



**FOR IMMEDIATE RELEASE**

# Formal Complaint Filed with Texas Secretary of State Challenging Federal Voting Law Compliance

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**AUSTIN, TX** — Jeffrey Yuna of Harris County, former candidate for the 38th Congressional District, and Debra Boehm, a voter in Collin County have submitted a formal HAVA complaint with the Texas Secretary of State (SOS), the Hon. Jane Nelson, who is the State’s Chief Election Administrator.

The complaint, supported by Unite4Freedom evidence, seeks a hearing on the record under the longstanding Federal Help America Vote Act (HAVA) (§ 402, 52 U.S.C. § 21112, and 1 Tex. Admin. Code § 81.171) to determine whether Texas is complying with HAVA § 303 in its administration of federal elections.

The complainants are not asking to overturn, contest, or alter any election result. Instead, they seek a record-based HAVA determination concerning Texas’s statewide voter registration list, voter history records, participation records, official-source reconciliation; preservation of source records; and future federal-election compliance.

## HAVA Requirements

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.” This complaint alleges a HAVA Title III violation that has occurred, is occurring, and is about to occur again unless corrected before the next federal election.

This Complaint asks four binary questions about the official Texas record of a single federal election:

1. Do the State’s four official counts of voter participation reconcile?
2. Is there documented administrative records showing how they reconcile?
3. Can the State identify the number that was certified and the source system that produced it?
4. Can the State produce the record-chain proof of how the certified number was derived and how it relates to the “single, uniform, official, centralized, interactive computerized statewide voter registration list”?

## Evidence of non-compliance

Unite4Freedom’s 2022 and 2024 Election Validity Scorecards and related records provide evidence of an unresolved statewide record issues in the four separate official counts of total voter participation in each federal general election in Texas.

Texas’s four official counts of voter participation	2024 GE	2022 GE
TX SOS Official Certified Vote Count	<b>11,388, 674</b>	<b>8,102,908</b>
TX SOS State Voter Roll Count ( <i>Voter-history in the SOS database</i> )	<b>11,101,461</b>	<b>8,120,067</b>
TX SOS County Voter Roll Aggregate Count ( <i>County-uploaded participation records, aggregated through the SOS system</i> )	<b>11,319,614</b>	<b>8,084,602</b>
TX Federal Report to the U.S. Election Assistance Commission ( <i>Texas’s EAVS F1a submission</i> )	<b>11,488,820</b>	<b>8,151,590</b>



**None of the State's four official counts of total voter participation in the 2024 federal general election reconcile. The discrepancy between the highest and lowest count is 478,359 voters.**

**The same issue existed in the 2022 General Election, with a discrepancy of 66,988 voters between the highest and lowest count.**

When the State produces four different official counts relating to voter participation in the same federal general election, and those counts are not reconciled or explained through preserved records, Texas has not demonstrated that the statewide list is functioning as the single, uniform, official, centralized record required by HAVA §303.

### Evidence impacting 2026

The discrepancy between these counts are of a magnitude that could impact certified federal office outcomes. The March 2026 Cornyn-Paxton U.S. Senate primary in Texas was certified with a margin of 31,818 votes. The discrepancies between each comparison of Texas's own four official counts of total federal general election turnout—in either 2024 or 2022—is greater than the Cornyn-Paxton margin, with the 2024 discrepancy of 478,359 being over 15 times larger.

Additionally, Unite4Freedom 2026 Primary Vote Tampering Reports show unexplained record movement. The snapshots of the official Texas Secretary of State early-voting voter participation files across the 11 days of early voting 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.

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, and certified results cannot be reconciled to a preserved authoritative statewide record, the same defect will affect present administration and future federal elections.

