



MFEI Investigation into Michigan Elections (**MIME**)

Summary of MFEI's Elections Oversight Committee Findings



September 2025
www.mifairelections.org

MFEI Investigation into Michigan Elections

(MIME)

Summary of MFEI Elections Oversight Committee Findings

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Date:

September 2025

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Edition Number Two, 2025

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Foreword. A Word from MFEI Chairperson

Dear Fellow Citizens,



The report you hold represents eight months of meticulous investigation into the integrity of Michigan's electoral processes. What began as routine oversight has uncovered systemic issues that demand immediate attention from every citizen who values the constitutional right to fair and transparent elections.

I extend my deepest gratitude to the MFEI Elections Oversight Committee and its exceptional leader, Dee Davey, whose unwavering commitment to thoroughness and accuracy made this comprehensive analysis possible. Week after week, this dedicated team of unpaid volunteers met to examine evidence, analyze data, and craft solutions that serve the public interest. Their professionalism and persistence in the face of bureaucratic obstacles exemplifies the citizen engagement our republic requires.

The MFEI Data Evaluation of Election Processes (DEEP) team deserves special recognition for their sophisticated analysis of Michigan's Qualified Voter File and election records. Their technical expertise transformed raw data into actionable intelligence, revealing patterns that might otherwise have remained hidden. Working without compensation, these analysts demonstrate that concerned citizens can conduct rigorous, peer-reviewed research that holds government accountable.

We are profoundly grateful to the law firm of Mohrman, Kaardal & Erickson and attorney Tom Lambert for their dedication to election integrity litigation where necessary. Their legal expertise provides the foundation for potential remedies to the violations documented in this report. In an era when many shy away from controversial issues, these legal professionals courageously pursue justice through proper channels.

Most importantly, I thank the local clerks, MFEI supporters, and members of the public who reported irregularities and worked constructively toward solutions. Our republic functions best when citizens remain vigilant and engaged. Your willingness to document concerns, submit Freedom of Information Act requests, and participate in the oversight process reflects the civic virtue essential to self-governance.

The findings in this report are sobering. From ballot-voter discrepancies exceeding 100,000 in recent federal elections to systematic failures in record preservation, from inadequate verification processes to obstruction of transparency requirements, Michigan's election administration faces

significant challenges. These are not partisan issues—they are fundamental questions of compliance with federal and state law.

Yet this report also represents hope. By identifying specific problems and proposing concrete solutions, we create opportunities for meaningful reform. The path forward requires collaboration among citizens, election officials, legislators, and legal professionals committed to the rule of law and the integrity of our institutions.

I encourage readers to study these findings carefully, share them with others, and engage constructively in the process of preserving our constitutional republic. Whether through supporting legislation, volunteering as election workers, or simply demanding accountability from public-servant officials, every citizen has a role in safeguarding our elections.

The work documented here reflects MFEI's commitment to defending the republic through careful investigation, respectful dialogue, and adherence to constitutional principles. We remain dedicated to ensuring that Michigan's elections reflect the true will of eligible voters, conducted with transparency, accuracy, and security.

Sincerely,



Patrice Johnson, Chairperson
Michigan Fair Elections Institute
patrice@mifairelections.org
September 7, 2025

Introduction

The integrity of elections forms the cornerstone of self-governance in our constitutional republic, yet Michigan's election administration faces mounting concerns as to compliance with federal and state laws. This report presents the Michigan Fair Elections Institute's (MFEI) comprehensive investigation into systemic issues affecting the accuracy, transparency, and security of the state's electoral processes.

Drawing from extensive data analysis of Michigan's Qualified Voter File (QVF), Freedom of Information Act (FOIA) requests, and examination of administrative practices across the state's 1,690 local jurisdictions, this investigation reveals patterns of non-compliance with critical federal statutes, including the Help America Vote Act (HAVA), the National Voter Registration Act (NVRA), and the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA). It also examines apparent violations of state election laws under Michigan Compiled Law.

The findings documented in this report span two primary categories: first, an urgent need for federal investigation into the inadequate scope of Election Assistance Commission (EAC) audits of HAVA grant compliance; and second, fourteen priority areas of apparent systemic non-compliance with election laws that risk undermining electoral outcomes and public confidence in elections.

From ballot-voter discrepancies totaling over 100,000 more ballots than voters in recent federal elections to premature destruction of legally mandated records, from inadequate verification of voter eligibility to obstruction of transparency requirements, these issues collectively represent a significant challenge to election integrity. The investigation reveals not isolated incidents, but rather systemic patterns that appear to violate both the letter and spirit of laws designed to ensure fair, accurate, and transparent elections.

This report serves multiple audiences: legal professionals seeking evidence for potential litigation, policymakers considering legislative reforms, election officials working to improve compliance, and citizens demanding accountability from their government institutions. Each identified issue includes a summary of evidence, legal analysis of potential violations, proposed remedial actions, and priority ratings to guide strategic responses. MFEI's Election Oversight Committee and team of investigators will be pleased to provide more details upon request.

The stakes could not be higher. As the U.S. Supreme Court has recognized, the dilution of legitimate votes through irregular practices undermines the fundamental right of every eligible citizen to participate meaningfully in self-governance. Michigan's election challenges demand urgent attention and comprehensive reform to restore public trust and ensure compliance with the rule of law.

Acknowledgments

Michigan Fair Elections (MFEI) expresses gratitude to the dedicated volunteers who contributed to this report, including those who wished to remain anonymous. Key contributors include:

- **Dee Davey:** MFEI Election Oversight Committee Chair, MFEI Board of Directors, Program Manager
- **Judi Bennett:** Investigator, FOIA coordinator, Washtenaw County Election Integrity Task Force.
- **Patrick Colbeck:** Former Michigan State Senator, Certified Microsoft Small Business Specialist, B.S. and M.S. in Aerospace Engineering, founder of LetsFixStuff.org.
- **Howard Green:** MFEI Reports Editor, experienced in purchasing, expediting, shipping and receiving.
- **Janine Iyer:** MFEI trainer, MFEI Board of Directors. President of Livingston County chapter, B.S. in Engineering.
- **Patrice Johnson:** Chair of MFEI and Pure Integrity Michigan Elections, former Fortune 50 executive, M.A. in English Literature.
- **MFEI DEEP Team:** The Data Evaluation of Election Processes (DEEP) team of experts analyzes election data, submits it for peer review, and operates on a totally unpaid basis.
- **Phani Mantravadi:** IT Engineer, Election data analyst, B. Tech (Honors) degree in Electrical Engineering, founder of CheckMyVote.org.
- **Jeffery Schaeper:** Director of MFEI Strategic Studies, CPA, MBA, retired Internal Controls Manager.
- **Mark Vaeth:** Chair MFEI Audit Committee, CPA, MBA, former Supervisory Auditor.
- **Tim Vetter:** Co-Leader, MFEI-DEEP Data Evaluation of Election Processes Team, Manufacturing Equipment Engineer for the automotive industry in Michigan, active in World Class Technology as the pillar co-chair for Digital Manufacturing Validation. Vetter uses data and the latest digital technology to solve complex process and equipment layout design issues.

We apologize for any contributors inadvertently overlooked.

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Executive Summary

The Michigan Fair Elections Institute (MFEI) presents its second annual report identifying and prioritizing the critical issues affecting the integrity of the state's elections. *MFEI Investigation into Michigan Elections (MIME)* provides a streamlined summary of potential high-priority violations of law.

Detailed analyses are available upon request. Key findings include:

- **Ballot-Voter Discrepancies:** 104,137 more ballots than recorded voters in 2020; 70,713 in 2022.
- **Record Destruction:** Premature destruction of electronic poll book (EPB) data within 7 days, violating federal 22-month retention requirements.
- **Voter Roll Issues:** Estimated 800,000 ineligible registrations, including 558,627 inactive registrants since 2019.
- **Duplicate Voting:** 82,467 voter IDs linked to 125,428 duplicate votes in 2024, later removed as a “glitch.”
- **Risk of Noncitizen Voting:** 81.2% of 2024 overseas ballots sent to potentially unverified civilians, risking ineligible voting. Neither driver's licenses nor Social Security Numbers—numbers which are required to register to vote—document proof of citizenship.

These issues risk vote dilution and raise concerns about compliance with federal laws, which include the Help America Vote Act (HAVA) and the National Voter Registration Act (NVRA). This report also considers potential violations of Michigan's elections laws.

Starting in January 2025, MFEI's Elections Oversight Committee, led by Chair Dee Davey, met weekly to investigate issues and propose solutions. During eight months of in-depth analysis, the committee identified one urgent need for a federal investigation, 15 priority areas of apparent systemic noncompliance, and 4 key areas of potential risk of violation of federal and state election laws.

This report, designed for both legal experts and the public, is organized into two parts. The first, highlights a national audit issue. The second documents administrative irregularities and anomalies. Both parts describe the issue, summarize the evidence, and list practices that appear to conflict with federal and state (Michigan) law. Last, the authors recommend remedial actions and assign a priority rating.

Background

1. Methodology

The MFEI DEEP Team's analyses, contained in this report, were compiled from Freedom of Information Act (FOIA) requests submitted to government agencies, including the Michigan Secretary of State (SOS) and its Bureau of Elections (BOE). The state's official voter rolls, known as the Qualified Voter File (QVF), provided the primary source of data. Each month for the past five years (2020–2025), skilled data analysts, in cooperation with [CheckMyVote.org](https://checkmyvote.org), have obtained via FOIA the state's monthly QVF snapshots and publicly available voter registration information. In addition, FOIA requests were fulfilled by the state's local and county election officials, including county, township, city, and village clerks. As standard practice, all findings of the MFEI DEEP team were peer reviewed prior to public release.

2. Limitations

This report acknowledges the following legal limitations and analytical constraints:

- Reliance on available public records.
- Statistical analysis represents preliminary findings pending independent verification.
- Legal interpretations require judicial review for definitive determination.
- These analyses may not capture complete administrative context, so some practices may have legitimate administrative justifications not fully explored.
- Recommendations reflect MFEI's perspective and may not represent consensus views.
- This report represents MFEI's best efforts to present fact-based information. Any errors or omissions were unintentional. All information should be independently verified. MFEI is not an attorney. Readers should not construe these materials as legal advice.

3. The Michigan Framework

Michigan operates a highly decentralized election system with 1,690 local and county election officials, including 83 county clerks, 1,240 township clerks, 274 city clerks, and 93 village clerks. These elected officials are primarily responsible for administering elections in their jurisdictions and are accountable to their constituents and local boards, not directly to the Secretary of State (SOS) or its Bureau of Elections (BOE). The SOS and BOE are tasked with ensuring a lawful statewide system, compliant with federal and state laws.

Despite the decentralized structure designed to ensure local autonomy, MFEI's findings reveal systemic failures to comply with law, traceable in large part to inaccurate SOS and BOE directives, information, and actions. The primary areas of apparent compromise include voter roll accuracy, record retention, and transparency.

4. Impact on Election Integrity

When the SOS and its BOE fail to comply with the law, they obstruct clerks' abilities to conduct fair and honest elections. This may result in two forms of voter suppression: One discourages citizens from exercising their constitutional right to vote; the other dilutes valid ballots cast by eligible voters through the casting of invalid ballots from ineligible or duplicate voters. These issues erode public trust in elections and threaten the foundation of the constitutional republic. As the U.S. Supreme Court stated in [*Anderson v. United States*](#), 417 U.S. 211 (1974), and [*U.S. v. Saylor*](#), 322 U.S. 385 (1944):

“The deposit of forged ballots in the ballot boxes, no matter how small or great their number, dilutes the influence of honest votes in an election.. The right to an honest [count] is a right possessed by each voting elector, and to the extent that the importance of his vote is nullified, wholly or in part, he has been injured in the free exercise of a right or privilege secured to him by the laws and Constitution of the United States.”

The concerns in this report are consistent with the principles of the [US Citizens Elections Bill of Rights](#) (CEBOR), the product of collaboration among election integrity groups in about half the states. CEBOR calls for only US citizens to participate in elections, rigorous voter rolls maintenance, secure voting systems, and full transparency to prevent fraud and vote dilution, ensuring elections reflect the true will of eligible voters.

Last year's MFEI report, [Ten Potential Election Law Violations of Michigan's Secretary of State](#) (2024), is available on MFEI's website in its free library.

5. Compliance with Law

This report examines compliance with federal and state laws and Generally Accepted Government Accounting Standards (GAGAS), including the following:

Potential violations of federal law:

- [52 U.S.C. §§ 20301 - 21145](#): The range of the U.S. Code was codified from Title 42 to Title 52 in 2014. The range includes three major federal election laws: the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA), the National Voter Registration Act of 1993 (NVRA), and the Help America Vote Act of 2002 (HAVA)
 - Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA), [UOCAVA](#)
 - National Voter Registration Act (NVRA), [52 U.S.C. Ch. 205 NVRA](#)
 - Help America Vote Act (HAVA), [HAVA H.R.3295](#) (See descriptions below)
- Driver's Privacy Protection Act (DPPA), [18 U.S.C. § 2721](#)
- U.S. Constitution and its amendments, [Elections Clause](#)
- Executive Order 14248, [EO 14248](#)
- The certification requirements in HAVA Titles I, II, III, and IX are as follows:

Title I

[52 U.S.C. § 20901](#): Payments to States for activities to improve administration of elections

(c) Use of funds to be consistent with other laws and requirements

In order to receive a payment under the program under this section, the State shall provide the Administrator with certifications that—

(1) the State will use the funds provided under the payment in a manner that is consistent with each of the laws described in section 21145 of this title, as such laws relate to the provisions of this chapter; and

(2) the proposed uses of the funds are not inconsistent with the requirements of subchapter III.

Title II

[52 U.S.C. § 21001](#): Requirements payments

(a) In general

The Commission shall make a requirements payment each year in an amount determined under section 21002 of this title to each State which meets the conditions described in section 21003 of this title for the year

(b) Use of funds

(1) In general

Except as provided in paragraphs (2) and (3), a State receiving a requirements payment shall use the payment only to meet the requirements of subchapter III.

(2) Other activities

A State may use a requirements payment to carry out other activities to improve the administration of elections for Federal office if the State certifies to the Commission that—

(A) the State has implemented the requirements of subchapter III; or

(B) the amount expended with respect to such other activities does not exceed an amount equal to the minimum payment amount applicable to the State under section 21002(c) of this title.

[52 U.S.C. § 21003](#): Condition for receipt of funds

(a) In general

A State is eligible to receive a requirements payment for a fiscal year if the chief executive officer of the State, or designee, in consultation and coordination with the chief State election official, has filed with the Commission a statement certifying that the State is in compliance with the requirements referred to in subsection (b). A State may meet the requirement of the previous sentence by filing with the Commission a statement which reads as follows:

" _____ hereby certifies that it is in compliance with the requirements referred to in

section 253(b) of the Help America Vote Act of 2002." (with the blank to be filled in with the name of the State involved).

(b) State plan requirement; certification of compliance with applicable laws and requirements
The requirements referred to in this subsection are as follows:

(3) The State is in compliance with each of the laws described in section 21145 of this title, as such laws apply with respect to this chapter.

Title III

Chapter 301 ([52 U.S.C. Ch. 301](#)) may apply only indirectly as it is primarily associated with Federal Campaign Finance, codified under Subtitle III of Title 52 of the U.S. Code. Specifically, Title III focuses on Federal Election Campaigns (Chapter 301), encompassing regulations related to disclosure of Federal Campaign Funds ([Subchapter I, §§ 30101 – 30126](#)), for reporting contributions and expenditures in federal elections, and General Provisions ([Subchapter II, §§ 30141 – 30146](#)).

Title IX

[52 U.S.C. § 21145](#): No effect on other laws

(a) In general

Except as specifically provided in [section 21083\(b\) of this title](#) with regard to the [National Voter Registration Act of 1993](#) ([42 U.S.C. 1973gg](#) et seq.) [now [52 U.S.C. 20501](#) et seq.], nothing in this chapter may be construed to authorize or require conduct prohibited under any of the following laws, or to supersede, restrict, or limit the application of such laws:

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

Potential violations of State of Michigan law:

- Michigan Constitution, [MCL - Article II § 4](#),
- Michigan Compiled Election Law (168.1 - 168.992), [MCL - Chapter 168](#).

Generally Accepted Government Accounting Standards (GAGAS) are not laws.

They are a set of auditing standards established by the [Government Accountability Office \(GAO\)](#), sometimes known as the "Yellow Book". [GAGAS](#) provide guidelines for auditors

when auditing government entities or contractors, ensuring the accuracy and reliability of financial statements and promoting accountability, but they themselves are not laws that have been passed by Congress.

6. Broader National Recommendations

To address the systemic issues identified in Michigan, MFEI recommends aligning state election reforms with the US Citizens Elections Bill of Rights (full document available at: https://irp.cdn-website.com/5fccbda6/files/uploaded/US_Citizens_Elections_Bill_of_Rights_-_0108.pdf).

MFEI urges the Michigan legislature to enact laws reflecting these standards and encourages federal action to enforce HAVA, NVRA, UOCAVA, and EO 14248 compliance nationwide, ensuring elections reflect the true will of eligible US citizens.

Part A: Fourteen (14) Potential Priority Violations

This report summarizes 14 key issues affecting election integrity in Michigan in order of priority. Each summary provides a short description of the issue along with evidence supporting the argument. It assesses the Legal Framework and recommends remedial actions. Then, MIME rates each issue according to its potential impact. Additional information is available on each of the issues upon request. The issues are as follows:

1. More Ballots than Recorded Voters (Ballot-Voter Discrepancies)
2. Failure to Preserve Election Records
3. Duplicate Voting, Vote History Manipulation, and Failure to Perform Basic Data Validation
4. Vulnerability of Mail-in Voting and Online Registrations
5. Failure to Verify the Identity, Residency, and Eligibility of Voter Registrations
6. Risk of Voter Roll Bloating Due to June 30, 2025, Implementation of Public Act 268 (HB 4983)
7. Registrants in Challenged and Verify Status provided absentee ballots
8. Failure to Verify Citizenship of Domestic and Overseas (UOCAVA) Registrants
9. Federal Election Day Deadline Violations—Acceptance of Late-Arriving UOCAVA Ballots
10. Electronic Registration Information Center (ERIC) Violations
11. Electronic Voting Machine Vulnerabilities
12. Party Parity Violations of Several Major Municipalities
13. Obstruction of Freedom of Information (FOIA) Requests
14. Potential Issues to Monitor
 - A. Unlawful Votes of Incarcerated Felons
 - B. Ranked Choice Voting (RCV)
 - C. Risk of Expansion of Electronic Ballot Returns to Include Overseas Civilians from Active-Duty Military Abroad

1. More Ballots than Recorded Voters (Ballot-Voter Discrepancies) ¹

The number of counted ballots should match the number of the voters recorded in any election (one person, one vote). Unfortunately, in Michigan, counted ballots far exceed recorded voters. In the past two federal elections, Michigan reported 70,713 more ballots than voters in 2022 and 104,137 more ballots than voters in 2020. Despite the discrepancies and in violation of auditability requirements, certification occurred.

Detroit's counting boards compound the issue due to their consolidation of precincts and precinct data. This consolidation of precincts renders the vote numbers nearly unverifiable and non-auditable. However, the numbers from each precinct are required by Michigan law to be reported separately. (See [MCL 168.798b\(2\)](#).)

The change in the number of ballots cast in any given election, as indicated by the monthly QVF provided by the State BOE, shows that Michigan fails to preserve voter histories and manipulates voter history information each month after elections.

Findings:

- The MFEI DEEP Team analysis of official SOS QVF data as of Jan. 1, 2024, shows Michigan counted 70,713 more ballots than recorded voters in the November 2022 Federal Election. These 70,713 extra ballots represent an increase over the 17,974 ballots-to-voters difference reported by the State Board of Elections (BOE) on Dec. 1, 2022. Also, data from the November 2020 Federal Election showed 104,137 more ballots-to-voters as of Dec. 1, 2020.

This imbalance increased to 271,566 a year later. The tables below show the official total number of voters statewide for the 2022 and 2020 federal elections compared to the total number of voters contained in subsequent statewide QVFs obtained via FOIA monthly for each election. The total number of voters in every QVF never match and always falls short of the official total number of voters published by the Secretary of State.

¹ Internal reference C2. MFEI Report, [When Vote Totals Don't Match: An Investigative Analysis](#), December 2024

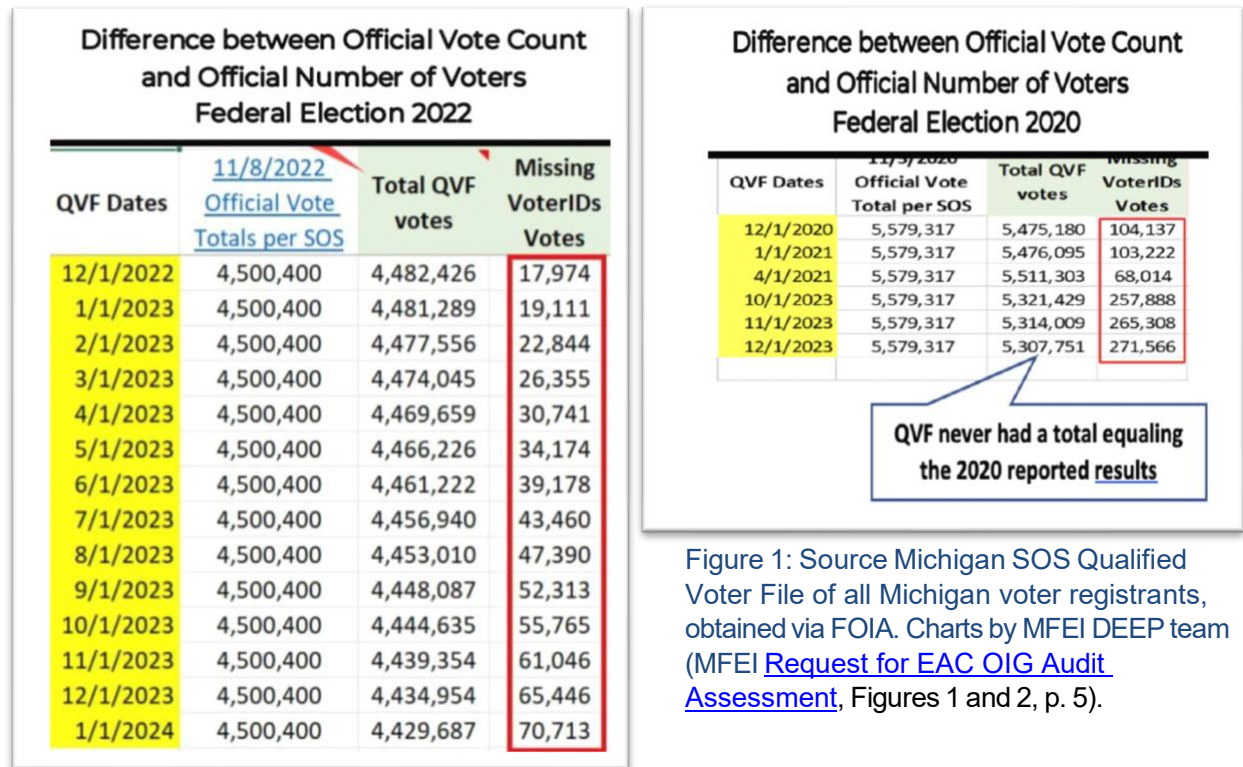


Figure 1: Source Michigan SOS Qualified Voter File of all Michigan voter registrants, obtained via FOIA. Charts by MFEI DEEP team (MFEI [Request for EAC OIG Audit Assessment](#), Figures 1 and 2, p. 5).

