E-FILED
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Clerk, U.S. District Court, ILCD

FILED
11/17/2026
CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

HARRY R. HAURY; LAURA HOIS; ROBERT R. "RUSTY" STEVENS; JIMMY LEE TILLMAN II; JODIE ZITKO; MARY CATHERINE PAUKSTYS; and GREGORY STENSTROM,

Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. 26-cv-3397

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiffs seek enforcement of continuing federal duties before certification of the November 3, 2026 election. Successive official files through May 13, 2026 contain extensive changes to earlier participation histories; individual histories remain disputed; and 2026 requests have not supplied the operational records needed to reconcile those conditions. Illinois acknowledged the requests, produced general materials, and promised a supplement. Plaintiffs request immediate inspection, sworn accountability, and independent examination of the continuing processes, with an urgent hearing on any necessary, limited certification restraint. The injuries are concrete. Two Plaintiffs dispute entries in their own voting histories. Two were candidates in the November 3 election and need the records during the canvass of their races. The requesting individuals cannot complete their existing Illinois inspection and correction work without the records. The substantive claims concern whether the State actually performed its federal list-maintenance duties,

including lawful follow-through on potentially ineligible registrations.

I. Jurisdiction and parties

1. This action arises under the National Voter Registration Act ("NVRA"), 52 U.S.C. §§ 20507 and 20510(b). Jurisdiction lies under 28 U.S.C. § 1331. Plaintiffs seek prospective declaratory and injunctive relief under § 20510(b), 28 U.S.C. §§ 2201–2202, and Rule 65 against Defendants in their official capacities. Ex parte Young, 209 U.S. 123, 159–60 (1908).

2. Venue lies in this District and the Springfield Division under 28 U.S.C. § 1391(b): Defendants' principal offices and material acts and omissions are here.

3. Laura Hois is a DuPage County resident and registered Illinois voter. She was the Republican candidate for Illinois House District 81 on November 3, 2026. Robert R. "Rusty" Stevens is a DuPage County resident and registered voter who was a candidate for DuPage County Board District 2 in that election. Their declarations identify records work, campaign burdens, and their need to examine the shared registration and participation processes used in their races before certification. Exs. J–K.

4. Jodie Zitko is a Kane County resident and registered Illinois voter whose official history records participation in three general elections in which she says she did not vote. Mary Catherine Paukstys is a Cook County resident, registered voter, and Chicago election judge whose history records a Democratic ballot in the March 17, 2020 primary although she says she cast a Republican ballot. Both seek records explaining their own entries. Exs. H–I.

5. Jimmy Lee Tillman II is a Cook County resident and registered Illinois voter. He sought the Republican United States Senate nomination in March 2026 and did not advance from the primary. He personally joined the Second Notice and seeks records for the inspection and correction activities stated in his declaration. Ex. L.

6. Harry R. Haury, a Missouri resident, and Gregory Stenstrom, a Pennsylvania resident, are individual records requesters and analysts. Haury is Chair and President of Unite 4 Freedom, Inc. ("U4F"), a nonprofit organization whose Illinois official-file analysis and inspection project predates this dispute. Stenstrom participates in that work. Stenstrom and Haury personally made the August request and joined the Second Notice. U4F also participated in those historical notices and activities but is not a plaintiff in this initial complaint. Exs. A, G, M, O.

6A. Harry R. Haury is the first-listed (lead) individual Plaintiff. All seven Plaintiffs proceed pro se, each on his or her own behalf. Gregory Stenstrom is the submitting plaintiff for administrative transmission of the jointly signed filings; he does not represent any other Plaintiff or U4F. Plaintiffs intend to seek addition of U4F as a plaintiff by amended complaint when licensed counsel authorized to practice in this Court enters an appearance for the organization, subject to Rules 15, 20, and 21 and any required consent or leave. U4F is not presently represented or seeking relief as a party, and its later addition is not automatic. References to U4F in the historical evidence identify its actual role and are retained without alteration.

7. Bernadette Matthews is the Board's Executive Director. Illinois designates that office as chief State election official for NVRA purposes.

26 Ill. Admin. Code § 216.100(b); 52 U.S.C. §

20509. John Oldfield directs the Division of Voting and Registration Systems, responsible for IVRS and related statewide records. Ex. D. Each is sued in an official capacity for prospective relief concerning records and functions within that official's authority. Local officials are not assumed to be bound merely because they participate in Illinois elections.