In addition to federal law cited above, the complaint rests in Texas State Law including the Texas Administrative Code § 81.171, and Texas Election Code §§ 18.061, 18.065, 18.066, 18.069, 31.001, 31.003, 31.004, 31.005, 1.012 and 66.058. **Federal law establishes criminal penalties for election officials who willfully fail to retain and preserve election records, and cause submission of materially defective registrations or ballots, and for malfeasance by election officials acting under color of law by performing such acts as diluting ballots with invalid ones, rendering false tabulations of votes or preventing valid voter registration or votes from being given effect in any election.**

Review the [filing](#), to see the complete list of Title III compliance questions and the full list of requested relief.

Visit [unite4freedom.com/litigation](https://unite4freedom.com/litigation) to view additional filings for New York, Colorado, Missouri and Pennsylvania, and more.

### 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 us ensure elections are legal, transparent, accurate, and auditable.



*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. Unite4Freedom has studied federal elections in 35 states and is the FIRST organization to MEASURE the current election misconduct as defined in criminal law. For more information, visit [Unite4Freedom.com](https://Unite4Freedom.com).*



## Texas 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>13.7%</b> REGISTRATION ERROR RATE
Exact duplicates by full name and birthdate	250,565	
Duplicates with suspect first and last name swaps	430	
Duplicates with suspect first or middle name swap with initials (i.e. A Henry Moss becomes Andrew Henry Moss)	11,905	
Suspect name changes	103,937	
Residential address provides a non-concise description of the location	6,413	
Residential address at a commercial mail handler or post office	10,091	
Illegal apartment addresses without apartment number	322,130	
Other address related issues	26,589	
Age discrepant registrants	7,474	
Names embedded with numerals and symbols	456	
Modifications to voter information WITHOUT an effective date of registration change **	2,198,276	
Voters moved from cancelled to NOT cancelled	69,629	
<b>TOTAL REGISTRATION VIOLATIONS PROHIBITED BY LAW:</b>	<b>3,007,895</b>	
<b>UNIQUE REGISTRATIONS PROHIBITED BY LAW:</b>	<b>2,802,281</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>14.7%</b> VOTE ERROR RATE
Duplicate registrations that voted (from lines 1-3 above)	76,126	
Suspect name changes that voted	75,133	
Invalid addresses that voted (lines 5-8 above)	118,799	
Age discrepant registrants that voted	606	
Lack of effective date of registration change that voted	1,492,866	
Registrations that moved from cancelled to NOT cancelled that voted	29,341	
<b>TOTAL VOTING VIOLATIONS PROHIBITED BY LAW:</b>	<b>1,792,871</b>	
<b>UNIQUE VOTES PROHIBITED BY LAW:</b>	<b>1,672,893</b>	

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

Official Source	Reported Total by Official Source
Official state-certified result from state election results webpage (Votes counted)***	11,388,674
Official state voter roll vote count (Voters who voted)	11,010,461
<b>DIFFERENCE (MORE votes counted than voters who voted):</b>	<b>378,213</b>
Other official counts of the same election	
Divergent official general election county voter roll vote as of January 12, 2025: **** Early Votes Cast: 9,051,839 + Election Day Votes Cast: 2,267,775 =	11,319,614

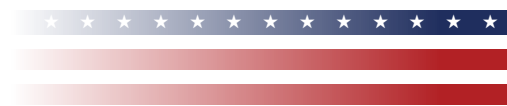
### ★ 4. Was the number of ballots in error valid according to the Help America Vote Act of 2002?

Total ballots counted in error in the 2024 GE	1,672,893
Allowable machine error rate is 1/10,000,000 ballot positions or 1/125,000 ballots	92
<b>Total excess ballots counted in error: Provable accuracy fails to meet any protective legal standard</b>	<b>1,672,801</b>

## ★ TOTAL ELECTION ERRORS (Sections 2+3) . . . . . 2,051,106 **18.0%**

**18.0%**  
TOTAL  
ELECTION  
ERROR  
RATE

\* Voter registration data is from an official copy of the registration database from December 2024 and was sourced directly from the Texas Secretary of State (SOS).  
 \*\* Modifications to voter information WITH an effective date of registration change = 803,533.  
 \*\*\* County vs. State Voter Rolls: The "state voter roll" and "county voter rolls" are both official lists of voters who voted in the November 2024 General Election. Both were sourced directly from the SOS. The state roll comes from the official state database, while the county roll is originally uploaded by each county and then reported on the SOS website. The county voter lists are aggregated from each county and the result is a secondary view of who voted in this election.  
 \*\*\*\* Section 3 item 3 was pulled from the data from January 12, 2025.



