

**State of Michigan
Bureau of Elections**

The Verified Complaint of

Michigan Fair Elections
4891 Dexter Trail
Stockbridge MI 49285

Jeffery Schaeper
2897 Santia Drive
Troy, MI 48085

Against Complaint Respondent

Grand Valley State University
1 Campus Drive
Allendale, MI 49401-9403

I, as one of the above-named complainants believe that probable cause exists for violations of the Help America Vote Act, 52 U.S. Code § 21083 (Pub. L. 107–252, title III, § 303, Oct. 29, 2002, 116 Stat. 1708). This sworn complaint is made under the State of Michigan Bureau of Elections Complaint Process and includes claims of violations of the Help America Vote Act (HAVA), 52 U.S. Code § 21083 (Pub. L. 107–252, title III, § 303, Oct. 29, 2002, 116 Stat. 1708) regarding federal elections in Michigan. The complainants claim a violation has occurred.

1. Grand Valley State University has violated and is violating the Help America Vote Act (HAVA) by engaging in university-sponsored student get-out-the-vote and voter registration drives.

2. Alternatively, if the Grand Valley State University is legally authorized to engage in university-sponsored student get-out-the-vote and voter registration drives, then, the university's student get-out-the-vote and voter registration drives have failed and are failing to comply with HAVA's legal requirements.

Parties

3. Jeffery Schaeper is Chair of the Michigan Fair Elections Audit Committee.

4. Michigan Fair Elections is a non-profit corporation with a mission to improve Michigan's election administration.

5. Grand Valley State University is a state agency of the State of Michigan.

6. The non-party Tufts University, Jonathan M. Tisch College of Civic Life, National Study of Learning, Voting and Engagement (NSLVE) is located in Massachusetts.

HAVA has an express preemption clause.

7. 52 U.S. Code § 21084, accurately quoted here, preempts states from having election "technology and administration requirements" which are "inconsistent" with federal law:

The requirements established by this subchapter are minimum requirements and nothing in this subchapter shall be construed to prevent a State from establishing election technology and administration requirements that are more strict than the requirements established under this subchapter so long as such State requirements are not inconsistent with the Federal requirements under this subchapter or any law described in section 21145 of this title.

Pub. L. 107-252, title III, § 304, Oct. 29, 2002, 116 Stat. 1714. The statutory reference to the subchapter is to HAVA, including 52 U.S. Code § 21083(5)(B)(i). The statutory reference to § 21145 includes descriptions of other federal laws: (1) National Voter Registration Act of 1993 (42 U.S.C. 1973gg et seq.) [now 52 U.S.C. 20501 et seq.]; (2) The Voting Rights Act of

1965 (42 U.S.C. 1973 et seq.) [now 52 U.S.C. 10301 et seq.]; (3) The Voting Accessibility for the Elderly and Handicapped Act (42 U.S.C. 1973ee et seq.) [now 52 U.S.C. 20101 et seq.]; (4) The Uniformed and Overseas Citizens Absentee Voting Act (42 U.S.C. 1973ff et seq.) [now 52 U.S.C. 20301 et seq.]; (5) The National Voter Registration Act of 1993 (42 U.S.C. 1973gg et seq.) [now 52 U.S.C. 20501 et seq.]; (6) The Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.); and (7) The Rehabilitation Act of 1973 (29 U.S.C. 701 et seq.).

8. Therefore, any state election “technology” or “administration” requirement which is “more strict” than the subchapter’s requirements and is “inconsistent” with these federal laws is preempted—i.e., prohibited.

HAVA preempts university-sponsored student get-out-the-vote and voter registration drives.

9. HAVA, 52 U.S. Code § 21084, preempts government-sponsored get-out-the-vote drives and voter registration drives.

10. In determining whether an “inconsistent” “election technology and administration requirement” exists under 52 U.S. Code § 21084, it is important to note that the U.S. Election Assistance Commission has already opined that use of HAVA funds for government-sponsored get-out-the-vote drives and voter registration drives is inconsistent with HAVA.

11. In 2008, the U.S. Election Assistance Commission issued an advisory opinion that election officials are prohibited from using federal funds to conduct “voter registration drives” and “get out the vote efforts” because they are inconsistent with HAVA:

3. Neither Section 101 nor 251 funds may be used to conduct voter registration drives or get out the vote efforts; including advertising for the event, setting up booths, and paying salaries of employees who register new voters.
4. HAVA authorizes the use of Section 101 funds to educate voters about registering to vote. However, as noted in response to question 2, neither Section 101 nor 251 funds can be used for “get out the vote” activities.

