NOTICE OF VIOLATIONS AND DEMAND FOR CORRECTIVE ACTION

PURSUANT TO 52 U.S.C. § 20510(b)

VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED
AND ELECTRONIC MAIL

September 2, 2026

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CC:

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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 attached Appendix A. 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 the attached New York 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.

Appendix A identifies 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 Appendix A fall into two 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 Scorecards 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, Appendix A identifies 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 Appendix A.

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 supporting 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 Appendix A.

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 Appendix A.

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 Appendix A.

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 incorporated Appendix A.

VI. STATUTORY CURE PERIOD

This Notice is provided pursuant to 52 U.S.C. § 20510(b). Because the violations alleged in this Notice are continuing and are occurring within one hundred twenty (120) days before the November 3, 2026 federal general election, the twenty-day cure period prescribed by 52 U.S.C. § 20510(b)(2) applies. U4F and the identified aggrieved persons therefore request that the State investigate, document, explain, correct, preserve, produce, or otherwise resolve the matters identified herein within twenty (20) days after receipt of this Notice.

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 APPENDIX A AND ELECTRONIC EXHIBIT

Each documented record identified within Appendix A 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 materials accompanying this Notice consist of:

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

The USB media accompanying this Notice contains the New York Election Validity Scorecard machine-readable supporting dataset. Due to file size, record-level data are provided 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,

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/s/ Marilyn Prutsman
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_____

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September 2, 2026

APPENDIX A

Unite4Freedom ELECTION VALIDITY SCORECARDS

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 Scorecards were 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:

1. duplicate or conflicting voter-registration records;

2. unexplained registration-date anomalies;

- internally inconsistent registration records;

3. 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: New York

Election(s):

・2024 General Election

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

Summary Tables

New York 2024 General Election

Voter Registration Record Conditions

Category	**Number of Instances**
Duplicate registrations	1,558,302
Registered after GE cutoff date and voted	11,392
Purged with no purge date	1,617,236
Purged records that were never active	716,522
Registered after last voted date	146,131

Voter identity unverified	185,230
Age discrepant (younger than 16, older than 115)	30,571
Blank address	44,379
New Year's registrations	989,431
Active status for over 8 years with no voting activity	579,576

Total registration conditions identified: 5,878,770

Unique registrations identified: 5,163,178

Records Associated With Votes Cast in the 2024 General Election

Category	**Number of Instances**
Duplicate registrations	602,948
Duplicate registrations with double votes	4,290
Registered after GE cutoff date	11,392
Purged with no purge date	390
Purged before election	1,753
Registered after last voted date	5,387
Voter identity unverified	6,278
Age discrepant (younger than 16, older than 115)	2,705
Blank address	21,492
New Year's registrations	258,003

Total voting conditions identified: 914,638

Unique votes identified: 895,595

Certification Comparison

Official Source	**Reported Total**
NYSBOE Official Tabulated and Certified Results	8,380,458
NYSVoter database total voters who voted	8,251,264

Difference (more votes counted than voters who voted): 129,194

HAVA Accuracy Comparison

Total ballots counted in error in the 2024 General Election: 895,595

Allowable machine error rate: 67 ballots

Total excess ballots counted in error: 895,528

Total election errors (Scorecard Sections 2 and 3): 1,024,789 (12.2%)

Summary Observations

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

The identified conditions include duplicate registrations, registrations after the general-election cutoff, purge records lacking purge dates, records purged before election, records with unverified voter identity, age discrepancies, blank addresses, New Year's registrations, and other 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 New York-specific report and supporting dataset are incorporated into this Appendix.

New York 2024 General Election Validity Scorecard

- Unite4Freedom_NY_Scorecard_2024_2026-07-29.pdf
- New York Election Validity Scorecard machine-readable supporting dataset

SOURCE SCORECARD

UNITE 4 FREEDOM

"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)

New York 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*
Duplicate registrations	1,558,302
Registered after GE cutoff date and voted	11,392
Purged with no purge date	1,617,236
Purged records that were never active	716,522
Registered after last voted date	146,131
Voter identity unverified	185,230
Age discrepant (younger than 16, older than 115)	30,571
Blank address	44,379
New Year's registrations	989,431
Active status for over 8 years with no voting activitiy	579,576
TOTAL REGISTRATION VIOLATIONS PROHIBITED BY LAW:	**5,878,770**
UNIQUE REGISTRATIONS PROHIBITED BY LAW:	**5,163,178**

22.7% REGISTRATION ERROR RATE

★ 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*
Duplicate registrations	602,948
Duplicate registrations with double votes	4,290
Registered after GE cutoff date	11,392
Purged with no purge date	390
Purged before election	1,753
Registered after last voted date	5,387
Voter identity unverified	6,278
Age discrepant (younger than 16, older than 115)	2,705
Blank address	21,492
New Year's registrations	258,003
TOTAL VOTING VIOLATIONS PROHIBITED BY LAW:	**914,638**
UNIQUE VOTES PROHIBITED BY LAW:	**895,595**

10.7% VOTE ERROR RATE

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

Official Source	Reported Total by Official Source
NYSBOE Official Tabulated and Certified Results	8,380,458
NYSVoter database total voters who voted	8,251,264
DIFFERENCE (MORE votes counted than voters who voted):	**129,194**

★ 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	895,595
Allowable machine error rate is 1/10,000,000 ballot positions or 1/125,000 ballots	67
Total excess ballots counted in error: Provable accuracy fails to meet any protective legal standard	**895,528**

★ **TOTAL ELECTION ERRORS** (Sections 2+3) **1,024,789**

12.2% TOTAL ELECTION ERROR RATE

**Extracted from an official copy of the NYSVoter database provided by NYSBOE via FOIL request on December 10, 2024.*

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