However, voter histories should never change and must be preserved for 22 months according to federal law ([52 U.S.C. § 20701](#)) and 22 months to 5 years according to Michigan law. Yet, the data above shows that the Michigan Secretary of State's office is continually altering and manipulating election (voter) history records for every Michigan election.

As a result, neither the State of Michigan nor any clerk can provide an accurate report of voters in any given election, due to the failure of the SOS's administration to take a snapshot (or make a backup) to preserve the election's record. The number of Voter names or IDs should match the number of cast and counted ballots in an election. Instead, the election result totals and IDs of voters in the election do not match and the IDs of voters in any given election are in a state of perpetual flux, in violation of HAVA ([52 U.S.C. § 21081\(a\)\(2\)\(A\)](#)), NVRA ([52 U.S.C. § 20507\(a\)\(4\)](#)) and [52 U.S.C. § 20701](#).

The number of recorded voters per jurisdiction is inconsistent, depending on whether the source of information is state, county, or local. The table below shows that in the City of Detroit, the vote totals do not match and depend on the source and timing of the report. Below are the vote totals in the City of Detroit, from 4 data sets. They should all be the same, but they are not:

List of Detroit City Voters

Location/Provider	Data Source	Date	Number	Difference
Wayne County	Statement of Votes Cast	Nov 5 Federal Election	247,770	
SOS	QVF (via FOIA)	Dec. 12, 2024	247,378	(-392)
Wayne County	QVF FOIA	Jan. 28, 2025	246,854	(-916)
Detroit	QVF FOIA	Jan. 23, 2025	243,334	(-4,436)

Figure 2: Where information was not publicly posted, MFEI DEEP team obtained via FOIA.

- The problem of matching votes to voters is exacerbated in Detroit, due to counting boards combining voter results of multiple precincts, making audits next to impossible.

CITY OF DETROIT						
GENERAL ELECTION-NOVEMBER 5, 2024						
TOTAL PRECINCTS-401						
Precincts	Precincts	Precincts	Precincts	Precincts	Precincts	Precincts
1	40	79	120	156	195	233
2	37	41	2	37	157	197
4	2	80	7	158	6	234
				159		236
5	43	81	121	26	198	238
6	44	82	34	22	199	239
7	33	83	37	22	200	240
8	45	84	122	161	201	241
9	46	85	123	162		242
10	23	86	124		203	60
11	1	87	125	35		243
12	23	88	126	18	204	244
		89	127	28	205	
14	21	90	128	22	206	61
15		91	129		207	245
16	55	92	130		208	246
18	10	93	131	8	209	247
19	25	94	132		210	248
20	1	95	133	4	211	249
22	59	96	134			250
23	64	97	135	29		251
25		98	136			252
		99	137			253
26	32	100	138			254
27	36	101	139			255
29	33	102	140			256
		103	141			257
		104	142			258
32		105	143			259
33	2	106	144			260
34	4	107	145			261
35	10	108	146			262
36	25	109	147			263
38	2	110	148			264
		111	149			265
		112	150			266
		113	151			267
		114	152			268
		115	153			269
		116	154			270
		117	155			271
		118	156			272
		119	157			273
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		132	170			286
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		142	180			296
		143	181			297
		144	182			298
		145	183			299
		146	184			300
		147	185			301
		148	186			302
		149	187			303
		150	188			304
		151	189			305
		152	190			306
		153	191			307
		154	192			308
		155	193			309
		156	194			310
		157	195			311
		158	196			312
		159	197			313
		160	198			314
		161	199			315
		162	200			316
		163	201			317
		164	202			318
		165	203			319
		166	204			320
		167	205			321
		168	206			322
		169	207			323
		170	208			324
		171	209			325
		172	210			326
		173	211			327
		174	212			328
		175	213			329
		176	214			330
		177	215			331
		178	216			332
		179	217			333
		180	218			334
		181	219			335
		182	220			336
		183	221			337
		184	222			338
		185	223			339
		186	224			340
		187	225			341
		188	226			342
		189	227			343
		190	228			344
		191	229			345
		192	230			346
		193	231			347
		194	232			348
		195	233			349
		196	234			350
		197	235			351
		198	236			352
		199	237			353
		200	238			354
		201	239			355
		202	240			356
		203	241			357
		204	242			358
		205	243			359
		206	244			360
		207	245			361
		208	246			362
		209	247			363
		210	248			364
		211	249			365
		212	250			366
		213	251			367
		214	252			368
		215	253			369
		216	254			370
		217	255			371
		218	256			372
		219	257			373
		220	258			374
		221	259			375
		222	260			376
		223	261			377
		224	262			378
		225	263			379
		226	264			380
		227	265			381
		228	266			382
		229	267			383
		230	268			384
		231	269			385
		232	270			386
		233	271			387
		234	272			388
		235	273			389
		236	274			390
		237	275			391
		238	276			392
		239	277			393
		240	278			394
		241	279			395
		242	280			396
		243	281			397
		244	282			398
		245	283			399
		246	284			400

Figure 3: Green items represent the consolidated precincts for Detroit, the only city in Michigan allowed to consolidate precincts, making audits difficult. Source: MFEI DEEP team FOIA to Detroit City Clerk, November 2024 Election.

- The state also has no standardized reporting systems:
 - Multiple names for the same candidates
 - Precinct numbers do not match official QVF
 - Votes for one candidate often show as votes for their opponent
 - Totals do not match
 - Election totals often appear as individual candidate's votes
 - This data took 6 months to receive from the SOS
 - Without the local files, no one could know the truth

Accurate Precinct Level Tabulator Results					SOS's Official Inaccurate Precinct Level Tabulator Results						
Jurisdiction (source)	Precinct Identifier	KYRA HARRIS BOLDEN	PATRICK WILLIAM O'GRADY	Total	City/Township Name	Precinct Identifier	KYRA HARRIS BOLDEN	KYRA HARRIS BOLDEN	PATRICK WILLIAM O'GRADY	PATRICK WILLIAM O'GRADY	Total
LIVONIA CITY	1A	972	434	1406	LIVONIA CITY	1	365	972	236	434	2,007
LIVONIA CITY	1B	365	236	601	LIVONIA CITY	2	744	335	1079		
LIVONIA CITY	2A	744	335	1079	LIVONIA CITY	3	542	810	312	503	2,167
LIVONIA CITY	3A	542	312	854	LIVONIA CITY	4	833	665	1498		
LIVONIA CITY	3B	810	503	1313	LIVONIA CITY	7	668	449	1117		
LIVONIA CITY	4A	833	665	1498	LIVONIA CITY	8	447	451	320	451	1,669
LIVONIA CITY	7A	668	449	1117							
LIVONIA CITY	8A	447	451	898							
LIVONIA CITY	8B	451	320	771							
Total		5,842	3,705	9,537			2,599	3,682	4,562	1,388	5,834

Figure 4: The SOS official results for a given jurisdiction do not reflect the accurate, local report obtained via FOIA from the local jurisdiction. As the example, the table above shows the City of Livonia's results for the November 2024 State Supreme Court race included unaccountable discrepancies. Data regarding Livonia obtained via FOIA of Michigan's Qualified Voter File as of June 2024. *NP* connotes nonpartisan.

The SOS official results for a given jurisdiction do not reflect the accurate, local report obtained via FOIA from the local jurisdiction. As the example in the table above shows, the City of Livonia's results for the November 2024 State Supreme Court race included unaccountable discrepancies.

Record preservation. According to Michigan law and the official retention schedule, the preservation period for voter records varies depending on the specific document type, with some registration applications to be kept for six years. Here is a breakdown of specific voter and election record retention periods (See also [General Schedule #23 - Elections Records Retention Schedule](#)):

- **Voter registration applications and absentee ballot applications:** These must be preserved for six years following the primary or election for which they were executed. For applications to be added to the permanent absentee voter list, the retention period is six years after the certification of the first election held after the application was received. [MCL 168.811](#)
- **Canceled voter registration records:** Original master cards for cancelled voter registrations must be retained for five years after cancellation. [MCL 168.514](#)
- **Federal election ballots and records:** Ballots that include a federal office must be kept for 22 months after the primary or election, according to federal law. Other federal election materials,

- including poll lists and envelopes, also have a 22-month retention period. [MCL 168.615c](#)
- **State and local election ballots:** These can be destroyed after 30 days following the final canvass of the election, unless a recount petition is filed or their destruction is stayed by a court order.
- **Presidential primary ballot selections:** The specific information showing a voter's party ballot selection must be destroyed after the 22-month federal retention period expires. [MCL 168.615c](#)
- **Drop box collection records:** These must be preserved for not less than 22 months following the election. [MCL 168.761d](#)

Legal Framework:

Potential violations of federal law:

- HAVA, [52 U.S.C. § 21081\(a\)\(2\)\(A\)](#): Voting systems must produce auditable records to reconcile votes with voters; discrepancies appear to conflict with this.
- NVRA, [52 U.S.C. § 20507\(a\)\(4\)](#): Requires accurate voter lists to match vote counts; unreconciled counts are potentially inconsistent with this.
- U.S. Constitution, Article I, Section 4, Clause 1 ([States and Elections Clause](#)): States must ensure election integrity; discrepancies undermine this.
- Government Auditing Standards, [GAGAS 8.98](#): Unreliable vote count data appears to conflict with sufficiency standards.
- Altering vote history election records is a federal violation per [52 U.S.C. § 20701](#) (22 months' retention)
- Executive Order 14248, [EO 14248 § 4\(c\)](#): EAC must report HAVA fund discrepancies to DOJ.
- Executive Order 14248, ([EO 14248 § 5\(a\)](#)): DOJ must investigate vote count issues.

Potential violations of Michigan law:

- Michigan Constitution ([MCL - Article II § 4\(2\)](#)): Guarantees transparent election results; discrepancies appear to conflict with transparency.
- [MCL 168.509r](#): Requires accurate voter lists in QVF to align votes with voters.
- Altering vote history election records is a state felony per [MCL 168.932](#)
- [MCL 168.798b](#): Requires an accumulation report from absentee ballot counting boards.

An accumulation report of unofficial results using the tabulated votes available after 8 p.m. on election day must be compiled and published using a format that clearly indicates all the following:

- The election day precinct results.
- The corresponding absent voter ballot counting board results.
- The corresponding early voting results.
- The sum of subdivisions (a), (b), and (c) for each precinct and contest.

(2) For a city or township with 250 or more precincts using common ballot forms instead of the election day precinct format in the absent voter counting boards and early voting sites, the accumulation report will not report results from absent voter counting boards or early voting sites as corresponding to election day precincts.

Accumulation reports in each city or township described in this subsection must report the results for each election day precinct and separately report the results of each absent voter counting board and the corresponding early voting results. [Emphasis added.]

Proposed Remedial Actions:

1. State government officials should not be exempt from personal accountability. Perhaps the U.S. Department of Justice should consider investigating and prosecuting the Michigan SOS to hold her accountable for violations of federal election law.
2. Michigan's voter roll system must ensure security, transparency, accessibility, and auditability of vote history records prior to county certification of an election. To do that, the system must provide an accurate ballots-to-voters count. This may require a consent decree to enforce actions required to fix or replace the QVF
3. If the state's official voter roll system (QVF) is incapable of preserving the records of an election, then a new system should be mandated and implemented, under the watchful eye of an independent and certified agency.
4. Michigan's voter roll system must ensure security, transparency, accessibility, and auditability of vote history records prior to county certification of an election. To do that, the system must provide an accurate ballots-to-voters count. This may require a consent decree to enforce actions required to fix or replace the QVF.
5. If the state's official voter roll system (QVF) is incapable of preserving the records of an election, then a new system should be mandated and implemented, under the watchful eye of an independent and certified agency.
6. Before county canvassers are allowed by law to certify their county's election, in addition to other requirements, two numbers must match: A. The number of cast and counted votes, and B. The number of recorded voters. In other words, A must equal B ($A = B$).
7. Sue to reconcile ballots-to-voters discrepancies before the 2026 election ([HAVA § 21081\(a\)\(2\)\(A\)](#)).
8. Sue for a [GAGAS 8.98](#)-compliant audit of discrepancies.
9. Sue to mandate vote-to-voter count matching in 2026 elections.
10. Enact legislation requiring vote counts to match recorded voters before certification.
11. Detroit must keep separate and make public the data for each precinct for each election per [MCL168.798b](#).

Priority Rating: 5/5 (High)

- Impact: Severe, as discrepancies dilute legitimate votes and erode trust.
- Likelihood of Successful Remediation: High, due to clear evidence and precedents ([Anderson v. United States](#)).
- Timeline/Resources: Short-term (1-2 years), moderate resources for lawsuits and audits.

Summary:

The Michigan Fair Elections Institute (MFEI) reports significant ballot-voter discrepancies in Michigan's 2020 (104,137 excess ballots) and 2022 (70,713 excess ballots) elections, violating the principle of one person, one vote. These discrepancies, compounded by Detroit's precinct consolidation, render vote counts nearly unverifiable, breaching HAVA (52 U.S.C. § 21081) and NVRA (52 U.S.C. § 20507) requirements for auditable records and accurate voter lists. Michigan's failure to preserve voter histories, with ongoing QVF manipulation, violates federal (52 U.S.C. § 20701) and state laws (MCL 168.811, MCL 168.798b). MFEI recommends DOJ investigations, GAGAS 8.98-compliant audits, and legislation to mandate matching vote-to-voter counts before certification. These issues dilute legitimate votes, eroding trust. Urgent reforms are needed to ensure compliance and restore election integrity.

2. Failure to Preserve Election Records²

Michigan destroys records prematurely and lacks chain of custody, hindering auditability. The SOS orders destruction of electronic poll book (EPB) data and flash drives within 7 days of canvass, hindering transparency, potentially violating 22-month retention ([52 U.S.C. § 20701](#)). The SOS and BOE issue guidance under the guise of directives to clerks, and when any clerk refuses to follow what they assess to be unlawful directives to destroy records, the State Attorney General charges them with felonies.

Findings:

- SOS orders 2020 EPB data deletion. Alleged SOS overreach. A four-year felony case involves multiple charges against Stephanie Scott, a former Adams township clerk, and Stefanie Lambert, the legal counsel she consulted. The two are charged with taking steps to prevent Hart Systems from potentially destroying election records at the direction of Bureau of Elections (BOE) Director Jonathan Brater, who works under the direction of Secretary of State Jocelyn Benson. Attorney General Dana Nessel prosecuted clerk Scott, alleging Scott unlawfully transmitted data from an electronic pollbook, among other allegations.

During a probable cause hearing in August 2025 in Hillsdale, the defense attorney asked, "Before issuing a directive [to clerks] to delete EPB [electronic pollbook] flash drive data, did you consult with DOJ on the legality of your directive?"

Brater responded, "I don't remember." ([Unintended Consequence: Hearing Targeting Township Clerk Reveals Weaknesses in Conduct of MI Elections](#) and [Deleted from History: Inside the Hillsdale County Election Case That Could Shake Michigan](#))

- Monthly vote history changes. 270,559 votes removed and 103,128 added for 2020 (MFEI's [Request for EAC OIG Assessment of Audit Risk](#), Figure 31, p. 59).
- Local investigations (e.g., Livonia) show 87.5% of deceased registrants from 1900–1999 remain active, and 66.5% of dual/moved registrants are active.

- Transparent record-keeping counters fraud risk by ensuring auditability.
- Detroit's 2020 AVCB lacked chain-of-custody documentation for tens of thousands of ballots.

Legal Framework:

Potential violations of federal law:

- [52 U.S.C. § 20701](#): Mandates 22-month record retention; premature destruction appears to conflict with this.
- HAVA, [52 U.S.C. § 21081\(a\)\(2\)\(B\)](#): Requires auditable paper records; destruction undermines this.
- NVRA, [52 U.S.C. § 20507\(i\)\(1\)](#): Mandates public access to voter list maintenance records; obstruction appears to conflict with this.
- U.S. Constitution, [Fourteenth Amendment § 1](#): Due process requires transparency. Record destruction appears to conflict with this.
- Government Auditing Standards, [GAGAS 8.37](#): Lack of transparency in record retention appears to conflict with legislator input standards.
- Executive Order 14248, [EO 14248 § 5\(a\)](#): DOJ must investigate record destruction for transparency.
- Executive Order 14248, [EO 14248 § 4\(b\)\(i\)](#): EAC must ensure voter-verifiable records and secure custody.

Potential violations of Michigan law:

- Michigan Constitution ([Article II § 4\(2\)](#)): Requires transparent elections; record destruction appears to conflict with this.
- [MCL 168.932\(c\)](#): Prohibits record destruction; SOS orders appear to conflict with this felony statute.
- [MCL 168.509q](#): Mandates 5-year preservation of election records.
- [MCL 168.509r](#): Requires QVF maintenance and auditability.
- [MCL 168.813](#): Mandates vote history reporting within 7 days.
- [MCL 168.795](#): Requires audit trails.
- [MCL 750.248](#): Criminalizes alteration of public records.

Proposed Remedial Actions:

- Seek injunction to halt record destruction.
- Sue for [GAGAS 8.37](#)-compliant audit of 2024 election record retention practices.
- Sue to enforce 5-year preservation and public access to vote histories ([MCL 168.509q](#)).

² Internal reference B1b.

Priority Rating: 5/5 (High)

- Impact: Critical, as record destruction prevents audits and enables fraud.
- Likelihood of Successful Remediation: High, given clear statutory violations and evidence.
- Timeline/Resources: Short-term (1-2 years), moderate resources for legal action and audits.

Summary:

The Michigan Fair Elections Institute (MFEI) investigation reveals systemic failures in preserving election records, notably the premature destruction of electronic poll book (EPB) data within 7 days, violating federal law (52 U.S.C. § 20701), requiring 22-month retention. This practice undermines auditability and transparency, risking vote manipulation and eroding public trust. Michigan's Secretary of State (SOS) and Bureau of Elections (BOE) fail to enforce retention and direct for early destruction, violating the Help America Vote Act (HAVA) and Michigan law (MCL 168.811). MFEI recommends immediate audits per Government Auditing Standards (GAGAS 8.71), legal action to enforce retention mandates, and revised SOS protocols to ensure compliance. These violations threaten election integrity by preventing verification of voter records, necessitating urgent reform to align with federal and state laws and restore trust in Michigan's electoral process.

3. Duplicate Voting, Vote History Manipulation³, and Failure to Perform Basic Data Validation⁴

Federal law, under Title 52 of the United States Code ([52 U.S.C. § 21083\(a\)\(2\)\(B\)\(iii\)](#)), mandates that computerized statewide voter registration lists be maintained to eliminate duplicate names. Additionally, vote histories must remain static post-election certification to ensure integrity and auditability. However, MFEI investigators found persistent duplicates and unauthorized changes in Michigan's QVF, indicating systemic issues.

These findings are based on FOIA-obtained, monthly QVF data from the Michigan Bureau of Elections (BOE), and they highlight risks such as vote dilution. For in-depth analysis, refer to the MFEI DEEP Team [report](#) presented to the Michigan House Election Integrity Committee on June 3, 2025 (starting from slide 15; available [here](#); video recording [here](#)).

Findings:

MFEI investigators identified multiple instances of duplicate votes and vote history manipulations in Michigan's QVF data from 2020–2025. These issues were validated through FOIA requests, including data from Detroit and Wayne County.

A. Multiple votes linked to same voter identification⁵

1. **Duplicate Voter IDs and Vote History Changes (2020–2025):** Analysis of QVF FOIA data, validated via Detroit FOIA requests, revealed duplicate vote history records with matching voter IDs and election dates. On June 1, 2025, the Secretary of State (SOS)-BOE

removed duplicates from the past five elections without investigation. This involved registrants with identical voter IDs (VIDs) and election dates, indicating unaddressed duplicate vote records. MFEI is currently peer-reviewing this issue.

Michigan Statewide vote history DUPLICATES per election dates

Election Dates	12/1/2023	1/1/2024	2/1/2024	3/1/2024	4/1/2024	5/1/2024	6/1/2024	7/1/2024	8/1/2024	9/1/2024	10/1/2024	11/1/2024	12/1/2024	12/12/2024	1/1/2025	2/1/2025	3/1/2025	4/1/2025	5/1/2025	6/1/2025	6/12/2025	7/1/2025	8/1/2025
11/5/2024														201	130	105	85	85	65	SCRUBBED DUPLICATES			
3/6/2024										6126	109	45	45	45	45	45	45	45	45				
5/7/2024							1	1	1	1	1	1	1	1	1	1	1	1	1				
2/27/2024				1	4	3	115	114	114	114	113	83	83	83	83	82	81	81	82				
11/7/2023	602	602	602	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5				
3/8/2023	3	3	3	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
5/2/2023	19	18	19	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
11/8/2022	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2	1	1	1
3/2/2022	17	16	16	16	16	16	16	16	16	16	16	13	13	13	13	13	13	13	13	13	13	13	13
5/3/2022	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
11/2/2021	4	4	4	4	4	4	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
3/3/2021	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
5/4/2021	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
11/3/2020	29	29	29	29	29	29	30	30	30	31	31	31	31	31	31	31	31	31	30	30	30	30	30

Figure 5: A graph illustrating QVF FOIA data (2020–2024) analyzed for duplicate voter IDs and vote history changes. Source: MFEI DEEP Team data analysis, August 25, 2025.

2. **Daily Absentee Voter (AV) Records for November 2024:** MFEI's DEEP Team obtained daily AV records via FOIA starting September 30, 2024. The redesigned records showed multiple votes linked to single voter IDs. Examples include six duplicate votes from Detroit, all on the QVF permanent absentee voter list and non-UOCAVA (not overseas civilian or active military).

³ Internal reference B1a.

⁴ Internal reference B3a.

⁵ Internal Ref B3b and B3c

ANGELA DENNISE HILL Active

Voter Id: 249447 WAYNE - DETROIT CITY - 03088 -

Year of Birth: 1958 Sex: F Reg. Date: Oct 10th 2000

Registered Address: Redacted

Mailing Address:

Perm. Absentee: Y UOCAVA Status: NON-UOCAVA

Voting History

Elections (Month Year) → Voter File Snapshots ↓	May '25	Nov '24	Aug '24	Feb '24	Nov '23	Nov '22	Aug '22	May '22	Mar '22	Nov '21	A
2025-08-01		V	V	V		V	V			V	
2025-07-01		V	V	V		V	V			V	
2025-06-01		V	V	V		V	V			V	
2025-05-01	N/A	V V	V	V		V	V			V	
2025-04-01	N/A	V V	V	V		V	V			V	
2025-03-01	N/A	V V	V	V		V	V			V	
2025-02-01	N/A	V V	V	V		V	V			V	
2025-01-01	N/A	V V	V	V		V	V			V	
2024-12-01	N/A	V V	V	V		V	V			V	
2024-11-01	N/A	N/A	V	V		V	V			V	
2024-10-01	N/A	N/A	V	V		V	V			V	

Figure 6: A table displaying examples of duplicate votes. Source: Checkmyvote.org, August 2025.

- B. **Anomaly on October 28, 2024, Absentee Vote Records:** An incident involved 82,467 voter IDs associated with 125,428 unauthorized duplicate votes. After MFEI reported this, the SOS/BOE removed most duplicates, attributing them to a "glitch" and "formatting error" without detailed explanation, despite FOIA requests. This underscores vulnerabilities in mail- in absentee ballots.

