

VERIFIED ADMINISTRATIVE COMPLAINT

Under Section 402 of the Help America Vote Act of 2002
and 1 Texas Administrative Code § 81.171

In re 2026 Texas Primary Election and Statewide Voter Registration System Administration

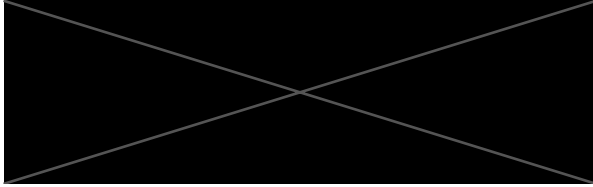
Filed with:

Texas Secretary of State
Elections Division, c/o Legal Department
P.O. Box 12060
Austin, Texas 78711-2060

I. Parties and Designated Roles

A. Candidate Co-Complainant

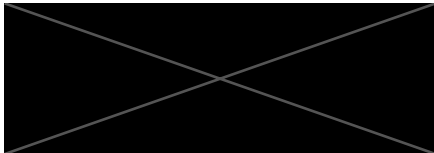
Jeffrey M. Yuna (a.k.a. Jeff Yuna)



Jeff Yuna (“Candidate Co-Complainant”) was a candidate of the Republican Party for the United States House of Representatives for Texas's 38th Congressional District in the Republican Primary Election held on March 3, 2026, and is a registered voter of Montgomery County, Texas, who cast a ballot in that election. Candidate Co-Complainant files this administrative complaint under HAVA § 402, 52 U.S.C. § 21112, and 1 Tex. Admin. Code § 81.171. Candidate Co-Complainant does not ask the Secretary of State to overturn, contest, or alter any election result. Candidate Co-Complainant seeks a HAVA Title III determination, preservation of records, audit/change logs, county feeder records, vendor/publication records, and reconciliation materials necessary to determine whether Texas is complying with HAVA § 303 in its administration of federal-office elections. Candidate Co-Complainant's executed Verified Consent is filed herewith as Exhibit 16.

B. Texas Voter Co-Complainant

Debra Boehm



Debra Boehm (“Texas Voter Co-Complainant”) is a Texas resident and registered voter of Collin County, Texas, who cast a ballot in the March 3, 2026 Texas Primary Election. Texas Voter Co-

Complainant joins this complaint to request a record-based HAVA determination concerning Texas's statewide voter registration list, voter history records, participation records, official-source reconciliation, and future federal-election compliance. Her interest in this proceeding is as a Texas voter affected by the record-chain issues identified herein.

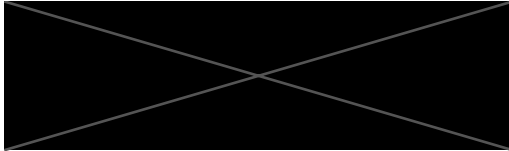
C. Respondent

Jane Nelson, in her official capacity as Texas Secretary of State
Texas Secretary of State
Elections Division, c/o Legal Department
P.O. Box 12060
Austin, Texas 78711-2060

Respondent is named in her official capacity as the chief election officer of Texas under Texas Election Code § 31.001, and as the state official responsible for Texas's HAVA administrative complaint procedure, statewide HAVA implementation, election administration uniformity, and maintenance of the statewide computerized voter registration list for federal elections.

D. Expert Witness on Election-System Auditability, Cybersecurity, and Record-Chain Controls

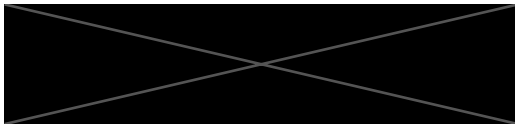
Harr Robert Haur III



Complainants identify Harry Robert Haury III (“Haury”) as an expert witness on election-system auditability, cybersecurity, and record-chain controls. Mr. Haury is not a complainant. His qualifications, opinions, and disclosed affiliations are set forth in his sworn declaration filed as Exhibit 8.

E. Technical Witness and Data Custodian

Todd Lindstrom



Complainants identify Todd Lindstrom (“Lindstrom”) as Technical Witness and Data Custodian. Mr. Lindstrom is a Texas resident and registered voter of Collin County, Texas, who cast a ballot in the March 3, 2026 Texas Primary. He is the principal data analyst responsible for the chain-of-custody download archive, the file-version analyses, and the methodology underlying the 2026 Texas Primary Election Day Voter Record Analysis (study agentic7eday) and the 2026 Texas Primary Early Voting companion study (agentic6cum) cited in this complaint. He is not named as a complainant. His sworn declaration is filed herewith as Exhibit 9 and authenticates the source data, chain of custody, methodology, and specific factual findings on which this complaint relies. Complainants request that Mr. Lindstrom be permitted to testify in person or remotely at any hearing on the record; if live testimony is not accepted in whole or in

part, Complainants request that his declaration, methodology, Table of Authorities, source file manifest, redacted examples, and written proffer be accepted into the administrative record.