U.S. Election Assistance Commission Funding Advisory Opinion FAO-08-005, attached as Ex. G.

12. This advisory opinion was based on 52 U.S.C. § 20901(b)(1)(C) limiting use of HAVA funds to educating voters, not for use of HAVA funds for government-sponsored get-out-the-vote and voter registration drives:

A State shall use the funds provided under a payment made under this section to carry out one or more of the following activities: ...

(C) Educating voters concerning voting procedures, voting rights, and voting technology.

Id.

13. Since fiscal year 2006, Office of Inspector General (OIG) audits of HAVA grants have resulted in 19 recommendations and just over \$1 million dollars in questioned costs related to government-sponsored get-out-the-vote drives and voter registration drives.

Ex. H at 2.

14. In the following cases the OIG concluded that the use of HAVA funds for government-sponsored get-out-the-vote drives and voter registration drives was inconsistent with HAVA.

15. The Colorado Office of Secretary of State charged \$356,846 to its HAVA grant for contractual services associated with a “2012 Voter Registration Campaign,” which included only an incidental educational component. As a result, the charges were questioned.

Ex. I. The OIG concluded in its January 2014 report that such spending on a government-sponsored voter registration drive was inconsistent with HAVA:

During the summer of 2012, the Office charged \$356,846 to an account entitled “Marketing—Public Relations”, for activities associated with an initiative described on the Office’s web site as the “2012 Voter Registration Campaign.” These costs included small payments to media outlets and \$348,480 of payments to three contractors, none of which were made pursuant to a contract or through competitive solicitation...[V]oter registration activities do not qualify for funding under the umbrella of improvements to the administration of elections for Federal office because the activities do not directly contribute to the administration of a Federal election.”

Ex. I at 13-14.

16. The Mississippi Office of Secretary of State expended HAVA funds for get-out-the-vote efforts and voter registration forms, which are not allowable under HAVA. Ex.

J. The OIG concluded in its August 2017 report that such spending on get-out-the-vote efforts and voter registration forms was inconsistent with HAVA:

The Office expended \$62,117 of HAVA funds for four transactions for advertising which would be considered get out the vote efforts. The Office expended \$4,761 of HAVA funds for one transaction which was for voter registration forms. These costs are not allowable under HAVA Section 101(b)(1)(B) or (C).

Ex. J at 11.

17. The Florida Office of Secretary of State charged salaries and benefits for poll workers serving at voter registration drives to HAVA grants, resulting in \$139,056 in questioned costs. Ex. K. The OIG concluded in its November 2008 report that such spending was inconsistent with HAVA:

6. Poll worker charges not appropriate for voter registration drives. Salaries and benefits for poll workers serving at voter registration drives in one of the counties visited were charged to the HAVA voter education grants, and the portion

allocable to registration activity was not separately stated. Therefore, the total cost of poll workers for fiscal years 2004 through 2006 of \$139,056 are questioned.

Ex. K at 5.

18. Additionally, the OIG concluded in its April 2017 report that the South Dakota Office of Secretary of State expenditure of \$1,474 in HAVA for sample registration forms for K-12 students was inconsistent with HAVA. Ex. L at 12

19. To be sure, the use of HAVA funds for government-sponsored voter registration drives could be more restrictive than 52 U.S.C. § 21084's prohibition on university-sponsored student get-out-the-vote and voter registration drives. But, there is no evidence at all that university-sponsored student get-out-the-vote and voter registration drives are 'consistent' with HAVA. The only evidence that exists is that university-sponsored get-out-the-vote and voter registration drives are "inconsistent" with HAVA.

20. In summary, university-sponsored student get-out-the-vote and voter registration drives are expressly preempted under HAVA.

21. Consistently, federal campaign finance laws are premised on get-out-the-vote and voter registration drives being conducted by private parties, not the universities. *See* 11 C.F.R. § 100.133.

22. There is no provision in federal law legally authorizing universities to conduct university-sponsored student get-out-the-vote and voter registration drives. Instead, HAVA preempts university-sponsored get-out-the-vote drives and voter registration drives.