II. Duties and the State records that document performance

8. Section 20507(a)(4) requires a reasonable program to remove ineligible names because of death or changed residence, subject to statutory safeguards. Section 20507(b)(1) requires uniform and nondiscriminatory list maintenance. Sections 20507(b)(2) and (d) protect eligible voters against improper removal. When participation history is used in the notice-and-waiting process, inaccurate history can affect continued registration.

9. Section 20507(i) requires retention for at least two years and public inspection of covered list-maintenance implementation records, expressly including confirmation-notice lists and response information. Plaintiffs seek covered existing records and lawful redactions. Retention claims concern records generated or received and subject to that duty; the requested court- ordered compliance accounting is ancillary equitable relief.

10. This Court held Illinois's statewide voter file subject to § 20507(i) and conflicting State duplication restrictions preempted. Public Interest Legal Foundation, Inc. v. Matthews, 589 F. Supp. 3d 932 (C.D. Ill. 2022), No. 20-cv-3190, ECF No. 37 at 24–27 (Mar. 8, 2022). The present requests

concern existing operational records documenting maintenance. Project Vote/Voting for America, Inc. v. Long, 682 F.3d 331, 339–40 (4th Cir. 2012), and Public Interest Legal Foundation, Inc. v. Bellows, 92 F.4th 36 (1st Cir. 2024), support disclosure of covered implementation records; those decisions do not themselves order a certification restraint.

11. Illinois describes IVRS as a centralized database synchronized with local systems at least every twenty-four hours. The Board performs or coordinates matching, data exchanges, and statewide oversight. Its own overview states that IVRS work items display current and historical matches and resolution status and require local review and action. Ex. D, overview at 1–2.

12. The IVRS manual identifies Client Transmission reports, Site Activity Reports, Automatic Processing Report Details, Cancelled Voters Reports, voter snapshots, and work-item histories. Those records permit examination of source transmissions, actions, dates, and dispositions. Ex. E. Referring requesters to local offices does not provide records generated or controlled by the Board's own systems.

III. Notice followed by incomplete performance

13. On August 18, 2026, U4F, Stenstrom, and Haury submitted a written NVRA communication identifying Illinois-specific analyses, alleged violations, requested implementation records, and corrective action. The Board received it August 24 and acknowledged receipt by email September 4. Exs. A–B.

14. Plaintiffs sent a preservation demand September 2, received by the Board September 3. The September 4 email acknowledged both

communications and stated that the twenty-day cure period for the August notice expired September 14. Exs. B–C.

15. On September 14 the Board responded through General Counsel. It reviewed the supplied files, produced a general overview, the IVRS manual, and ERIC materials, and stated that personnel were considering additional responsive records. It expressly promised a further letter updating the § 20507(i) request. Ex. D, response at 7–8.

16. The same response disputed the August notice because a separate request had not preceded it and directed individual-record inquiries to 108 local authorities. It stated that local authorities do not report the reason for each determination to the Board, while acknowledging Board-held implementation records and continuing work on further production. Ex. D, response at 7–8.

17. As of November 4, the requesters have received no promised supplemental letter, inspection appointment for the remaining records, custodian index, or completion schedule. The remaining categories include field definitions, transmission and activity reports, automatic-processing details, work-item dispositions, and applicable notice/response records. Exs. G, O; Ex. D.

18. All seven individual Plaintiffs joined the Second NVRA Notice dated October 25 and transmitted October 26 by certified mail and email. It renews the implementation-record requests and identifies substantive process failures and verification measures. No response making those records available has been received or reviewed by the signers as of November 4. Exs. H–M, O. Exhibit M remains the notice as supplied, including its original demands.

19. The conduct requiring relief is specific: acknowledged requests remain incomplete, a promised supplement never arrived, and no inspection or completion date was set while the canvass began. Plaintiffs seek an order fixing responsibility and performance dates so that delay no longer defeats the examination they requested before Election Day.

IV. Particular records and unresolved conditions

20. Successive official files show 254,027 changes to 2024 participation records between January 24, 2025 and May 13, 2026: 109,976 voted-to-did-not-vote changes, 15,119 did-not- vote-to-voted changes, 111,268 deletions, and 17,664 additions. Analyses also report 288,447 changes for 2022 and 472,581 for 2020. Exs. A, M. These are historical-election fields compared in later official files, including a 2026 file. Their relevance continues because the requested source, change, and disposition records remain unavailable, and participation history can affect present list-maintenance decisions. Exhibit P maps the evidence to the records and relief requested.