F. Records Coordinator / Preservation and TPIA Sender

Co-Complainant Boehm sent a pre-complaint preservation notice dated May 13, 2026; a Phase 1 Texas Public Information Act / Texas Election Code § 1.012 request dated May 14, 2026; and a Phase 1A TPIA Supplement dated May 21, 2026, in her individual capacity as a Texas registered voter and as a Texas records coordinator assisting affected Texas voters, candidates, and technical witnesses in preserving and evaluating official-source election records. Those documents are referenced in Section VI.E below and filed herewith as Exhibits 14, 15, and 17.

G. Non-Attorney Assistance to Complainants

Constance Kramer
Email: connie.kramer@pm.me

Complainants designate Constance Kramer (“Kramer”), a Missouri resident, as a non-attorney administrative coordinator. Ms. Kramer’s role is limited to evidence custody, exhibit organization, administrative tracking, and chain-of-custody documentation. Ms. Kramer is not a complainant and does not appear as legal counsel. Her role in this proceeding is administrative only.

II. Introductory Statement, Requested HAVA Process, and Preservation of Statutory Deadlines

This complaint alleges Texas's failure to maintain, identify, preserve, and reconcile the single, uniform, official, centralized statewide voter registration list and related participation records required for federal elections by 52 U.S.C. § 21083(a)(1)(A)–(B). The complaint is brought under HAVA § 402, 52 U.S.C. § 21112, and 1 Tex. Admin. Code § 81.171. Complainants request a hearing on the record under 1 Tex. Admin. Code § 81.171(c)(4) and (h), a written final determination within the time required by HAVA and § 81.171(i), and administrative relief within the Secretary of State's HAVA authority.

This complaint concerns one issue: whether Texas is maintaining, identifying, preserving, and using the single, uniform, official, centralized, interactive computerized statewide voter registration list required by HAVA, and whether Texas can reconcile that authoritative statewide record to voter history, participation records, county feeder records, EAVS reporting, official statewide election totals, public early-voting files, Election Day TEAMS files, and later changes reflected in official-source participation data for federal elections.

This complaint is not a direct private federal lawsuit, not an election contest, and not a request to invalidate any election, determine the validity of any ballot or vote, declare any winner, award damages, conduct a criminal investigation, or decide criminal intent. The requested relief is administrative, record-based, and prospective: identify the authoritative statewide record; preserve source records; produce or

describe audit/change logs, county upload records, vendor/publication records, and reconciliation materials; hold a hearing on the record; and issue written findings.

Procedural Sufficiency. This Complaint satisfies 1 Tex. Admin. Code § 81.171(c): it is written, signed, notarized, identifies the Complainants and their contact information, describes a Title III violation with particularity (supported by the sworn declarations filed as Exhibits 8 and 9 and the factual record in Section VI), and requests a hearing on the record. The alleged violation falls within § 81.171(b)(3) because it concerns Texas’s creation, maintenance, identification, and reconciliation of the statewide voter registration system required by HAVA § 303, 52 U.S.C. § 21083(a)(1)(A)(i)–(viii).

The Four Binary Questions This Complaint Asks. This Complaint asks four binary questions about the official Texas record of a single federal election: whether the State’s four official measurements of voter participation reconcile; how they reconcile; which number Texas certified and from which source system; and whether the State can produce the record-chain proof. The questions are set out with the supporting record in Section VI.A and renewed in Section VII.

Statutory Deadlines Preserved. Complainants do not consent to any extension of the 90-day final-determination period required by 1 Tex. Admin. Code § 81.171(i), and Complainants do not waive the alternative dispute resolution procedure provided by § 81.171(i) in the event that final determination is not issued within ninety (90) days. Complainants request that the Secretary of State's written notice of acceptance under § 81.171(d) state the date of receipt that commences the 90-day final-determination period. If no such written notice is issued, Complainants will treat the date this Complaint was hand-delivered or mailed to the Secretary of State as the date of receipt commencing the 90-day period under § 81.171(i).

III. Jurisdiction, State Plan Authority, and Related Texas Law

HAVA § 402 requires a state-based administrative complaint procedure for alleged Title III violations. 52 U.S.C. § 21112. Texas implemented that procedure at 1 Tex. Admin. Code § 81.171. The Texas rule requires a written, signed, notarized complaint, permits a hearing on the record if requested, and limits remedies so the HAVA process is not used to invalidate an election or determine the validity of a ballot or vote. This complaint is brought within those limits.

HAVA § 303 requires each state, acting through the chief state election official, to implement a single, uniform, official, centralized, interactive computerized statewide voter registration list, defined, maintained, and administered at the state level. 52 U.S.C. § 21083(a)(1)(A). That list “shall serve as the official voter registration list for the conduct of all elections for Federal office in the State.” 52 U.S.C. § 21083(a)(1)(A)(viii). HAVA also authorizes Department of Justice civil enforcement of HAVA requirements. 52 U.S.C. § 21111.

