

NOTICE OF VIOLATIONS AND DEMAND FOR CORRECTIVE ACTION
PURSUANT TO 52 U.S.C. § 20510(b)
VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED

September 4, 2026

The Honorable Paul D. Pate

Iowa Secretary of State / State Commissioner of Elections
Voter Registration Commission
Lucas State Office Building, 321 E. 12th Street, 1st Flr
Des Moines, IA 50319

CC:

The Honorable Brenna Bird

Attorney General of Iowa
Office of the Iowa Attorney General
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I. INTRODUCTION

This Notice is provided pursuant to Section 11(b) of the National Voter Registration Act of 1993 ("NVRA"), 52 U.S.C. § 20510(b).

Unite 4 Freedom, Inc. ("U4F"), together with the identified aggrieved person(s), provides this Notice of Violations and Demand for Corrective Action concerning the State's continuing implementation of voter-registration list-maintenance programs, maintenance, and preservation of records concerning those programs, and public inspection obligations imposed by the National Voter Registration Act.

The attached U4F Election Validity Scorecard and supporting machine-readable data identify documented record-level conditions requiring investigation, explanation, correction, preservation, or disclosure under the NVRA. These materials are presented to identify suspected statutory violations requiring review and corrective action. They are not presented as proof that every individual record independently establishes an NVRA violation.

This Notice identifies the statutory duties at issue, the categories of alleged violations, the supporting factual bases, individual records that appear to be in violation of legal requirements, and the corrective actions requested. The summary report is provided as a guide to the violations, but each record must be resolved and explained. It is intended to provide the notice and opportunity to cure required by Congress before a civil action may be commenced under 52 U.S.C. § 20510(b).

II. NATURE OF THE NOTICE

Congress enacted the National Voter Registration Act to establish uniform national standards governing voter-registration administration, voter-list maintenance, and public inspection of records concerning those programs and activities.

Section 20510(b) authorizes an aggrieved person to provide written notice of violations to the chief State election official and affords the State an opportunity to investigate, correct, explain, or otherwise cure those violations before civil litigation is commenced.

This Notice concerns three categories of continuing statutory duties imposed by the NVRA:

1. The duty to conduct a reasonable and uniform voter-list maintenance program consistent with federal law;

2. The duty to maintain, preserve, and make available for public inspection those records Congress expressly identified in 52 U.S.C. § 20507(i); and
3. The duty to document, preserve, and explain the implementation of those list-maintenance programs sufficiently to permit meaningful public review and statutory compliance.

For administrative efficiency, the identified record-level conditions are summarized in this Notice and presented in detail within the attached appendices. Each documented record is documentation of a suspected violation and must be reviewed individually. These individual records also identify a suspected pattern of violation and form part of the factual basis for this Notice of Suspected Statutory Violations.

III. FACTUAL BASIS OF THIS NOTICE

U4F has analyzed official voter-registration, voter-history, and related election records obtained from the State and its election officials. Using those official records, U4F generated State-specific Election Validity Scorecard and supporting machine-readable datasets identifying documented conditions requiring further investigation, explanation, correction, preservation, or disclosure.

The attached analyses identify recurring categories of record-level conditions that include, where applicable:

- apparent irregularities in voter-registration records;
- duplicate or conflicting registration records;
- unexplained registration-date anomalies;
- record changes requiring supporting implementation documentation;
- apparent inconsistencies in voter-list maintenance activities; and
- other documented conditions relevant to the statutory duties identified in this Notice.

To the extent any documented condition arises from voter-registration or voter-list maintenance activities involving Uniformed and Overseas Citizens Absentee Voting Act ("UOCAVA") registrants, this Notice likewise requests the implementation records, explanatory documentation, audit records, and preservation records sufficient to determine whether those activities were administered consistently with the National Voter Registration Act and other

applicable federal law. This Notice does not assert an independent UOCAVA claim but requests records concerning any list-maintenance activities affecting UOCAVA registrants to the extent those activities are relevant to the statutory duties identified herein.

The analyses identify documented record-level conditions requiring investigation under the National Voter Registration Act.

Whether any individual condition ultimately constitutes a statutory violation depends upon the implementation records and explanations required by federal law and requested in this Notice.

The attached appendices identify the documented record-level conditions and the corresponding categories of implementation records requested for each alleged statutory violation.

IV. ALLEGED STATUTORY VIOLATIONS

The record-level conditions identified in the attached appendices fall into three principal categories of continuing statutory violations under the National Voter Registration Act.

Each category corresponds to a separate statutory duty imposed by Congress. Although individual records may implicate more than one statutory provision, the categories below are presented separately to facilitate investigation, response, and corrective action.

The factual allegations supporting each category are contained in the attached U4F Election Validity Scorecard and supporting machine-readable datasets incorporated by reference into this Notice.