21. The registration analysis reports 4,566,205 flagged instances associated with 3,875,145 identifiers; the 2024 participation analysis reports 1,468,959 instances associated with 1,045,659 identifiers. These are screening outputs. A flagged condition, established ineligibility, participation credit, and a counted unlawful ballot are separate facts to be determined from underlying evidence. Historical-field changes and the reported 56,164 difference between certified turnout and a later file do not alone establish altered certified totals. Exs. A, D, G.

22. The largest registration-date category contains 3,065,495 instances. The Board attributes apparent chronological inconsistencies to differing

local meanings of registration date, including original registration, last voter-initiated change, or last record change. Ex. D, response at 6 n.2. Plaintiffs seek the definitions and mappings used when these different values enter the statewide matching and maintenance processes.

23. Zitko's history records voting in 2010, 2014, and 2018, although she did not vote in those elections. She and her husband reported their disputed entries to the Kane County Clerk in

2023. She has received no source transaction, audit trail, or written determination explaining her entries. Ex. H.

24. Paukstys's March 17, 2020 history records a Democratic ballot although she requested and cast a Republican ballot. Her separate November 2020 election-judge party designation arose from a different assignment circumstance. She seeks the source and correction records for the March voter-history entry. Ex. I.

25. Hois requested election-mail handling and custody records on January 30, 2026; the County reported no responsive records on February 6. Her campaign later narrowed an FPCA- related request to forty-five registrants and five categories. On July 28 the County produced redacted forms but reported no responsive transmission, delivery, return, or processing-audit records in the requested categories. Those experiences explain why a referral alone has not supplied the operational trail she needs. Ex. J.

26. Stevens preserved approximately 354 returned pieces of campaign mail, including moved, vacant, unable-to-forward, and unknown markings. He needs official address histories, confirmation notices, responses, and

dispositions to determine whether the conditions were lawfully addressed. His declaration also describes direct observation of vote-by-mail verification and follow-up work. Ex. K.

27. On information and belief, the challenged statewide processes lack sufficient common definitions and change controls to ensure uniform treatment when registration-date and participation information governs matching or list status. The basis is the Board's differing-date explanation, the official-file changes, and the Plaintiffs' disputed histories. The operative mappings, controls, and source histories are held in the State and local systems and are the subject of the requests.

28. On information and belief, implementation of the residence-related program is deficient in tracing and resolving the noticed address conditions through matching, referral, notice, and disposition. The basis is the record-level address conditions in the supplied analyses, Stevens's preserved evidence, and the official responses described above. Plaintiffs challenge actual follow-through, not the existence of a program description. They seek lawful correction of verified errors and adjudication of the program's operation.

29. Plaintiffs request independent examination of continuing conditions now. Phase One traces up to fifty selected histories from the preserved baseline through available 2026 versions and the current canvass: definitions, transmissions, before-and-after values, work items, notices, responses, dispositions, and synchronization. It includes affected Plaintiffs and selected address/change conditions. Phase Two uses an approved statewide probability frame of records linked to recorded 2026 participation, with a separate historical-change sample. Report each cycle

and version separately; trace shared identifiers longitudinally where available. The proposed protocol states the controls and feasibility showing required.

V. Injuries and relief before certification

30. Each Plaintiff personally requested records and needs them for identified comparison and correction work. Zitko and Paukstys cannot trace their own disputed histories or present fully supported correction requests without source records. Hois and Stevens cannot complete examination of the processes used in their races during the open canvass. Exs. H–K.

31. Hois and Stevens devoted campaign time and resources to records review and follow-up described in their declarations. Their need for records during the canvass concerns their own races. Bost v. Illinois State Board of Elections, 607 U.S. ___, No. 24-568, slip op. at 3–10 & n.7 (Jan. 14, 2026), recognizes candidate standing to challenge vote-counting rules without proof of likely defeat and reserves other categories of election rules. Plaintiffs invoke its reasoning by analogy to the maintenance and participation processes affecting their races, together with the separate concrete information injuries pleaded here. Exs. J–K.