Texas law reinforces the statewide-list structure. Texas Election Code § 18.061 requires the Secretary of State to implement and maintain a statewide computerized voter registration list as the single system for storing and managing the official list of registered voters. Texas Election Code § 18.065 concerns Secretary of State monitoring of voter registrars. Texas Election Code § 18.066 concerns availability of statewide computerized voter registration list information. Texas Election Code § 18.068 concerns comparison of information regarding ineligibility. Texas Election Code § 18.069 requires the general custodian of election records, not later than the 30th day after the election, to electronically submit to the Secretary of State a record of each voter who voted, in the form prescribed by the Secretary. Texas Election Code §§ 31.001, 31.003, 31.004, and 31.005 identify the Secretary of State's role as chief election officer, with responsibility for uniformity, assistance to local officials, and correction of irregularities. Texas Election Code §§ 1.012 and 66.058, and 52 U.S.C. §§ 20701–20703, support public access, preservation, and federal access to election records.

Texas's HAVA State Plan is not the source of the Title III duty by itself — HAVA and Texas law are. But the State Plan matters under HAVA's state-plan framework, 52 U.S.C. § 21004, because it describes how Texas represented it would implement HAVA Title III using state and county election administration. The State Plan confirms that Texas election administration is decentralized at the county level for operational tasks while the Secretary of State is the chief election officer responsible for uniformity and for advising and assisting local officials, and that the HAVA performance goal was implementation of a single, uniform, official, centralized, interactive computerized statewide voter registration list, defined, maintained, and administered at the state level, with the Secretary of State and county election officials responsible for that measure.

IV. Timeliness, Ongoing Nature of the Violation, and Imminent Federal Elections

This complaint alleges a Title III violation that has occurred, is occurring, and is about to occur again unless corrected before the next federal election. The 2022 and 2024 materials are offered as pattern-and-notice evidence of an unresolved statewide record-chain issue. The 2026 Primary materials are offered as current evidence because they concern official-source participation files from a primary election cycle that included federal-office contests.

The Texas Primary Runoff Election scheduled for May 26, 2026, including federal-office contests, will be administered using the same statewide voter registration system that produced the record-chain issues identified in this complaint. The November 3, 2026 General Election will follow on the same system. The issue is therefore not limited to one past election. If official statewide reporting streams, voter history data, participation records, county source records, public early-voting files, Election Day TEAMS files, and certified results cannot be reconciled to a preserved authoritative statewide record, the same defect will affect present administration and future federal elections. This complaint is ripe and is not moot. The Texas Primary Runoff Election is now days away as of the date of this filing. The Office's failure to issue an initial determination, hold a hearing, or take any administrative action before the runoff

is administered on the same statewide voter registration system that produced the record-chain issues identified in this Complaint does not moot the Complaint and does not relieve the Secretary of State of the duty to make a final determination within the 90-day period required by 1 Tex. Admin. Code § 81.171(i).

Complainants do not consent to any extension of HAVA's 90-day final-determination deadline unless each Complainant expressly consents in writing.

V. Complainants' Interests and Injuries

Candidate Co-Complainant has a direct and particularized interest in the lawful administration, stable record chain, accurate participation records, and public legitimacy of the election in which he participated. The injury asserted here is not a demand to change the outcome. It is the inability, as a candidate in the March 3, 2026 Texas Primary, to verify the authoritative record chain used for registration status, voter history credit, public participation reporting, canvass-supporting records, and later review.

Texas Voter Co-Complainant is a Texas resident and registered voter of Collin County, Texas, who participated in the March 3, 2026 Texas Primary. When official statewide reporting streams, voter history data, county participation records, EAVS turnout, public early-voting participation files, Election Day TEAMS files, and official statewide totals do not reconcile, and when the State does not identify the authoritative statewide record and audit trail explaining those differences, Texas Voter Co-Complainant cannot determine whether Texas is using the HAVA-required statewide list as the official list for federal elections.

Both Complainants seek a record-based HAVA determination, preservation of source records, a hearing on the record, written findings, and a final determination within the HAVA deadline. They also request that all exhibits, declarations, proffers, excluded evidence, objections, witness questions, hearing materials, recordings, and final written findings be retained as part of the administrative record.

VI. Factual Basis

A. Four official Texas measurements of the 2024 General Election do not reconcile; the same pattern existed in 2022.

Texas produces four separate official measurements of total voter participation in each federal general election: (i) the certified vote count from the Texas Secretary of State's official election results page (machine tabulation derived from county ES&S and Hart tabulators); (ii) the Texas Secretary of State's state voter roll vote count (voter-history credit posted in the SOS database); (iii) the Texas Secretary of State's county voter roll aggregated vote count (county-uploaded participation records, aggregated through the SOS system); and (iv) Texas's federal report to the U.S. Election Assistance Commission (EAVS F1a). Each of the four purports to measure the same underlying universe — voters who

participated in a single federal general election. If the HAVA § 303 statewide voter registration list were functioning as the statute requires, the four measurements would reconcile, or any difference would be explainable through preserved definitions, source records, timing records, and reconciliation materials. They do not, and the State has not published reconciliation between them. (Exs. 6, 7.)

Table 1. Four official Texas measurements of total 2024 General Election voter participation.