A. Failure to Conduct a Reasonable and Uniform List-Maintenance Program

52 U.S.C. § 20507(a)(4)

The attached analyses identify documented conditions requiring investigation concerning the State's continuing implementation of voter-list maintenance programs.

These conditions include, where applicable:

- duplicate or conflicting voter-registration records;
- unexplained changes in voter-registration status;
- registrations containing internally inconsistent or illogical data;
- apparent irregular registration changes;
- registration conditions requiring documented explanation under established list-maintenance procedures; and
- other record-level conditions identified within Appendix A.

This Notice does not presume that every identified condition independently establishes a violation of federal law. Rather, the documented conditions require the State to determine whether its list-maintenance program has been implemented in a reasonable, uniform, and nondiscriminatory manner consistent with the requirements imposed by Congress.

The corresponding record-level instances are identified within the attached U4F Election Validity Scorecard and supporting datasets.

B. Failure to Maintain and Make Available Records Concerning List-Maintenance Programs

52 U.S.C. § 20507(i)

The attached analyses further identify documented conditions requiring production, preservation, or explanation of records concerning the implementation of the State's voter-list maintenance programs.

Among other matters, the appendices identify documented record-level conditions for which implementation records, implementation documentation, or explanatory materials are necessary to determine:

- the basis for recorded changes;
- the authority under which those changes occurred;
- the implementation of voter-list maintenance procedures;
- the preservation of required records; and
- the completeness of the State's public-inspection obligations under the National Voter Registration Act.

To the extent those implementation records exist, this Notice requests their production or inspection as part of the corrective actions described above.

To the extent such records do not exist, this Notice requests written confirmation identifying the specific records unavailable and the reasons for their absence.

V. REQUESTED CORRECTIVE ACTION

Pursuant to 52 U.S.C. § 20510(b), U4F and the identified aggrieved person(s) respectfully request that the State **investigate, document, explain, correct, preserve, or otherwise resolve the statutory matters identified in this Notice** and appendices.

Specifically, U4F requests that the State undertake the following corrective actions.

A. Investigation of Identified Record-Level Conditions

Investigate each category of documented record-level conditions identified in the attached U4F Election Validity Scorecard and implementation of machine-readable datasets.

The investigation should determine, at a minimum:

- whether the identified condition reflects a lawful implementation of the State's voter-list maintenance program;
- the statutory or administrative authority relied upon;
- the records supporting that determination; and
- whether corrective action is required.

B. Production and Inspection of Implementation Records

Produce, or make available for inspection, all records concerning the implementation of the State's voter-list maintenance programs that are required to be maintained or made available under 52 U.S.C. § 20507(i).

To the extent records exist, they should include, where applicable:

- identification of the records reviewed in reaching the State's conclusions;

- implementation records supporting voter-list maintenance activities;
- records documenting additions, changes, removals, or corrections to voter-registration records;
- records identifying the authority for those actions;
- records identifying the responsible officials or offices;
- confirmation-notice records required by federal law;
- written procedures governing implementation of voter-list maintenance programs; and
- any other records necessary to explain the documented conditions identified in the attached appendices.

Electronic production in the format maintained by the State is preferred whenever reasonably available.

C. Written Explanation of Documented Record-Level Conditions

Provide a written explanation describing the procedures, policies, and implementation practices responsible for the documented record-level conditions identified in the attached appendices.

Where a documented condition reflects a lawful administrative process, identify:

- the applicable procedure;
- the authority under which it occurred;
- the records documenting that action; and
- the basis upon which the State concludes the action complied with the National Voter Registration Act.

Where a documented condition reflects an error, omission, or deficiency, identify:

- the corrective action taken;
- the date correction occurred;
- the records documenting the correction; and
- any prospective measures implemented to prevent recurrence.

D. Preservation of Relevant Records

Preserve all records, electronic data, audit logs, implementation records, correspondence, database transaction logs, database change-history tables, import/export transaction logs, system event logs, and implementation documentation relevant to the matters identified in this Notice until the issues presented herein have been resolved.

Such preservation should include all records reasonably necessary to reconstruct, explain, or verify the implementation of the voter-list maintenance activities identified in the attached appendices.

This preservation request includes active records, archived records, backup media, disaster-recovery copies, cloud-hosted records, replicated databases, audit repositories, and any other electronic storage containing implementation records relevant to the matters identified in this Notice.

E. Written Disposition

Provide a written response addressing each record level violation identified and the category patterns identified in this Notice.

For each category, indicate whether the State:

- agrees that corrective action is required;
- disputes the asserted statutory duty;
- disputes the factual basis;
- has undertaken corrective action;
- requires additional information; or
- contends that no violation exists.

Where corrective action is denied, identify the statutory, regulatory, or legal authority upon which the State relies.

The violation categories described above are supported by the record-level documentation contained in the incorporated appendices.

