



**FOR IMMEDIATE RELEASE**

# A DAVID VS. GOLIATH STRUGGLE: Private Citizen’s Election Complaint Advances over Missouri SOS’s Attempt to Circumvent Federal Law

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DATE: *March 8, 2026*

A federal judge has ruled that the State of Missouri must allow a voter’s federal election complaint based on Unite4Freedom analysis to proceed under the Help America Vote Act (HAVA), ordering the Missouri Secretary of State to accept the complaint, conduct a formal hearing, and issue a written determination within 90 days.

The decision comes after the State previously rejected the complaint based on a Missouri regulation requiring complaints to be filed within 30 days after election certification. The court ruled that **state procedural rules cannot be used to block federally protected rights established by Congress under HAVA.**

The court’s order requires the Secretary of State to process the complaint through the federal HAVA complaint procedure, including a hearing on the record and a written determination. The court also ordered **preservation** of key election system records while the complaint is investigated, including **statewide voter registration database records, voter history records, audit logs, and related election system data.** These records may be relevant to determining whether election systems are operating in compliance with federal requirements.

Importantly, the court stated that the plaintiff obtained the full relief requested in the complaint and that the court will retain jurisdiction for 90 days to ensure compliance with the order.

## The Complaint

The HAVA complaint filed by the plaintiff centers around a simple analysis in Unite4Freedom’s Election Validity Scorecard demonstrating that the state’s certified vote tallies from the 2022 and 2024 did not match the EAC vote tally or the state’s voter history records.

20 22	3. Was the number of votes counted equal to the number of voters who voted?	
	Official Source	Reported Total
	State Official Results of 2022 GE report (Secretary of State)	<b>2,069,481 votes counted</b>
	EAC Data (EAVS 2022 Public Data, V1: EAC has 234,769 more votes than SOS)	<b>2,304,250 votes counted</b>
	State raw data, official federal document (MCVR, 2/1/2023)*	<b>2,022,368 voters who voted</b>

20 24	3. Was the number of votes counted equal to the number of voters who voted?	
	Official Source	Reported Total by Official Source
	Total Votes Counted by MO SOS Voter Turnout	<b>2,995,327 vote counted</b>
	EAC Data (EAVS 2024 Public Data, V1: EAC has 131,50 more votes than SOS)	<b>3,126,837 votes counted</b>
	Votes Counted from Voter History in MCVR	<b>3,022,817 votes counted</b>



HAVA § 303(a)(1)(A) requires each state to implement a **“single uniform, official, centralized, interactive computerized statewide voter registration list”** maintained at the state level with a unique identifier for every single legally registered voter. § 303(a)(1)(A) further requires that this single statewide list serve as **the** official list for the conduct of all federal elections in the state. If different “official” channels produce different totals for the same election, the State is not operating off one authoritative list.

### What the Ruling Means

The ruling does not determine whether any election law violations occurred. Instead, **“This case is about ensuring that federal election law is followed,”** said plaintiff, Connie Kramer. “Congress created a process under the Help America Vote Act so that citizens can raise concerns about election administration and receive a formal hearing and determination. The court confirmed that states cannot block that federal process with procedural technicalities.

The court also emphasized that the ruling does not address the underlying merits of the allegations but ensures that the federally required process will occur.

“This ruling reinforces a simple principle,” the plaintiff added. “Federal election law applies to every state. When Congress created a complaint process for violations of HAVA, it meant for that process to be accessible to citizens.”

### National Significance

While the decision applies directly to Missouri, the ruling carries potential national implications because the Help America Vote Act establishes uniform federal requirements for election administration across all states.

#### Legal observers note that the decision reinforces several key principles of federal election law:

- **Citizens have the right to file complaints under the federal HAVA complaint process.**
- **States cannot use procedural rules to deny access to federally mandated complaint procedures.**
- **Courts may enforce the federal complaint process when states refuse to provide it.**
- **Election system records may be preserved and examined when compliance with federal election law is questioned.**

Because every state that receives federal funding under HAVA must comply with its requirements, the reasoning in the ruling may be cited in future cases involving election administration and access to the federal complaint process.

This ruling will be used in citizen complaints going forward. Remember in 2020 when no one had standing? ***This ruling will be used as precedent in future citizen complaints against states who violate their civil right to a free and fair election.***

The complete filing can be found at: <https://unite4freedom.com/litigation/>

### Unite For Freedom

Valid elections are guaranteed in the Constitution and are the foundation of our Republic. Join us to Unite For Freedom ([Unite4Freedom.com](https://Unite4Freedom.com)) and help save our country.