C. **Vote History Alterations:** Vote history records for November 2022 voters were removed from the QVF, re-added before the November 2024 election, and removed again post-election, violating federal (22-month) and state (22-month and 5-year) retention laws. The November 5, 2024, vote history was absent from the December 2024 QVF, raising questions about authorization.

D. **Detroit Case Study:** A sample of Detroit voters showed 47 individuals voting twice across early, absentee, and in-person methods. The MFEI DEEP Team validated 34 duplicates based on sworn affidavits from Detroit resident Ramone Jackson. Wayne County data showed inexplicable changes, with duplicate votes added, removed, and re-added post-certification. An excerpt report (Table 6) details 10 voter IDs altered regarding the November 8, 2022, election,

varying by monthly QVF version.

Dups	QVF dates	Added or remove	Election date	VoterID
3	6/1/2024	REMOVED	11/8/2022	108345408
3	11/1/2024	ADDED	11/8/2022	108345408
3	12/1/2024	REMOVED	11/8/2022	108345408
3	11/1/2023	REMOVED	11/8/2022	108619533
3	5/1/2024	ADDED	11/8/2022	108619533
3	10/1/2024	REMOVED	11/8/2022	108619533
3	2/1/2024	REMOVED	11/8/2022	108894366
3	11/1/2024	ADDED	11/8/2022	108894366
3	2/1/2025	REMOVED	11/8/2022	108894366
3	5/1/2024	REMOVED	11/8/2022	108980697
3	11/1/2024	ADDED	11/8/2022	108980697
3	12/1/2024	REMOVED	11/8/2022	108980697
3	1/1/2024	REMOVED	11/8/2022	159377579
3	5/1/2024	ADDED	11/8/2022	159377579
3	7/1/2024	REMOVED	11/8/2022	159377579
3	2/1/2024	REMOVED	11/8/2022	159401126
3	11/1/2024	ADDED	11/8/2022	159401126
3	12/1/2024	REMOVED	11/8/2022	159401126
3	2/1/2024	REMOVED	11/8/2022	159417255
3	11/1/2024	ADDED	11/8/2022	159417255
3	12/1/2024	REMOVED	11/8/2022	159417255
3	1/1/2024	REMOVED	11/8/2022	159460613
3	5/1/2024	ADDED	11/8/2022	159460613
3	11/1/2024	REMOVED	11/8/2022	159460613
3	3/1/2024	REMOVED	11/8/2022	160114952
3	11/1/2024	ADDED	11/8/2022	160114952
3	12/1/2024	REMOVED	11/8/2022	160114952
3	1/1/2024	REMOVED	11/8/2022	160692892
3	11/1/2024	ADDED	11/8/2022	160692892
3	12/1/2024	REMOVED	11/8/2022	160692892

Duplicate Voter IDs and Local Election Data

LASTNAME	FIRSTNAME	MIDDLENAME	VOTER_ID	JURISDICTION	ELECTIONDATE	VOTED	VOTING_TYPE
Example: 8 pairs of identical last names, first names and middle names/initials redacted out of consideration for privacy.			249447	DETROIT CITY	11/5/2024	Y	EARLY VOTING
			249447	DETROIT CITY	11/5/2024	Y	ELECTION DAY
			354944	DETROIT CITY	11/5/2024	Y	ABSENTEE
			354944	DETROIT CITY	11/5/2024	Y	ELECTION DAY
			426665	DETROIT CITY	11/5/2024	Y	ABSENTEE
			426665	DETROIT CITY	11/5/2024	Y	EARLY VOTING
			515043	DETROIT CITY	11/5/2024	Y	ABSENTEE
			515043	DETROIT CITY	11/5/2024	Y	ELECTION DAY
			816110	DETROIT CITY	11/5/2024	Y	ABSENTEE
			816110	DETROIT CITY	11/5/2024	Y	ELECTION DAY
			924944	DETROIT CITY	11/5/2024	Y	ABSENTEE
			924944	DETROIT CITY	11/5/2024	Y	ELECTION DAY
			31407089	DETROIT CITY	11/5/2024	Y	ABSENTEE
			31407089	DETROIT CITY	11/5/2024	Y	EARLY VOTING

Figure 8: Partial view of local data from Detroit City for Nov. 5, 2024, voters, showing 47 double votes.
 Source: MFEI DEEP Team research, based on QVF, Jan. 23, 2025; Detroit dataset.

E. Statewide Duplicate Registrations Due to Name Variations and Data Validation

Failures: Over 1,300 duplicate registrations in Wayne County (outside Detroit) were found due to slight name changes (e.g., "Robert" vs. "Bob"), typographical errors (e.g., quotation marks, periods, pound signs), or inconsistent middle initials. These prevent accurate matching for in-state, cross-state, and obituary checks, allowing multiple registrations and votes. Simple data validation rules could prevent this. Analysis from Dr. Rick Richards suggests this issue is nationwide.

Data Validation

NO FULL LEGAL NAME							
	GA	IL	NC	NV	TX	WA	WI
Registrations	7,913,293	8,307,901	7,496,728	2,331,270	20,603,853	5,389,258	3,843,500
First Initial Only	9,363	17,752	3,970	1,206	14,462	7,350	159
No Middle Name	951,160	1,935,612	742,839	415,776	3,092,688	100,618	255,548
Middle Initial Only	866,680	4,523,040	436,281	186,983	1,170,054	868,003	1,503,896
	1,827,203	6,476,404	1,183,090	603,965	4,277,204	975,971	1,759,603
	23%	78%	16%	26%	21%	18%	46%
Adjusted NMN	1,697,201	5,797,948	1,117,648	575,918	4,101,696	845,771	1,534,019
	21%	70%	15%	25%	20%	16%	40%

There may be multiple errors per registration.

Estimated 10-15% do not have middle names; field should contain "NMN".

Simple data validation rules would fix most of these errors.

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Figure 9: Data validation examples from other states.
 Source: Dr. Rick Richards, ELLY, Eagle AI, GA, August 2025.

Data Validation

- Special Characters and Foreign Characters should not be in text or number fields.

Characters	GA	IL	NV
"#"	185,120	55,436	
". "	201,976	59,385	125,582
"(" or ")"	881,061	62,615	684,721
" ' "	112,667	1,697	181,486
"&"	6,064	6,188	14,175
Total	1,386,888	185,321	1,005,964
of Registrations	18%	2%	43%

Every one will prevent in state, cross state & obituary matching

Simple data validation rules would fix these errors.

Figure 10: Illustration of errors preventing matching, noting that simple validation rules could resolve them. Source: Dr. Rick Richards, ELLY, Eagle AI, GA, August 2025.

Official Statements:

- SOS Jocelyn Benson (October 2024) stated that “Anyone who tries to vote multiple times ‘will get caught and they will be charged,’” [SOS Media Release](#).
- AG Dana Nessel (October 2024), Charged four St. Clair Shores residents for double voting, emphasizing felony status. Source: [AG Nessel media release \(MCL 168.932a\)](#).
- AG Nessel, SOS Benson (September 2020): Urged voters not to commit felony by casting multiple ballots in elections, [AG Nessel media release](#).
- Michigan Department of State (MDOS), Election Fact Center (August 2025): Affirms that individuals can only vote once. Source: [You can only vote once](#).

Legal Framework

Potential violations of federal law:

- HAVA, [52 U.S.C. § 21083\(a\)\(4\)](#): Requires accurate voter records to prevent duplicate voting through list maintenance. Failure to maintain accurate records to prevent duplicates.
- NVRA, [52 U.S.C. § 20507\(a\)\(3\)](#): Prohibits duplicate voting and mandates proper list maintenance. PV: Inadequate list maintenance allowing duplicates.
- [52 U.S.C. §§ 20701–20706](#): Mandates 22-month retention period for election records. PV: Breaches in record retention
- [52 U.S.C. § 20702](#): Imposes penalties for theft, destruction, concealment, mutilation, or alteration of election records. Potential violation: Alteration of records
- U.S. Constitution, [U.S. Constitution, Article I, Section 4, Clause 1 \(Elections Clause\)](#): Ensures the integrity of elections, which is undermined by duplicate voting. PV: Undermines election integrity.
- Government Auditing Standards, [GAGAS 8.98](#): Indicates that duplicate voting reflects unreliable data.
- Executive Order 14248, [EO 14248 § 5\(a\)-\(b\)](#): Directs the Department of Justice (DOJ) to investigate and enforce against duplicate voting. Lack of state government investigation into duplicates.

Potential violations of Michigan law:

- Michigan Compiled Laws, [MCL 168.932\(c\)](#): Classifies altering vote history or election records as a felony. Felony for altering vote histories.
- [MCL 168.509r](#): Requires accurate maintenance of the QVF. Failure to maintain accurate QVF.
- [MCL 168.932a\(e\)](#): Addresses felony charges for double voting.

Proposed Remedial Actions

- Submit issue to DOJ and other legal counsel for review.
- MFEI clerk advocates work with local clerks to remedy duplications.
- Continue to notify SOS and BOE of errors, data validation rules, and duplicates.
- MFEI Soles to Rolls and DEEP teams continue to monitor and communicate findings.
- Press Elections Assistance Commission for an audit to assess the risk of this issue.

Priority Rating: 5/5 (High)

- **Impact:** High risk of fraud due to duplications, inadequate validation, and unexplained changes to voter histories and ballots.
- **Likelihood of Successful Remediation:** High, with implementation of data validation rules, audits, and enhanced oversight.
- **Timeline/Resources:** Immediate audits of QVF and AV records; allocate resources for independent investigations and system upgrades. Conduct comprehensive training on data validation and enforce strict change logging. Collaborate with federal agencies for compliance reviews.

Summary:

MFEI's analysis uncovers 82,467 voter IDs linked to 125,428 duplicate votes in Michigan's 2024 election, later dismissed as a "glitch" by the SOS. This indicates systemic failures in data validation and voter history maintenance, violating HAVA (52 U.S.C. § 21081) and NVRA (52 U.S.C. § 20507) mandates for accurate voter rolls. The manipulation of voter histories and lack of basic data checks risk vote dilution and fraud. Michigan law (MCL 168.509r), requiring single-vote verification, is also violated. MFEI proposes GAGAS-compliant audits, legal action to enforce data validation, and real-time voter roll systems to prevent duplicates. These issues undermine election integrity, necessitating urgent reforms to ensure compliance with federal and state laws and restore public confidence in Michigan's elections.

4. Vulnerability of Mail-in Voting and Online Registrations

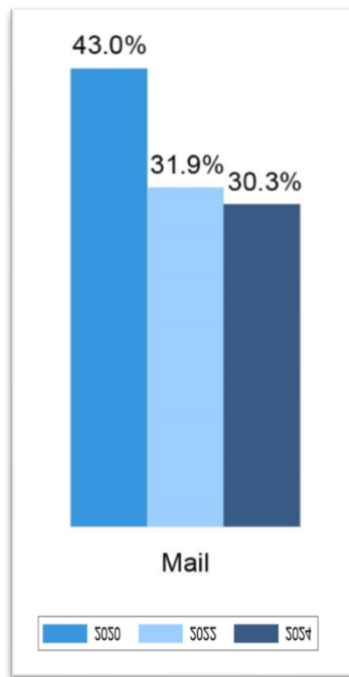


Figure 11: Nationwide voter turnout by mail-in ballot, 2024 Election
 Administration and Voting Survey Report, U.S. Election Assistance Commission (EAC EAVS Survey Report), p. 11.

The federal Carter-Baker Commission identified in its [*Building Confidence in U.S. Elections*](#) that mail voting is the most vulnerable to fraud. “Absentee ballots remain the largest source of potential voter fraud.” Yet, despite the risk of duplicate voting and of ineligible persons casting ballots, 35.4% (2,081,265) of Michigan’s ballots were returned via mail in 2024.

Michigan’s online registration and permanent absentee voting registration compound the risk of abuse. A person may register and vote without ever having to interact with another human being. (See Section 5, “Failure to Verify the Identity and Residency of Voter Registrations.”)

As the bar chart to the left illustrates, a significant proportion of ballots continues to be submitted via mail nationwide, and nearly 96.7% of those mail-in ballots were counted. However, three significant categories of weakness include the following:

A. Identity Verification:

- Signature verification processes vary widely and lack standardization
- No real-time identity confirmation at time of voting
- Potential for ballot submission by unauthorized persons
- Difficulty detecting impersonation or coercion
- Family members or caregivers may improperly complete ballots

F. Ballot security vulnerabilities:

- Ballots vulnerable to interception, alteration, or destruction in mail
- Lack of secret ballot protections (family or employer coercion possible)
- Mass production and distribution increases fraud opportunities
- Duplicate ballot requests may not be adequately tracked
- Electronic transmission of overseas ballots creates cybersecurity risks
- The larger the precincts and further removed from local clerk control, the greater the risk of undetected fraud.

G. Chain of Custody Vulnerabilities:

- Ballots in transit through the postal system lack continuous monitoring.
- Multiple handling points (postal workers, election officials, volunteers) create documentation gaps.

- Ballot harvesting by third parties can break chain of custody requirements.
- Unsecured drop boxes may lack proper surveillance and retrieval documentation.

Appendix A: Descriptive Tables

Overview Table 1: Mail Voting in the 2024 General Election



State	% Turnout by Mail	Total Mail Ballots Transmitted	Total Mail Ballots Returned	% Mail Ballots Returned	Mail Ballots Counted	
					Total	% of Returned
Michigan	35.4%	2,213,167	2,081,265	94.0%	2,017,704	96.9%

Figure 12: 2024 Election Administration and Voting Survey Report, U.S. Election Assistance Commission (EAC), p. 34.

Findings:

- Numerous video cameras captured ballot stuffing of drop boxes, most recently in Hamtramck, MI [Two Muslim City Council Members Charged with Election Crimes – One Caught Shoving Ballots into Drop Box in Hamtramck, MI](#)
- Ballots have been found in US Post Offices after the election
 - [Local business discovers ballots in local post office box](#)
 - [Ballots found on roadside outside Oak Harbor](#)
 - [Stack of mail-in ballots found outside Southern California storm drain](#)

Legal Framework

Potential violations of federal law:

- [HAVA Section 301](#): Mandates auditable paper trails and secure ballot handling.
- [52 U.S.C. § 20702](#): Criminalizes theft, destruction, or alteration of election records.
- [52 U.S.C. § 21081](#): Requires voter-verifiable paper audit trails.
- [Executive Order 14248](#): Requires election security to protect ballot integrity.
- [HAVA Section 303](#): Requires voter verification systems
- [52 U.S.C. § 21083](#): Mandates accurate voter identification processes
- [52 U.S.C. § 20501](#): Requires maintenance of accurate voter rolls

Potential violations of Michigan law:

- [MCL 168.932](#): Establishes criminal, felony penalties for ballot handling violations.
- [MCL 168.761d](#): Prohibits unauthorized persons from possessing, absentee ballots

- [MCL 168.761d](#): Restricts ballot return to registered electors, postal workers, or clerk staff only
- [MCL 168.764a](#): Provides detailed ballot handling instructions requiring specific delivery methods including mail, personal delivery to clerk's office, or authorized drop. Authorization for immediate family members to deliver ballots on voter's behalf. Requires ballots to reach the clerk before polls close on Election Day drop box security requirements.
- [MCL 168.761d](#): Mandates drop boxes in cities and towns.
- [MCL - 168.761d](#): Video monitoring of drop boxes for 75 days before elections and on Election Day.
- [MCL - 168.761d](#): Immediate reporting of vandalism or suspicious activity to law enforcement.
- [MCL 168.765](#) establishes signature verification protocols.
- [MCL 168.759a](#): Clerks must review and verify signatures on each ballot return envelope.
- [MCL 168.759a](#): Written documentation of receipt date, time, and approval for tabulation.
- [MCL 168.765a](#): Specific delivery procedures to counting boards and requires bipartisan oversight.
- [MCL 168.765a](#): At least one election inspector from each major political party must be present during ballot processing.
- [MCL 168.765a](#): Ballots cannot be left unattended during processing. Sworn oaths for all personnel handling ballots.
- [MCL 168.759](#): Governs ballot applications. Requirements for ballot application submission methods and verification. Criminal penalties for false statements on applications.
- [MCL 168.759a](#): Addresses military and overseas voters. Special provisions for electronic transmission and return of military ballots. Enhanced security requirements for electronic ballot returns
- [Michigan Constitution Article II, Section 4](#): Establishes:
- [MCL 168.765](#): Fundamental right to vote secretly
- [MCL 168.765](#): Legislative authority to "preserve the purity of elections" and "guard against abuses of the elective franchise." Requires voter registration and absentee voting systems.

Mitigating Factors

Courts have generally upheld mail-in voting when proper safeguards exist. However, safeguards depend heavily on implementation quality and adherence to existing security protocols—two areas in which Michigan is often deficient. For mail-in ballots to be secure, the following areas would require implementation via stringent protocols and GAGAS-compliant independent verification on a regular basis:

- Robust signature verification systems
- Secure ballot tracking and chain of custody protocols
- Clear voter identity verification procedures
- Adequate ballot security measures
- Proper training for election officials

While mail-in voting is not inherently illegal, inadequate safeguards can create violations of federal and state election integrity requirements.

Proposed Remedial Actions:

Mail ballots expose the entire electoral system to significant vulnerabilities. Now, with early voting, mail in ballot should be abolished, except for who are unable to vote in person. As was the law prior to 2018, only registrants over the age of 65, homebound registrants, and those who cannot be present should be allowed to apply for and be issued an absentee ballot from their local clerk.

Priority Rating: 4/5 (High)

- **Impact:** Significant risk of fraud with mail in ballots.
- **Likelihood of Successful Remediation:** Moderate, due to strong evidence but localized scope.
- **Timeline/Resources:** Medium-term (2-3 years), moderate resources for audits, lawsuits. Replacement of the Voter Roll System to modern standards.

Summary:

MFEI's investigation highlights vulnerabilities in Michigan's mail-in voting and online registration systems, which lack robust verification and risk ineligible voting. The absence of stringent identity, residency, and citizenship checks for online registrations and mail-in ballots violates HAVA (52 U.S.C. § 21083) and Michigan law (MCL 168.509m). These weaknesses enable potential fraud, as unverified ballots may dilute valid votes. MFEI recommends implementing secure verification protocols, such as mandatory ID checks, and GAGAS-compliant audits to assess vulnerabilities. Legal action to enforce compliance with federal and state verification standards is critical. These systemic flaws threaten election integrity, undermining public trust. Immediate reforms, including updated technology and clerk training, are essential to safeguard Michigan's elections and align with the US Citizens Elections Bill of Rights.

5. Failure to Verify the Identity, Residency, and Eligibility of Voter Registrations⁶⁷

Michigan's voter registration process lacks robust verification of identity, residency, and citizenship, creating potential vulnerabilities. For instance, the state permits online voter registration up to 14 days before an election. Voter may register same day, but the state's computer system is not real time. College students may register and vote using only a student ID. To show they meet the minimum 30-day residency requirement, they are allowed to access a website portal or present a utility bill. Considering that Michigan housed more than 38,000 foreign students in 2023/2024 and considering that [out-of-state students](#) in some years outnumber in-state students in their freshman classes, the risk of ineligible registrations and votes becomes significant.

College and University Student Registrations

The U.S. hosts the largest share of international (noncitizen) students globally (16 percent). About [1.1 million](#), or 6%, of this nation's college students are noncitizens ([Inside Higher Ed](#)). This number represents an all-time high for international student enrollment in the United States. [Greater than half](#) come from India (29.4%) and China (24.6%).

Of the 393,913 students enrolled in Michigan's 93 colleges and universities in 2023-2024, 38,123 were foreign students ([National Student Clearinghouse Research Center](#))—marking a 13.8% year-to-year increase.

International (Foreign) Enrollment in Michigan Colleges and Universities

	2022/2023	2023/2024	% change
Michigan	33,501	38,123	13.8

Figure 13: Source: [OpenDoorsData.org](#).

MFEI and PIME analysis of two elections in college cities revealed significant irregularities.

On the University of Michigan campus in Ann Arbor, students were allowed to register and vote until after 2 AM the day *after* the election, with more than 600 ballots cast and counted from residents who registered and voted after the polls closed on Nov. 8, 2022. Of these late registrations, 120 occurred in the early morning hours of the next day, November 9.

At the time, the law was clear. Students were allowed to vote after the polls closed if they were already registered and waiting in line to vote and feed their ballot into a tabulator. No one was allowed to *register* to become a voter after the 8 PM deadline, no matter if they were standing in line. The SOS

⁶ MFEI Report: [Ann Arbor Compromises Election Integrity during 2022 Election](#), July 2023,

⁷ PIME Report: [Lights Out: Voter Roll Anomalies during the 2020 Election, Lansing, Michigan](#), May 2022.

instructed clerks otherwise. [DAY LATE: Ann Arbor, MI, counts 120 absentee ballots cast on Nov. 9 in the Nov. 8 election.](#)

Ballots that were not fed into a tabulator (absentee ballots) had to be mailed or delivered before 8 PM the Friday before the election. In further violation of the law, electioneering was allowed, as was voting in a precinct other than the precinct in which a registrant is recorded. These abuses of the law occurred under the direction of a veteran city clerk. [Unlawful re-registrations during 2022 election: Ann Arbor \(Part 3\)](#)

In addition, the two satellite clerk offices exhibited discriminatory and partisan placement on University of Michigan campuses, favoring students in student housing communities (which voted 94.7% for the Democratic candidate for governor) while ignoring senior living centers of equal population density. This violated the National Voter Registration Act (NVRA) SEC. 8(b.), which requires uniform and nondiscriminatory practices. One hundred eighty (180) voters were allowed to illegally re-register and vote from precincts within the city jurisdiction, leading to delays and long lines that amounted to voter suppression. Electioneering violations included the distribution of free pizzas, water, hot cocoa, and blankets as enticements to wait in line and vote.



Figure 14: Ann Arbor's new State Rep. Jason Morgan posts a selfie with a pizza on Twitter "Making sure students stay in line for same-day registration on campus. #VoteBlueToSaveDemocracy," [The Ann Arbor Independent](#), Nov. 14, 2022, and [A2Politico: Let Them Eat Pizza!](#)

Similar verification failures were documented in East Lansing during the 2020 election, where a review of the Qualified Voter File (QVF) revealed widespread anomalies, including 5,718 registered

voters no longer at their QVF-recorded address (e.g., moved out), 1,738 voters registered to closed MSU dorms (with 124 voting absentee and 102 in person despite no alternate address listed), 828 voters at fraternities, sororities, co-ops, and group housing (many ineligible, with 33 voting absentee and 17 in person), 767 voters at addresses sold prior to September 30, 2020 (with 67 voting absentee and 18 in person), 165 voters at invalid addresses (e.g., post offices, vacant lots, non-existent streets like Cherry Lane, Spartan Village, or University Village), and 105 duplicate registrations (e.g., due to name changes, moves, or typos, with one person having four voter IDs). Despite these issues, ineligible voters cast ballots, highlighting weak verification of identity, residency, citizenship, and overall eligibility.