VI. STATUTORY CURE PERIOD

This Notice is provided pursuant to 52 U.S.C. § 20510(b). Because this Notice is served within **one hundred twenty (120) days before the November 3, 2026 federal general election**, U4F and the identified aggrieved person(s) request that the State investigate, document, explain, correct, preserve, produce, or otherwise resolve the matters identified herein within the **twenty (20) day statutory cure period** prescribed by 52 U.S.C. § 20510(b), to the extent applicable.

If the State contends that any portion of this Notice is not subject to the **twenty (20) day cure period** provided by 52 U.S.C. § 20510(b), the State should identify the specific factual and legal basis for that position in its written response.

The applicable statutory cure period shall be determined in accordance with 52 U.S.C. § 20510(b), including the provisions governing notices provided within one hundred twenty (120) days before a federal election and the provisions applicable to notices provided within thirty (30) days before such an election.

Nothing contained in this Notice shall be construed as shortening or enlarging any period established by Congress.

VII. RESERVATION OF RIGHTS

Nothing contained in this Notice should be construed as:

- an allegation that any identified individual voter is ineligible to vote;
- an allegation that any particular ballot was unlawfully counted or rejected;
- an allegation that any identified record independently establishes an NVRA violation;
- a request that any voter be removed from the registration rolls;
- a challenge to any completed election result; or
- a waiver of any right, remedy, claim, or cause of action available under federal or state law.

This Notice concerns only the continuing statutory duties imposed by the National Voter Registration Act and the State's opportunity to investigate, explain, correct, preserve, or otherwise resolve the matters identified herein before litigation is commenced.

Nothing contained in this Notice limits the right of U4F or any aggrieved person to pursue any additional administrative, judicial, or other lawful remedy arising from the matters identified herein.

VIII. INCORPORATION OF APPENDICES

Each documented record identified within the appendices is a suspected violation and forms part of the factual basis supporting one or more of the statutory violation categories identified in this Notice.

The appendices accompanying this Notice consist of:

- **Appendix A** — U4F Election Validity Scorecard (Iowa 2024 General Election)
- **Electronic Exhibit 1** (USB Media) — Machine-Readable Supporting Data

The USB media accompanying this Notice contains the machine-readable supporting datasets, including the Iowa NVRA Scorecard Section 01 and Section 02 datasets, and the Iowa Election Validity Scorecard dataset. Due to file size, certain record-level datasets are provided exclusively on USB media rather than as paper attachments.

IX. REQUEST FOR WRITTEN RESPONSE

The identified aggrieved person(s) and U4F respectfully request a written response addressing the matters identified in this Notice.

The written or machine readable response should identify, for each requested record and implementation record category, whether the record is being produced, made available for inspection, withheld, unavailable, never created, destroyed pursuant to an established retention schedule, or otherwise unavailable. For every category not produced, the response should identify the statutory, regulatory, administrative, or other legal authority supporting that determination and the official responsible for that determination.

To facilitate meaningful review and resolution, the response should identify, for each violation presented herein:

1. whether the State agrees or disagrees that the identified statutory duty applies;

2. whether the documented record-level conditions have been investigated;
3. whether corrective action has been undertaken;
4. whether responsive records exist and will be produced or made available for inspection;
5. whether additional information is requested from the identified aggrieved person(s) or U4F; and
6. the name, title, office, and contact information of the individual responsible for coordinating the State's response.

If the State concludes that any requested implementation record does not exist, the response should identify the official responsible for maintaining that category of record and state whether the record was never created, no longer exists, or cannot be located.

To the extent the State concludes that any requested corrective action is unnecessary, the response should identify the statutory, regulatory, administrative, or judicial authority upon which that determination is based.

X. GOOD-FAITH RESOLUTION

The purpose of this Notice is to provide the opportunity for voluntary compliance contemplated by Congress.

The identified aggrieved person(s) and U4F remain willing to confer with the State concerning the matters identified herein, provide additional information reasonably necessary to facilitate review, and discuss appropriate corrective measures consistent with the requirements of the National Voter Registration Act.

Nothing in this Notice should be interpreted as discouraging voluntary cooperation, clarification, or resolution during the statutory cure period.

U4F and the identified aggrieved person(s) respectfully request the State's timely attention to the matters identified in this Notice and appreciate its cooperation in achieving voluntary compliance with the National Voter Registration Act.

Respectfully submitted,



For Unite4Freedom

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September 4, 2026

APPENDIX A

Unite4Freedom ELECTION VALIDITY SCORECARD

I. PURPOSE

This Appendix provides the factual support for the voter-registration and voter-list maintenance categories identified in the Notice of Violations and Demand for Corrective Action.

The attached U4F Election Validity Scorecard was generated from official voter-registration and voter-history records obtained from the State or its election officials. The analyses identify documented record-level conditions requiring investigation, explanation, correction, preservation, or disclosure under the National Voter Registration Act ("NVRA").