Source	2024 General Election	Type	Provenance
Texas SOS certified results	11,388,674	Votes counted (President race total)	Texas SOS results page (Ex. 6)
Texas SOS state voter roll	11,010,461	Voters who voted	Texas 2024 Scorecard § 3 (Ex. 7)
Texas SOS county voter rolls	11,319,614	Voters who voted (aggregated 1/12/2025)	Texas 2024 Scorecard § 3 (Ex. 7)
EAVS F1a (Texas submission)	11,488,820	Total voter turnout	2024 EAVS Report App. A (Ex. 6)

Table 2. Pairwise differences among the four 2024 official measurements (absolute values).

Comparison (2024)	Absolute difference
EAVS F1a vs. SOS state voter roll	478,359
EAVS F1a vs. SOS county voter rolls	169,206
EAVS F1a vs. SOS certified results	100,146
SOS certified results vs. SOS state voter roll	378,213
SOS certified results vs. SOS county voter rolls	69,060
SOS county voter rolls vs. SOS state voter roll	309,153

No two of the State’s four official measurements of total 2024 federal general election voter participation agree. The spread between the highest and lowest measurement is 478,359 voters, or approximately 4.20% of the certified count. Each of the six pairwise differences is non-zero.

HAVA § 303 requires Texas to implement and maintain a "single, uniform, official, centralized, interactive computerized statewide voter registration list" that "shall serve as the official voter registration list for the conduct of all elections for Federal office in the State." 52 U.S.C. § 21083(a)(1)(A) and (a)(1)(A)(viii). When the State produces four different official measurements relating to voter participation in the same federal general election, and those measurements are not reconciled or explained through preserved records, Texas has not demonstrated on this record that the statewide list is functioning as the single, uniform, official, centralized record required by HAVA § 303. The list is not the single record. It is not uniform across the State’s own reporting streams. It is not the official record from which

the certified count was derived (see Section VI.B and Exhibit 10, Executive Summary § 6). And it is not centralized in any sense that reconciles state-level and county-level outputs to a common authoritative source.

Table 3. Four official Texas measurements of total 2022 General Election voter participation.

Source	2022 General Election	Type	Provenance
Texas SOS certified results	8,102,908	Votes counted (Governor race total)	Texas SOS results page (Ex. 6)
Texas SOS state voter roll	8,120,067	Voters who voted	Texas 2022 Scorecard § 3 (Ex. 7)
Texas SOS county voter rolls	8,084,602	Voters who voted (aggregated 9/26/2023)	Texas 2022 Scorecard § 3 (Ex. 7)
EAVS F1a (Texas submission)	8,151,590	Total voter turnout	2022 EAVS Report App. A (Ex. 6)

Pairwise absolute differences (2022): EAVS vs. county rolls 66,988; EAVS vs. certified 48,682; EAVS vs. state roll 31,523; state roll vs. county rolls 35,465; certified vs. county rolls 18,306; state roll vs. certified 17,159.

The same pattern existed in the 2022 General Election. No two of the State’s four official measurements agree; the spread between the highest and lowest is 66,988 voters. The direction of the discrepancies differs from 2024 — in 2022 the SOS state voter roll runs above certified by 17,159 voters; in 2024 it runs below certified by 378,213 voters. A consistent timing-lag or routine administrative-delay explanation would produce directional bias consistent across cycles. The direction reverses, which undermines a simple timing-lag explanation and requires Texas to produce the underlying definitions, source records, timing records, and reconciliation materials.

These spreads operate at a scale material to certified federal-office outcomes. The 2026 Cornyn-Paxton U.S. Senate primary in Texas was certified with a margin of 31,818 votes (Ex. 10, Executive Summary § 5); every pairwise difference between Texas’s own four official measurements of total federal general election turnout — in either 2024 or 2022 — is larger than that margin, with the 2024 four-source spread (478,359) approximately 15× larger.

The Title III question this Complaint poses is, at its core, contained in four binary questions Texas has not answered:

First. Do these four official Texas measurements of the same election reconcile? Texas should be able to produce the reconciliation.

Second. Show how they reconcile. The record should connect 11,388,674 to 11,010,461 to 11,488,820 to 11,319,614 for 2024, and the corresponding 2022 figures, through documented Texas administrative records.

Third. Identify the number Texas certified and the source system that produced it. The Collin County exact-match comparison in Section VI.B and Exhibit 10 establishes that certified federal-office results in Texas derive from county ES&S tabulation rather than from the State’s HAVA § 303 list (TEAMS), implicating 52 U.S.C. § 21083(a)(1)(A)(viii).

Fourth. Produce the record-chain proof: the records, worksheets, audit logs, county upload records, vendor records, EAVS worksheets, and reconciliation files demonstrating how the certified number was derived and how it relates to the § 303 list. These records are identified in Section IX of this Complaint.

B. Texas certified federal-office results derive from county tabulation, not from the HAVA § 303 list (Collin County two-system proof).