32. Stenstrom and Haury personally need the requested records to test the existing Illinois analyses, distinguish explained conditions from verified errors, and present supported jurisdiction-specific issues. Stenstrom will conduct the comparisons; Haury will direct inspection and evaluate dispositions in his individual requester capacity. Tillman will use the requested records for the comparison and correction activities stated in his declaration. The denial obstructs their existing work; litigation

expenditure is not the asserted injury. Exs. G, L, O.

33. The concern about nonqualified participation arises from the alleged failures to implement reasonable and uniform maintenance and to disclose the implementation trail. The examination must determine whether noticed conditions were explained, lawfully corrected, or left unresolved in 2026; whether they affected current registration or participation; and what qualification and acceptance evidence supports any asserted unlawful vote. Plaintiffs seek enforcement of specific duties and redress for their own denied examination and correction work. They do not ask the Court to equate an analytical flag with a disqualified voter.

34. Plaintiffs sought implementation records before Election Day to investigate identified discrepancies. Continued nonproduction prevents the requested examination while the canvass moves toward certification. A later records judgment cannot restore the opportunity to present supported issues during this canvass. Plaintiffs therefore affirmatively seek an expedited examination and a short, specified certification restraint where necessary to prevent an identified Plaintiff's concrete irreparable injury from a likely federal violation. Require a fixed endpoint, proper officials, and findings on narrower alternatives. Certification should not be treated as extinguishing these accrued access claims or unresolved requests for prospective compliance.

35. Some implementation records created during the 2024 election and canvass approach the two-year retention minimum in November and December 2026. Plaintiffs' September hold was acknowledged, but its implementation remains unconfirmed. A tailored order preserving existing records protects adjudication while allowing ongoing election operations.

35A. Plaintiffs expressly raise the Fourteenth Amendment's protection of a meaningful opportunity for adjudication and the First and Fourteenth Amendment access-to-courts principles as grounds supporting timely prospective relief. The threatened loss is effective examination and adjudication of the pleaded NVRA inspection and implementation claims during the canvass, while the requested source evidence remains controlled by officials. Logan v. Zimmerman Brush Co., 455 U.S. 422, 428–37 (1982), supports the principle that official procedural failure cannot automatically extinguish a protected cause of action without a meaningful opportunity to be heard. Its different statutory setting requires an analogy, not an assertion that it decides election certification.

35B. Plaintiffs request a ruling on those constitutional grounds if statutory relief is held unavailable to prevent the identified loss. Christopher v. Harbury, 536 U.S. 403, 413–16 (2002), requires an arguable underlying claim and actual obstruction; the underlying claims here are specified in Counts I–III, and the requested means of removing the evidentiary obstacle are inspection, expedited discovery, and timely adjudication. Plaintiffs seek those remedies in this action. These are grounds for construing and applying the available remedies, not a freestanding constitutional right to every government record or an allegation that a separate election contest has already been lost. No assertion of partisan discrimination or deliberate judicial obstruction is made without supporting facts.

VI. Statutory notice

36. Stenstrom and Haury individually rely on the August communication, acknowledged August 24, the Board's September 14 response and stated deadline, and continuing noncorrection more than twenty days afterward. The written communication identified the asserted violations and exact implementation-record categories. 52 U.S.C. § 20510(b)(2); Exs. A–D.

37. All Plaintiffs alternatively invoke § 20510(b)(3) for the challenged failures occurring within thirty days before the November 3 federal election, including the failures identified in Exhibit M. If an additional cure period applies to a Second Notice claim, Plaintiffs request supplementation under Rule 15(d) upon its expiration and separate adjudication of the matured August claims. Receipt on October 26 would yield November 15 as the twentieth day; actual receipt controls.

VII. Claims for relief

Count I — Failure to provide public inspection

38. Plaintiffs incorporate paragraphs 1–37. Defendants have failed to make available covered existing implementation records requested in Exhibits A and M, including the priority records in paragraph 29, in violation of 52 U.S.C. § 20507(i). The identified reports, histories, notices, and dispositions concern implementation of list-maintenance activities. Plaintiffs seek prompt inspection, lawful redaction, and ancillary compliance reporting under § 20510(b). Preservation and retention relief accompanying Count I

39. Plaintiffs request preservation of existing covered records and identification of actual gaps, retention schedules, and disposition dates as

ancillary relief under Count I. The present packet does not establish a specific unlawful destruction. Any additional retention claim will require facts identifying a covered record, the duty and applicable period, and its loss or unlawful disposition.