This Appendix is incorporated into the Notice by reference.

II. SCOPE OF ANALYSIS

The U4F Election Validity Scorecards evaluate official statewide voter-registration records using objective analytical procedures designed to identify documented record-level conditions relevant to voter-list maintenance and recordkeeping.

The analyses do not determine election winners or losers.

The analyses do not determine voter eligibility.

The analyses do not determine whether any individual record independently establishes a violation of federal law.

Rather, the analyses identify documented conditions requiring explanation, investigation, correction, preservation, or disclosure under the statutory duties identified in the accompanying Notice.

III. RELATIONSHIP TO THE NOTICE

The Election Validity Scorecard supports the statutory violation records and categories identified in Section IV of the Notice.

Where applicable, the Scorecards identify documented conditions including:

- duplicate or conflicting voter-registration records;

- unexplained registration-date anomalies;
- internally inconsistent registration records;
- apparent irregular registration changes;
- voter-list maintenance conditions requiring supporting implementation records;
- apparent inactive-status anomalies;
- and other documented record-level conditions relevant to the implementation of voter-list maintenance programs.

Each record level and category violation is supported by the corresponding record-level data contained within Electronic Exhibit 1 (USB Media).

IV. SCORECARD SUMMARY

State: Iowa

Election(s):

- 2024 General Election

The attached Iowa Election Validity Scorecard summarizes documented record-level conditions identified during U4F's analysis of official Iowa voter-registration and voter-history records.

Summary Tables

Iowa 2024 General Election

Voter Registration Record Conditions

Category	Number of Instances
Invalid addresses	26,646
Registered at an address with more registrants than dwelling capacity	509
Duplicate registrations	2,065
Inactive and 8+ years without voting	79,730
Registered while voter rolls were closed for 2024 GE	96,270
Age discrepant registrants (more than 114 yo or registered before the legally permitted age)	1,086
Federal holiday and Sunday registration (prior to online registration)	112,394
Invalid names	892
Double voters (Voter who voted twice or more in a single election)	44

Total registration conditions identified: 319,636

Unique registrations identified: 308,236

Records Associated With Votes Cast in the 2024 General Election

Category	Votes Cast in 2024 General Election
Invalid addresses	16,767
Registered at an address with more registrants than dwelling capacity	222
Duplicate registrations	1,613
Registered while voter rolls were closed for 2024 GE, yet voted	96,270
Age discrepant registrants (more than 114 yo or registered before the legally permitted age)	789
Federal holiday and Sunday registration (prior to online registration)	97,991
Invalid names	681
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Total voting conditions identified: 214,377

Unique votes identified: 208,495

Certification Comparison

Official Source	Reported Total
Iowa DOE Official Results of 2024 GE—Votes counted	1,674,011
Iowa Oct 2025 raw data, Official Federal document—Voters who Voted	1,654,730

Difference: 19,281

Summary Observations

The Iowa Election Validity Scorecard identifies documented record-level conditions within official Iowa voter-registration and voter-history records requiring investigation, explanation, correction, preservation, or disclosure under the National Voter Registration Act.

The identified conditions include duplicate or conflicting voter-registration records, registration-date anomalies, inactive-status conditions, registration changes requiring supporting documentation, questionable address conditions, and voter-history conditions requiring implementation records and explanations.

The Scorecard identifies categories of records requiring review and supporting documentation. This appendix identifies suspected record level violations supporting the category summaries. It does not independently determine that every identified condition constitutes a violation of federal law. Rather, the identified conditions are presented to facilitate investigation, determination of applicable procedures, production of implementation records, and corrective action where appropriate.

V. INTERPRETATION OF THE SCORECARDS

The U4F Election Validity Scorecards organize documented record-level conditions into standardized analytical categories to facilitate review by election officials.

The individual suspected record violations are intended to assist the State in determining:

- whether the documented condition reflects lawful implementation of voter-list maintenance procedures;
- whether sufficient implementation records exist;
- whether additional records should be preserved or produced;
- whether correction is appropriate; and
- whether no corrective action is required.

Accordingly, the Scorecards are intended to facilitate investigation rather than predetermine investigative conclusions.

VI. LIMITATIONS

The Election Validity Scorecards identify documented conditions requiring further review.

They are not intended to establish that every identified condition independently constitutes a violation of federal law.

Many documented conditions may ultimately be explained through implementation records, preserved documentation, or other information maintained by the State.

Accordingly, the purpose of this Appendix is to identify those documented conditions requiring investigation and response under the National Voter Registration Act.

VII. INCORPORATED SCORECARDS

The following State-specific reports are incorporated into this Appendix.

- Iowa 2024 General Election Validity Scorecard
- IA 2024 Scorecard CSV Files.zip

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