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Maintaining Current and Accurate Voter Lists

The Help America Vote Act (HAVA) introduced sweeping changes to the administration of federal elections. Under HAVA all states are required to create a centralized, computerized statewide database of all eligible voters, and to maintain accurate and up-date statewide databases in accordance with the previously enacted list maintenance provisions of the National Voter Registration Act (NVRA).

Both HAVA and NVRA provide that states shall periodically remove ineligible voters from the statewide official voter list. HAVA also requires states to match their official voter registration lists against external databases such as motor vehicle department and Social Security databases, although the Act does not make any express provision for what is to be done with any resulting match. The NVRA was passed in recognition of the fact that discriminatory and non-uniform voter registration laws have a disparate impact on certain groups, including minorities; it mandates that states ensure that eligible applicants are registered to vote in an election, and to ensure current and accurate voter lists. Under the NVRA any state program to protect the integrity of the electoral process through list maintenance practices must be uniform, nondiscriminatory, and in compliance with the Voting Rights Act of 1965 (42 U.S.C. 1973 et seq.).

States are therefore faced with performing a careful balancing act between the federal mandate to maintain accurate and current registration lists and the mandate to ensure that all eligible registrants are on the rolls. On the one hand they must see to it that no eligible registrant is purged from the statewide voter rolls; on the other hand, they must remove voters who were placed on the rolls

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in error or who have become ineligible through death, felony conviction, an adjudication of mental incompetence, or a change of address.

Although HAVA mandates that states must check their voter registration databases against external databases, the Act lacks clear standards for conducting these database matches. As a result, state standards for database matching vary widely, and often vary within a state, as election officials have been forced to develop their own matching standards. Although HAVA was enacted to prevent disenfranchisement of eligible voters, the result of matching voter registration databases to external databases has been that thousands of eligible voters have been denied the right to cast a ballot that is ultimately counted. This is due primarily to hastily designed and implemented state programs for matching voter lists to other databases and an absence of guidance on what is to be done with a mismatch. The voters who have been most heavily impacted by this situation are often minorities and the young.

This policy paper explores the federal law relating to list maintenance under NVRA and HAVA, presents an overview of problems that have arisen as a result of the implementation of federal list maintenance provisions, and gives specific recommendations for minimizing or eliminating list maintenance errors that adversely impact voters.

Federal Law Mandating Voter Registration List Maintenance

Section 303(a) of HAVA requires states to implement, in a uniform and nondiscriminatory manner, a centralized

and computerized statewide voter registration list that is to be maintained and administered at the state level.¹ States subject to HAVA were required to create the statewide database by January 1, 2006.

Section 303(a) of HAVA also mandates that states are to perform periodic system wide list maintenance to ensure that duplicate names and ineligible voters are removed from the database.²

The Act calls for the coordination of the official voter database with state death and felony databases to meet this requirement. The Election Assistance Commission (EAC) recommends that states also coordinate with relevant federal databases, such as the U.S. Postal Service National Change of Address and Social Security Death Index databases, as well as criminal conviction records from U.S. Attorneys and federal courts.

Under HAVA, list maintenance is to be conducted in accordance with the list maintenance provisions of NVRA.³ Section 8 of NVRA requires states to conduct a “general program that makes a reasonable effort to remove the names of ineligible voters” from the official voter list by reason of death or a change of residence. The same section provides that states “are not precluded” from removing voters from the official registration list due to (1) the request of the voter; (2) death; (3) criminal conviction; or (4) mental incapacity. For voters whose names are to be removed from the statewide voter database due to an apparent change in residence, section 8 of NVRA mandates specific notification procedures and a waiting period.⁴ NVRA also requires states to complete any systematic programs to remove ineligible voters not later than 90 days before any federal election. The exceptions to this rule are that states may remove voters from the registration rolls during that period for the reasons listed above,

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upon (1) the request of the voter; (2) a certified report of death; (3) an adjudication of incompetence; or (4) a felony conviction. Although there is no express requirement under NVRA or HAVA for states to notify such voters that they are being removed from the official voter database (other than those who are subject to removal due to a change in residence), states are not prohibited from providing notice. The list maintenance requirements of both acts are minimum standards below which a state may not fall, but states are free to develop more exacting standards if the standards further the purpose of the acts.⁵ One indisputable purpose of both acts is to ensure that all eligible registrants are on the statewide voter database and able to vote.