*Unite4Freedom is a non-partisan, volunteer, civic organization committed to restoring the fundamental right of every American citizen to legitimate representative government, through legal, valid, and accurate elections. Active in more than 30 states, U4F conducts forensic audits, educational initiatives, and policy advocacy to ensure Real Voters, Real Votes, Real Counts, Real Proof, and Real Security. For more information, visit [Unite4Freedom.com](https://Unite4Freedom.com)*

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

<b>CONSTANCE KRAMER,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 2:25-cv-04257-MDH</b>
	)	
<b>DENNY HOSKINS, in his official capacity</b>	)	
<b>as Secretary of State of Missouri,</b>	)	
	)	
<b>Defendant.</b>	)	

**ORDER**

Before the Court is Plaintiff’s Motion for a Temporary Restraining Order, Motion for Preliminary Injunction. (Doc. 2). The Court held a motion hearing on February 4, 2026, in which Plaintiff and counsel for Defendant Denny Hoskins were present. The motion is now ripe for adjudication on the merits. For reasons discussed herein, Plaintiff’s request for relief is **GRANTED**.

This *pro se* Plaintiff requests relief in the form of a TRO or preliminary injunction. (Doc. 2). Reviewing Plaintiff’s Complaint and requested relief liberally, the Court finds that a preliminary injunction, not TRO, is the most appropriate relief in this case.

A TRO which has no expiration date on its face, and which exceeds the limit as imposed by Federal Rule of Civil Procedure 65(b) is treated as a preliminary injunction in the Eighth Circuit. *See Nike, Inc. v. Partnerships & Unincorporated Associations Identified on Schedule A*, No. 4:25-CV-01598-MTS, 2025 WL 3554185, at \*1 (E.D. Mo. Dec. 11, 2025) (“Extending a TRO for a longer length of time effectively renders the Order an appealable preliminary injunction.”); *Sampson v. Murry*, 415 U.S. 61, 86 (1974) (“[A] [TRO] continued beyond the time permissible



## Missouri 2024 General Election Validity Scorecard

### ★ 1. Were the voter rolls accurate, as required by the National Voter Registration Act of 1993?

Registrations with material errors and omissions as per the Civil Rights Acts of 1964	Number of Instances	<b>37.5%</b> REGISTRATION ERROR RATE
Illegal duplicate registrations	24,699	
Registration date errors (voted before registered, or invalid date)	974,647	
Altered registration date backward	604	
Altered registration date forward	29,243	
Non-workday registrations prior to start of online registrations	77,230	
Invalid age for registration date or registered age (over 115 or under 17 years old)	1,780	
Multiple votes in an election	5,621	
Registration address blanks	26,007	
Altered birthdate	1,552	
Backdated voter history changes	600	
Voter removed and added back in	4,559	
First name has suspicious characters or changes	412,891	
Anyone on rolls for 8 years without voting or hasn't voted in 10 years	372,021	
<b>TOTAL REGISTRATION VIOLATIONS PROHIBITED BY LAW:</b>	<b>1,931,454</b>	
<b>UNIQUE REGISTRATIONS PROHIBITED BY LAW:</b>	<b>1,639,027</b>	

### ★ 2. Were the votes counted from eligible voters, as required by the US Constitution?

Registrations with material errors and omissions whose votes were counted	Number of Instances	<b>35.2%</b> VOTE ERROR RATE
Illegal duplicate registrations	16,352	
Registration date errors (voted before registered, or invalid date)	720,861	
Altered registration date backward	440	
Altered registration date forward	14,168	
Non-workday registrations prior to start of online registrations	60,569	
Invalid age for registration date or registered age (over 115 or under 17 years old)	978	
Multiple votes in an election	4,427	
Registration address blanks	17,028	
Altered birthdate	1,060	
Backdated voter history changes	507	
Voter removed and added back in	910	
First name has suspicious characters or changes	313,893	
Anyone on rolls for 8 years without voting or hasn't voted in 10 years	53,736	
NOT registered in November 2024 but later listed as voted November 2024	2,274	
<b>TOTAL VOTING VIOLATIONS PROHIBITED BY LAW:</b>	<b>1,207,203</b>	
<b>UNIQUE VOTES PROHIBITED BY LAW:</b>	<b>1,054,751</b>	