Lindstrom's analysis establishes that Texas SOS certified results for federal-office contests are produced from county machine tabulation totals (ES&S and Hart), not from CIVIX TEAMS. TEAMS is a separate administrative participation record that is supposed to independently agree with the machine count. The analysis uses Collin County as a controlled comparison. The Collin County official ES&S canvass report was compared line-by-line against the Texas SOS certified results for Collin County. The match is exact across all four principal contests — Republican U.S. Senate (102,689 / 102,689), Republican Governor (100,366 / 100,366), Democratic U.S. Senate (95,839 / 95,839), and Democratic Governor (89,507 / 89,507) — including the early voting / Election Day / mail breakdown after combining the ES&S “Early Voting” and “Mail” categories into the SOS “Early Votes” column. The same two systems, however, report different registered-voter counts for Collin County: Texas SOS reports 752,502; Collin County ES&S reports 760,111; the difference is 7,609 registered voters — same county, same election, two different answers from two official sources. Complainants offer these facts as record-chain evidence requiring the State to identify the authoritative record and the reconciliation path, not as proof of intent or invalid votes. (Ex. 9, Lindstrom Declaration ¶¶ 34–37; Ex. 10, Executive Summary § 6.)

C. 2026 Primary early-voting files show unexplained record movement

Lindstrom's early-voting companion study (agentic6cum) captured 2,997 snapshots of the official Texas Secretary of State early-voting voter participation files across the 11 days of early voting (February 17 through February 27, 2026). First download: February 18, 2026 at 20:01 Central Time. The study identified categories of changes, including records that appeared, disappeared, reappeared, or remained absent from later snapshots, large-scale update or removal events, and a reported file-format or column-name change affecting county/precinct mapping mid-archive. Two large post-canvass modifications were captured on the early-voting files: 16,542 Republican voter records added on April 21, 2026 (49 days post-election); 29,778 Democratic voter records added on May 8, 2026 (66 days post-election). The

Republican certified early-voting machine count ran 84,000 to 100,000 records ahead of the published TEAMS early-voting file at canvass; the April 21 modification partially closed that gap. These facts are offered as notice facts requiring preservation and explanation, not as a final determination of cause, intent, ballot validity, or legal violation. (Ex. 9, Lindstrom Declaration; Ex. 10, Lindstrom Executive Summary; Ex. 11, Lindstrom Table of Authorities; Ex. 20, Lindstrom Early Voting TEAMS Record Format Transition Summary.)

D. 2026 Primary Election Day TEAMS files add a separate current record-chain issue

Lindstrom’s Election Day TEAMS analysis (study agentic7eday) concerns the March 3, 2026 Texas Republican Primary (CIVIX code 53813) and Democratic Primary (CIVIX code 53814). The analysis is based on public Election Day voter roster files downloaded directly from the Texas SOS / CIVIX TEAMS system, captured with cryptographic hash records at each download session and cross-referenced against the Texas statewide voter registration file (pb202602, dated February 14, 2026). The analysis documents what changed, when, and at what scale. (Ex. 9, Lindstrom Declaration; Ex. 10, Lindstrom Executive Summary; Ex. 11, Lindstrom Table of Authorities.)

The file-naming convention used in Lindstrom's materials retains the labels PR24REP and PR24DEM. This is a typographical artifact: the date prefix was encoded “PR24” rather than “PR26” on the first day of capture, and the decision was made to leave the files unchanged to preserve chain of custody rather than rename them after the fact. Every reference to PR24REP or PR24DEM in Lindstrom's materials refers to the 2026 Texas Republican Primary or 2026 Texas Democratic Primary, respectively. The actual election date (March 3, 2026) and election codes (53813 and 53814) are encoded inside the filenames and .info metadata. (Ex. 9, Lindstrom Declaration ¶ 17.)

For the Republican Election Day file, the analysis identifies four distinct file versions across 263 download sessions, each authenticated by MD5 and SHA-256 hash. The canvass-period stable version (v3, MD5 D7536C73...) contains 547,574 unique voter unique identifiers (VUIDs) and was downloaded 181 times without change between March 6 and April 20, 2026. A later version (v4, MD5 4480A89A...) first appeared on April 27, 2026 at 03:53 Central Time — 55 days post-election and more than 25 days after the canvass deadline; it contains 783,850 unique VUIDs. The set-arithmetic difference between v3 and v4: 237,139 VUIDs added, 863 VUIDs removed, net change +236,276. The April 27 modification was accompanied by a schema change — column names reverted from lowercase to uppercase, and STATEWIDE_POLLING_PLACE_INFO.csv reappeared inside the v4 ZIP archive, matching the structure of the pre-election v1 test file but absent from v2 and v3. The HAVA question is why those 237,139 participation records were absent from the canvass-period TEAMS file and what source records, audit logs, county upload records, vendor records, and authorization records explain the April 27 operation. (Ex. 9, Lindstrom Declaration ¶¶ 24–30.)

For the Democratic Election Day file, the analysis identifies two distinct file versions across 279 download sessions. The published version (v2, MD5 8B886F16...) has contained 583,671 unique VUIDs

since March 6, 2026 and has remained byte-identical through May 16, 2026. No modification corresponding to the April 27 Republican modification has occurred. Comparing the Democratic TEAMS Election Day record (583,671) against the certified machine-count proxy derived from the Democratic U.S. Senate race (approximately 784,647 Election Day voters certified by the State, less certified early voting), the analysis identifies a gap of approximately 201,000 voter records — approximately 26% of the certified Election Day count — that has never been reconciled. Complainants request the records needed to determine whether that gap reflects definitions, timing, file-generation limits, county upload issues, voter-history processes, or a record-chain failure. (Ex. 9, Lindstrom Declaration ¶ 31.)