Overview of Problems with State List Maintenance Programs

Absence of clear and specific standards

As stated above, HAVA does not provide specific standards and methods for conducting database matches or list maintenance. The EAC issued a Guidance report on implementing HAVA that, while helpful, does not recommend specific criteria and procedures for developing database matches and conducting list maintenance.⁶ The Guidance provides that states are mandated to develop provisions for list maintenance that are transparent, non-discriminatory, and uniform. In the absence of specific guidance, states have been left to fill the void and to balance the dual mandates to ensure that all eligible applicants are registered and that statewide voter reg-

istration lists are accurate and current. State legislative and regulatory responses to HAVA's list maintenance provisions have been piecemeal and broadly drafted. Like HAVA itself, state regulation has lacked clearly-drawn specific purge criteria and adequate procedures to safeguard against removal of eligible voters in error. The result is that widely variable and often poorly designed and implemented voter list maintenance programs have disenfranchised thousands of eligible voters.

For those states that permit removal of voters from the official lists at the local level, there is often a wide disparity between jurisdictions within a state in the methods used to perform list maintenance. A survey of Ohio county election boards, for example, revealed that list maintenance varies from jurisdiction to jurisdiction.⁷ Several other states also have a "bottom-up" statewide voter registration database, in which local jurisdiction manage the verification of new applications and the removal of voters deemed to be ineligible.

The difference in list maintenance procedures between states was glaringly apparent just prior to the 2008 Presidential election, when election advocacy groups filed suit against the secretaries of state in Michigan, Colorado, and Indiana for immediately purging voters whose registration acceptance notices were returned as undeliverable. The court in Michigan ruled that this practice violated the NVRA,⁸ which calls for notice to voters who are to be purged on the basis of registration, and a lack of response through two federal elections before the voters name may be removed from the official voter registration rolls. In the Colorado suit, the district court also ruled that voters purged in violation of the NVRA were to be restored to the voter rolls.⁹ Plaintiffs in that suit alleged that about 31,000 eligible voters were unlawfully removed from the rolls 90 days before the election. In Missouri, Project Vote

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and private attorneys sought to prevent the potential disenfranchisement of over 86,000 voters who had been placed in “inactive” status, many in violation of the NVRA. Being in inactive status required that the voters go through a time consuming and cumbersome procedure before being permitted to vote in the presidential election.¹⁰

List maintenance programs are almost universally carried out without transparency pursuant to schedules that are not made known to the public. Election advocates must obtain information on purging, if at all, after the fact. Without advance notice of scheduled list maintenance, voters and advocates have no way of ascertaining how and why voters are removed from the official rolls. The firewall behind which statewide voter purges take place inevitably leads to public distrust of the results.

Purges based on flawed database matching programs

Creating database-matching programs for list maintenance has been a challenge for state elections officials. Purges based on computerized database matching are inherently fallible, as clerical error alone can be expected to lead to a significant error rate. Additionally, the likelihood that individuals in a large database may share the same name and date of birth is high. Reliable studies have found database matching error rates of between 20 and 32 percent.¹¹ Errors in the database used for matching, irrespective of matching criteria, frequently lead to false matches or failures to match. For example, Social Security Administration databases are commonly used for purposes of voter list maintenance, yet the Social Security Administration has reported that between January 2004 and September 2005, it had added 23,366 living people to its Death Master File.¹²

Where database matching is based on “substantial” matching criteria—as opposed to exact matching criteria across several data fields—eligible voters have been, and will continue to be, disenfranchised. Matches that take variations on a name into account are even more likely to produce unreliable results. Examples of this would include finding a match where the first name is listed as Tom or Thomas. An exact match should form the basis of any database match conducted for the purpose of eliminating duplicate registrations or ineligible voters.