HAVA authorizes and regulates sharing of some private driver data for private get-out-the-vote and voter registration drives, but not private student data.

23. HAVA, 52 U.S.C. § 21083(a)(5)(B), authorizes and regulates sharing some private driver data for private get-out-the-vote and voter registration drives.

24. But, HAVA does not authorize universities to use private student data for university-sponsored student get-out-the-vote and voter registration drives.

Additionally, HAVA imposes 14 voter registration system requirements on the State

25. 52 U.S.C. § 21083 states, "each State, acting through the chief State election official, shall implement, in a uniform and nondiscriminatory manner, a single, uniform, official, centralized, interactive computerized statewide voter registration list defined, maintained, and administered at the State level that contains the name and registration information of every legally registered voter in the State and assigns a unique identifier to each legally registered voter in the State (in this subsection referred to as the "computerized list"), and includes the following:

- (i) The computerized list shall serve as the single system for storing and managing the official list of registered voters throughout the State.
- (ii) The computerized list contains the name and registration information of every legally registered voter in the State.
- (iii) Under the computerized list, a unique identifier is assigned to each legally registered voter in the State.
- (iv) The computerized list shall be coordinated with other agency databases within the State.
- (v) Any election official in the State, including any local election official, may obtain immediate electronic access to the information contained in the computerized list.
- (vi) All voter registration information obtained by any local election official in the State shall be electronically entered into the computerized list on an expedited basis at the time the information is provided to the local official.
- (vii) The chief State election official shall provide such support as may be required so that local election officials are able to enter information as described in clause (vi).
- (viii) The computerized list shall serve as the official voter registration list for the conduct of all elections for Federal office in the State.

26. 52 U.S.C. § 21083 has fourteen legal requirements for a State's voter

registration system:

- (1) the chief State election official implements the voter registration system
- (2) the implementation shall be in a uniform and nondiscriminatory manner
- (3) the voter registration system shall be a single, uniform, official, centralized, interactive statewide voter registration list
- (4) the statewide voter registration list shall be maintained and administrated at the State level
- (5) the statewide voter registration list shall contain the name and registered information of every legally registered voter in the State
- (6) the statewide voter registration system shall assign a unique identifier to each legally registered voter
- (7) the computerized list shall serve as the single system for storing and managing the official list of registered voters throughout the State.
- (8) the computerized list contains the name and registration information of every legally registered voter in the State.
- (9) Under the computerized list, a unique identifier is assigned to each legally registered voter in the State.
- (10) The computerized list shall be coordinated with other agency databases within the State.
- (11) Any election official in the State, including any local election official, may obtain immediate electronic access to the information contained in the computerized list.
- (12) All voter registration information obtained by any local election official in the State shall be electronically entered into the computerized list on an expedited basis at the time the information is provided to the local official.
- (13) The chief State election official shall provide such support as may be required so that local election officials are able to enter information as described in clause (vi).
- (14) The computerized list shall serve as the official voter registration list for the conduct of all elections for Federal office in the State.

The Michigan Secretary of State is generally required to meet the 14 HAVA requirements below in her administration of the Qualified Voter File (QVF) voter registration system.

27. For the purposes of this administrative complaint, the Michigan Secretary of State (SOS) is responsible for maintaining the QVF database in general compliance with the 14 requirements of 52 U.S.C. § 21083 as follows.

28. First, the SOS is the chief State election official who implements the QVF voter registration system.

29. Second, the SOS is responsible for implementing the QVF in a uniform and nondiscriminatory manner.

30. Third, the SOS is responsible for maintaining the QVF voter registration system as a single, uniform, official, centralized, interactive statewide voter registration list.

31. Fourth, the SOS is responsible for maintaining and administering the QVF statewide voter registration list at the State level.

32. Fifth, the SOS's QVF statewide voter registration list must contain the name and registered information of every legally registered voter in the State

33. Sixth, the SOS's QVF statewide voter registration system must assign a unique identifier for each legally registered voter

34. Seventh, the SOS's QVF computerized list is to serve as the single system for storing and managing the official list of registered voters throughout the State.

35. Eighth, the SOS is to maintain a computerized QVF list containing the name and registration information of every legally registered voter in the State.

36. Ninth, under the SOS's QVF computerized list, a unique identifier is to be assigned to each legally registered voter in the State.