Of the 237,139 voters added to the Republican Election Day file on April 27, 99.8% are present in pb202602 (the official Texas statewide voter registration file dated February 14, 2026); 99.4% carry Active registration status; registration-year distribution is consistent with the broader Texas electorate; and county attribution in the Election Day file matches county attribution in pb202602 to within ± 50 records per county. The question this raises is not who they are. The question is why their Election Day participation record was absent from the published State Election Day file for 55 days after the election. (Ex. 9, Lindstrom Declaration ¶ 33.)

E. Provenance and pre-complaint notice

Lindstrom's Table of Authorities identifies the data sources, the CIVIX TEAMS API endpoint (<https://goelect.txelections.civixapps.com/api-ivis-system/api/v1/getFile>), the API response format, the decoded CSV and ZIP formats, the .info sidecar files, the MD5 and SHA-256 hash records, the representative files, version identity by content hash, verification commands for independent verification, the February 14, 2026 statewide voter registration file pb202602, the Texas SOS certified results, and the Collin County ES&S canvass report. This material supports provenance and reproducibility, not just conclusions. Any party who receives a representative file can verify it independently by computing its hash and comparing to the recorded value. (Ex. 11, Lindstrom Table of Authorities.)

Before this HAVA complaint was filed, Co-Complainant Boehm sent a preservation notice dated May 13, 2026 (Ex. 14); a Phase 1 Texas Public Information Act / Texas Election Code § 1.012 request dated May 14, 2026 (Ex. 15); and a Phase 1A TPIA Supplement concerning the Election Day CIVIX TEAMS records dated May 21, 2026 (Ex. 17). Those letters asked Texas to preserve records and to identify the authoritative record chain, publication process, schema structure, vendor role, county upload/import path, audit/change logs, and reconciliation path. The letters show notice, preservation, and a reasonable records-request sequence before this complaint.

VII. Why These Facts State a Title III Violation Within 1 Tex. Admin. Code § 81.171(b)(3)

The violation alleged falls within 1 Tex. Admin. Code § 81.171(b)(3) — failure to create [and maintain] the statewide voter registration system required by HAVA. The Title III provisions implicated are HAVA § 303, 52 U.S.C. § 21083(a)(1)(A)(i)–(viii), together with § 21083(a)(2) (ongoing list

maintenance). A system that the State cannot identify, preserve, or reconcile is not the “single, uniform, official, centralized, interactive computerized statewide voter registration list” the statute requires.

The statutory hook is the keystone clause of HAVA § 303: the statewide list “shall serve as the official voter registration list for the conduct of all elections for Federal office in the State.” 52 U.S.C. § 21083(a)(1)(A)(viii). If the certified federal-office results for Texas are produced by county tabulation systems while the State's HAVA § 303 list is a separate administrative record that does not reconcile to the certified totals, then Texas has not demonstrated, on this record, that the § 303 statewide list and related voter-history and participation records are functioning as the authoritative statewide control record for federal election administration. The Collin County two-system comparison in Section VI.D above establishes that certified results derive from ES&S machine counts rather than from TEAMS, while TEAMS is the State's HAVA § 303 system. The record presented in this complaint shows that the two are not reconciled.

The record evidence raises these Title III compliance questions:

1. What is the authoritative statewide voter registration list Texas used for the 2022 and 2024 federal general elections and for the 2026 Primary federal-office contests, identified by date, time, file name, fields, source system, custodian, and preservation status?
2. What is the authoritative statewide voter history or participation record Texas used to credit voters with participation in those elections, and what records show how that authoritative voter-history record was derived from county participation records and how it relates to the registration list identified in Question 1?
3. What records show how county feeder records were uploaded, imported, validated, corrected, transformed, or reconciled into the statewide system?
4. What records support Texas’s EAVS F1a turnout figures, and how do those EAVS source records, worksheets, definitions, county inputs, validation records, and submission materials reconcile to Texas SOS certified results, state voter history totals, county voter roll aggregates, and the authoritative statewide record?
5. What records support the public early-voting and Election Day TEAMS participation files released or maintained during and after the 2026 Primary, including all file versions, schema changes, hash records, publication logs, and county upload logs?
6. What records explain the April 27, 2026 Republican Election Day TEAMS modification, including the source of the 237,139 records added, the 863 records removed, the user or process that performed the modification, the authorization for the operation, the stated reason, and the schema-change records?

7. What records explain whether the Democratic Election Day TEAMS file was later updated, and if not, why that record remained materially short of the certified machine-count proxy identified in the technical record?
8. What audit logs, change-history records, access logs, access-control records, and record-integrity controls does the Texas statewide voter registration system maintain, and do those controls satisfy the technical minimum standards a HAVA-compliant “single, uniform, official, centralized, interactive computerized statewide voter registration list” must meet under federal law? Complainants offer the expert testimony of Harry Robert Haury III — who consulted on the drafting of HAVA — on what those minimum standards require and what records a compliant State must be able to produce. (Ex. 8, Haury Declaration.)