The EAC commissioned the National Research Council (NRC) to study and issue a report on the challenges of maintaining state voter roll databases. In an interim report issued in 2008, the NRC concluded that matches based on comparison of the first and last names plus the birth date are inherently inferential and thus subject to higher rates of error. The report concluded that matches across more fields, such as the first and last names, date of birth, and the last four digits of the social security number have a higher rate of accuracy.¹³ A critical aspect of improving database matching covered in the report is the need for empirical testing of the procedures used for database matching, yet is frequently omitted by states prior to conducting list maintenance matches. The report also recommends developing exact standards for matching, including field-level and record-level matching criteria, and publishing these standards to improve transparency.

An example of disenfranchisement due to overbroad database matching standards was seen in Florida before the 2000 election. Voter registration rolls were loosely matched to names in a felon database. The procedure permitted fuzzy matching, in which “Willy” and “William” were deemed to be the same first name, a standard that resulted in the disenfranchisement of thousands of Florida voters. Such results serve to undermine public faith in

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elections. In 2004, Florida expanded its matching criteria to include race when it developed a program to purge voters who were ineligible because of felony convictions, but the state used incompatible databases. The state's records of felony convictions did not specify Hispanic as a specific race, while the official statewide voter registration list did. As a result of this database incompatibility approximately 22,000 African American voters were scheduled to be purged from the official Florida voter database, while just slightly more than 60 Hispanic voters were tagged for removal. In this case, extensive news coverage of the purging program and a strong public reaction convinced the state to discard the flawed purge list.

Ohio had 200,000 mismatches between the state voter registration rolls and the department of motor vehicle rolls just prior to the 2008 general election.¹⁴ The Ohio Republican Party was unsuccessful in its litigation to force Ohio Secretary of State Brunner to provide a separate list of the mismatches to county boards of election. (This information was readily available to the boards through a name search, but it was not provided in the form of a list.) Ohio law does not require registrations to be canceled simply because of a mismatch to an external record. In contrast, after a federal court upheld Florida's controversial "no match" law in 2008, more than 12,000 Floridians were placed at risk of having to cast provisional ballots unless they very quickly resolved apparent discrepancies between their voter registration applications and driver license or Social Security numbers.

Interstate voter registration database matching

With the establishment of statewide computerized voter registration databases in advent of HAVA, several states

have gone beyond the dictates of the act and entered into interstate agreements to compare their voter registration databases in order to purge duplicate registrations. Database errors—the errors that occur between registration form and database due to applicant error, illegibility, or data entry error—are compounded when state A compares its list with states B, C, and D or beyond. State voter registration databases vary in degree of accuracy, the number and type of data fields collected, and the frequency with which they are updated.

The basis for removal of a voter in the event of a match using interstate databases is that the voter has moved to another state and intends to continue to reside there. When election officials have reason to believe that a voter has changed residences, Section 8 of NVRA provides that voters may not be removed from the database because they have moved unless they (1) have requested removal in writing; or (2) have failed to respond to a notice of removal and not voted in two federal elections. The notice must be sent by a forwardable postage-prepaid and pre-addressed return card.¹⁵ If the voter does not respond, the state shall remove the voter from the registration rolls after the passage of two federal elections. When states remove voters merely on the basis of an interstate database match, they not only risk disenfranchising eligible citizens, they act in contravention of the NVRA.