37. Tenth, the SOS's QVF computerized list is to be coordinated with other agency databases within the State.

38. Eleventh, the SOS is to ensure that any election official in the State, including any local election official, may obtain immediate electronic access to the information contained in the QVF computerized list.

39. Twelfth, the SOS is to ensure that all voter registration information obtained by any local election official in Michigan is electronically entered into the computerized list on an expedited basis at the time the information is provided to the local official.

40. Thirteenth, the SOS Administrator is to provide support as may be required so that local election officials are able to enter information into QVF.

41. Fourteenth, the SOS is to ensure that the QVF computerized list serves as the official voter registration list for the conduct of all elections for Federal office in the State.

The Grand Valley State University engages in university-sponsored student get-out-the-vote and voter registration drives.

42. The Grand Valley State University engages in university-sponsored student get-out-the-vote and voter registration drives.

43. Tufts University, Jonathan M. Tisch College of Civic Life, National Study of Learning, Voting and Engagement (NSLVE), and Grand Valley State University engage in a public-private exchange of student private data to support Grand Valley State University's engagement in government-sponsored student get-out-the-vote and voter registration drives.

44. Grand Valley State University is a state agency of the State of Michigan and as such is subject to HAVA.

45. Grand Valley State University has several reports, attached hereto as exhibits, documenting its engagement in student get-out-the-vote and voter registration drives:

- GVSU Votes! GVSU Campus Plan, Grand Valley State University (2022-23) (Exhibit A)
- GVSU Votes! Campus Democratic Engagement Plan, Grand Valley State University, (2020-2021) (Exhibit B)
- GVSU Votes! Campus Democratic Engagement Plan, Grand Valley State University, (2018) (Exhibit C)
- Student Voting Rates for Grand Valley State University, 2020 NSLVE Campus Report, Tufts University Jonathan M. Tisch, College of Civic Life and IDHE Institute for Democracy and Higher Education, Oct. 2021 (Exhibit D)
- 2014 and 2018 Campus Report, Student Voting Rates for Grand Valley State University, NSLVE National Student of Learning, Voting, and Engagement, Sept. 2019 (Exhibit E)
- 2012 and 2016 Campus Report, Student Voting Rates for Grand Valley State University, NSLVE National Student of Learning, Voting, and Engagement, August 2017 (Exhibit F)

46. GVSU Votes! GVSU Campus Plan, Grand Valley State University (2022-2023) (Exhibit A) indicates that its first goal is to increase the student voting rate:

Goal 1: Ensure that every GVSU student has an opportunity to register and vote in an effort to increase overall voter participation from 44.1% to 75% or above.

Exhibit A at p. 7.

47. GVSU Votes! Campus Democratic Engagement Plan, Grand Valley State University (2020-2021) (Exhibit B) indicates that its first goal is to increase the student voting rate:

Goal 1: Ensure that every GVSU student has an opportunity to register and vote in an effort to increase overall voter participation from 44.1% to 75% or above.

Exhibit B at p. 8.

48. GVSU Votes! Campus Democratic Engagement Plan, Grand Valley State University (2018) (Exhibit C) indicates that its first goal is to increase the student voting rate:

Goal 1: Ensure that every GVSU student has an opportunity to register and vote in an effort to increase overall voter participation from 44.1% to 75% or above.

Exhibit C at p. 8.

49. Student Voting Rates for Grand Valley State University, 2020 NSLVE Campus Report, Tufts University Jonathan M. Tisch, College of Civic Life and IDHE Institute for Democracy and Higher Education (Exhibit D), published in October of 2021, indicates that NSLVE reports are intended to be used by Grand Valley State University to increase student voter registration and student voting rates:

We are pleased to send you this tailored report containing your students' voting rates for 2020. This report contains three years of relevant topline data: 2016, 2018 and 2020. As always, we disaggregate this data so you can better identify and address gaps in participation.

College and university student participated in record-breaking numbers in the 2020 election. In 2016, the Average Institutional Voting Rate was 53%. This year, it jumped to 66%. We encourage you to review Democracy Counts 2020 our most recent national report.

Exhibit D at p. 2.