In 2020, Michigan State University had 27 residence halls and three apartment complexes on campus. These campus residential facilities could house 17,500 students and faculty. The East Lansing Voter Anomalies chart from the Lights Out report (page 3), created by Bill Richardson and Patrice Johnson visually represents the number of voter anomalies in East Lansing for the 2020 election. It shows 1) 5,718 people voted who were no longer at their address of record, 2) 1,738 votes from registered voters allegedly from MSU dorms that were “lights out” closed due to COVID-19 shutdowns; 3) 828 anomalous votes from fraternities that no longer existed, over-aged registrants at sororities, co-op, and group housing, 4) 767 votes from addresses of record that were sold to new owners prior to Sep. 30, 2020, and 5) 165 votes from invalid addresses like parks and streets that no longer existed, and 6) 105 duplicate votes from the same individuals with duplicate IDs.

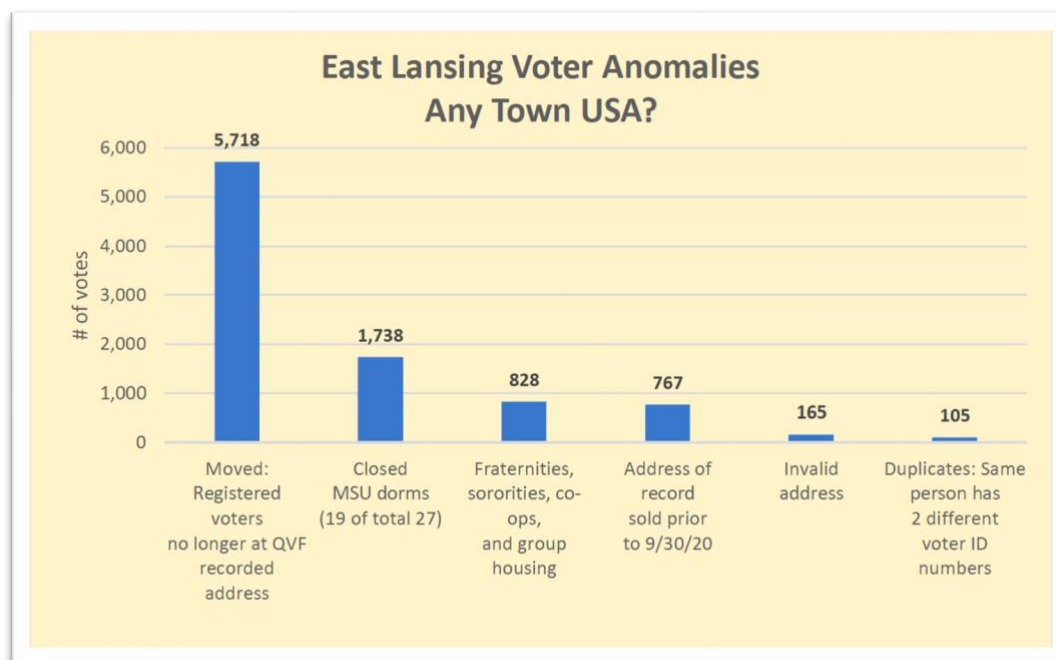


Figure 15: Data compiled by Anne Hill. Chart by Bill Richardson.

The accompanying map, sourced from pages 7-8 of the Ann Arbor Compromises report, displays the locations of the University of Michigan's 17 student housing facilities and 2 clerk satellite offices across U-M's two campuses. This map of Ann Arbor identifies all 17 University of Michigan

residential locations, the primary clerk's office, and both satellite clerk offices, positioned exclusively within U-M campus boundaries. The positioning of these satellite offices near student housing areas demonstrates what appears to be preferential placement that primarily serves university students.

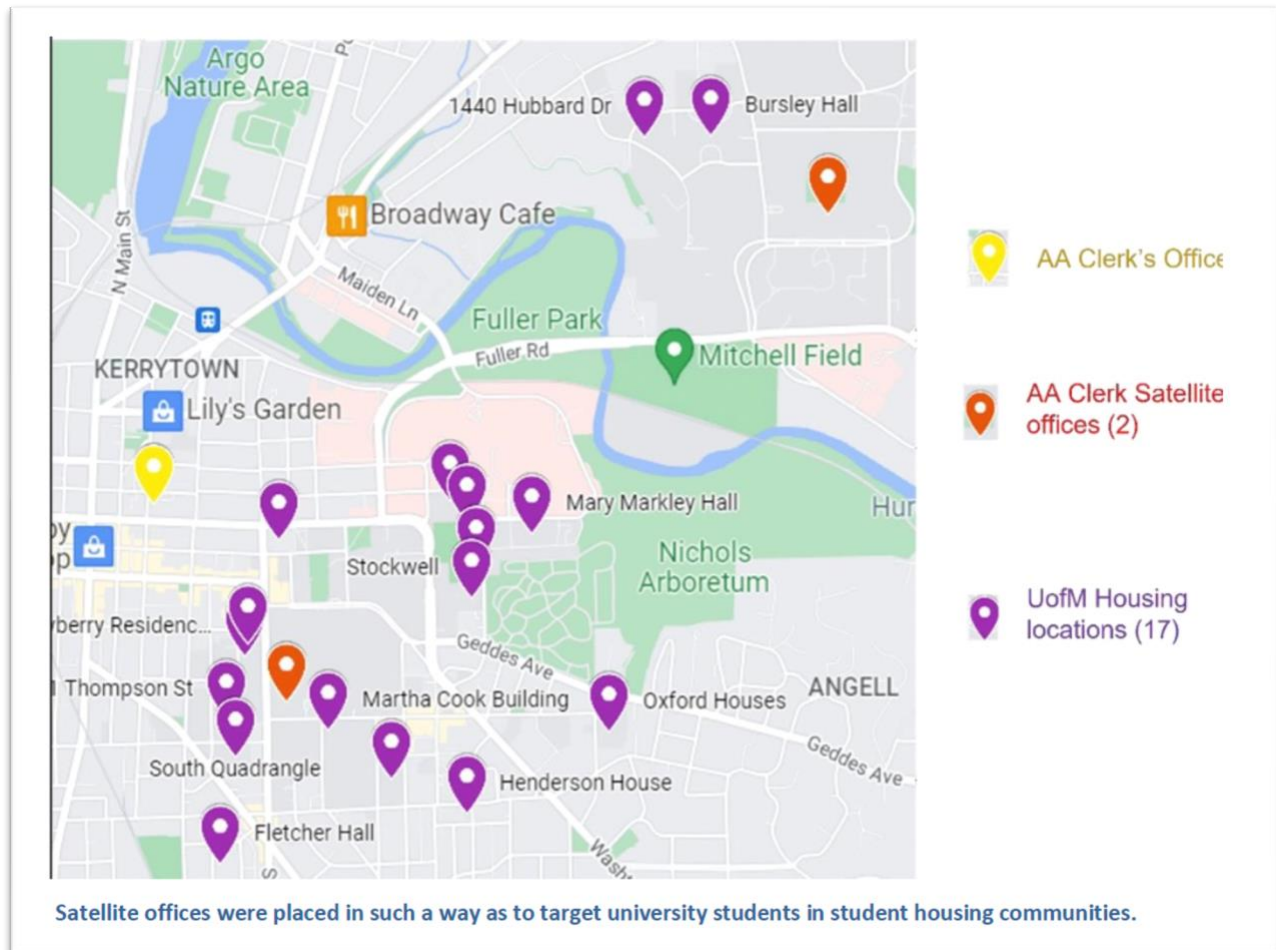


Figure 16: Map by Bill Richardson.

In contrast, the map below from the Ann Arbor Compromises report (page 9) depicts the locations of Ann Arbor's 23 largest senior living centers (clustered in the southwest corner of the city) in contrast to the satellite registration offices—all were all on U-M campuses with none near the senior centers. In showing the bias toward students in the placement of satellite office, the map illustrates the clerk's discriminatory practice against senior citizens.

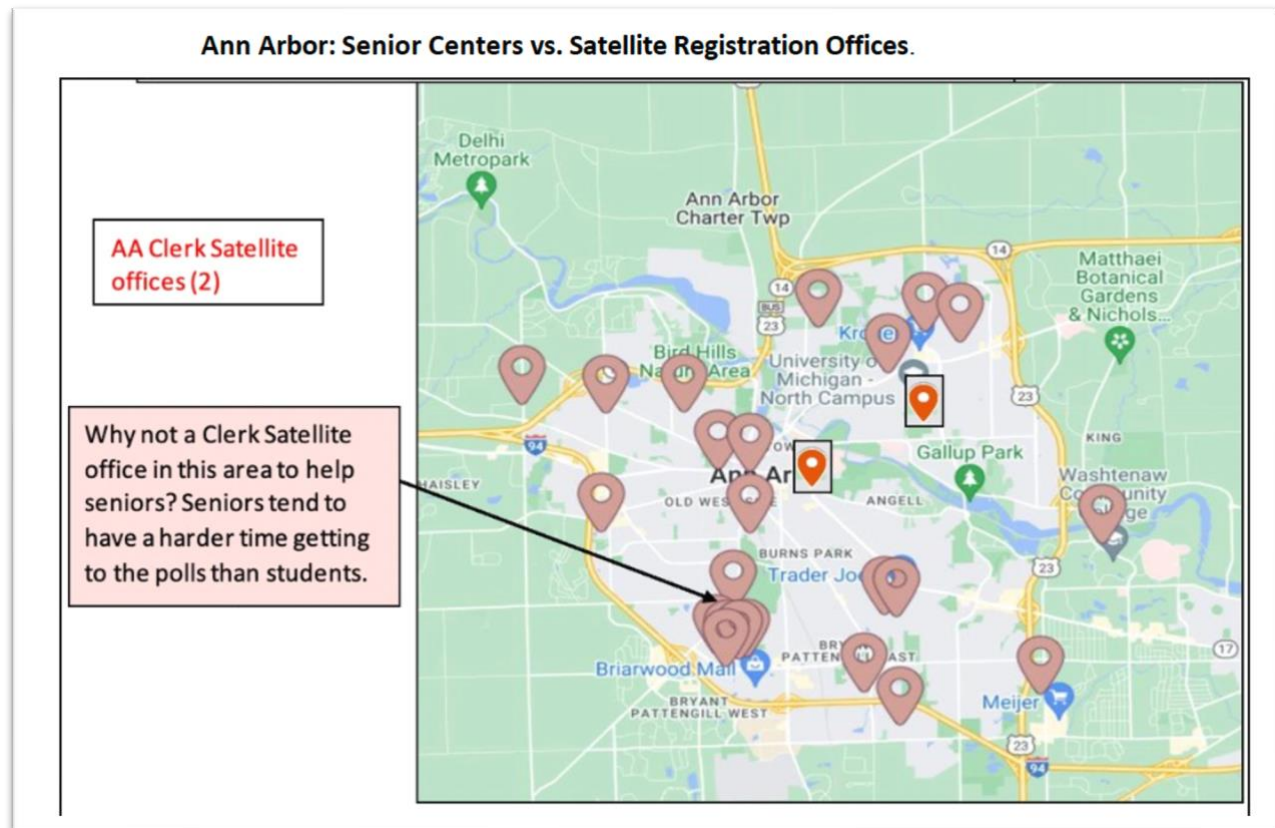


Figure 17: Of the 23 largest senior living centers in Ann Arbor, a significant cluster is situated in the southwest corner of the city near the Briarwood Mall. Senior citizens tend to have more difficulty driving or walking than 20-year-old college students have, yet no satellite registration offices were placed near them to accommodate their greater need.

Michigan students are allowed register to vote using their student ID along with verifying their residency with a student portal webpage displaying their campus address, a utility bill, or official university registration paperwork. They have the flexibility to register using either their campus address or their home address. Recent changes to state law have broadened both pre-registration and same-day registration opportunities.

Online registrations compound voter roll vulnerabilities.

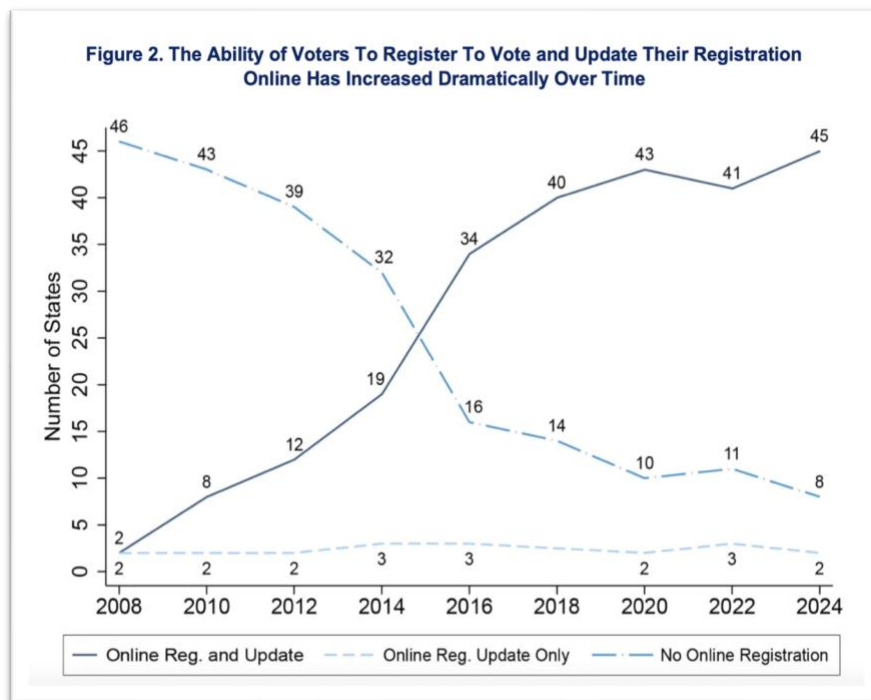


Figure 18: 2024 Election Administration and Voting Survey Report, EAC, p. 66.

Federal law, HAVA, [52 U.S.C. § 21083\(a\)\(4\)](#), requires accurate voter records to prevent duplicate voting. NVRA, [52 U.S.C. § 20507\(a\)\(3\)](#), prohibits duplicate voting via list maintenance. The U.S. Constitution, Article I, Section 4, Clause 1 [States and Elections Clause](#), prohibits duplicate registration and voting, plus various other issues that undermine election integrity. Duplicate voting indicates unreliable data per Government Auditing Standards, [GAGAS 8.98](#); Executive Order 14248, [EO 14248 § 5\(a\)-\(b\)](#).

Online registration and updating:

- A person may register and vote without ever interacting with another human being ([2024 EAC EAVS Survey Report](#), p. 95).
- The risk of error and fraud increases as online registration grows. Meanwhile Michigan's systems for verifying a registrants' identity and residency are vulnerable to abuse with automatic registration, electronic registration, and same day registration on a non-real time statewide computer system. Michigan officials confirmed this high-risk situation in their responses to the Election Assistance Commission (EAC):

Policy Survey Table 1: Voter Registration Policies

State	Registration Policies Allowed for 2024 General Election			
	Automatic and Electronic Registration Offered	Online Registration Offered	Same Day Registration Offered	Age Limit for Pre-Registration
Michigan	Yes	Yes, registration and updates	Yes	16

Figure 19. [2024 Election Administration and Voting Survey Report](#), EAC, p. 95.

Legal Framework

Potential violations of federal law:

- HAVA, [52 U.S.C. § 21083\(a\)\(4\)](#): Requires accurate voter records to prevent duplicate voting.
- NVRA, [52 U.S.C. § 20507\(a\)\(3\)](#): Prohibits duplicate voting via list maintenance.
- U.S. Constitution, Article I, Section 4, Clause 1 [States and Elections Clause](#): Duplicate voting undermines election integrity.
- Government Auditing Standards, [GAGAS 8.98](#): Duplicate voting indicates unreliable data.
- [52 U.S.C. §§ 20701-20706](#) (See description above).
- National Voter Registration Act of 1993 ([National Voter Registration Act](#)) (See description above).
- Help America Vote Act of 2002 ([HAVA](#)): (See description above)
- [52 U.S.C. § 20702](#): (See description above).
- Executive Order 14248: [EO 14248 § 5\(a\)-\(b\)](#): DOJ must investigate and prioritize enforcement of duplicate voting.

Potential violations of Michigan law:

- [MCL 168.932\(c\)](#): Altering vote history election records is a state felony.

Proposed Remedial Actions:

- Given the high turnover of student populations, MFEI recommends annual voter roll cleanups in college towns and enhanced residency verification to monitor and prevent escalation of ineligible voting.

- Mandate a remedial action for the SOS/BOE to conduct regular cross-checks with federal databases (e.g., SAVE) to identify and remove duplicate registrations.
- Sue for a [GAGAS 8.98](#)-compliant audit to assess tampering risks, identify duplicate voting, and ensure lawful resolution.
- Enforce single-vote verification in the QVF per [MCL 168.509r](#), including real-time checks to prevent duplicates.
- Replace the QVF with a secure, auditable system using blockchain technology to ensure record integrity, enforced via a consent decree.
- Mandate immediate SOS/BOE transparency on “glitch” corrections, including public release of investigation reports.
- Align with Principle IV of the [US Citizens Elections Bill of Rights](#) to enforce rigorous voter roll maintenance and prevent duplication.

Priority Rating: 4/5 (High)

- **Impact:** Significant, as duplicate voting dilutes legitimate votes.
- **Likelihood of Successful Remediation:** Moderate, due to strong evidence but localized scope.
- **Timeline/Resources:** Medium-term (2-3 years), moderate resources for audits, lawsuits. Replacement of the Voter Roll System to modern standards.

Summary:

Critical systemic failures exist regarding verifying voter identity, residency, citizenship and overall eligibility in Michigan. Applicants can register and vote without ever having to interact with another human being. College towns like Ann Arbor and East Lansing exhibit increased vulnerability due to lax residency and citizenship verification, higher foreigner populations, and the high turnover rates of student populations. MFEI studied two university towns, whereas Michigan is home to 93 colleges and universities with an estimated total college enrollment around 393,913 in 2024 (National Student Clearinghouse Research Center).

Issues include late registrations and voting after legal deadlines, discriminatory placement of satellite clerk offices favoring students over senior citizens and other demographics, illegal re-registrations causing voter suppression through long lines, electioneering violations, and widespread QVF anomalies such as registrations from uninhabitable “lights out” dorms, invalid addresses, sold properties, and duplicates. These problems risk ineligible voting, dilute legitimate votes, and violate federal laws like NVRA and HAVA, as well as state statutes. Remedial actions, including audits, enhanced cleanups, and system replacements, are essential to restore election integrity. The estimated impact is localized but significant with an approximate 36% error rate in college areas.

6. Risk of Voter Roll Bloating Due to June 30, 2025, Implementation of Public Act 268 (HB 4983)

Michigan's Public Act 268 (PA 268) of 2023, effective June 30, 2025, implements House Bill 4983 (HB 4983), amending Michigan Election Law (MCL 168.493a, 500a, 501; adds 493b) to expand automatic voter registration (AVR) through state agencies, such as during driver's license or ID applications. This mirrors the intent of former President Biden's Executive Order 14019, which was canceled by President Trump. PA 268 lacks robust verification mechanisms, such as mandatory citizenship proof, and relies on a cumbersome opt-out process, risking ineligible registrations (e.g., duplicates, non-residents, non-citizens). This contributes to voter roll bloating, exacerbating systemic inaccuracies in the Qualified Voter File (QVF) and undermining election integrity.

Findings:

- The Election Assistance Commission (EAC) reports that AVR and motor vehicle offices accounted for nearly 60% of the 103 million registration transactions nationwide between 2022 and 2024, with AVR alone contributing over 25% ([2024 EAC Election Administration and Voting Survey Report](#), p. IV-VI).
- Michigan's active registered voters exceed the Citizen Voting Age Population (CVAP) by approximately 570,000, indicating over-registration (2024 EAC Report, p. VI).

Appendix A: Descriptive Tables

Executive Summary Table 1: 2024 EAVS at a Glance

State	Total EAVS Jurisdictions	Total Active Registered Voters	Total CVAP	Total Voter Turnout	Turnout as % of Active Reg.	Turnout as % of CVAP
Michigan [10]	83	7,267,666	7,646,222	5,706,503	78.5%	74.6%

Figure 20: 2024 Election Administration and Voting Survey Report, Election Assistance Commission, p. VI.

- MFEI's DEEP Team estimates 800,000 ineligible voters since 2018, including 558,627 long-inactive registrations (pre-2019) and 300,000 fewer voters than ballots in 2020.
- An MFEI-sponsored statistical sample of 384 registrations (95% confidence interval, 5% error rate) showed a 22.4% initial exception rate (121,355 scaled exceptions statewide), rising to 27.4% (149,657 scaled) after confirmation letters. Additionally, 173,399 scaled cases had unclear residency, and 56,527 scaled voters likely moved out of state (MCL 168.509bb). Analysis used public tools ([CheckMyVote.org](#), Michigan voter lookup, returned letters, people search sites, AI analysis).

- Over 1,300 duplicate registrations in Wayne County were identified due to slight name variations (e.g., “Robert” vs. “Bob”) or marriage name changes, indicating inadequate data validation.
- External entities (e.g., ERIC, Rock the Vote) have write access to the QVF, increasing tampering risks.
- Concerns exist about groups claiming influence via registrations, potentially tied to non-citizen driver’s licenses (e.g., “[Illegals group claims credit for flipping state House – will get drivers licenses as payoff?](#)” - The Midwesterner).

Methodology:

Based on sample size of 384 registrations, analyzed using public information to categorize exceptions (e.g. out of state registration, property sales records, obituaries, [CheckMyVote.org](#), Michigan voter lookup, returned undeliverable confirmation letters, people search sites, AI analysis, etc.).

Findings suggest a total registration scaled exception (error) range between 142,531 and 157,139 with an average of 149,657. This estimate may reflect administrative delays in list maintenance rather than systemic violations. Confidence interval: 95.0% with a 5.0% error rate. Limitations: Analysis based on available public records; official verification pending.

Duplicate ID number registrations - Name with IDx and name with IDy registered

- Same first name, address, birth year, address
- Last name slightly different or marriage name change
- Investigation in progress, 1,300-plus examples to date.

Legal Framework

Potential violations of federal law:

- NVRA, [52 U.S.C. § 20507\(a\)\(4\)](#): Mandates removal of ineligible voters. Failure to remove ineligible voters conflicts with mandates for accurate list maintenance.
- HAVA, [52 U.S.C § 21083\(a\)\(4\)\(A\)](#): Requires accurate voter lists; excess registrations are potentially inconsistent. Excess registrations violate requirements for accurate voter lists.
- U.S. Constitution, [Fourteenth Amendment § 1](#): Over-registration dilutes votes, violating equal protection.
- VRA, [52 U.S.C. § 10301](#): Ineligible registrations may lead to purges disproportionately affecting minorities.
- Government Auditing Standards, [GAGAS 8.104e](#): Implausible registration-to-CVAP ratio indicates systemic failure.
- Executive Order 14248, [EO 14248](#) § 2(b)(iii), 3(c): DHS and DOJ must enforce list maintenance.
- False registration is a federal crime ([FBI website](#)).

Potential violations of Michigan law:

- Michigan Constitution, [MCL - Article II § 4\(1\)](#): Over-registration dilutes votes, violating voting rights.
- MCL [168.509r](#): QVF must maintain accurate voter lists.
- MCL [168.492](#), [168.523](#): Require verified electors; AVR risks non-compliance.
- MCL [168.509bb](#): Inactivity triggers review; long-inactive voters not addressed.