Kentucky election officials, for example, sought to purge voters who appeared to have registered in another state merely on the basis of a match with official voter databases in two other states, Tennessee and South Carolina. The 2006 plan did not follow the NVRA procedure for purging voter registrations on the basis of a change in residence: sending forwardable notice letters to affected voters, and then, if the voters did not respond, waiting for two federal general elections before removing the voters

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from the rolls. Although the state had implemented the change of residence provisions of the NVRA, the secretary of state chose not to apply them. In a broad interpretation of state law, Kentucky officials concluded that voters whose names later appeared on the Tennessee or South Carolina voter databases had implicitly requested removal from the Kentucky voter list and that notice was therefore unnecessary. It is important to note that this list of cancelled voters was not compiled from notifications from elections officials in other jurisdictions that the person had registered in that jurisdiction, but by a simple computerized voter database match. Kentucky's Attorney General filed suit to stop the purge program. The Kentucky Franklin Circuit Court ruled in favor of the attorney general finding that the Defendants had conducted an illegal purge under Kentucky law.

In 2005, four states, Missouri, Iowa, Nebraska and Kansas entered into a memorandum of understanding in which they agreed to implement a task force to study, among other election administration issues, "method for cross-checking voter registrations." Subsequently, in 2007, the four states joined with Minnesota and South Dakota in a memorandum of understanding in which they agreed to share voter registration databases to cross-check and identify duplicate registrations. The state of Iowa served as the central repository of the six state databases and will return to each state a list of matches. A voter is considered a match when the exact first, middle and last names along with the birth date are matched (see Appendix A). As pointed out above, a higher error rate occurs when name and birth are matched without the use of a unique identifier, such as the last four digits of the social security number are also matched.

According to data obtained in response to Project Vote public records requests, other memoranda of under-

standing have been joined by a group led and hosted by Kansas including Arizona, Arkansas, Colorado, New Mexico, Oklahoma, Texas, Minnesota and other states. Kansas performed the state database matching for the group. Each participating state took its own approach to processing database matches. Some states did not use the information from the match, others followed procedures that are in clear contravention of the NVRA requirement to send confirmation notices to each voter deemed to have moved out of state and to allow two federal election cycles to pass without a vote or a response by the voter before cancelling the registration. Colorado, on the other hand, fully complies with the NVRA Section 8 list maintenance procedures for changes of address. Among the states that are parties to the memoranda, only Minnesota is exempt from the NVRA, and the office of the Secretary of State has advised Project Vote that the state does not use the match list to cancel registrations. Covered states that ignore the Section 8 procedures for cancelling the registrations of voters believed to have moved out of state clearly create an unnecessary risk of litigation under the Act.

The pitfalls of intrastate database matching and the higher risk of error in interstate database matches are well-documented. Nevertheless, carefully crafted database matching may be a useful tool in list maintenance when it is used to identify registrations in need of further investigation and when it is coupled with adequate advance notice to affected voters, in accordance with the NVRA. When it is used as a tool for immediate cancellation of registrations identified in the matching procedures, it is more likely to be a tool for disenfranchisement than a tool for maintaining accurate voter rolls. Kansas, for example, uses an interstate database match list as a starting point of investigations to be carried out by local election officials, and in 2010 Secretary of State Ron Thornburg issued new

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instructions directing Kansas county election officials to follow NVRA notice procedures before removing any voter from the rolls. Other states, unfortunately, look no further than the computer-generated database match.

An example of such a state is Louisiana. In 2007, the state crosschecked registration information with other states and jurisdictions including San Diego, Calif., Colorado, Florida, Georgia, Las Vegas, Nev., New York, N.Y., Tennessee and Texas. Subsequently, the state purged nearly 20,000 voters from the rolls without complying with the NVRA process for removing voters based on a change of address.¹⁶ Rather than following the change of residence provisions of the NVRA, Louisiana chose to process the matches under an expedited state law procedure for the removal of voters who had “deliberately given an incorrect address.”¹⁷ Under the procedure developed for the purge election officials send notice of the alleged irregularity to the address listed in the registrar’s office. The voter then has 21 days to respond and defend their registration. This, of course, assumes that the voter still resides at the pre-Katrina address. In the aftermath of Katrina, displaced voters from New Orleans and surrounding communities were forced to relocate for extended periods while the slow process of rebuilding and developing housing continued. The states with which Louisiana compared its voter database include the states to which Katrina victims were forced to temporarily relocate. Although state officials maintain that voters displaced by Katrina were not targeted in this purge, and there is certainly no basis to impute a negative intent, the impact of this effort to skirt the NVRA list maintenance provisions has been to disenfranchise distressed voters, a majority of whom are low income or minority voters.