50. The 2014 and 2018 Campus Report: Student Voting Rates for Grand Valley State University NSLVE National Student of Learning, Voting, and Engagement (Exhibit E), published in September 2019 state that the Grand Valley State University provides its student data to NSLVE to produce the student voter registration and voting rates found in the reports:

The voter registration and voting rates in this report reflect the percentage of your institution's students who were eligible to vote and who voted in the 2014 and 2018 elections. These results are based on enrollment records your institution submitted to the National Student Clearinghouse and publicly available voting files collected by Catalist. We exclude FERPA-blocked records.

Exhibit E at p. 2.

51. The 2012 and 2016 Campus Report: Student Voting Rates for Grand Valley State University, NSLVE National Student of Learning, Voting, and Engagement (Exhibit F), published in August 2017, states that Grand Valley State University provides its student data to NSLVE to produce the student voter registration and voting rates found in the reports:

The voter registration and voting rates in this report reflect the percentage of your institution's students who were eligible to vote and who voted in the 2012 and 2016 elections. These results are based on enrollment records your institution submitted to the National Student Clearinghouse (FERPA-blocked records excluded) and publicly available voting files collected by Catalist.

Exhibit F at p. 2.

52. In addition to Catalist, L2, Inc., located in the State of Washington, has had or has a role in collecting publicly available voting records for NSLVE to use to produce its reports to the Grand Valley State University.

53. The Grand Valley State University continues to engage in HAVA-prohibited university-sponsored student get-out-the-vote and voter registration drives in the 2024 election and beyond.

Count

HAVA Violations

54. The above paragraphs are incorporated herein by reference.

55. The Grand Valley State University has violated and is violating the Help America Vote Act, 52 U.S.C. § 21083, by engaging in university-sponsored student get-out-the-vote and voter registration drives.

56. HAVA, 52 U.S.C. § 21083 and 52 U.S.C. § 21084, preempt university-sponsored student get-out-the-vote and voter registration drives.

57. The Grand Valley State University violates HAVA's prohibition by engaging in university-sponsored student get-out-the-vote and voter registration drives.

58. Alternatively, if the university-sponsored student get-out-the-vote and voter registration drives are legally authorized, then this purpose cannot be accomplished by Grand Valley State University without complying with HAVA.

59. NSLVE's and Grand Valley State University's student registration and voting data exchange have failed and are failing to comply with HAVA's legal requirements.

60. For the purposes of this administrative complaint, 52 U.S.C. § 21083 has 14 requirements that Grand Valley State University, as a state agency, must follow in order to engage in university-sponsored student get-out-the-vote and voter registration drives.

61. Grand Valley State University has violated and is violating HAVA's requirements.

62. First, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University to implement government-sponsored student get-out-the-vote and voter registration drives, without the prior, written approval of the SOS Administrator who is the chief State election official who implements Michigan's elections and the QVF voter registration system.

63. The Grand Valley State University has violated 52 U.S.C. § 21083 by not having its student get-out-the-vote and voter registration drives administered by the State's chief election official, the SOS Administrator.

64. Second, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University to implement government-sponsored student get-out-the-vote and voter registration drives because it interferes with SOS's implementation of a voter registration system which must have a uniform and nondiscriminatory manner.

65. The Grand Valley State University has violated 52 U.S.C. § 21083 by targeting its get-out-the-vote and voter registration drives to students only, because HAVA requires the State to have a uniform and nondiscriminatory voter registration system.

66. The Grand Valley State University's targeting of students for its get-out-the-vote and voter registration drives discriminates against non-students, thereby violating HAVA.

67. Third, the Grand Valley State University's students-only get-out-the-vote and voter registration drives violate 52 U.S.C. § 21083 in that they contradict with the SOS's maintenance of the QVF voter registration system as a single, uniform, official, centralized, interactive statewide voter registration list.

68. The Grand Valley State University has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives contradiction with the SOS's voter registration system which is, as required by HAVA, a single, uniform, official, centralized, interactive statewide voter registration list.

69. Fourth, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives to contradict with the SOS's responsibility to maintain and administer the QVF statewide voter registration list at the State level.

70. The Grand Valley State University has violated 52 U.S.C. § 21083 by not having its students-only get-out-the-vote and voter registration drives integrated with SOS's voter registration system which, as required by HAVA, is maintained at the State level.

71. Fifth, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives to partially duplicate SOS's QVF statewide voter registration list containing the name and registered information of every legally registered voter in the State.