If Texas can answer the four binary questions set out in Section VI.A, the answers will demonstrate the operation of a HAVA-compliant statewide voter registration list. If Texas cannot answer them, the four official measurements of total federal general election participation stand unreconciled on the State’s own books, and the Secretary of State is asked to determine whether that record satisfies HAVA § 303.

VIII. Request for Hearing on the Record

Complainants expressly request a hearing on the record under HAVA § 402, 52 U.S.C. § 21112(a)(2)(E), and 1 Tex. Admin. Code § 81.171(c)(4) and (h). Complainants request that the Secretary of State identify the hearing officer, presiding official, or designee in advance; state whether that person is acting as the Secretary's designee; clarify appearance requirements; and state whether Lindstrom and Haury may testify in person or remotely. Complainants reserve the right to object to the designation of any hearing officer who cannot provide impartial review consistent with HAVA § 402.

IX. Requested Relief

Complainants respectfully request that the Secretary of State:

1. Accept this Complaint as a formal HAVA Title III complaint under 52 U.S.C. § 21112 and 1 Tex. Admin. Code § 81.171; assign a complaint number; issue written notice of acceptance stating the date of receipt that commences the 90-day final-determination period under § 81.171(i); and hold a hearing on the record and issue a final written determination within the time required by HAVA and Texas’s HAVA complaint procedure, unless each Complainant expressly consents to more time in writing.
2. If the Secretary of State intends to invoke 1 Tex. Admin. Code § 81.171(d) to close this Complaint on the ground that it does not meet the requirements as to form, content, or identification of a Title III violation, Complainants request that the written notice (a) identify with particularity the specific requirement of § 81.171(c) the Complaint allegedly fails to satisfy or the

specific reason the alleged violation does not fall within § 81.171(b); (b) state the basis for that determination notwithstanding the sworn expert testimony in Exhibit 8 and sworn technical testimony in Exhibit 9; and (c) be issued in a form sufficient to permit administrative review.

3. Identify, in a written final determination, the authoritative statewide voter registration record and the authoritative voter history / participation record used by Texas for the 2022 and 2024 federal general elections and for the 2026 Primary federal-office contests, including date, time, file name, fields, source system, custodian, and preservation status.
4. Determine whether Texas's current statewide voter registration system and related voter history / participation record practices comply with 52 U.S.C. § 21083(a)(1)(A)–(B), subsection (a)(1)(A)(viii), § 21083(a)(2), and Texas Election Code § 18.061.
5. Produce, identify, or preserve a written reconciliation showing how EAVS F1a turnout, Texas SOS certified results / official total figures, state voter history totals, county voter roll aggregate totals, early voting records, Election Day records, public early-voting participation files, Election Day TEAMS participation files, and any later corrections relate to one authoritative statewide record, including any definitions, timing rules, data dictionaries, worksheets, county inputs, validation records, and reconciliation materials necessary to explain differences among those records.
6. Produce, identify, or preserve the records sufficient to support that reconciliation and to explain any non-reconciliation, including statewide voter-registration snapshots, voter history files, participation records, county feeder records, upload/import records, validation and correction records, EAVS worksheets and submission materials, data dictionaries, field definitions, reconciliation worksheets, audit/change logs, access logs, access-control records, database logs, schema-change records, vendor/publication records, and records necessary to explain the April 21, 2026 Republican early-voting modification, the May 8, 2026 Democratic early-voting modification, and the April 27, 2026 Republican Election Day TEAMS modification.
7. Permit Mr. Haury and Mr. Lindstrom to testify in person or remotely as Expert Witness and Technical Witness / Data Custodian respectively, and if live testimony is not accepted in whole or in part, accept their sworn declarations, methodology materials, Table of Authorities / provenance reference, source file manifest, redacted samples, written proffers, curricula vitae, and exhibits into the administrative record.
8. If a violation is found, require corrective action sufficient to ensure compliance in the May 26, 2026 Texas Primary Runoff Election and the November 3, 2026 General Election, including preservation of a point-in-time statewide record showing the official voter registration list, voters credited with participation, county feeder records, upload/import timestamps, vendor/publication

records, schema changes, audit/change logs, EAVS worksheets, and reconciliation to official statewide reporting.

X. Restricted Evidence and Voter Privacy Handling

Complainants intend to submit public, redacted, and aggregate exhibits with this complaint, including the Haury Declaration and the Lindstrom Declaration, the Lindstrom Executive Summary, the Lindstrom Table of Authorities / provenance reference, non-private hash and manifest materials, legal authorities, preservation-notice materials, TPIA materials, and complainant declarations. Complainants do not intend to file full raw voter-level source files, unredacted voter-level change-event tables, or files containing full voter ID, full name, address, date of birth, or other sensitive voter data in the public complaint file.

Those materials are preserved and may be made available through a confidentiality procedure, redaction protocol, hashed-identifier method, protective order, in-camera review, or secure production process if needed. The absence of raw voter-level data from the public filing should not be treated as a failure to support the complaint because the public exhibits identify the issue, method, provenance, categories of preserved records, and State records needed to explain the official record chain.