Lack of notice or opportunity to challenge removal

As mentioned above, states have been charged with the complicated task of developing list maintenance programs under HAVA and NVRA while also meeting their mandate to ensure that eligible registered voters are not disenfranchised. One of the most useful means to avoid unlawful disenfranchisement is to give advance notice of a pending removal to all voters whose registrations are to be purged, not just those who must be given notice of pending removal due to a suspected change of address. With the exception of this notice, no federal statute expressly requires states to notify voters of their removal from the official voter list. Thus, removal on the basis of a positive match with state or federal databases on death, felony convictions, or adjudications of incompetence may be carried out without any notice to the voter in most jurisdictions. This is true whether such removals take place before or after the 90-day deadline. Clearly, removal due to a match with another state’s voter registration list is based upon a change of address and calls for initiating the NVRA notice procedure outlined above. For removal on other bases, such as a mismatch with a Social Security database, it is important for states to recognize that federal election legislation sets minimum standards for the protection of voters. States are not precluded from giving notice to all voters who are to be removed from the official database for reasons other than change of address to ensure that eligible voters are not inadvertently removed from the database.

Some states do provide notice of removal to other classes of voters. Virginia law, for example, does not require notice of cancellation to voters convicted of a felony, but the Virginia Board of Elections advises elections officials to

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send a notice of cancellation to such voters and to include information on how to challenge the removal and/or restore voting rights.¹⁸ The State of Washington has passed legislation requiring quarterly purges based on death or felony convictions. The law also requires notice to be given to all voters whose registrations are to be cancelled as a result of an apparent match with that of a person listed in a state or federal felons database.

Most states, unfortunately, do not provide notice of cancellation beyond that required by federal law. For example Michigan, which encourages an otherwise expansive official voter list under its Qualified Voter File provisions, does not provide notice to voters whose registrations are to be cancelled except for those who are deemed to have changed addresses. Michigan also permits local jurisdictions to perform periodic “postcard purges” in which voters whose postcards from the elections boards are returned as undeliverable are considered to have moved.¹⁹

Recommendations

Develop specific standards for database matching.

State legislatures or rule-making authorities should pass laws or regulations that specify that external database matching criteria must be exact when performing database matching for the purpose of purging ineligible voters. Before implementing the standards, states should conduct certification tests to determine if their standards are effective. Pre-certification test results should be made public. Suggested procedures include:

- A positive match must be based on multiple fields including the voter’s first, middle, and last name, birth date, a unique identifier such as a driver’s license or the last four digits of the social security number, and an address where applicable.
- Name matching should include all of the letters of the voter’s first and last names in addition to any suffix such as junior or senior.
- Multiple layers of checks should be instituted, such as checking positive matches against other databases and requiring a manual check of the list produced by a computerized database match.
- Require the agreement of two election officials of different parties before a voter may be purged from the voter rolls.
- Designate an election officer to be responsible for overseeing list maintenance statewide.
- Establish a state commission tasked with studying list maintenance programs to determine best practices. Open the commission’s proceedings to the public and invite public comment on programs developed by the commission.
- Enact sanctions against election officials who knowingly engage in reckless or unlawful acts related to list maintenance that cause the disenfranchisement of eligible voters.

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Provide notice and an opportunity to be heard to all voters scheduled to be purged.

- Expand advance notice requirements to include all voters who are to be purged.
- Notice should be sent by certified and forwardable mail to the voter's last known address.
- Notice should contain the voter's identifying data, the reason for the removal, the deadline for challenging the removal, and how to prevent removal.