72. The Grand Valley State University has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives partially duplicate the SOS's voter registration system which, as required by HAVA, is to be only statewide voter registration list containing the name and registered information of every legally registered voter in the State.

73. Sixth, the Grand Valley State University has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives contradict with the SOS's voter registration system which, as required by HAVA, is to be the only statewide voter registration system assigning a unique identifier for each legally registered voter.

74. Seventh, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives to contradict with the SOS's QVF computerized list serving as the single system for storing and managing the official list of registered voters throughout the State.

75. The Grand Valley State University has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives be in addition to the SOS's voter

registration system which, as required by HAVA, is to be the single system for storing and managing the official list of registered voters throughout the State.

76. Eighth, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives to contradict with SOS's QVF computerized list containing the name and registration information of every legally registered voter in the State.

77. The Grand Valley State University has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives partially duplicate the SOS's voter registration system which, as required by HAVA, is to be the only State computerized list containing the name and registration information of every legally registered voter in the State.

78. Ninth, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives to contradict with the SOS's QVF computerized list requirement of a unique identifier being assigned to each legally registered voter in the State.

79. The Grand Valley State University has violated 52 U.S.C. § 21083 by having its computerized list contradict the SOS's computerized list requirement which, as required by HAVA, is to be the only statewide voter list of a unique identifier being assigned to each legally registered voter in the State.

80. Tenth, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives to not be

coordinated with the SOS's QVF computerized list as other state agency databases within the State are.

81. The Grand Valley State University has violated 52 U.S.C. § 21083 by not coordinating with the SOS's QVF computerized list as other state agencies within the state do.

82. Eleventh, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives, including student data, not to be integrated into SOS's QVF database so that any election official in the State, including any local election official, may obtain immediate electronic access to the student information contained in the QVF computerized list.

83. The Grand Valley State University has violated 52 U.S.C. § 21083 by not integrating its students-only get-out-the-vote and voter registration drives, including its student data, into the SOS's QVF database so that any election official in the State, including any local election official, may obtain immediate electronic access to the student information contained in the QVF computerized list.

84. Twelfth, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives, including student data, to not be integrated into SOS's QVF database so that all student voter registration information obtained by any local election official in Michigan is electronically entered into the computerized list on an expedited basis at the time the student information is provided to the local official.

85. The Grand Valley State University has violated 52 U.S.C. § 21083 by not integrating its students-only get-out-the-vote and voter registration drives, including student data, into the SOS's QVF database so that all student voter registration information obtained by any local election official in Michigan is electronically entered into the computerized list on an expedited basis at the time the student information is provided to the local official.

86. Thirteenth, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives, including student data, to not be integrated with the SOS Administrator to provide support as may be required so that local election officials are able to enter the student information into QVF.

87. The Grand Valley State University has violated 52 U.S.C. § 21083 by not integrating its student data into the SOS's QVF database so that the SOS Administrator may provide support as required so that local election officials are able to enter the student information into the QVF.

88. Fourteenth, it is a violation of 52 U.S.C. § 21083 for the Grand Valley State University's students-only get-out-the-vote and voter registration drives to interfere with the SOS's assurance that the QVF computerized list serves as the official voter registration list for the conduct of all elections for Federal office in the State.

89. The Grand Valley State University has violated 52 U.S.C. § 21083 by not integrating its student data into the SOS's QVF database so the SOS can provide its assurance that the QVF computerized list serves as the single, uniform, nondiscriminatory official voter registration list for the State's conduct of all elections for Federal office in the State.

Prayer for Relief

The complainants, pursuant to 52 U.S.C. § 21112, request the following relief.

1. The complainants request an independent administrative law judge be appointed to adjudicate this complaint.
2. The complainants request a hearing on the record.
3. The complainants request a declaration that Grand Valley State University has violated HAVA in its engagement in government-sponsored student voter registration drives and in government-sponsored student get-out-the-vote drives.
4. The complainants request an injunction enjoining Grand Valley State University from engaging in government-sponsored student voter registration drives and in government-sponsored student get-out-the-vote drives.
5. The complainants request a declaration that the Grand Valley State University has violated HAVA's legal requirements.
6. The complainants request an injunction that the Grand Valley State University is required to comply with HAVA's legal requirements.
7. The complainants request any other appropriate remedy or relief authorized by 52 U.S.C. § 21112.