Proposed Remedial Actions:

- File a federal lawsuit to enjoin PA 268 enforcement and hold the SOS/BOE accountable for violating federal list maintenance laws.
- Mandate citizenship verification using federal databases (e.g., SAVE, [8 U.S.C. § 1373\(c\)](#)).
- Limit AVR to Department of Motor Vehicles and SOS agencies with verified data and enhance opt-out processes.
- Enforce single-vote verification in the QVF ([MCL 168.509r](#)).
- Conduct audits compliant with [GAGAS 8.98](#) (sufficiency of evidence) and [8.104e](#) (testimonial evidence evaluation) to assess tampering risks and identify duplicates.
- Prohibit external entities (e.g., ERIC, Rock the Vote) from write access to the QVF.
- Enact laws requiring 6–8 years of inactivity for voter removal, aligning with states like Ohio and Florida (80.9% and 82.1% registration rates).
- Replace the QVF with a secure, real-time blockchain system via a consent decree.
- Prosecute violations of federal election law as required by [HAVA](#).

Priority Rating: 4/5 (High)

- **Impact:** High, as excess registrations risk vote dilution and suppression.
- **Likelihood of Successful Remediation:** Moderate, due to evidence but complex legal and political challenges.
- **Timeline/Resources:** Medium-term (2–3 years), requiring significant resources for audits, legal challenges, and system reforms.

Summary:

Michigan's Public Act 268 (HB 4983), effective June 30, 2025, introduces automatic voter registration (AVR) without robust citizenship verification, risking voter roll bloating. MFEI estimates 800,000 ineligible registrations, including 558,627 inactive since 2019, violating HAVA (52 U.S.C. § 21083) and NVRA (52 U.S.C. § 20507). This threatens vote dilution, as unverified registrations may enable ineligible voting. Michigan laws (MCL 168.509r, MCL 168.509aa) are also at risk. MFEI recommends legal action to enjoin PA 268, mandatory citizenship checks, and GAGAS-compliant audits. These issues undermine election integrity, requiring urgent reforms to ensure accurate voter rolls and compliance with federal and state laws, aligning with the US Citizens Elections Bill of Rights.

7. Registrants in Challenged and Verify Status Provided Absentee Ballots⁸

Michigan's QVF includes approximately 800,000 ineligible registrants, with 558,627 inactive since 2019 or earlier, contributing to registrations exceeding the voting-age population by 570,000 in 2024.⁹ State law ([MCL 168.509aa](#)) prohibits registrants in challenged (CH) or verify (V) status—due to issues like death, relocation, felony status, non-citizenship, or duplicate registrations— from receiving ballots until resolving their status. However, a 2024 QVF system change automatically included CH/V registrants in absentee ballot mailing label printing, leading clerks to unwittingly mail ballots to ineligible voters. The SOS described this issue as a “glitch.”

Findings

- In Oakland County, 476 absentee ballots were sent to CH/V registrants, with 56 voting (Michigan QVF, December 2024).

voter_identi					QVF date	REG date	Status	QVF date	REG date	Status	Count Vote	REMOVED					
cation numb	first name	last name	year of birth	REMOVED	REMOVED	REMOVED	ADDED	ADDED	ADDED	Records (2020-24)	then ADDED	BACK	county name	jurisdiction name	precinct	ward	
er																	
1736917	VICTOR	GARBONKUS	1941	10/1/2023	2/1/1989	V	5/1/2024	2/1/1989	V	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		19		
1742511	CHERYL	BARCEWICZ	1955	1/1/2024	9/23/1994	CH	5/1/2024	9/23/1994	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		18		
1756811	THOMAS	SHEPARD	1954	6/1/2022	3/9/1983	V	7/1/2022	3/9/1983	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		19		
1761001	RENTA	GARBONKUS	1970	10/1/2023	6/12/1991	CH	5/1/2024	6/12/1991	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		19		
1763253	COLLEEN	GARCIA	1961	12/1/2023	2/17/1993	CH	5/1/2024	2/17/1993	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		12		
2027080	MILDRED	BUCHANON	1943	1/1/2024	9/30/1966	CH	5/1/2024	9/30/1966	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		5		
2027720	CAROL	SCHARF	1934	1/1/2024	10/5/1966	CH	5/1/2024	10/5/1966	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		4		
2030323	SAYUD	RAHBE	1958	1/1/2024	2/27/1978	CH	5/1/2024	2/27/1978	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		7		
2030417	MARY	SCHERBING	1936	1/1/2024	3/26/1976	CH	5/1/2024	3/26/1976	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		3		
2035227	MICHAEL	MCINAIN	1945	1/1/2024	12/20/1984	CH	5/1/2024	12/20/1984	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		2		
9262754	STEVEN	LOWE	1967	1/1/2024	10/4/1999	CH	5/1/2024	10/4/1999	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		20		
9479650	KELLY	ANDRUS	1970	1/1/2024	1/28/2000	V	5/1/2024	1/28/2000	V	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		18		
9479656	STEVEN	ANDRUS	1971	1/1/2024	1/28/2000	CH	5/1/2024	1/28/2000	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		18		
9927906	DEBORAH	CHASNICK	1974	1/1/2024	7/28/2000	CH	5/1/2024	7/28/2000	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		18		
9931161	HEATHER	WALL	1981	1/1/2024	7/28/2000	CH	5/1/2024	7/28/2000	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		10		
10009089	EVELYN	VOGT	1933	1/1/2024	2/22/1990	CH	5/1/2024	2/22/1990	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		14		
10180026	STEVEN	RANDEL	1973	1/1/2024	10/9/2000	CH	5/1/2024	10/9/2000	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		8		
10205801	DAVID	CHASNICK	1972	1/1/2024	10/11/2000	CH	5/1/2024	10/11/2000	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		18		
10223234	CHARISMA	BALTAZAR	1975	1/1/2024	1/13/1994	CH	5/1/2024	1/13/1994	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		16		
10403683	ROBIN	ELLIOTT	1957	1/1/2024	9/9/1997	CH	5/1/2024	9/9/1997	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		2		
10433085	NAMIR	SALMU	1962	1/1/2024	1/24/2001	CH	5/1/2024	1/24/2001	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		19		
10486878	JASON	BUNKER	1978	1/1/2024	2/20/2001	CH	5/1/2024	2/20/2001	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		13		
10506925	ANTHONY	CLARK	1967	1/1/2024	2/28/2001	CH	5/1/2024	2/28/2001	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		3		
10578281	KATHRYN	GOUGH	1968	1/1/2024	4/2/2001	CH	5/1/2024	4/2/2001	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		11		
31076952	WESLEY	PHILLIPS	1960	1/1/2024	2/6/2009	CH	5/1/2024	2/6/2009	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		15		
31093232	PAUL	GONDEK	1966	11/1/2023	9/14/2022	CH	5/1/2024	9/14/2022	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		21		
31375213	WILLIAM	BROWN	1959	1/1/2024	5/14/2003	CH	5/1/2024	5/14/2003	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		14		
31438205	ANINIF	LAWBNPF	1983	1/1/2024	7/8/2015	CH	5/1/2024	7/8/2015	CH	#N/A	TRUE	OAKLAND	WATERFORD TOWNSHIP		20		
QVF Regs ADDED and REMOVED			PNOT_JURISDICTION		PNOT_VoterID		QVF Registrations ADDED + VOTES			SQL							

Figure 21. Source: Tim Vetter, Co-chair, MFEI DEEP team, based on Michigan's official voter rolls, the Qualified Voter File, August 2025.

- A FOIA-obtained QVF snapshot from Royal Oak, Oakland County, shows CH/V registrants mailed absentee ballots, few of whom were on the permanent absentee list (December 2024).

⁸ Internal reference: ABS mailed to Challenged/Verify voters D1, D2, D3

⁹ Internal Ref C1.

voter_idc ntification n_num	voter_status_ty pe_code	registration_dat e	year_of_b irth	moved_fr om_coun ty	jurisdicti on_name	precinct	uocava_s tatus_co de	is_permanent_a bsentee_vot	city	zip_code	extension	location_ hash	ballot_sent_ date
33368697	V	2013-10-10T04:00	1941	OAKLAND	ROYAL OA	1	N	Y	ROYAL OA	48067	APT 921	606WILLIA	2024-09-26T0
33316752	V	2022-09-18T04:00	1948	OAKLAND	ROYAL OA	9	N	N	ROYAL OA	48073		2600OLIVE	2024-09-26T0
1.61E+08	CH	2022-11-08T05:00	1955	OAKLAND	ROYAL OA	8	N	N	ROYAL OA	48073		117W12M	2024-09-20T0
1.61E+08	V	2024-08-02T04:00	1957	OAKLAND	ROYAL OA	12	C	N	ROYAL OA	48073		537DEVILL	2024-09-20T0
7694071	V	1996-11-05T05:00	1958	OAKLAND	ROYAL OA	9	N	N	ROYAL OA	48073		1522W12P	2024-09-27T0
1.08E+08	V	2020-09-09T04:00	1958	OAKLAND	ROYAL OA	17	N	N	ROYAL OA	48073		4418SVBR	2024-09-26T0
1.05E+08	V	2001-08-16T04:00	1962	OAKLAND	ROYAL OA	14	N	N	ROYAL OA	48073		226WBLO	2024-09-20T0
1.08E+08	V	2013-02-15T05:00	1962	OAKLAND	ROYAL OA	15	N	N	ROYAL OA	48073	APT 201	4001CROC	2024-09-26T0
1.05E+08	V	2004-04-23T04:00	1963	OAKLAND	ROYAL OA	14	N	N	ROYAL OA	48073		226WBLO	2024-09-20T0
1.61E+08	V	2021-12-03T05:00	1969	OAKLAND	ROYAL OA	5	C	N	ROYAL OA	48067	UNIT 426	101CURRY	2024-09-20T0
7776818	V	1991-10-14T04:00	1970	OAKLAND	ROYAL OA	3	N	N	ROYAL OA	48067		815HOFF	2024-09-20T0
8.15E+08	CH	2016-06-21T04:00	1971	OAKLAND	ROYAL OA	6	N	N	ROYAL OA	48067		470CAMB	2024-09-20T0
1.09E+08	V	1999-09-15T04:00	1973	OAKLAND	ROYAL OA	11	N	N	ROYAL OA	48073		2328VINS	2024-09-27T0
1.03E+08	V	2008-01-31T05:00	1973	OAKLAND	ROYAL OA	7	N	N	ROYAL OA	48073		1918WICK	2024-09-27T0
1.61E+08	V	2024-01-11T05:00	1975	OAKLAND	ROYAL OA	15	N	Y	ROYAL OA	48073	APT 325	2317STAR	2024-09-26T0
33290456	V	2017-05-03T04:00	1980	OAKLAND	ROYAL OA	8	N	N	ROYAL OA	48067		1023OROP	2024-09-25T0
1.09E+08	CH	2014-07-21T04:00	1981	OAKLAND	ROYAL OA	3	N	N	ROYAL OA	48067		704WELLE	2024-09-26T0
1.59E+08	V	2019-06-08T04:00	1981	OAKLAND	ROYAL OA	14	C	N	ROYAL OA	48073		217WLAS	2024-09-20T0
34425862	V	2018-10-08T04:00	1983	OAKLAND	ROYAL OA	1	N	N	ROYAL OA	48067		322WPARI	2024-09-26T0
1.6E+08	CH	2020-09-21T04:00	1983	OAKLAND	ROYAL OA	6	N	N	ROYAL OA	48067	APT 1	103NCEN	2024-09-20T0
1.61E+08	V	2022-06-28T04:00	1986	OAKLAND	ROYAL OA	1	N	N	ROYAL OA	48067		825BATAV	2024-09-20T0
1.6E+08	V	2019-11-21T05:00	1987	OAKLAND	ROYAL OA	3	N	N	ROYAL OA	48067		1605E4TH	2024-09-26T0
1.09E+08	CH	2014-06-07T04:00	1989	OAKLAND	ROYAL OA	6	N	N	ROYAL OA	48067	APT 201	207NLAFA	2024-09-20T0
1.59E+08	V	2021-11-30T05:00	1990	OAKLAND	ROYAL OA	15	N	N	ROYAL OA	48073	APT 421	2425STAR	2024-09-27T0
1.59E+08	V	2019-06-24T04:00	1990	OAKLAND	ROYAL OA	18	N	N	ROYAL OA	48073		4604HILL	2024-09-26T0

Figure 22. Source Obtained via FOIA: QVF of Michigan, December 2024.

- QVF data indicates CH/V registrants were removed and re-added without resolving their status (Source: Tim Vetter, MFEI DEEP Team, August 2025).
- A 2024 QVF algorithm change defaulted to including CH/V registrants in mailing label printing. Clerks, unaware due to delayed ballot printing (caused by Robert F. Kennedy Jr.'s ballot status), missed a new requirement to exclude CH/V registrants.

Legal Framework

Potential violations of federal law:

- HAVA, [52 U.S.C. § 21083\(a\)\(4\)\(A\)](#): Requires state election systems to maintain accurate voter registration records that are updated regularly. Sending ballots to challenged/verify status voters may conflict with accuracy requirements.
- NVRA, [52 U.S.C. § 20507\(a\)\(4\)](#): Also requires states to conduct a general program that makes a reasonable effort to remove registrants who are ineligible to vote from the official list of eligible voters.
- NVRA, [52 U.S.C. § 20507\(d\)\(1\)](#): Mandates removal of inactive voters. Failure to remove inactive voters violates maintenance mandates through list maintenance programs.
- U.S. Constitution, [Fourteenth Amendment § 1](#) (Equal Protection Clause): Counting ballots from ineligible voters may dilute legitimate votes.
- Government Auditing Standards, [GAGAS 8.104e](#): Systemic failure to update rolls violates testimonial evidence standards.
- Executive Order 14248, [EO 14248 § 3\(c\)](#): Directs DOJ to enforce NVRA/HAVA list maintenance requirements.

- Executive Order 14248, [EO 14248 § 3\(c\)](#): DOJ must enforce NVRA/HAVA list maintenance.

Potential violations of Michigan law:

- Michigan Constitution, [MCL - Article II § 4\(1\)](#): Only eligible voters may vote. Providing ballots to ineligible (CH/V) violates eligibility requirements
- [MCL 168.509aa](#): Prohibits ballots to challenged or verify (CH/V) registrants.
- [MCL 168.509r\(5\)](#): Requires inactive status after 6 years of non-voting.
- [MCL 168.509dd](#): Exempts non-program removals from 90-day rule.
- [MCL 168.510](#): Mandates removal of deceased voters.
- [MCL 168.6, 168.759e](#): Define permanent mail ballot rules; sending ballots to Ch/V registrants violates this.

Proposed Remedial Actions:

- Conduct an independent, [GAGAS 8.104e](#)-compliant audit to identify CH/V ballot recipients.
- Develop a [GAGAS 8.104e](#)-compliant plan to remove inactive voters per NVRA ([52 U.S.C. § 20507\(d\)\(1\)](#))
- Mandate training for clerks on excluding CH/V registrants from mailing labels and preventing future “glitches.”
- Alert clerks statewide to the 2024 QVF process change and enforce compliance.

Priority Rating: 4/5 (High)

- **Impact:** Moderate, affecting a subset of ballots risking dilution.
- **Likelihood of Successful Remediation:** High, due to clear statutory violations.
- **Timeline/Resources:** Short-term (1-2 years), moderate resources for audits and education.

Summary:

The Michigan Fair Elections Institute (MFEI) found that Michigan’s Qualified Voter File (QVF) contains approximately 800,000 ineligible registrants, including 558,627 inactive since 2019, with 476 absentee ballots sent to challenged/verify (CH/V) registrants in Oakland County in 2024, 56 of whom voted. A 2024 QVF algorithm change automatically included CH/V registrants in absentee ballot mailings, violating HAVA (52 U.S.C. § 21083) and NVRA (52 U.S.C. § 20507) mandates for accurate voter rolls, and Michigan law (MCL 168.509aa) prohibiting ballots to CH/V registrants. This creates risk of vote dilution and erodes trust. MFEI recommends GAGAS 8.104e-compliant audits, clerk training to exclude CH/V registrants, and a plan to remove inactive voters. Urgent reforms are needed to ensure compliance and safeguard election integrity.

8. Failure to Verify Citizenship of Domestic and Overseas (UOCAVA) Registrants¹⁰

Michigan's implementation of the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) lacks robust verification of civilian overseas voters, creating risks for ineligible voting—including by non-citizens. The Michigan Fair Elections Institute (MFEI) has identified eight systemic failures in UOCAVA processes:

Findings:

1. Overseas Civilians Receive Preferential "Protected Status" Treatment

The Michigan Secretary of State (SOS) instructed clerks to afford all overseas **non-military applicants** "protected status." This designation effectively directed clerks to waive standard verification processes of identity, citizenship, and residency for overseas civilians.

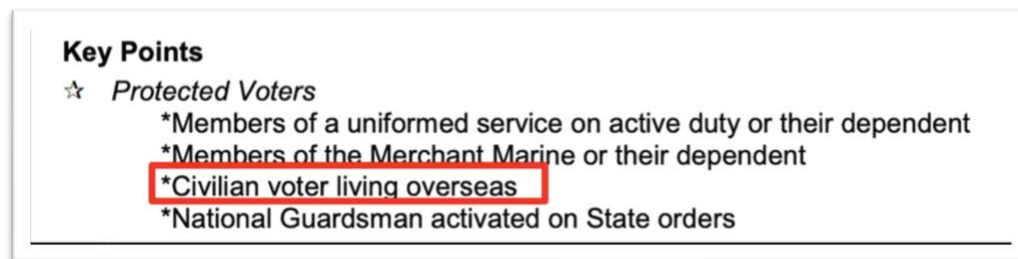


Figure 23: Source: "Introduction to Military and Overseas Ballots," [Military and Overseas Voters Manual for Election Administrators](#), State of Michigan, Secretary of State, Michigan Department of State Bureau of Elections, March 2018, p. 3.

While protected class status applies to military service members abroad (who may be in submarines or undisclosed wartime locations and situations), civilians are not in the same situation. Overseas civilians hardly warrant protected status. This is a significant issue because civilians dominate UOCAVA voting:

- Civilian overseas voters outnumber military voters by more than 8 to 2.
- In 2022, 83% of Michigan's overseas ballots came from non-military civilians.
- In 2024, 81.2% of Michigan's 21,128 overseas ballots were transmitted electronically to non-military civilians.

¹⁰ MFEI Report: [Failure of UOCAVA: Potential for Noncitizen Voting in Our Elections](#), December 2024

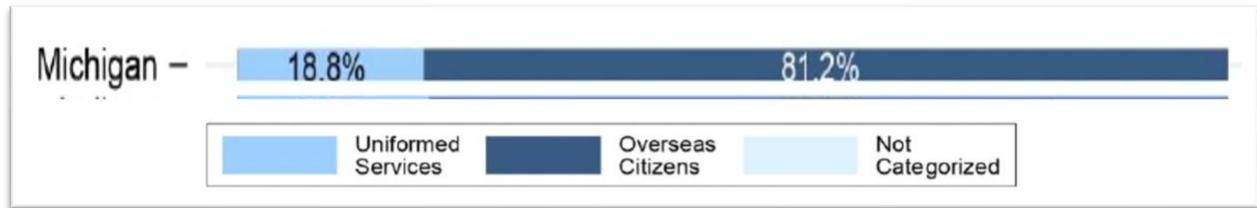


Figure 24: Transmission of UOCAVA Ballots to Uniformed Military Service Members Compared to Civilian (Nonmilitary) Overseas Registrants in 2024
[EAC EAVS Survey Report](#), Figure 4, p. 202.

National Trends:

- Nationwide in 2024, civilian overseas voters represented 70.7% of UOCAVA ballots
- Military voters declined to 26.3% of overseas voters ([EAC EAVS Survey Report](#), p. 200)
- Civilian overseas voters increased 9.4% from 2020, while military voters decreased 25%
- Civilian ballots exceeded 500,000 in 2020 (a 48% increase from 2016)

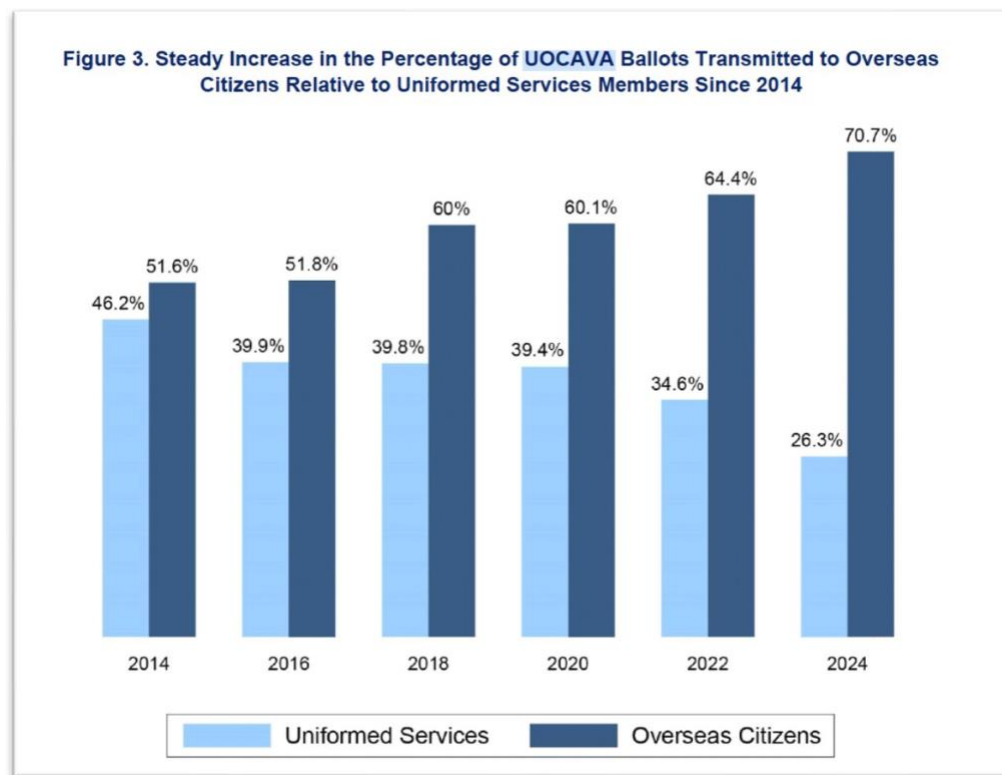


Figure 25: Steady increase in Percentage of UOCAVA Ballots Transmitted to Overseas Citizens Relative to Uniformed Services Members since 2014. [EAC EAVS Survey Report](#), p. 200.

2. Inadequate Verification of Overseas Non-Military Applicants

The Federal Post Card Application (FPCA) and Federal Write-in Absentee Ballot (FWAB) allow applicants to omit Social Security numbers, driver's licenses, or valid IDs, and still have applications forwarded to states, without verification. Michigan clerks are then instructed to accept applications, issue voter ID cards, and transmit ballots electronically without adequate scrutiny.