Make voter list purge programs transparent.

- Establish a voter purge schedule for all types of voter list purges, for example, the first Monday of January, April, July, and October, or decide upon an annual or biannual list maintenance date.
- Provide public notice of the voter list purge schedule.
- Halt all purge activity, for any reason, during the period between close of registration and Election Day.
- Maintain records of voters purged from the rolls for at least two years.

Registration Modernization

Modernized registration is one solution to the problem that states face as they seek to maintain accurate and current voter registration rolls while ensuring that eligible registrants are not disenfranchised. Currently, the burden is placed upon the voter to become and to remain registered at his or her current address. At the same time, rules for registering to vote and remaining registered have become increasingly complex and onerous. This is not the case in at least 24 other democratic nations. Canada, for example, places the burden for registering eligible citizens on the government. The result is that 93.1 of eligible Canadians are registered to vote.²⁰ (Canadian citizens may opt out of the registration database if they choose.²¹) States could adopt similar practices to achieve greater participation in our electoral process.

Registration Portability

The most common reason for purging voter registrations is a belief that the voter has moved out of the jurisdiction in which he or she is registered. As we are an increasingly mobile society, this leads to a constant need to conduct systemic voter list maintenance in order to comply with federal law. While residency in a particular local jurisdiction is a valid requirement for voting for candidates and issues unique to that jurisdiction, there is no reason that voter registration should not be made "portable" within a particular state. To this end, state laws may be enacted to allow voters to update their registrations up to and including Election Day by signing an affidavit stating that they have moved and giving their prior registration address. The NVRA and the Voting Rights Act each contain provisions mandating registration portability under cer-

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tain circumstances.²² Most states allow for some degree of voter registration portability. Florida's state registration portability law is an excellent example of such a law. A Florida voter who moves from one precinct in the state to any other precinct in the state may update his or her registration and cast a regular ballot up to and including Election Day. The voter signs an affidavit that provides the voter's current and previous registration addresses and an attestation that the voter has not voted in any other Florida precinct and is otherwise qualified to vote.²³ Similar provisions in other states would go far to reduce concern over whether voter registration addresses are current as well as concern over voter caging programs that disproportionately affect minority and low income voters.

Conclusion

Thus far, a majority of states have not developed sufficiently specific and rigorous standards for database matching for purposes of purging voter registration rolls of ineligible voters. By placing too much reliance on inherently unreliable database matching to purge voters, states have failed to meet federal statutory requirements to ensure that eligible registered voters are not removed from statewide voter rolls. While states are under federal mandate to conduct regular programs to maintain current and accurate statewide voter registration lists and while they are required to conduct database matching between voter registration rolls and other databases, they are not under any duty to purge voters who fail to match.

States are clearly under no obligation to engage in the even more problematic practice of interstate voter registration database matching for purposes of eliminating duplicate voters. HAVA does not require interstate database matching. Under NVRA, voters who are believed to have changed residence may not be removed from the

rolls unless they (1) have requested removal in writing or (2) failed to respond to a notice of removal and not voted in two federal elections. This applies to a voter identified through an interstate voter registration roll match as well as voters identified through the United State Postal change of address service.

Finally, a lack of transparency in conducting list maintenance programs lists further exacerbates the public distrust surrounding statewide voter registration roll maintenance. There is much that states can do to reconcile their dual obligations to maintain current and accurate voter rolls and to ensure that all eligible registered voters get to cast their ballots on Election Day. It is hoped that the recommendations in this brief and those of many election advocates may assist states in their efforts to meet those obligations.