Count II — Nonuniform list maintenance

40. Plaintiffs incorporate paragraphs 1–37. The operational use of inconsistent registration- date meanings and inadequately controlled participation changes, when used for matching or list- status decisions, fails to provide uniform administration under § 20507(b)(1), on the information- and-belief basis pleaded above. Plaintiffs seek production and examination of the operative controls and prospective correction of the nonuniform processes established by the evidence.

Count III — Deficient residence-related maintenance

41. Plaintiffs incorporate paragraphs 1–37. The failure to implement reasonable follow- through on the noticed residence-related conditions, on the information-and-belief basis pleaded above, violates § 20507(a)(4)(B). Plaintiffs seek examination of matching, referrals, notices, and dispositions and prospective compliance with a reasonable program, subject to all safeguards in § 20507(b)–(d).

VIII. Prayer for relief

A. Declare and remedy the established violations of § 20507(i), (b)(1), and (a)(4)(B);

B. Order immediate preservation of the existing responsive records and suspension of deletion or overwriting needed to preserve them;

C. Require identification of responsible custodians and known certification dates within two business days; initial inspection of paragraph 29 records within three business days of an inspection order; and a sworn category-by-category accounting of searches, production, withholding grounds, custodians, gaps, and completion dates within five business days;

D. Authorize immediate independent examination under the proposed two-phase protocol, limited expedited discovery, and examiner access to covered records and separately authorized discovery; require a preliminary report before the relevant certification;

E. Enter a short restraint on specified certification acts if the noticed record establishes likely federal violation, concrete irreparable injury to an identified Plaintiff, proper officials, necessity, and a fixed endpoint; decide that affirmative request at an urgent hearing before the relevant act, with separate consideration of immediately available access and examination relief;

F. Permit expedited joinder of officials needed for supported certification relief and a prompt supplemental evidentiary submission. Grant the independent examination or any narrower supported relief without making all relief depend on a statewide certification halt;

G. Order supported prospective program compliance and lawful correction; decide the pleaded constitutional grounds if necessary; state findings and conclusions under Rule 52(a)(2) for each interlocutory injunction granted or refused, including any narrower relief, and award allowable costs and counsel fees under § 20510(c).

PRO SE SIGNATURES AND CONTACT INFORMATION

Each individual signs only for himself or herself. Gregory Stenstrom submits the documents as a co-plaintiff and does not appear as counsel for any other person or organization.

s/Harry R. Haury

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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Harry R. Haury (lead); Laura Hois; Robert R. Stevens; Jimmy Lee Tillman II; Jodie Zitko; Mary Catherine Paukstys; Gregory Stenstrom (all pro se)

(b) County of Residence of First Listed Plaintiff St. Louis County, Missouri
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Gregory Stenstrom, Pro Se (submitting plaintiff)
1541 Farmers Lane, Glen Mills, PA 19342
856-264-5495; gregorystenstrom@gmail.com

DEFENDANTS

Bernadette Matthews, Executive Director; John Oldfield, Director of Voting and Registration Systems, Illinois State Board of Elections (official capacities)

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*
Not yet appeared / unknown

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

INTELLECTUAL PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☒ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

V. ORIGIN *(Place an "X" in One Box Only)*

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District *(specify)* ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
52 U.S.C. §§ 20507, 20510(b)

Brief description of cause:
NVRA inspection, preservation, uniform list-maintenance duties; declaratory and emergency injunctive relief.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $ Injunctive relief

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE None identified DOCKET NUMBER

DATE 11/17/2026

SIGNATURE OF ATTORNEY OF RECORD s/Gregory Stenstrom, Pro Se

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below**; NOTE: federal question actions take precedence over diversity cases.**)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.

V. Origin. Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT

for the

Central District of Illinois

Harry R. Haury; Laura Hois; Robert R. Stevens;
Jimmy Lee Tillman II; Jodie Zitko;
Mary Catherine Paukstys; Gregory Stenstrom

Plaintiff(s)

v.