# Texas 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 duplicates	166,983
Invalid address	105,922
Age discrepant	7,714
Names embedded with numerals and symbols	494
Voters listed in the county voter roll but not in the state voter roll **	10,350
Edit without an Effective Date of Registration change	755,982
Related edit with an Effective Date of Registration change	277,598
Cancelled and then activated	26,815
Transposed names same address	344
<b>APPARENT REGISTRATION VIOLATIONS:</b>	<b>1,352,202</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 duplicates	37,167
Invalid address	29,847
Age discrepant	620
Names embedded with numerals and symbols who voted	179
Transposed names same address	122
Unique Voter registrations that cast multiple votes according to the state voter roll	142
Unique Voter registrations that cast multiple votes according to the county voter roll	1,715
Voters listed in the county voter roll with state voter ID of zero	7
Voters listed in the state voter roll with an unidentified voting method	13,229
Voters recorded in county voter roll, missing from state voter roll, or vice versa	113,386
Voting method discrepancy between county and state voter rolls	244
<b>APPARENT VOTING VIOLATIONS:</b>	<b>196,658</b>

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

Official Source	Reported Total
Official <b>state-certified</b> result from state election results webpage	<b>Votes counted: 8,102,908</b>
Official <b>state</b> voter roll vote count (September 2023)**	<b>Voters who voted: 8,120,067</b>
<b>TOTAL DIFFERENCE:</b>	<b>LESS votes counted than voters who voted: 17,159</b>
Official Source	Reported Total
Official <b>state-certified</b> result from state election results webpage	<b>Votes counted: 8,102,908</b>
Official <b>county</b> voter roll vote count (September 2023)***	<b>Voters who voted: 8,127,055</b>
<b>TOTAL DIFFERENCE:</b>	<b>LESS votes counted than voters who voted: 24,147</b>

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

Ballots with apparent voting violations in the 2022 GE according to TX raw data	196,658
Allowable machine error rate is 1/125,000 ballots	65
<b>Provable accuracy fails to meet any protective legal standard</b>	<b>Unresolved vote errors: 196,593</b>

*“Congress seeks. . . to guard the election of members of Congress against any possible unfairness by compelling, under its pains and penalties, everyone concerned in holding the election to a strict and scrupulous observance of every duty devolved upon him while so engaged. . . . The evil intent consists in disobedience to the law.” —In re Coy, 127 U.S. 731 (1888)*

\* Voter registration data is an official copy of the registration database from 09/26/2023 and was sourced directly from the Texas Secretary of State (SOS).  
 \*\* The calculation for voters who voted included the 13,229 unidentified voting method votes.  
 \*\*\* County vs State Voter Rolls: The “state voter roll” and “county voter roll” are both official lists of voters who voted in the November 2022 General Election. Both were sourced directly from the SOS. The state roll comes from the official state database, while the county roll is originally uploaded by each county and then reported on the SOS website. The county voter lists are aggregated together from each county and the result is a secondary view of who voted in this election.

# Real-Time High Resolution Vote Tampering Report



## Texas Early Voting

### 2026 DEMOCRAT PRIMARY ELECTION

#### Illegal Voter Participation History Changes During the Election

This analysis examines early voting data obtained real-time directly from the Texas Secretary of State's public election dataset website. The state's published files are expected to reflect the official list of all voters who cast ballots during the early voting period for the 2026 Democrat primary election.

Snapshots were downloaded at regular intervals every day from the beginning of early voting. This analysis includes multiple snapshots per day; it is for votes cast up to and including February, 27, 2026, the final day of early voting, and includes snapshots taken up to and including election day, March 3, 2026. The final dataset in this analysis contained 1,405,576 records.