### ★ 3. Was the number of votes counted equal to the number of voters who voted?

Official Source	Reported Total by Official Source
Total Votes Counted by MO SOS Voter Turnout	2,995,327
Votes Counted from Voter History in MCVR	3,022,817
<b>DIFFERENCE (LESS votes counted than voters who voted):</b>	<b>-27,490</b>

### ★ 4. Was the number of ballots in error valid according to the Help America Vote Act of 2002?

Total ballots counted in error in the 2024 GE	1,054,751
Allowable machine error rate is 1/10,000,000 ballot positions or 1/125,000 ballots	24
<b>Total excess ballots counted in error: Provable accuracy fails to meet any protective legal standard</b>	<b>1,054,727</b>

## ★ TOTAL ELECTION VOTE COUNT ERRORS (Sections 2+3) . . . . . 1,082,241

**36.1%**  
TOTAL  
ELECTION  
ERROR RATE

*Extracted from official copies of the Missouri Centralized Voter Registration system (MCVR) database (dtd 11/1/2022, 11/1/2024, 12/2/2024, 1/2/2025, 2/3/2025), and votes counted from <https://sos.mo.gov>*



# Missouri's 2022 General Election Validity Scorecard

## ★ 1. Were the voter rolls accurate, as required by the National Voter Registration Act of 1993?

Ineligible or Uncertain Registration Type	Number of Instances*
Illegal duplicate registrations	35,410
Registration date errors (voted before registered, or invalid date)	1,079,175
Altered registration date backward	1,330
Altered registration date forward	174,913
Non-workday registrations prior to start of online registrations	96,762
Invalid age for registration date or registered age (over 115 or under 17 years old)	9,683
Multiple votes in an election	7,753
STL County votes missing from MCVR (Missouri Centralized Voter System)	15,296
Registration address blanks	53,441
Altered birthdate	3,234
Backdated voter history changes	7,175
Voter removed and added back in	17,188
First name has suspicious characters or changes	370,774
Anyone on rolls for 8 years without voting or hasn't voted in at least 10 years	534,420
<b>APPARENT REGISTRATION VIOLATIONS:</b>	<b>2,406,554</b>

## ★ 2. Were the votes counted from eligible voters, as required by the US Constitution?

Ineligible or Uncertain Registration Type that Voted in 2022 GE	Votes cast in 2022 GE
Illegal duplicate registrations	15,352
Registration date errors	532,232
Altered registration date backward	622
Altered registration date forward	74,164
Non-workday registrations prior to January 2017	53,493
Invalid age for registration or registered age (over 115 or Under 17 years old)	4,148
Multiple votes in an election	4,609
STL County votes missing from MCVR (Missouri Centralized Voter System)	15,058
Registration address blanks	19,555
Altered birthdate	1,721
Backdated voter history changes	4,936
Voter removed and added back in	600
First name has suspicious characters or changes	185,882
Anyone on rolls for 8 years without voting or hasn't voted in at least 10 years	35,766
NOT registered in November 2022 but later listed as voted November 2022	1,065
<b>APPARENT VOTING VIOLATIONS:</b>	<b>949,203</b>
<b>UNIQUE VOTES IMPACTED BY APPARENT VOTING VIOLATIONS:</b>	<b>746,892</b>

## ★ 3. Was the number of votes counted equal to the number of voters who voted?

Official Source	Reported Total
State Official Results of 2022 GE report (Secretary of State)	2,069,481 votes counted
EAC Data (EAVS 2022 Public Data, V1: EAC has 234,769 more votes than SOS)	2,304,250 votes counted
State raw data, official federal document (MCVR, 2/1/2023)*	2,022,368 voters who voted
<b>DIFFERENCE:</b>	<b>281,882 more votes counted than voters who voted</b>

## ★ 4. Was the number of ballots in error valid according to the Help America Vote Act of 2002?

Apparent voting violations in the 2022 GE according to MS SOS raw data	746,892
Allowable machine error rate is 1/10,000,000 ballot positions or 1/125,000 ballots	17
<b>Provable accuracy fails to meet any protective legal standard</b>	<b>746,875 unresolved vote errors</b>

Extracted from official copies of the MO MCVR (Missouri Centralized Voter System) database, raw data, official federal document provided by MO SOS. MCVRs dated 11/02/2020, 11/01/2022, 12/01/2022, 02/01/2023, 11/01/2023

\* RSMO 115.157 Allows 3 months for counties to submit Voter History to MCVR system.