Bernadette Matthews and John Oldfield,
each in official capacity

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

Bernadette Matthews, Executive Director
Illinois State Board of Elections
2329 S. MacArthur Blvd.
Springfield, IL 62704

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Gregory Stenstrom, Pro Se (submitting plaintiff)
1541 Farmers Lane
Glen Mills, PA 19342
856-264-5495 | gregorystenstrom@gmail.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print Save As... Reset

UNITED STATES DISTRICT COURT

for the

Central District of Illinois

Harry R. Haury; Laura Hois; Robert R. Stevens;
Jimmy Lee Tillman II; Jodie Zitko;
Mary Catherine Paukstys; Gregory Stenstrom

Plaintiff(s)

v.

Bernadette Matthews and John Oldfield,
each in official capacity

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

John Oldfield, Director, Division of Voting and Registration Systems
Illinois State Board of Elections
2329 S. MacArthur Blvd.
Springfield, IL 62704

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Gregory Stenstrom, Pro Se (submitting plaintiff)
1541 Farmers Lane
Glen Mills, PA 19342
856-264-5495 | gregorystenstrom@gmail.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print Save As... Reset

E-FILED
Tuesday, 17 November, 2026 01:36:50 PM
Clerk, U.S. District Court, ILCD

EXHIBIT INDEX

Haury et al. v. Matthews et al.

Exhibits A–F accompany the complaint as Volume 1. Exhibits G–P accompany the complaint as Volume 2. Original exhibit labels and internal page references identify the cited material.

Exhibit	Description
A	August 18 notice and Illinois analyses
B	Acknowledgments and correspondence
C	Preservation demand
D	September response and IVRS overview
E	IVRS manual
F	ERIC agreement and bylaws
G	Declaration of Gregory Stenstrom
H	Declaration of Jodie Zitko
I	Declaration of Mary Catherine Paukstys
J	Declaration of Laura Hois
K	Declaration of Robert R. Stevens
L	Declaration of Jimmy Lee Tillman II
M	Second NVRA notice
N	Record and source inventory
O	Declaration of Harry R. Haury
P	Continuing conditions and requested reconciliation

E-FILED
Tuesday, 17 November, 2026 01:36:50 PM
Clerk, U.S. District Court, ILCD

EXHIBIT A

August 18, 2026 NVRA Notice

Includes the Illinois-specific Appendix A, scorecards, category summaries, comparison periods, and requested record categories.

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

August 18, 2026

Bernadette Matthews
Executive Director and Chief State Election Official
Illinois State Board of Elections
2329 S. MacArthur Blvd.
Springfield, IL 62704

CC:

The Honorable Kwame Raoul
Attorney General of Illinois
Office of the Illinois Attorney General
500 South Second Street
Springfield, IL 62701

Eric V. Neff Acting Chief, Voting Section
Civil Rights Division
U.S. Department of Justice
4 Constitution Square
150 M Street, NE
Room 8.923
Washington, DC 20530

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 Scorecards, Vote Tampering Reports, 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 Scorecards, Vote Tampering Reports, 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 changes to voter-history records following election certification;
- 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 Scorecards, Vote Tampering Reports, 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, 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.

C. Failure to Preserve and Document Record-Level Changes Relevant to List-Maintenance Activities

The attached U4F analyses identify numerous documented changes to voter-history and voter-registration records occurring across successive official statewide voter-file snapshots.

These documented changes do not, standing alone, establish that any particular modification violated federal law. They do, however, identify record-level conditions requiring investigation, explanation, and implementation documentation sufficient to determine whether the State has maintained and preserved records concerning the implementation of its voter-list maintenance programs as required by the National Voter Registration Act.

The corresponding record-level instances are identified throughout the attached Vote Tampering Reports and implementation of machine-readable datasets.

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 Scorecards, Vote Tampering Reports, 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 (Illinois 2024 General Election)
- **Appendix B** — U4F Vote Tampering Report (Illinois)
- **Electronic Exhibit 1** (USB Media) — Machine-Readable Supporting Data

The USB media accompanying this Notice contains the machine-readable supporting datasets, including the Illinois NVRA Scorecard Section 01 and Section 02 datasets, the Illinois Election Validity Scorecard dataset, and the Illinois Vote Tampering Report 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

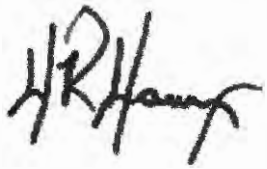
The purpose of this Notice is to provide the opportunity for voluntary compliance contemplated by Congress.

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.