XI. Reservation Regarding County-Specific Complaints

This complaint is directed to the Texas Secretary of State because HAVA § 303 places the statewide-list duty at the state level and Texas law identifies the Secretary of State as the chief election officer and statewide-list authority. Complainants do not waive the right to file later county-targeted HAVA complaints, Texas Public Information Act requests, preservation notices, or other lawful requests directed to county election officials, county voter registrars, vendors, contractors, or other custodians if specific evidence shows a separate Title III violation or a failure to preserve, produce, reconcile, or explain county feeder records.

XIV. Exhibit List

- Exhibit 1.** HAVA § 303, 52 U.S.C. § 21083(a)(1)(A)–(B), statewide voter registration list requirements.
- Exhibit 2.** HAVA § 402, 52 U.S.C. § 21112, state-based administrative complaint procedure requirements.
- Exhibit 3.** 1 Tex. Admin. Code § 81.171, Texas HAVA administrative complaint procedure.
- Exhibit 4.** Texas Election Code authorities, including §§ 31.001, 31.003, 31.004, 31.005, 18.061, 18.065, 18.066, 18.068, 18.069, 1.012, and 66.058; federal preservation authorities, 52 U.S.C. §§ 20701–20703.
- Exhibit 5.** Amended Texas State Plan Pursuant to HAVA (January 2005), selected excerpts on Texas's state/county election structure, statewide voter registration system, performance measures, county responsibilities, and complaint procedure.
- Exhibit 6.** Texas 2024 and 2022 EAVS–SOS reconciliation materials.
- Exhibit 7.** Texas 2022 and 2024 supporting scorecard, voter-history, and county aggregate materials (USA / Unite4Freedom Texas Validity Scorecards), redacted or restricted as necessary.
- Exhibit 8.** Declaration of Harry Robert Haury III in Support of Verified HAVA Administrative Complaint (Expert Witness on Election-System Auditability, Cybersecurity, and Record-Chain Controls), with curriculum vitae.
- Exhibit 9.** Declaration of Todd Lindstrom in Support of Verified HAVA Administrative Complaint (Technical Witness and Data Custodian), with attached methodology summary.
- Exhibit 10.** Lindstrom Executive Summary, 2026 Texas Primary — Election Day Voter Record Analysis (study agent7eday), prepared May 17, 2026.
- Exhibit 11.** Lindstrom Table of Authorities / provenance and verification reference for the 2026 Texas Primary Election Day voter participation records.
- Exhibit 12.** Representative .info sidecar file, hash example, source URL / API endpoint reference, and verification-command example.
- Exhibit 13.** Restricted Evidence Inventory and Source File Manifest identifying raw files, representative files, hash manifests, snapshot manifests, code and SQL, and redacted samples preserved but not filed publicly.
- Exhibit 14.** Boehm Preservation Notice dated May 13, 2026, with proof of transmission.
- Exhibit 15.** Boehm Phase 1 TPIA / Texas Election Code § 1.012 request dated May 14, 2026, with proof of transmission.
- Exhibit 16.** Verified Consent of Candidate Co-Complainant Jeff Yuna, signed May 21, 2026, and any addenda.

Exhibit 17. Boehm Phase 1A TPIA Supplement concerning Election Day CIVIX TEAMS records dated May 21, 2026, with proof of transmission.

Exhibit 18. Texas SOS Notice of Apparent HAVA Compliance Issues dated February 3, 2026 (Boehm), with attachments.

Exhibit 19. Texas 2024 Early Voting Record-Change Report (Unite4Freedom, January 22, 2026). Public-facing summary report concerning observed additions, removals, oscillations, and other record changes in Texas 2024 early-voting participation files. Offered as pattern-and-notice evidence only, not as a final determination of cause, intent, ballot validity, criminal conduct, or legal violation. The underlying source data and methodology are preserved separately and can be made available through appropriate confidentiality or redaction procedures if required.

Exhibit 20. Lindstrom Early Voting TEAMS Record Format Transition Summary (agentic6cum), concerning the April 21, 2026 Republican and May 8, 2026 Democratic early-voting TEAMS format transitions and related post-election batch record changes. Offered as pattern-and-notice evidence only and as a summary of preserved source data; not offered as a final determination of cause, intent, ballot validity, criminal conduct, or legal violation.

XV. Certificate of Service

I certify that on May 22, 2026, I caused this Verified HAVA Administrative Complaint and accompanying exhibits to be served on the following recipients by the methods indicated:

By United Parcel Service Ground (hard copy with tracking):

Jane Nelson, Secretary of State
Texas Secretary of State
1019 Brazos Street
Austin, Texas 78701

Texas Secretary of State
Elections Division, c/o Legal Department
P.O. Box 12060
Austin, Texas 78711-2060

By electronic mail (with read receipts requested):

JNelson@sos.texas.gov — Secretary Jane Nelson
CAAdkins@sos.texas.gov — Christina Adkins, Director of Elections
generalcounsel@sos.texas.gov — Office of General Counsel
elections@sos.texas.gov — Elections Division

/s/ Debra Boehm
Debra Boehm
Co-Complainant