The purpose of this analysis is to identify and quantify non-standard patterns of record changes that are inconsistent with legitimate data maintenance or expected ballot processing behavior.

#### Summary of Suspected Manipulation

The counts in the analysis are based on records that match ALL of the following record details including: Voter ID, Voter Name, and Voting Method. Analysis does not include County and Precinct details because they were not consistently available in the data downloaded from the Secretary of State's website.

<b>Voter OSCILLATION</b>	<b>37,039</b>
Voter ID appears, disappears, and reappears, sometimes multiple times in the data. <b>26,481 of these Voter IDs have a ballot at the END of Early Voting.</b>	
<b>INJECTED Ballots</b>	<b>35,169</b>
Additional ballots injected for voter IDs who had already cast a ballot.	
<b>Voter History CHANGES</b>	<b>80,903</b>
Total number of incremental changes (additions or deletions) to number of ballots assigned to a voter ID over time.	
<b>Voter History DELETIONS</b>	<b>10,558</b>
Voter IDs with previously cast ballot (vote record) completely missing at the end of early voting in the evening dataset from February 27.	
<b>Voters with MULTIPLE ballots the FIRST TIME THEY APPEAR in Early Voting records</b>	<b>9</b>
<b>Voters with MULTIPLE ballots at the END of Early Voting</b>	<b>54</b>

**ASSESSMENT:** These problems happen too often and follow patterns that don't occur by chance or simple mistakes. The way the data changes over time suggests intentional or automated manipulation, not normal reporting errors. Because these issues are repeated and significant, they should be formally investigated and reviewed under state and federal election laws.

# Real-Time High Resolution Vote Tampering Report



## Texas Early Voting

### 2026 REPUBLICAN PRIMARY ELECTION

#### Illegal Voter Participation History Changes During the Election

This analysis examines early voting data obtained real-time directly from the Texas Secretary of State's public election dataset website. The state's published files are expected to reflect the official list of all voters who cast ballots during the early voting period for the 2026 Republican primary election.

Snapshots were downloaded at regular intervals every day from the beginning of early voting. This analysis includes multiple snapshots per day; it is for votes cast up to and including February 27, 2026, the final day of early voting, and includes snapshots taken up to and including election day, March 3, 2026. The final dataset in this analysis contained 1,265,564 records.

The purpose of this analysis is to identify and quantify non-standard patterns of record changes that are inconsistent with legitimate data maintenance or expected ballot processing behavior.

#### Summary of Suspected Manipulation

The counts in the analysis are based on records that match ALL of the following record details including: Voter ID, Voter Name, and Voting Method. Analysis does not include County and Precinct details because they were not consistently available in the data downloaded from the Secretary of State's website.

<b>Voter OSCILLATION</b>	
Voter ID appears, disappears, and reappears, sometimes multiple times in the data. <b>ONLY 21,190 of these Voter IDs have a ballot at the END of Early Voting.</b>	<b>87,336</b>
<b>INJECTED Ballots</b>	
Additional ballots injected for voter IDs who had already cast a ballot.	<b>35,772</b>
<b>Voter History CHANGES</b>	
Total number of incremental changes (additions or deletions) to number of ballots assigned to a voter ID over time.	<b>137,693</b>
<b>Voter History DELETIONS</b>	
Voter IDs with previously cast ballot (vote record) completely missing at the end of early voting in the evening dataset from February 27.	<b>66,146</b>
<b>Voters with MULTIPLE ballots the FIRST TIME THEY APPEAR in Early Voting records</b>	<b>1,400</b>
<b>Voters with MULTIPLE ballots at the END of Early Voting</b>	<b>1,549</b>

**ASSESSMENT:** These problems happen too often and follow patterns that don't occur by chance or simple mistakes. The way the data changes over time suggests intentional or automated manipulation, not normal reporting errors. Because these issues are repeated and significant, they should be formally investigated and reviewed under state and federal election laws.