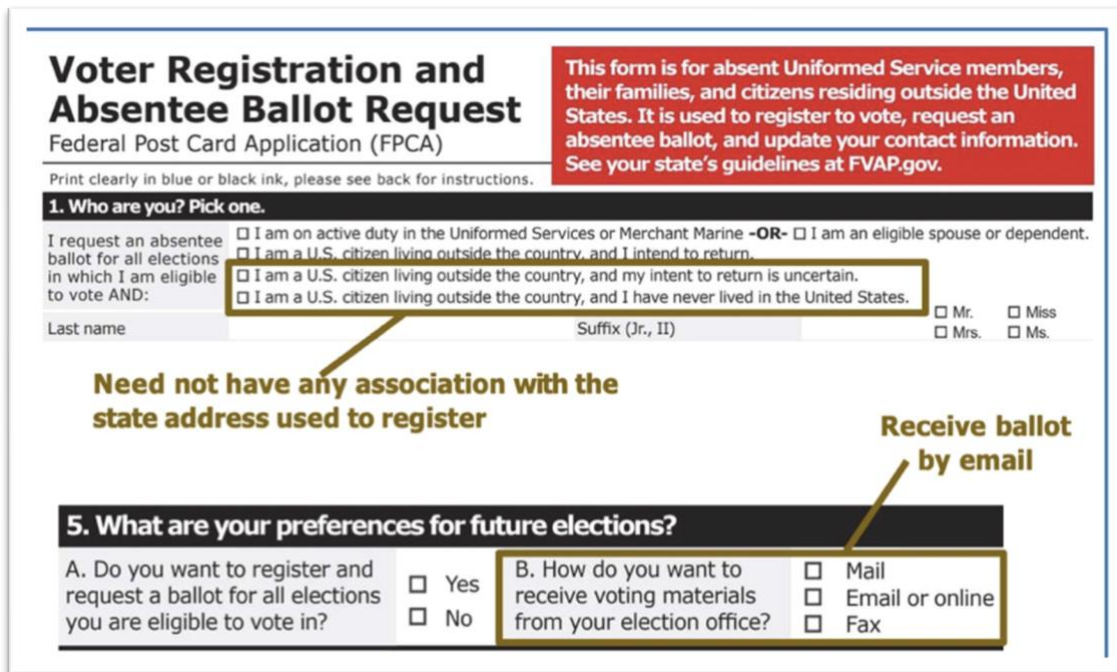


Figure 26: Voter Registration and Absentee Ballot Request Application.
 Source: Federal Voting Assistance Program: <https://www.fvap.gov/r3/fpca/my-information>.

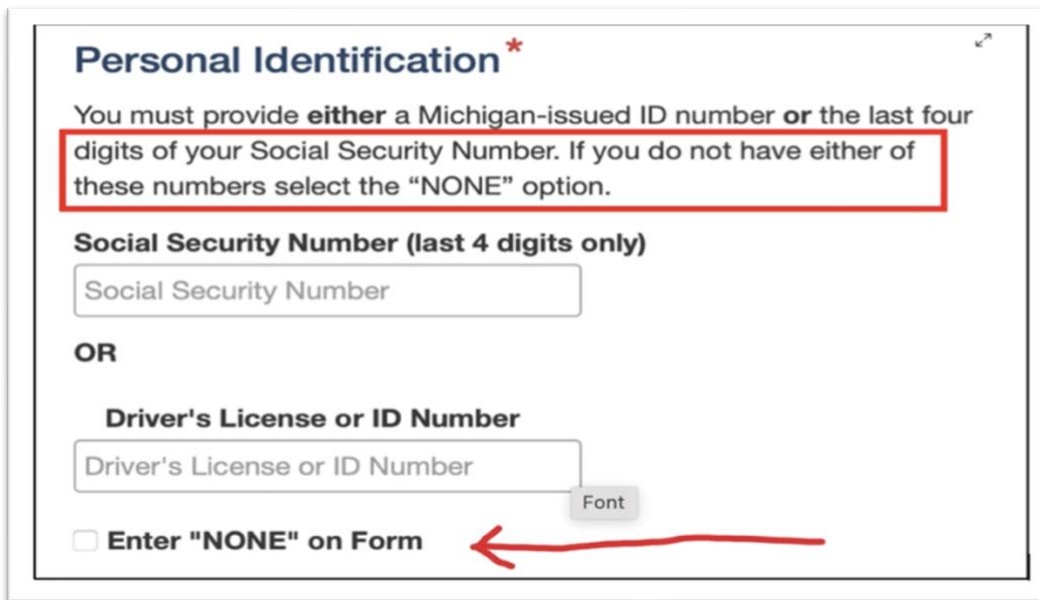


Figure 27: Voter Registration and Absentee Ballot Request Application.
 Source: <https://www.fvap.gov/fpca-privacy-notice>.

Federal UOCAVA System Points of Failure:

1. UOCAVA's original aim is diluted when military and civilian voters are treated similarly
2. Lacks robust eligibility requirements—the EAC assumes states will enforce eligibility
3. Registration applications lack critical verification points for identity, citizenship, or residency
4. Federal post card applications allow unvetted registrants to remain on rolls post-expiration

Michigan's Specific Points of Failure:

- SOS directives grant "protected status" to overseas civilians without verification.
- Ballots sent to UOCAVA registrants without identity/eligibility checks.
- Unclear or un-postmarked ballots accepted six days post-election.
- UOCAVA allows ballots from states where registrants never resided.
- No definitive citizenship match required for ballot counting.

3. Additional Systemic Failures

Defective Signature Verification Process: Regular absentee ballots are processed with only voter signature certificates for electronic ballots—no real (wet) signatures—with no additional identity or citizenship checks.

Permanent Absentee Ballot Risks: UOCAVA registrants can request ballots for all eligible elections. Then, after 12 months when their UOCAVA status expires, they may remain on rolls as non-UOCAVA voters, exacerbated by Michigan's 10-year permanent absentee list.

Obsolete Technology: The SOS manual, originally published in 1986 and updated in 2018, references obsolete technology predating widespread internet use.

Unverified Foreign-Mailed Ballots: Michigan accepts unclear or un-postmarked ballots up to six days post-election from any carrier.

Appendix A: Descriptive Tables

UOCAVA Table 1: Registered and Eligible UOCAVA Voters

State	Registered UOCAVA Voters						
	All UOCAVA Voters	Uniformed Services Members		Overseas Citizens		Not Categorized by Voter Type	
		Total	%	Total	%	Total	%
Michigan	26,734	5,188	19.4%	21,546	80.6%	0	0.0%

Figure 28: [EAC EAVS Survey Report](#), p. 210.

Legal Framework

Potential violations of federal law:

- UOCAVA, [U.S.C Title 52](#) and [52 U.S.C. § 20301](#) et seq.: Requires verification of overseas voters. Unverified ballots and "protected status" for civilians violate verification requirements. Current Michigan process fails to meet UOCAVA's verification standards.
- UOCAVA, [52 U.S.C. § 20302](#): Requires verification of overseas voters; unverified ballots appear to violate this.
- HAVA, [52 U.S.C. § 20901](#) et seq.: Michigan's failure to verify eligibility conflicts with accuracy and security standards. Title II requirements for voter roll maintenance and prevention of ineligible voting are not met
- NVRA, [52 U.S.C. § 20507](#): Inadequate voter roll maintenance risks ineligible voting. Failure to maintain accurate rolls violates federal standards
- Executive Order 14248, [EO 14248 § 2\(a\)\(i\)](#): Requires documentary proof of citizenship for voter registration. Michigan's current process fails to comply with citizenship verification requirements.

Potential violations of Michigan law

- [MCL 168.761, 168.765](#): Mandate verification for absentee ballots; non-compliance with identity, citizenship, signature, or residency violates these statutes.
- [Michigan Constitution \(MCL - Article II § 1\)](#): Guarantees only eligible citizens vote; unverified overseas registrations undermine this.
- [MCL 168.509o](#): Requires reasonable efforts to maintain QVF accuracy. Failure to verify UOCAVA applicants violates QVF accuracy requirements,
- [MCL 168.18a](#): Mandates verification for absentee ballots; non-compliance violates this statute.

Michigan Constitution, [Article II § 1](#)

- Guarantees only eligible citizens vote
- Unverified overseas registrations undermine citizen-only voting requirements

Proposed Remedial Actions

1. **Enforce Robust Citizenship Verification**
 - Require documentary proof of U.S. citizenship for all overseas civilian voters, consistent with [Executive Order 14248 § 2\(a\)](#), including:
 - U.S. passport, REAL ID-compliant identification indicating citizenship
 - Official military ID, or valid federal/state photo ID with citizenship proof
 - State/local officials must record document details while ensuring information security
2. **Separate Military and Civilian Processing**
 - Align with Principle VIII of the [US Citizens Elections Bill of Rights](#)
 - Mandate separate verification procedures for military and civilian overseas voters
 - Require robust ID verification (e.g., passport copies) and residency checks for civilians
3. **Restrict Electronic Ballot Returns**
 - Limit electronic ballot transmission and returns to military voters using secure Common Access Cards (CAC) or successor technologies
 - Ensure compliance with Michigan law ([MCL 168.761](#), [168.765](#))
4. **Update Technology and Guidance**
 - Revise the *Military and Overseas Voters Manual* to reflect current technology and EAC guidance
 - Replace obsolete 2018 and 1986 references predating widespread internet use
5. **Conduct Compliance Audits**
 - Perform GAGAS-compliant audits of 2022 and 2024 UOCAVA ballots
 - Assess compliance and identify ineligible voting per Government Auditing Standards
6. **Prohibit Unverified "Protected Status"**
 - Eliminate "protected status" for unverified civilian overseas voters
 - Educate clerks on risks to prevent fraud
7. **Pursue Legal Accountability**
 - File lawsuit to enforce compliance with [HAVA](#) and [UOCAVA](#) verification requirements
 - Enter consent decree to align Michigan with [EO 14248](#) citizenship verification standards

Priority Rating: 4/5 (High)

- **Impact:** Moderate, as it affects a subset of ballots but risks dilution through potential foreign interference or non-citizen voting, with potential to spike in presidential years
- **Likelihood of Successful Remediation:** High, due to clear statutory violations and federal reports
- **Timeline/Resources:** Short-term (1-2 years), moderate resources for lawsuits, audits, and manual updates

Summary:

The Michigan Fair Elections Institute (MFEI) identifies systemic failures in Michigan's UOCAVA implementation, with 81.2% of 2024 overseas ballots sent to unverified civilian voters, risking non-citizen voting. The Secretary of State's "protected status" for civilians waives or minimizes identity, citizenship, and residency verification, violating UOCAVA (52 U.S.C. § 20302), HAVA (52 U.S.C. § 20901), NVRA (52 U.S.C. § 20507), and Michigan laws (MCL 168.761 and 168.509o). Outdated technology, defective signature processes, and acceptance of un-postmarked and late ballots exacerbate fraud risks. MFEI recommends GAGAS-compliant audits, mandatory citizenship verification (e.g., passport), separate military/civilian processes, and legal action to enforce compliance. These issues undermine election integrity, requiring urgent reforms to ensure accurate voter rolls and compliance with federal and state laws.

9. Federal Election Day Deadline Violations—Acceptance of Late-Arriving UOCAVA Ballots

On March 25, 2025, President Trump issued [Executive Order 14248](#), which emphasized enforcement of federal election law by various federal government agencies and officials. Federal law establishes a uniform Election Day deadline ([2 U.S.C. § 7](#)) and ([3 U.S.C. § 1](#)), requiring that votes be cast and received by Election Day. As the Fifth Circuit held in [Republican National Committee v. Wetzel](#) (2024), federal statutes mandate that ballots "must be both cast by voters and received by state officials" by Election Day. Michigan appears to violate these federal requirements by allowing UOCAVA ballots (overseas military and civilian) to be received up to six days after Election Day, with or without postmark, per [Michigan Public Act \(PA\) 25](#) of 2023.

Findings:

Late-arriving UOCAVA ballots were received and counted in Michigan after Election Day deadlines during both the August 2024 Primary and November 2024 Federal Election:

Documented Late Ballot Receipts:*August 2024 Primary:*

- 347 ballots received on Aug. 7, 2024 (the day after Election Day),
- 366 ballots received on Aug. 8, 2024

November 2024 General Election:

- 517 ballots received on Nov. 6, 2024
- 497 ballots received on Nov. 7, 2024
- 473 ballots received on Nov. 8, 2024
- Additional late receipts through Nov. 11, 2024

Legal Framework

Potential violations of federal law:

- [2 U.S.C. § 7](#): Establishes uniform federal Election Day that Michigan appears to violate by accepting and processing late ballots.
- [3 U.S.C. § 1](#): Sets presidential Election Day deadline that Michigan's PA 25 contradicts.
- [3 U.S.C. § 21\(1\)](#): Defines election day as follows:
- “(1) “election day” means the Tuesday next after the first Monday in November, in every fourth year succeeding every election of a President and Vice President held in each State, except, in the case of a State that appoints electors by popular vote, if the State modifies the period of voting, as necessitated by force majeure events that are extraordinary and catastrophic, as provided under laws of the State enacted prior to such day, “election day” shall include the modified period of voting.”
- [Republican National Committee v. Wetzel](#) (5th Cir. 2024): Federal court ruling mandates ballot receipt by Election Day.
- U.S. Constitution, [Article I, Section 4, Clause 1](#) (Elections Clause): Federal election timing requirements supersede state law.

Potential violations of Michigan law

- [Michigan Public Act \(PA\) 25](#) of 2023: Conflicts with federal Election Day requirements by extending UOCAVA ballot receipt deadlines.

Proposed Remedial Actions

1. Federal Prosecution

- Petition U.S. Attorney General Bondi, AAG Harmeet Dhillon, and U.S. Attorney Jerome Gorgon for the 6th District to prosecute violations of federal Election Day statutes per [Executive Order 14248 § 5\(a\)](#).

2. Legislative Repeal

- Advocate for repeal of Michigan Public Act 25 of 2023 to bring state law into compliance with federal Election Day requirements.

3. Federal Litigation

- File federal lawsuit challenging Michigan's acceptance of post-Election Day ballots under [2 U.S.C. § 7](#) and [3 U.S.C. § 1](#).
- Cite Fifth Circuit precedent in [Republican National Committee v. Wetzel](#).

Priority Rating: 4/5 (High)

- **Impact:** Critical, as federal Election Day violations undermine uniform national election standards
- **Likelihood of Successful Remediation:** High, due to clear federal statutory violations and Fifth Circuit precedent
- **Timeline/Resources:** Urgent action needed before 2026 elections. Requires federal coordination and legal expertise

Summary:

The Michigan Fair Elections Institute (MFEI) reports that Michigan's acceptance of late UOCAVA ballots (e.g., 347 ballots on August 7, 2024; 517 on November 6, 2024) violates federal Election Day deadlines (2 U.S.C. § 7, 3 U.S.C. § 1), as affirmed by *Republican National Committee v. Wetzel* (5th Cir. 2024). Michigan Public Act (PA) 25 of 2023, allowing ballots up to six days post-Election Day, conflicts with the U.S. Constitution's Election Clause and Executive Order 14248's enforcement mandates. This violation undermines uniform election standards and risks vote dilution. MFEI recommends federal prosecution by the U.S. Attorney General, challenging and repealing portions of Michigan's Public Act 25, and filing lawsuits citing federal statutes. Urgent action before 2026 elections is critical to ensure compliance with federal law and restore trust in Michigan's elections.

10. Electronic Registration Information Center (ERIC) Violations¹¹

Since SOS Benson joined Michigan in the Electronic Registration Information Center [Home - ERIC, Inc.](#) (ERIC) in 2019, voter rolls have become increasingly bloated. ERIC shares personal data improperly, operates as a biased get-out-the-vote (GOTV) system, and is exempt from transparency laws—all while the state indemnifies it.

Findings:

- ERIC agreement allows data sharing with third parties ([Request for EAC OIG Audit Assessment](#), Exhibit A, of the agreement, sect. 4, “privacy: use of data”).
- Only 24 states participate, indicating obsolescence and incomplete data. Plus, more comprehensive and accurate services are available.
- ERIC’s GOTV activities and indemnification clause exacerbate risks (See Signed ERIC Agreement with SOS, [Request for EAC OIG Audit Assessment](#), Exhibit A).

Legal Framework

Potential violations of federal law:

- If a corporation or labor organization conducts a voter registration or GOTV drive that is not nonpartisan and the expenditure exceeds \$2,000 for any election, the payment must be reported on Form 7 by the corporation or labor organization itself, rather than by a separate segregated fund (SSF) or connected organization. While HAVA itself does not contain provisions that prohibit funding for these activities, the Federal Election Commission ([FEC](#)) regulations govern the reporting and coordination requirements for such expenditures. As a private corporation ERIC is not transparent or subject to FOIA, so its observation of FEC requirements is opaque to citizens. Also, ERIC is an obsolete, ineffective system subject to biased influence, and it has agreements with fewer than half of the states.
- NVRA, [52 U.S.C. § 20507\(a\)\(4\)](#): Undermined by ERIC’s bloated rolls.
 DPPA, [18 U.S.C. § 2721](#): Prohibits DMV data sharing; ERIC’s practices appear to violate this. ERIC has access to inappropriate, computer-processed information. While ERIC declares on its website that it does not share information, evidence shows ERIC is sharing personal identifying information of minor-aged children and others with undisclosed and anonymous third parties. Michigan’s agreement with ERIC ([Request for EAC OIG Audit Assessment](#), Exhibit A) allows ERIC to share information at its discretion with its “agents, contractors, and subcontractors,” and the agreement requires the state to indemnify ERIC from liability.

¹¹ Internal reference L.

- [U.S. Constitution - Fourth Amendment](#): Unauthorized data sharing appears to violate privacy.
- Government Auditing Standards, [GAGAS 8.98](#): ERIC's data-sharing undermines reliability.
- Executive Order 14248, [EO 14248 § 2\(b\)](#): DHS must ensure voter roll accuracy; ERIC undermines this.

Potential violations of Michigan law:

- Michigan Constitution, [MCL - Article II § 4\(1\)](#): Vote dilution via over-registration appears to violate voting rights.
- [MCL 168.509r](#): ERIC's data-sharing appears to violate QVF accuracy requirements.

Proposed Remedial Actions:

- Sue to audit ERIC's role per Government Auditing Standards, [GAGAS 8.98](#)
- Terminate Michigan's ERIC agreement
- State may have to repay HAVA funds

Priority Rating: 4/5 (High)

- Impact: High, as ERIC affects statewide voter rolls and privacy.
- Likelihood of Successful Remediation: Moderate, due to legal complexity but strong evidence.
- Timeline/Resources: Medium-term (2-3 years), significant resources for legal and policy changes.

Summary:

Michigan's use of ERIC for voter roll maintenance has led to systemic issues, including bloated voter rolls exceeding voting-age population (e.g., 104.1% registration rate in 2023) and unauthorized sharing of personal identifying information (PII) with third parties. ERIC's practices violate federal laws such as the Driver's Privacy Protection Act (DPPA, 18 U.S.C. § 2721) by sharing DMV data without proper safeguards, the National Voter Registration Act (NVRA, 52 U.S.C. § 20507) through failure to remove ineligible voters, and the Help America Vote Act (HAVA) by using funds for non-compliant activities like get out the vote (GOTV). State violations include Michigan Constitution Article II § 4 and MCL 168.509r for inaccurate QVF maintenance. Evidence from CheckMyVote.org and RNC analyses shows persistent over-registration and privacy breaches. MFEI recommends terminating Michigan's ERIC agreement, auditing ERIC's role per GAGAS 8.98, and repaying HAVA funds. Priority Rating: 4/5 (High) – High impact on statewide voter rolls and privacy, moderate remediation likelihood due to legal complexity, medium-term timeline with significant resources.

11. Electronic Voting Machine Vulnerabilities¹²

Michigan law requires all electronic tabulators to meet the U.S. Elections Assistance Commission's certification standards for electronic ballot tabulating machines. None of Michigan's three brands of machines (Dominion, ES&S, or Hart) meet EAC standards. As an example, Dominion Voting machines contain modems demonstrated to be vulnerable to hacking. All these tabulators lack audit capacity, lack sufficient security, and appear to allow modem-based data transfers. All risk vote tampering and lack public oversight. All contain a significant percentage of parts sourced in foreign-adversary nations, including China.

Findings:

- The Halderman Report identifies malware risks and lack of auditability ([Four election vulnerabilities uncovered by a Michigan Engineer](#)).
- Patrick Colbeck's testimony to the Michigan House Election Integrity Committee highlights inadequate SOS rules ([video archive link](#)).
- Source: Information on voting equipment testing and certification policy was collected in item Q22a of the 2024 Policy Survey ([2024 EAC Report](#), p. 93)

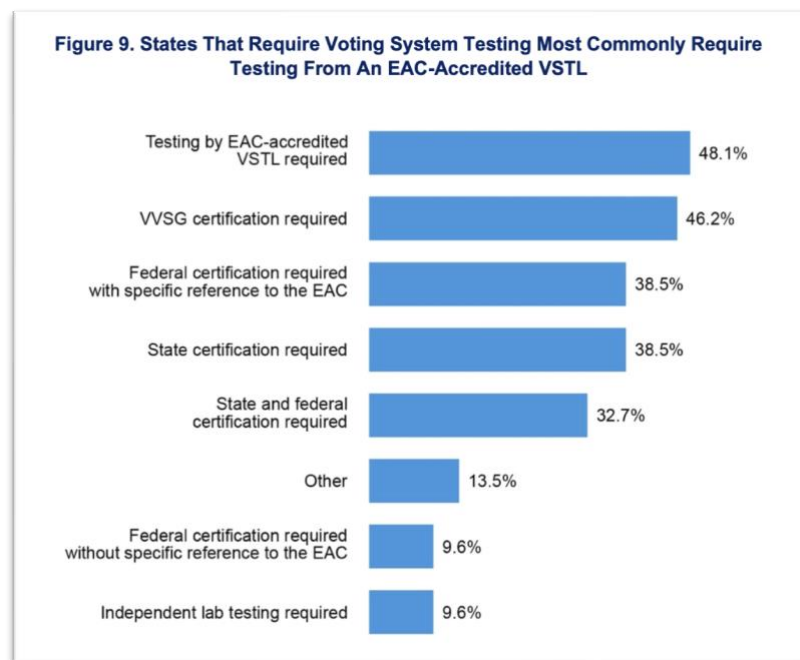


Figure 29. Information on voting equipment testing and certification policy was collected in item Q22a of the 2024 Policy Survey. Source: [2024 Election Administration and Voting Survey Report](#), EAC, p. 93.

¹² Internal reference G. Portions of this section contributed by Patrick Colbeck, [LetsFixStuff.org](#)

- Additional findings submitted by Patrick Colbeck, [LetsFixStuff.org](https://letsfixstuff.org):
 - [TCF Center Timeline Report](#)
 - [Speckin Forensics Audit of Detroit](#)
 - [Election Fraud Evidence Primer](#)
 - [Michigan Election Fraud Evidence](#)
 - [2024 Election](#)
 - [The Case for Decertification of the 2020 Election](#)
 - [Evidence of Electronic Voting System Vulnerabilities](#)
 - [Electronic Voting System Rules Assessment](#)
 - [The Case Against Electronic Voting Systems](#)
 - [Detroit Election Night Reporting Process](#)

Legal Framework

Potential violations of federal law:

- HAVA, [52 U.S.C. § 21081](#)(a)(1)(A)(i), (a)(2)(B): Require voter-verifiable and auditable records; Dominion's vulnerabilities appear to violate these.
- U.S. Constitution, Article I, Section 4, Clause 1 [States and Elections Clause](#): States must ensure secure elections; tabulator vulnerabilities appear to violate this.
- Government Auditing Standards, [GAGAS 8.59-8.67](#): Lack of security controls risks tampering.
- Executive Order, [EO 14248](#) § 4(b)(i), 6(b): EAC and DHS must ensure secure voting systems.