For Additional Information

See <http://projectvote.org/voter-rolls.html>

Project Vote's Model Bill on Voter List Maintenance
http://projectvote.org/images/publications/Model_Bills/List_Maintenance_Model_Bill.pdf

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Notes

- ¹ 42 U.S.C. § 15483(a)
- ² 42 U.S.C. § 15483(a)(2)(B)
- ³ 42 § 15483(a)(4)(B)
- ⁴ 42 U.S.C. § 1973gg-6(d)
- ⁵ EAC Voluntary Guidance on Implementation of Statewide Voter Registration Lists, July, 2005, p. 5, http://www.eac.gov/election/docs/statewide_registration_guidelines_072605.pdf/attachment_download/file last accessed November 18, 2008.
- ⁶ Id.
- ⁷ Project Vote, "Ohio Election Registration and List Maintenance Survey," June 2006
- ⁸ USSAF v. Land, U.S. District Court for the Eastern District of Michigan (Case 2:08-cv-14019); U.S. 6th Circuit Court of Appeals (Case 08-2352)
- ⁹ Common Cause v. Coffman, US District Court for the District of Colorado (Case 1:08-cv-02321)
- ¹⁰ Project Vote News, Nov. 1, 2008. [http://projectvote.org/index.php?id=80&tx_ttnews\[tt_news\]=2681&tx_ttnews\[backPid\]=75&cHash=52e6a42608](http://projectvote.org/index.php?id=80&tx_ttnews[tt_news]=2681&tx_ttnews[backPid]=75&cHash=52e6a42608) last visited November 22, 2008.
- ¹¹ Brennan Center for Justice, "Inaccurate Purges of the Voter Rolls," September 2006. http://www.brennancenter.org/page/-/download_file_38657.pdf, last visited November 19, 2008.
- ¹² Brennan Center for Justice, *Voter Purges*, Myrna Perez, p. 20, citing: Office of the Inspector General, Social Security Administration, *Audit Report 2*, p. 2 (Sept. 2006), available at <http://www.ssa.gov/oig/ADOBEPDF/A-06-06-26020.pdf>. last visited November 19, 2008.
- ¹³ State Voter Registration Databases: Immediate Actions and Future Improvements, Interim Report. P. 29- 30. http://www.eac.gov/clearinghouse/docs/state-vrd-interim-report.pdf/attachment_download/file last visited November 19, 2008.
- ¹⁴ *Brunner disallows mismatch challenges*, Mark Niquette, Columbus Dispatch. http://www.dispatch.com/live/content/local_news/stories/2008/10/23/no_challenge.ART_ART_10-23-08_BI_E3BM90B.html?sid=101, last visited Nov. 19, 2008
- ¹⁵ 42 U.S.C. § 1973gg-6(d)
- ¹⁶ *Voter purge drops 20,000 from Louisiana rolls*, Steven Maloney, New Orleans City Business Aug. 27, 2007 http://findarticles.com/p/articles/mi_qn4200/is_20070827/ai_n19488664
- ¹⁷ La. R.S. 18:193
- ¹⁸ Advancement Project, *Virginia Voter Protection Laws in a Nutshell*, from the Virginia General Registrar and Electoral Board Manual.
- ¹⁹ MCL §§ 168.509aa, 168.509.dd
- ²⁰ *Election gives early-balloting initiatives a boost*, Richard Wolf, USA Today, Nov. 7, 2008. Last visited Nov. 21, 2008. http://www.usatoday.com/printedition/news/20081107/a_voting07.art.htm
- ²¹ For discussion of the elements of Canadian universal registration see Description of the National Register of Electors. <http://www.elections.ca/content.asp?section=ins&document=national&dir=nre&la&textonly=false&textonly=false> Last visited Nov. 21, 2008.
- ²² 42 U.S.C. § 1973gg(e), 42 U.S.C. § 1973aa-1(e)
- ²³ Fl. Stat. § 101.045(2)(a).

Project Vote is a national nonpartisan, nonprofit organization that promotes voting in historically underrepresented communities. Project Vote takes a leadership role in nationwide voting rights and election administration issues, working through research, litigation, and advocacy to ensure that our constituencies can register, vote, and cast ballots that count.

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