illinois has refused to develop a statewide program for voter roll maintenance.

In fact, the DOJ intervention in Illinois found, according to the 2022 Election Administration Voting Survey conducted by the Election Assistance Commission, unbelievably, 34 jurisdictions in Illinois simply failed to report any data regarding list maintenance removals under the National Voter Registration Act.

Nineteen of these 34 counties failed to report any data regarding registrants removed due to death. Meaning, no one died in 19 counties? Do we believe that? Then, obviously, we are keeping these people on the voter rolls.

In 23 Illinois counties, fewer than 100 registrations were canceled during a 2-year period out of almost 1 million registrations, which Judicial Watch notes is an absurdly small number and demonstrates Illinois's lack of commitment to maintain clean voter rolls under the NVRA.

As this Committee is well aware, Illinois has a history of voting irregularities, and I appreciate the opportunity to highlight this important issue today.

Mr. Adams, what is required under the “reasonable effort” standard for voter list maintenance?

Mr. ADAMS. Well, almost nothing. That is what—in my written testimony, you will find the Sixth Circuit Court of Appeals ruled, if you have a program, it is good enough. It does not matter if the proof is in the pudding; it does not matter if it is effective.

One thing Congress might do on the data that you just talked—

Mrs. MILLER. Uh-huh.

Mr. ADAMS [continuing]. about, Congresswoman Miller, is—when I was at the Justice Department, I brought the case of United States v. Alabama and I brought the case of United States v. Vermont. Those two States were not reporting the data that you were just talking about, but it was only for UOCAVA voters, for military voters.

There is no obligation in the statute to report those data for regular voters. Congress just left out regular voters when they did the NVRA for the EAV survey. That is what you are referring to. It is the EAV, the Election Assistance Commission.

You might extend that to the entire survey, that States have to do that. It is optional. They do not have to report any data unless it is a military voter.

Mrs. MILLER. Well, that is why we are having this hearing, to highlight this and to make changes.

Mr. Riemer, as a former Virginia State Board of Elections official, how do election officials traditionally prescribe regulations to conduct voter list maintenance?

Mr. RIEMER. Absolutely. It is a combination of statutory obligations that the General Assembly in Virginia set which complement the NVRA.

While I was in Virginia, Governor McDonnell was very aggressive about beefing up the statutory provisions that we had to follow. We had to do annual reports to the General Assembly outlining in detail our list maintenance activities. There were more frequent checks that we had to make as well.

The issue I brought up about finding the 10,000 dead voters on our voter rolls that had been there for so long, you know, that is something that should have been caught, but no one had ever gone back and said, let us take a look at the entire death file—

Mrs. MILLER. Uh-huh.

Mr. RIEMER [continuing]. and compare it against the voter registration list. Everyone just assumed that these periodic comparisons were catching all the dead voters, but they were not, and for some reason we had this large pile of them on there.

These were all things that were enshrined in the law that we had to follow.

Mrs. MILLER. Uh-huh.

Mr. RIEMER. I think a lot of States could use more statutes and more regulations, just being more prescriptive in what they need to do.

Mrs. MILLER. How often did the State direct appropriate departments or officials to remove ineligible voter registrants?

Mr. RIEMER. As frequently as possible. As frequently as possible. We made a major cancellation leading up to the 2013 general elec-

tion, promptly got sued. We got sued several times on list maintenance issues because of how aggressive we were in the State.

Mrs. MILLER. Thank you for your work.

Thank you, Chairman.

Chairman STEIL. The gentlewoman's time has expired. She yields back.

That concludes our questioning.

I would like to thank our witnesses for appearing before us today.

Members of the Committee may have some additional questions for you, and we ask that you please respond to those questions in writing.

Without objection, each Member will have 5 legislative days to insert additional material into the record or revise and extend their remarks.

[Ashleigh Brown-Grier, Ph.D., letter follows:]

July 25, 2025

The Honorable Joseph Morelle
Ranking Member, Committee on House
Administration
U.S. House of Representatives
570 Cannon House Office Building
Washington, DC 20515

The Honorable Terri Sewell
Ranking Member, Committee on House
Administration Elections Subcommittee
U.S. House of Representatives
1035 Longworth House Office Building
Washington, DC 20515

The Honorable Shomari Figures
U.S. House of Representatives
225 Cannon House Office Building
Washington, DC 20515

Dear Ranking Member Morelle, Congresswoman Sewell, and Congressman Figures,

I am Ashleigh Brown-Grier, a lifelong Alabamian and resident of Mobile. I am writing to share my story in conjunction with the July 22nd Committee on House Administration hearing entitled “Clean Rolls, Secure Elections: Reviewing Voter List Maintenance Standards.”

Voting is deeply personal and important to me because of the sacrifices my ancestors made to ensure that our voices are heard, and our rights protected. I have always taken that responsibility seriously by voting in every election and maintaining my registration at my permanent address for over 20 years.

In April, I was surprised to receive a letter from Alabama Secretary of State Wes Allen’s office claiming they had received information suggesting I no longer lived at my permanent address. This was especially confusing because I voted in-person in the November 2024 Presidential election. Furthermore, in December I obtained a STAR ID and purchased a vehicle, both of which required me to show proof of residence at the same address.

While I have lived outside Alabama temporarily to pursue graduate education Mobile has always been home. I’ve always maintained my Alabama residency. My driver’s license has never listed a different address. Further, I’ve also always stayed connected to my Mobile community, following local issues and elections, and I’ve consistently voted absentee when living out of state. I even made arrangements to vote while living out of the country as a Fulbrighter in Malaysia and South Africa, because Alabama is home and I care deeply about how politics develop here.

I am concerned about how the Secretary of State’s office determined I was no longer living at my permanent address. After receiving the letter, I promptly completed and mailed the voter registration form the same day. In early July, I received a new voter card.

While I was able to respond quickly, I worry about those who may not receive or understand these notifications in time—especially people experiencing housing insecurity, college students, or voters working multiple jobs for whom it is burdensome to have to jump through additional administrative hoops. Purging voters without clear, accessible notification could disenfranchise many eligible citizens, particularly in this time of economic hardship and housing instability.

I urge your office to advocate for greater transparency and safeguards to ensure eligible voters remain on the rolls without unnecessary burden.

Sincerely,
Ashleigh Brown-Grier, Ph.D.

Chairman STEIL. There being no further business, I thank the Members for their participation.

Without objection, the Committee stands adjourned.

[Whereupon, at 11:53 a.m., the Committee was adjourned.]