Potential violations of Michigan law:

- Michigan Constitution, [MCL - Article II § 4\(2\)](#): Requires secure elections; vulnerabilities appear to violate this.
- [MCL 168.795](#): Mandates audit trails; Dominion lacks compliance

Proposed Remedial Actions:

- Sue for a [GAGAS 8.59](#)-compliant audit of electronic voting systems.
- Consult experts like Alex Halderman at University of Michigan for technical validation.

Priority Rating: 3/5 (Moderate)

- Impact: High. Localized to Dominion-using jurisdictions, which is the majority.
- Likelihood of Successful Remediation: Moderate, due to technical complexity.
- Timeline/Resources: Medium-term (2-3 years), significant resources for audits and expert testimony.

Summary:

Michigan's electronic voting machines from Dominion, ES&S, and Hart fail to meet EAC certification standards, posing risks of hacking, tampering, and inadequate auditing. Dominion systems are vulnerable to malware altering barcode-encoded votes, privacy flaws in ballot scanners affecting voter anonymity, and unauthorized software allowing result manipulation via USB or internet. Modems in systems like Dominion's EMS enable remote access, with evidence from Michigan's Canton Township showing open ports and non-certified software. All brands lack sufficient audit capacity, with anomalies in tabulators (e.g., Williamson County, TN) and foreign-sourced parts from adversaries like China increasing supply chain risks. These violate HAVA (52 U.S.C. § 21081) for verifiable records, the U.S. Constitution's Elections Clause, and Michigan law (MCL 168.795) for audit trails. Evidence includes the Halderman Report, Cybersecurity & Infrastructure Security Agency (CISA) advisories, and Michigan-specific investigations (e.g., Antrim County errors). MFEI recommends GAGAS 8.59- compliant audits, consulting experts like U-M Professor Alex Halderman, and implementing software patches. Priority Rating: 3/5 (Moderate) – High but localized impact, moderate remediation likelihood due to technical complexity, medium-term timeline with significant resources for audits and testimony.

12. Party Parity Violations of Several Major Municipalities¹³

Major municipalities, including Detroit, Warren, Grand Rapids, Lansing, Ann Arbor, and Dearborn, failed to maintain equal numbers of Republican and Democrat election inspectors for the November 5, 2024, election, undermining bipartisan oversight (See [MFEI Party Parity Analysis: Election Inspector Hiring Practices of Michigan Municipalities, 2025](#)). The report reveals patterns of imbalance and FOIA delays, constituting a violation of Michigan's equal representation laws ([MCL 168.674\(2\)](#) and [168.679a\(1\)](#)).

Of the eight municipalities, not one had overrepresented Republican election inspectors. Only Sterling Heights achieved near-equal representation (48.3% each major party), and it exemplified prompt FOIA compliance. Sterling Heights demonstrated that parity can be reached when desired, and FOIA laws can be honored

Findings:

- Detroit's 71.7% Democrat vs. 12.1% Republican inspectors in 2024; Flint's 92% Democrat vs. 8% Republican in 2022 ([MFEI Party Parity Analysis report 2025](#)).

¹³ MFEI publication, [Party Parity Analysis: Election Inspector Hiring Practices of Michigan Municipalities](#), May 2025.

- FOIA delays (e.g., Detroit: 115 days) exacerbate transparency issues.

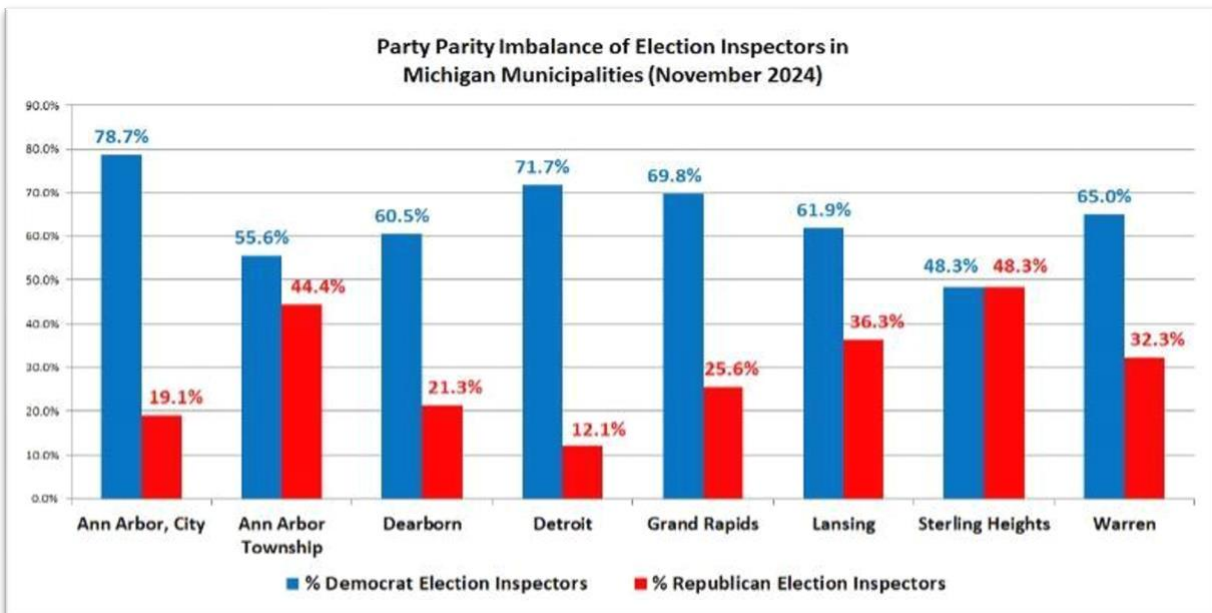


Figure 30: Systemic pattern of imbalance across multiple Michigan Municipalities.

Source: [MFEI Party Parity Analysis 2025](#).

- In Detroit's August 2024 primary, 131 of the 143 poll workers who had self-identified as Republicans in Detroit had voted in Democrat primaries, raising questions as to their actual party affiliation. (MFEI's analysis, "[Election Worker Disparity in Detroit's August Primary: A Call for Fair Representation](#)").
- The chart below illustrates the imbalances across the eight municipalities during the 2024 Presidential Election.

Detroit Election Inspector Affiliations

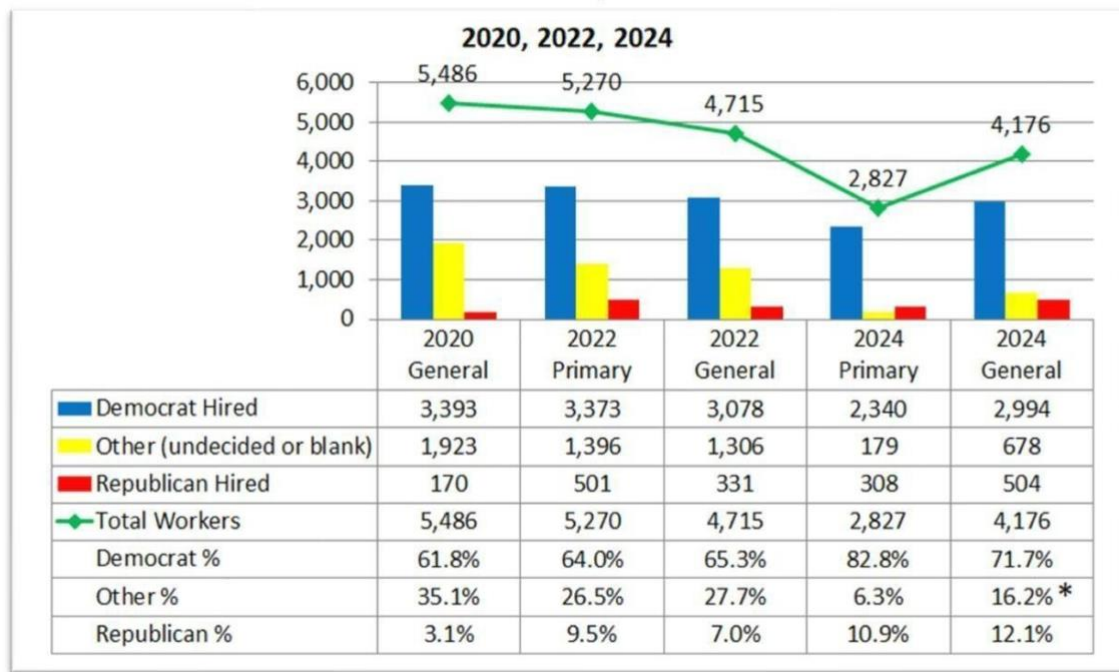


Figure 31: Detroit Election Inspector Party Affiliations. Source: [MFEI Party Parity Analysis 2025](#).

Legal Framework:

Potential violations of federal law:

- U.S. Constitution, [Fourteenth Amendment § 1](#) (Equal Protection Clause): Imbalances undermine equal protection through biased oversight.

Potential violations of Michigan law:

- [MCL 168.674\(2\)](#), [168.679a\(1\)](#): Mandate equal representation of major parties; imbalances appear to violate these statutes. (“The board of election commissioners shall appoint at least 1 election inspector from each major political party and shall appoint an equal number, as nearly as possible, of election inspectors in each election precinct from each major political party.”)
- Michigan Constitution, [MCL - Article II § 4\(2\)](#): Requires transparent elections; imbalances undermine trust.

Proposed Remedial Actions:

- Pursue stricter enforcement of legal mandates to establish parity, improved monitoring and FOIA compliance, and
- Sue to enforce party parity per [MCL 168.674\(2\)](#).
- Expand monitoring and enforce FOIA compliance for transparency.

Priority Rating: 4/5 (High)

- **Impact:** Quality of oversight indirectly affects vote counts.
- **Likelihood of Successful Remediation:** High, due to clear state law violations.
- **Timeline/Resources:** Short-term (1-2 years), moderate resources for lawsuits and monitoring.

Summary:

The Michigan Fair Elections Institute (MFEI) identifies significant party parity violations in major municipalities like Detroit, Flint, and Ann Arbor during the 2024 election, with imbalances such as Detroit's 71.7% Democrat vs. 12.1% Republican election inspectors. These disparities violate Michigan law (MCL 168.674(2), MCL 168.679a(1)) mandating equal representation, undermining bipartisan oversight and risking biased vote counts. FOIA delays (e.g., Detroit's 115 days) further obscure transparency, violating the Michigan Constitution (MCL Article II § 4). MFEI recommends legal action to enforce parity, enhanced monitoring, and FOIA compliance. These violations erode public trust in election integrity. Urgent reforms, including stricter enforcement and transparency measures, are needed to ensure compliance with state law and uphold fair elections.

13. Obstruction of Freedom of Information (FOIA) Requests¹⁴

Since November 2024, the BOE has obstructed FOIA requests by redesigning AV ballot tracking data and delaying responses, hindering audits and nullifying quo warranto remedies ([MCL 600.4545](#)). The SOS or BOE have unilaterally declared that certain standard materials that were formerly available to the public are now exempt from the Freedom of Information Act. However, the SOS and its BOE lack the authority to exempt materials.

Findings:

- Detroit's 115-day FOIA delay, Warren's 86 days, and redesigned incomplete tables. Source: [MFEI Party Parity Analysis 2025](#).
- SOS denies MFEI FOIA requests and directs clerks to deny MFEI FOIA requests. Many clerks comply. Judi Bennett, MFEI FOIA coordinator, files legal claim against SOS August 2025. MFEI sues Genesee County Clerk for FOIA violation. ([Judi Bennett versus MI Bureau of Elections](#), August 2025 and [MFEI vs Genesee County Clerk](#), August 2025).
- Clerks ignore or delay FOIA requests and destroy records before the 22-month retention period ([EAC OIG](#), Section 9).

¹⁴ Internal reference F1. [MFEI Party Parity Analysis: Election Inspector Hiring Practices of Michigan Municipalities](#), May 2025.

The table below illustrates systemic clerk failures to respond to federally mandated FOIA requirements:

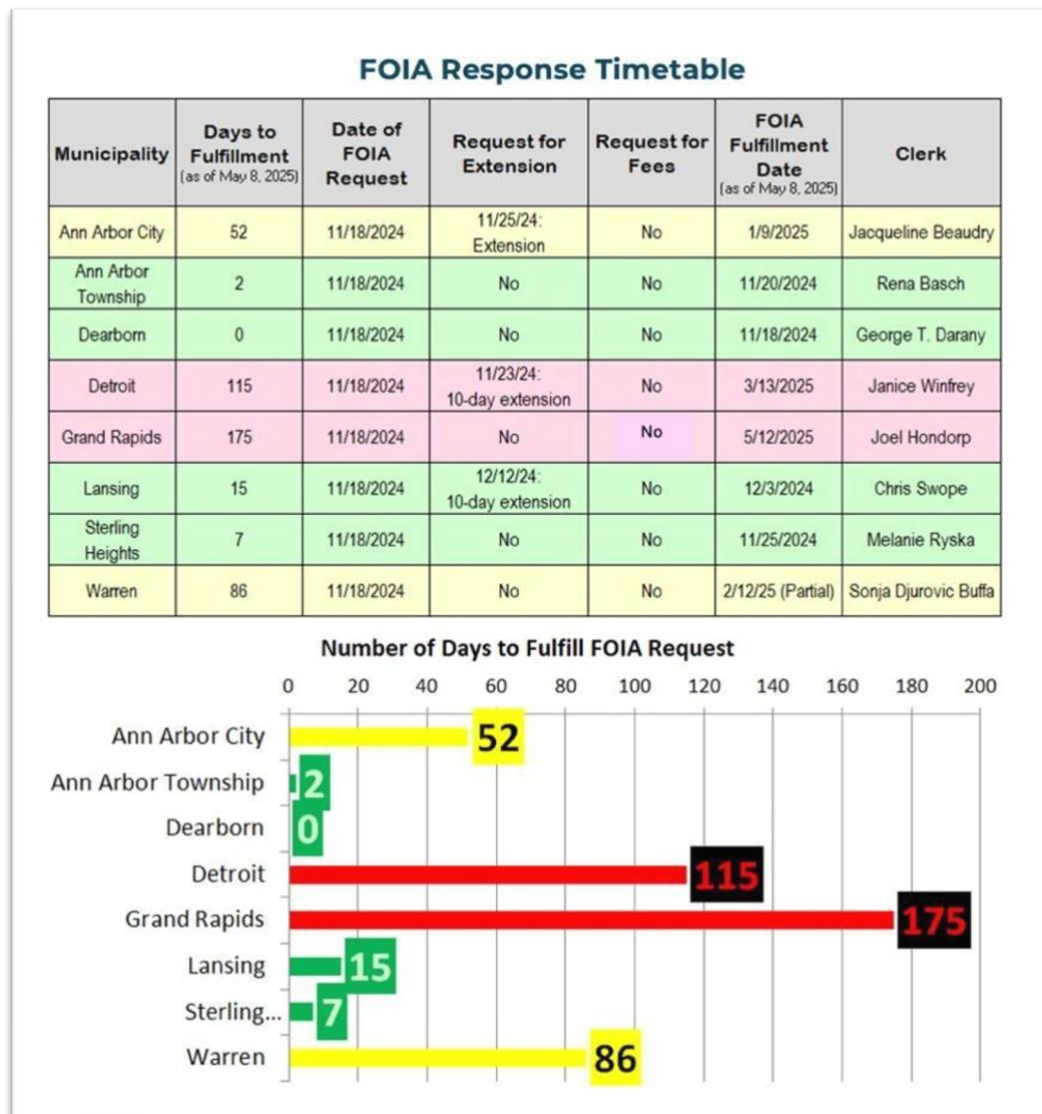


Figure 32: FOIA Response Timetable. Source: [MFEI Party Parity Analysis 2025](#).

Legal Framework:

Potential violations of federal law:

- HAVA, [52 U.S.C. § 21081\(a\)\(2\)\(A\)](#): Requires auditable records; FOIA obstruction prevents this.
- NVRA, [52 U.S.C. § 20507\(e\)\(1\)](#): Mandates public access to voter records; obstruction appears to violate this.
- U.S. Constitution, [First Amendment](#): Obstruction appears to violate the right to petition for redress.
- Government Auditing Standards, [GAGAS 8.71-8.76](#): FOIA delays increase fraud risk.

- Executive Order 14248, [EO 14248 § 5\(a\)](#): DOJ must investigate election interference, including FOIA obstruction.

Potential violations of Michigan law:

- Michigan Constitution, [MCL - Article II § 4 \(2\)](#): Guarantees transparency; FOIA obstruction appears to violate this.
- [MCL 15.231, 15.243](#): Mandate public access and timely FOIA responses.
- [MCL 15.244](#): FOIA Separation of Exempt and Non-Exempt Material: Must disclose non-exempt material.

Proposed Remedial Actions:

- Audit FOIA compliance per Government Auditing Standards, [GAGAS 8.71-8.76](#).
- Sue the SOS and EAC for FOIA violations, citing Michigan Press Association precedents.
- Demand immediate release of non-exempt records, including audit work papers and voter history data.
- Push for legislative amendments to clarify FOIA applicability to election records.
- Ensure all election records are public and retained for 24 months, as per Principle VII of the [US Citizens Elections Bill of Rights](#), to promote transparency and allow citizen oversight.

Priority Rating: 3/5 (Moderate)

- Impact: Moderate. Affects transparency but not the vote counts.
- Likelihood of Successful Remediation: High, due to clear FOIA violations.
- Timeline/Resources: Short-term (1-2 years), moderate resources for legal action.

Summary:

MFEI's investigation reveals systemic obstruction of FOIA requests by Michigan's Bureau of Elections (BOE), Secretary of State (SOS), and various municipal clerks with delays (e.g., Detroit's 115 days, Warren's 86 days, Grand Rapids 165 days) and unilateral exemptions of election records. These actions violate federal laws (HAVA, 52 U.S.C. § 21081; NVRA, 52 U.S.C. § 20507) and Michigan's FOIA laws (MCL 15.231, MCL 15.244), hindering audits and transparency. Such obstructions undermine public trust and election integrity. MFEI proposes GAGAS-compliant FOIA audits, legal action against the SOS and BOE, and legislative amendments to ensure record access. Immediate release of non-exempt records is critical. These reforms are essential to align with federal and state transparency mandates and the US Citizens Elections Bill of Rights, restoring confidence in Michigan's elections.

14. Potential Issues to Monitor

Methodology for Reclassification

To streamline the *MFEI's Investigation into Michigan Elections (MIME)* report and focus on issues with significant immediate impact, the Elections Oversight team applied a materiality threshold consistent with Generally Accepted Government Auditing Standards ([GAGAS](#)). Materiality was assessed using a dual-criteria approach: quantitative (issues affecting at least 0.5% of the Qualified Voter File, approximately 41,000 of 8.2 million registrations, or 10,000 ballots/voters in a federal election) and qualitative (issues with apparent legal violations, systemic risks, or significant erosion of public trust).

Three issues—Unlawful Votes of Incarcerated Felons, Ranked Choice Voting, and the Risk of Expansion of Electronic Ballot Returns to Include Overseas Civilians from Active-Duty Military Abroad—were deemed immaterial due to their limited scope, speculative nature, or lack of (though perhaps impending) current implementation. These issues, while concerning, do not meet the quantitative threshold (e.g., affecting less than 0.5% of QVF or 10,000 ballots) and have localized or hypothetical impacts. They are reclassified here for ongoing monitoring to ensure they do not escalate into material concerns in future elections. Detailed analyses for these issues are available upon request from MFEI.

A. Unlawful Votes of Incarcerated Felons¹⁵

The MIME report identified 274 incarcerated felons and misdemeanor offenders in Wayne, Genesee, and Oakland counties who voted in the 2022 general election, despite Michigan law ([MCL 168.758b](#)) prohibiting felon voting. This issue affects only 0.0033% of the QVF (8.2 million registrations) and 0.0049% of ballots cast in 2024 (5.6 million), well below the materiality threshold of 0.5% QVF or 10,000 ballots. While a clear violation of state and federal law (HAVA, [52 U.S.C. § 21083](#)), the limited scale suggests it does not currently pose a systemic threat to election integrity. However, the presence of felons on active voter rolls warrants monitoring to prevent potential growth in scope, particularly through regular cross-checks with county jail records. MFEI recommends continued FOIA requests to track felon voting and a GAGAS-compliant audit to ensure compliance with voter roll maintenance laws.

¹⁵ MFEI Report: [Request for EAC OIG Assessment of Audit Risk](#), January 29, 2024 (revised March 15, 2024).

B. Ranked Choice Voting (RCV)¹⁶

Ranked Choice Voting is not currently implemented in Michigan, requiring a petition drive and voter approval to become law. The MIME report notes potential risks of voter confusion, ballot exhaustion, and reduced transparency, which could conflict with federal election uniformity ([U.S. Constitution, Article I, Section 4](#)) and equal protection principles ([Fourteenth Amendment](#)). However, as RCV affects no current registrations or ballots, it fails both quantitative and immediate qualitative materiality thresholds. Its speculative nature makes it immaterial at present, but its potential adoption could pose significant risks. MFEI recommends monitoring petition drives and legislative developments, advocating for federal and state bans on RCV (as in [Tennessee](#) and [South Dakota](#)), and aligning with Principle IX of the [US Citizens Elections Bill of Rights](#) to protect one-person, one-vote standards.

C. Risk of Expansion of Electronic Ballot Returns to Include Overseas Civilians from Active-Duty Military Abroad.¹⁷

Effective September 15, 2025, the Secretary of State's office will launch a portal to allow the secure return of electronic ballots from active and abroad military service members. Members of the military have access to a secure communications method called a Common Access Card, CAC. However, based on the rules SOS Jocelyn Benson promulgated for implementing the portal under [MCL 168.759a](#), and based on her letter to the Michigan Attorney General, the SOS appears to favor expanding access beyond active-duty uniformed service members and merchant marines to overseas civilians. This expansion would open the door to foreigners voting and foreign interference.

Michigan's new law, [MCL 168.759a](#), restricts electronic returns to "eligible members" using only DoD-verified CAC security. In response to the SOS's inquiry, Attorney General Dana Nessel issued opinion #7322 against expansion of the [MCL 168.759a](#) to voters other than the military using a secure military system. However, the SOS has a history of blaming "glitches." She has [repeated violations](#) of the law with courts [ruling against her](#) eight times on election-related issues. The vagueness of SOS's promulgated rules for administering the portal, her expressed desire to allow overseas civilian votes, her conflict of interest in running for governor while administering the elections, and her declaring the portal exempt from FOIA—all raise red flags.

On August 22, the SOS sent an email announcing, "New ballot access platform to launch for military and overseas voters" effective Monday, Sept. 15, 2025. Her announcement cited [MCL 168.759a](#) and stated the new Electronic Delivery and Return Portal (EDARP) "delivers ballots electronically to eligible voters and allows eligible overseas active military members the option to conveniently mark and return an absentee ballot to their clerk's office electronically through a secure online portal."

¹⁶ MFEI Report: [Ranked Choice Voting: A Threat to Our Electoral Process](#), August 2025

¹⁷ MFEI Noncitizens Voting, JCAR file.

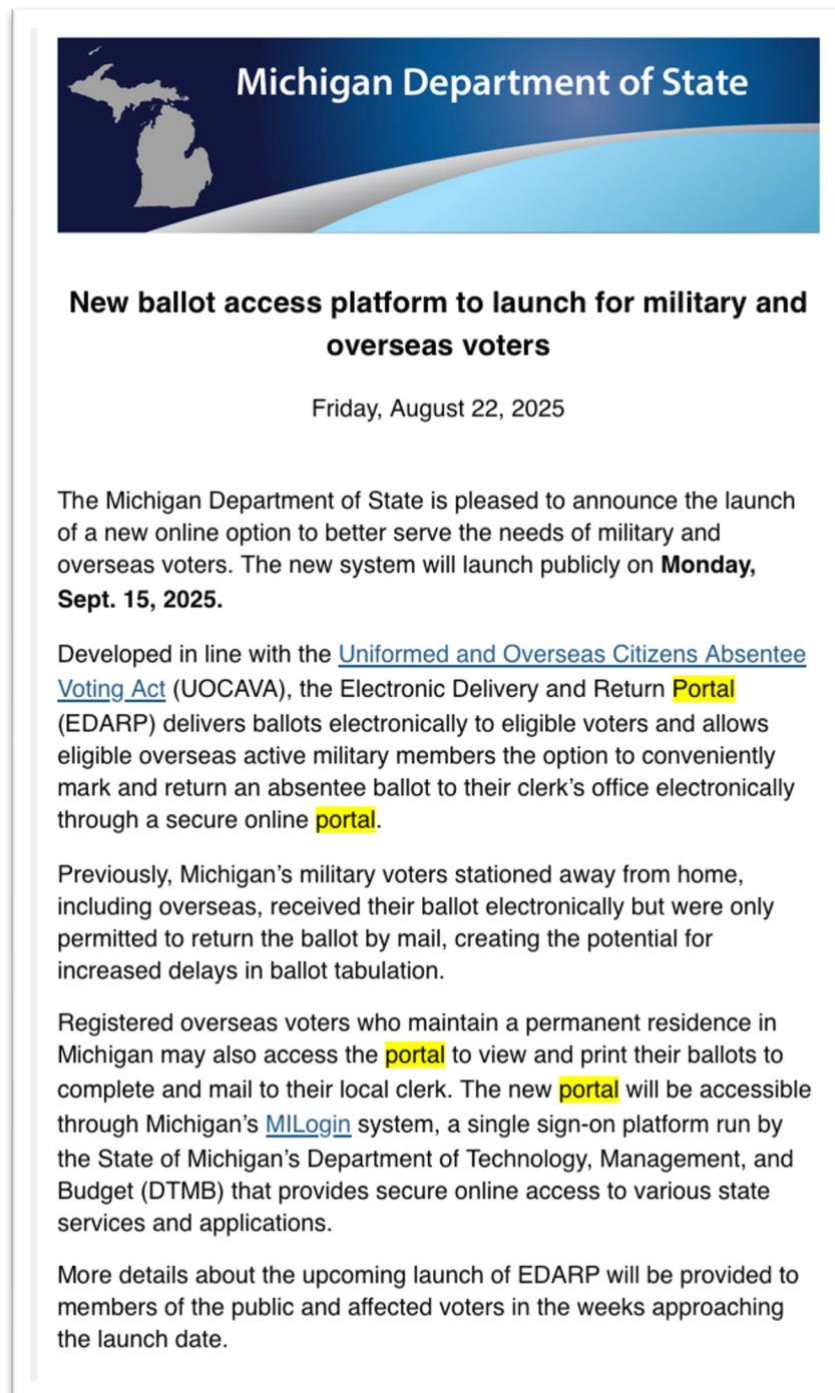


Figure 33: Email from SOS to MI clerks, Aug. 22, 2025.

Key information regarding this issue includes, the [SOS Pending Rules](#) ([LARA comments](#)) R 168.101(g), R 168.101(e), R 168.105(1)(d), R 168.106(7), R 168.114, R 168.111, R 168.103(3), R 168.113 ([LARA comments](#)). Sources: [Michigan SOS Absentee Voting Process Manual](#), <https://x.com/SenJRunestad/status/1932523383008141640>, [Court Opinion #372995](#).

Summary (August 9, 2025): “active uniformed service members and their spouses and dependents...[and] civilians residing or temporarily located overseas,” [States rush to combat AI threat to elections: Misleading AI-generated content a top concern](#), Attorney General Dana Nessel, [Opinion #7322](#), May 5, 2023.

The FBI, CISA, EAC, and NIST have all reported high risks with electronic voting:

RISK OVERVIEW			
	ELECTRONIC BALLOT DELIVERY	ELECTRONIC BALLOT MARKING	ELECTRONIC BALLOT RETURN
Technology Overview	Digital copy of blank ballot provided to voter	Making voter selections on digital ballot through the electronic interface	Electronic transmission of voted ballot
Risk Assessment	Low	Moderate	High
Identified Risks	Electronic ballot delivery faces security risks to the integrity and availability of a single voter’s unmarked ballot	Electronic ballot marking faces security risks to the integrity and availability of a single voter’s ballot	Electronic ballot return faces significant security risks to the confidentiality, integrity, and availability of voted ballots. These risks can ultimately affect the tabulation and results and, can occur at scale

Figure 33: “Electronic ballot return faces significant security risks...and can occur at scale.” [Risk Management for Electronic Ballot Delivery, Marking, and Return](#), Cybersecurity and Infrastructure Security Agency (CISA), Aug 28, 2025.

Summary:

MFEI identifies three issues for ongoing monitoring due to their limited current impact but potential to escalate: unlawful votes by incarcerated felons (274 cases in 2022), ranked choice voting (RCV), and the risk of expanding electronic ballot returns to overseas civilians. These issues, while below the materiality threshold (0.5% of QVF or 10,000 ballots), pose risks to election integrity. Felon voting violates MCL 168.758b; RCV is not implemented but could cause confusion; and electronic ballot expansion risks non-citizen voting, conflicting with MCL 168.759a. MFEI recommends continued FOIA requests, legislative monitoring, and GAGAS-compliant audits to prevent escalation. Proactive oversight ensures compliance with federal (HAVA, NVRA) and state laws, safeguarding Michigan’s elections.

Part B: Inadequate Scope of Federal Audits

Systemic Deficiencies in Government Agency Audits of HAVA grants and an Urgent Request for the Government Accountability Office to Investigate. Two core questions plague the audit of Michigan's usage of federal HAVA funds.

1. Did federal auditors properly consider stakeholder input about Michigan's election integrity concerns when conducting the \$49.88 million HAVA grant audit in 2024?
2. What did the federal auditors do to test whether Michigan's certification was in compliance with all HAVA requirements as required by [GAGAS 8.90](#) and [8.98](#)?

It appears the federal auditors focused narrowly on financial compliance under [2 CFR 200](#) while failing to evaluate critical HAVA mandates, such as voter access, election technology security, voter education, and adequate voter roll maintenance, as required by Titles I and II ([52 U.S.C. §§ 20901, 21081](#)).

See Compliance with Law for HAVA certification details.

The MIME report recommends the Government Accountability Office (GAO) conduct an immediate investigation into systemic deficiencies in the U.S. Election Assistance Commission (EAC) Office of Inspector General (OIG) audits of Help America Vote Act (HAVA) grants, particularly the inadequate scope employed by independent public accounting firms.

The Michigan audit (Report No. [G23MI0031-24-13](#), dated August 15, 2024) exemplifies this issue. The audit report focuses narrowly on financial compliance under [2 CFR 200](#). Meanwhile, the auditors failed to evaluate critical HAVA mandates, such as voter access, election technology security, voter education, and adequate voter roll maintenance, as required by Titles I and II ([52 U.S.C. §§ 20901, 21081](#)). This limited approach undermines HAVA's comprehensive certification requirements for fair, accessible, and secure elections.

The Michigan audit's shortcomings are part of a broader pattern, as seen in the New Jersey audit (Report No. [G23NJ0033-24-12](#), dated August 12, 2024), which similarly prioritizes financial oversight over election integrity.

Michigan's failure to maintain accurate voter rolls is particularly concerning, as highlighted in Michigan Fair Elections Institute's findings of 104,137 excess ballots in 2020 and 70,713 in 2022, alongside an estimated 800,000 ineligible registrations, including 558,627 inactive since 2019 (per the SOS QVF snapshot as of March 2025).

These discrepancies indicate systemic voter roll maintenance issues that the EAC OIG audits failed to address, risking vote dilution and eroding public trust. To align with national standards like

those outlined in the U.S. Election Assistance Commission's own guidelines (which emphasize principles of accuracy and integrity akin to a proposed U.S. Citizens' Election Bill of Rights), the GAO should mandate independent post-election audits to confirm accuracy and compliance, ensuring HAVA funds are used to uphold election integrity.

To rectify these deficiencies, the GAO should recommend the following actions:

- **Reaudit States with Comprehensive Scope:** The EAC OIG should reaudit states like Michigan and New Jersey, using a methodology that evaluates all HAVA requirements, including voter access, cybersecurity, voter education, and voter roll maintenance, to ensure compliance with Titles I and II standards.
- **Enforce HAVA Fund Claw Back:** The GAO should urge the EAC to enforce claw back of HAVA funds from non-compliant states, as authorized under HAVA Section 902 ([52 U.S.C. § 21142](#)), particularly for Michigan, where voter roll inaccuracies and excess ballots persist.
- **Strengthen Audit Guidelines:** The EAC OIG must revise its audit protocols to mandate assessment of election administration outcomes and HAVA Titles I and II compliance, ensuring robust voter roll maintenance and cybersecurity measures.

By implementing these measures, the GAO can ensure that HAVA audits address critical election integrity issues. It can prevent future non-compliance and safeguard federal elections.

Key Issues:

Several months after submitting our [Request for EAC OIG Assessment of Audit Risk](#) (2024), MFEI attempted to understand the scope of the EAC OIG audit of Michigan via FOIA requests and timelines. The following summarizes EAC's response and MFEI's subsequent concerns.

1. EAC Obstruction of FOIA Transparency

- EAC is withholding all audit work papers under Exemption 5 without specifying required "foreseeable harm"
- Denied MFEI's request for expedited processing despite public interest in oversight of \$49.88 million HAVA grant
- Ignored requests for segregability and interim release of non-exempt records. (In accounting, *segregability* is the ability to separate distinct assets, liabilities, revenues, or expenses and allocate them to individual projects, departments, or activities for accurate financial tracking and reporting.)
- Failed to address MFEI's narrowed scope requests

2. Audit Scope Concerns

- MFEI questions whether EAC OIG/Brown & Company CPAs considered MFEI's 65-page [Request for EAC OIG Assessment of Audit Risk](#) with its 426 pages of exhibits when planning the Michigan HAVA grant audit. MFEI was entitled to consideration as a party of interest

- Concerns about audit rigor and compliance with Government Auditing Standards ([GAGAS](#))
- Focus on whether voter roll maintenance issues under HAVA and NVRA were properly evaluated

MFEI and EAC OIG Interaction Regarding Michigan HAVA Funds Audit

The Michigan Fair Elections Institute (MFEI), as a party of interest, has a right and duty to engage with the Election Assistance Commission Office of Inspector General (EAC OIG) and provide input into an audit of Michigan's use of federal Help America Vote Act (HAVA) grants.

When MFEI learned of an upcoming EAC OIG audit of Michigan, MFEI attempted to exercise its right and duty to provide input and have transparency on one key issue: The scope of the EAC OIG's risk assessment of Michigan's compliance with HAVA law.

MFEI submitted a 65-page risk assessment report, [Request for EAC OIG Assessment of Audit Risk](#). In accompaniment to its report MFEI submitted approximately 400 pages of supportive exhibits.

Under Titles I and II ([52 U.S.C. §§ 20901, 21081](#)), the EAC OIG audit was supposed to evaluate Michigan's compliance with HAVA mandates. However, the EAC OIG's audit, subcontracted to independent public accounting (IPA) firms, appeared to ignore both its responsibility and MFEI's documented suggestions of issues surrounding voter access, election technology security, voter education, and voter roll maintenance. Instead, the EAC OIG and its contracted auditor conducted a financial audit only.

In the period leading up to, during, and after the audit, MFEI submitted requests for updates as to the EAC OIG's audit of Michigan and its consideration of MFEI's [Request for EAC OIG Assessment of Audit Risk](#). Throughout, the EAC OIG responded with systemic delays and denials.

Analysis of Potential FOIA Violation Due to Delay

The Freedom of Information Act mandates a response to FOIA requests within 20 working days, as outlined in the EAC's guidelines and [5 U.S.C. § 552\(a\)\(6\)\(A\)\(i\)](#). MFEI's request, first submitted on April 5, 2024, should have received a substantive response by late April 2024. The EAC's acknowledgment on April 29, 2024, met the initial notification requirement, but the current estimated completion date of April 2026 represents a delay of approximately two years.

This two-year delay exceeds the statutory 20-day response period and any reasonable extension under "unusual circumstances" ([5 U.S.C. § 552\(a\)\(6\)\(B\)](#)), which allows up to 30 additional working days with justification. Such a delay could be a violation of FOIA if not adequately justified, such as by overwhelming request volume or resource constraints, which the EAC vaguely cites (e.g., complexity, staffing levels).

The law ensures timely access to government records to promote transparency, and an undue delay may undermine this principle. The lack of interim updates beyond the initial acknowledgment and follow-up responses further suggests non-compliance with FOIA's intent, potentially warranting a complaint to the EAC FOIA Public Liaison or further legal action. The timeline below chronicles MFEI's FOIA requests and communications with the EAC OIG:

Chronology of MFEI's FOIA Submissions and the EAC OIG's Delays and Obstruction:

After learning of the EAC OIG's plan to audit Michigan's use of \$49.88 million of federal HAVA grant monies, MFEI submits its original 65-page [Request for EAC OIG Assessment of Audit Risk](#) along with its 426 pages of exhibits.

January 29, 2024	The Request for EAC OIG Assessment of Audit Risk , accompanied by an introductory memo, one-page summary, and exhibits, asks the EAC OIG to audit anomalies in the state's usage of federal HAVA funds.
April 5, 2024	Michigan Fair Elections (MFE) submits a Freedom of Information Act (FOIA) request to the U.S. Election Assistance Commission (EAC) via email, seeking detailed information on Help America Vote Act (HAVA) grants made to Michigan from 2017 to the present. The request, submitted by MFEI Chair Patrice Johnson, includes general categories such as public notices of financial assistance, government reviews of proposals and risks, certifications and representations, grant allocations, program narratives, grant award details, performance reports, financial management reports, cost-sharing documentation, and closeout records for both HAVA Election Security Grants (Assistance Listing No. 90.404) and HAVA Requirements Payments (Assistance Listing No. 90.401).
April 29, 2024	The EAC acknowledges receipt of the FOIA request (assigned file number 24-0056) via email from Seton Parsons, Associate Counsel, U.S. Election Assistance Commission. The response confirms processing under FOIA with no anticipated fees, provides links to publicly available Michigan grant reports, and notes processing will occur in the order received.
July 17, 2024, 11:40 AM	Mark Vaeth, MFEI Audit Director, follows up via email due to no response within the 20 working days, requesting confirmation of receipt and a status update.
July 17, 2024, 12:31 PM	EAC Associate Counsel Seton Parsons responds, confirming the April 29 acknowledgment and attaching the PDF letter for records, addressing the delay and offering further assistance.
August 15, 2024	The EAC OIG issues Michigan audit (Report No. G23MI0031-24-13), focusing narrowly on financial compliance under 2 CFR 200. The auditors

	failed to evaluate critical HAVA mandates, such as voter access, election technology security, voter education, and adequate voter roll maintenance, as required by Titles I and II (52 U.S.C. §§ 20901, 21081), thereby undermining HAVA's comprehensive certification requirements for fair, accessible, and secure elections.
January 26, 2025	Mark Vaeth emails again, inquiring about the FOIA request status and a potential timeline (e.g., early April 2025). Vaeth seeks guidance on submitting a FOIA request to the EAC Office of Inspector General (OIG).
February 6, 2025	Seton Parsons replies, stating the EAC processes FOIAs on a first-in, first-out basis, estimating completion by April 2026 due to complexity and volume, and confirms the same FOIA process applies for EAC OIG requests.
February 14, 2025	MFEI submitted FOIA for the complete audit work paper package prepared by Brown & Company CPAs and the EAC OIG for the Audit of the Administration of HAVA Grants Awarded to the State of Michigan (Report No. G23MI0031-24-13 , dated August 15, 2024).
March 4, 2025	The U.S. Election Assistance Commission acknowledges receipt of MFEI's FOIA via email to Patrice Johnson, confirming processing under FOIA with no anticipated fees, and assigning file number 25-0023. The request seeks the complete audit workpaper packages prepared by Brown & Company, CPAs, and the EAC OIG for the subject audit.
March 11, 2025	MFEI seeks a specific delivery timeline for the requested work papers, prompting a response from the EAC.
March 18, 2025	The EAC, via Associate Counsel Seton Parsons, responds that the request is being processed in a first-in, first-out order, citing a backlog from 2020 election cycle requests and staffing constraints, with an estimated completion date of March 1, 2026. EAC responds. Claims massive backlog and estimates completion of FOIA assessment by March 1, 2026, a one-year delay.
March 31, 2025	MFEI sends a letter challenging the year-long delay as a violation of FOIA's 20-day response requirement. Requests a revised delivery date on or before May 15, 2025), expedited processing, interim release of non-exempt records, and details on the backlog and staffing issues.
April 3, 2025	EAC requests clarification to narrow the scope of MFEI's FOIA request to facilitate faster processing.
April 4, 2025	MFEI responds by narrowing its request to substantive audit work papers and excluding administrative work papers. Narrowed focus is on risk assessment, audit objectives, and findings-related documents, while renewing requests for expedited processing, a revised delivery date, and interim release.
April 9, 2025	EAC revises delivery to May 15, 2025 , denies request for expedited processing.

May 20, 2025	EAC withholds all records under Exemption 5, cites the foreseeable harm standard but provides no specific harm explanation. The letter from EAC Seton Parsons states, “The EAC OIG has considered the foreseeable harm standard when reviewing these records and determined that the records responsive to your request are withheld pursuant to 5 U.S.C. § 552(b)(5) .”
May 23, 2025	MFEI submits this narrowed FOIA request, focusing solely on records related to the consideration of MFEI’s Request for EAC OIG Assessment of Audit Risk during the audit’s risk assessment and planning phase, while reserving rights to pursue an appeal or OGIS mediation.
May 28, 2025	MFEI submits a further narrowed request, focusing only on whether their risk assessment considered MFEI concerns.
June 17, 2025	MFEI received a response, which was insufficient to determine what the EAC OIG auditors examined. It appears the federal auditors limited their scope of work to a financial audit and failed to consider any of MFEI’s requests for audit assessment.
Current	MFEI is considering escalating the issue through administrative appeals or the Office of Government Information Services (OGIS) and submitting a complaint directly to the GAO.

Summary of MFEI’s FOIA Request Chronology

The EAC OIG is responsible for auditing state compliance with HAVA, and MFEI, as a party of interest, had a duty and responsibility to provide input into that audit. When the EAC OIG failed to audit Michigan for its compliance with HAVA Titles I and II, it failed to hold state election officials accountable for complying with federal election law in their expenditure of taxpayer dollars. If the EAC OIG failed to consider MFEI’s request for audit assessment, the EAC OIG ignored GAGAS-guidelines to consider input from parties of interest.

If these failures occurred, they jeopardized legitimate federal elections and eliminated the checks-and-balance system built into federal law. In addition, the EAC OIG’s delay and obstruction of fulfilling MFEI’s Freedom of Information Act submission appears to have violated citizens’ rights to government transparency, a key component of citizen self-government and a necessary ingredient to the integrity of elections.

Conclusion

The Michigan Fair Elections Institute's investigation identifies areas of concern in Michigan's election processes that warrant further investigation and appear to raise questions about compliance with federal and state laws. Processes that undermine the integrity of elections threaten to undermine the fundamental precepts of the constitutional republic and erode public trust.

Federal agencies, especially the [Elections Assistance Commission](#), bear the responsibility of ensuring that states abide by federal law in their use of federal funds for administering elections. As such, the [EAC OIG](#) must conduct real and effective audits of a state's usage of HAVA grants. This requires more than a cursory financial audit.

From ballot-voter discrepancies and unverified overseas voting to [FOIA](#) obstructions and inadequate voter roll maintenance, these violations demand urgent reform to ensure compliance with federal and state laws, including [HAVA](#), [NVRA](#), and [UOCAVA](#). By implementing the proposed remedial actions and aligning with the principles of the [US Citizens Elections Bill of Rights](#), Michigan can restore fair, transparent, and secure elections. MFEI calls on federal law enforcement agencies, including the [Department of Justice](#); policymakers, election officials; and citizens to act swiftly to protect the constitutional right of citizens to an honest and transparent election process. The nation's leaders, public servants, and citizens—working together and separately—can safeguard the foundation of our republic for future generations.

About Michigan Fair Elections Institute

The Michigan Fair Elections Institute ([MFEI](#)), a 501(c)(3) nonprofit (IRS tax-exempt #92-3943258), was founded on June 30, 2022, to restore integrity to Michigan's elections. Headquartered in Stockbridge, MI (P.O. Box 41, Stockbridge, MI 49285; 517-299-8002), MFEI operates through two foundational pillars: Election Oversight and Educational Outreach. Election Oversight investigates compliance with federal and state laws, focusing on voter roll hygiene, data analysis, and litigation, while Educational Outreach promotes public awareness through reports, townhalls, and voter engagement initiatives. With over 2,000 volunteers across chapters in more than half of Michigan's 83 counties, MFEI collaborates with local clerks, conducts data-driven analyses via its Data Evaluation Election Processes (DEEP) team, and supports legislative reform. Its affiliate, Pure Integrity Michigan Elections ([PIME](#), 501(c)(4), IRS tax-exempt #88-4108860), enhances advocacy efforts.

MFEI's 2024 achievements include increasing voter turnout by 43% in targeted districts through the Underserved Voter Outreach Team Effort (UVOTE) and influencing Executive Order 14248, which mandates citizenship verification and accurate voter rolls. MFEI's Soles to Rolls program removed thousands of ineligible registrations, and its opposition to Ranked Choice Voting shaped public discourse. The organization's unpaid board, led by Chair Patrice Johnson, includes Dee Davey, Janine Iyer, and others, supported by committees on communications, legislative education, and litigation. MFEI's free [online library](#) and newsletter provide accessible election data, earning endorsements from figures like Professor William Wagner, J.D., and Norm Shinkle.

Looking ahead, [MFEI](#)'s Strategic Plan 2025–2026 targets critical elections (e.g., 2025 mayoral races, 2026 gubernatorial and Supreme Court races) and ballot initiatives, opposing Ranked Choice Voting and supporting citizen-only voting. By expanding programs like election inspector recruitment, poll challenger credentialing, and voter roll hygiene, [MFEI](#) aims to ensure fair, transparent elections, aligning with the [US Citizens Elections Bill of Rights](#) and defending the [U.S.](#) and [Michigan Constitutions](#).

Defend the republic. Support MFEI.

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MFEI is a 501(c)(3) organization, EIN 92-3943258.



MiFairElections.org

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Good governance in a constitutional republic demands election laws that the average citizen can understand, trust, and verify. As citizens, scholars, and policymakers, we bear a solemn duty to ensure that every structural change to our electoral process fortifies—not fractures—the principles that secure our liberty.

-- Hon. William Wagner, Distinguished Professor Emeritus
(Constitutional Law) Former Federal Judge, United States Courts



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