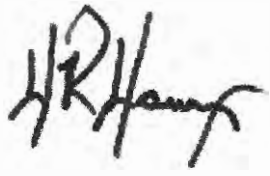
U4F and the identified aggrieved person(s) respectfully request the State's timely attention to the matters identified in this Notice and appreciate its cooperation in achieving voluntary compliance with the National Voter Registration Act.

Respectfully submitted,



For Unite4Freedom

314-498-2569
harryhaury@protonmail.com



Harry R Haury

314-498-2569
harryhaury@protonmail.com



Gregory Stenstrom, Pro Se

856-264-5495
gregorystenstrom@gmail.com

August 18, 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:

- 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: Illinois

Election(s):

- 2024 General Election

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

Summary Tables

Illinois 2024 General Election

Voter Registration Record Conditions

Category	Number of Instances
Duplicate registrations	906,146
Voted before registered	3,065,495
Inactive registration that was never active	12,882
Questionable inactive status	49,246
Voted while inactive	25,414

Backdated registrations	54,543
Record shows modification prior to registration date	3,352
Invalid or illogical registration date	206,958
Age discrepant registrants	14,556
Registrants with questionable address	227,613

Total registration conditions identified: 4,566,205

Unique registrations identified: 3,875,145

Records Associated With Votes Cast in the 2024 General Election

Category	Number of Instances
Duplicate registrations	725,023
Voted before registered	317,697
Inactive registration that was never active	273
Questionable inactive status	28,352
Registered after 2024 GE yet voted	60,013
Voted while inactive	24,787
Backdated registrations	35,557
Modified date prior to registration date	2,036
Invalid or illogical registration date	142,846
Age discrepant registrants	6,071
Registrants with questionable address	126,304

Total voting conditions identified: 1,468,959

Unique votes identified: 1,045,659

Certification Comparison

Official Source	Reported Total
State Official Certified Total	5,705,246
Actual Vote Records in the Data	5,649,082

Difference (more votes counted than voters who voted): 56,164

Related Post-Certification Voter-History Change Analysis

The Illinois Vote Tampering Report separately compares successive official voter-history records after certification. The following figures are incorporated as related factual support; they identify documented changes requiring investigation and implementation records.

Election / Comparison	Documented Changes
2024 GE: 01/24/2025 compared to 05/13/2026	254,027
2022 GE: 01/25/2023 compared to 10/13/2023	88,733
2022 GE: 10/13/2023 compared to 10/15/2024	199,714
2022 GE total	288,447
2020 GE: 01/25/2023 compared to 10/13/2023	172,334
2020 GE: 10/13/2023 compared to 10/15/2024	300,247
2020 GE total	472,581

For the 2024 General Election comparison, the report identifies 109,976 Vote-to-No-Vote changes, 15,119 No-Vote-to-Vote changes, 111,268 voter/ballot deletions, and 17,664 voter/ballot additions, totaling 254,027 documented changes.

Summary Observations

The Illinois Election Validity Scorecard identifies documented record-level conditions within official Illinois 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, records indicating voting before registration, inactive-status conditions, registration-date anomalies, 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 Illinois-specific reports and datasets are incorporated into this Appendix.

Illinois 2024 General Election Validity Scorecard

- Illinois 2024 General Election Validity Scorecard
- Illinois NVRA Scorecard Section 01.xlsx
- Illinois NVRA Scorecard Section 02.xlsx
- IL_Scorecard_2024_20260805.xlsx
- Illinois Vote Tampering Report (June 10, 2026)
- Illinois Vote Tampering machine-readable supporting dataset

APPENDIX B

Unite4Freedom VOTE TAMPERING REPORTS

DOCUMENTED POST-CERTIFICATION VOTER RECORD CHANGE ANALYSIS AND IDENTIFICATION OF CHANGES REQUIRING INVESTIGATION IN VOTER HISTORIES AND VOTE RECORDS

I. PURPOSE

This Appendix provides factual support for the documented voter-history and voter-registration record changes identified in the accompanying Notice of Violations and Demand for Corrective Action.

The attached U4F Vote Tampering Reports compare successive official statewide voter-history and voter-registration records obtained from the State or its election officials after certification of federal elections. Those comparisons identify documented record-level changes occurring within official State records following certification.

The purpose of this Appendix is not to determine whether any individual change was lawful or unlawful. Rather, it identifies documented changes requiring investigation and requests the implementation records, preservation records, and explanatory documentation that Congress required election officials to maintain concerning the implementation of voter-list maintenance programs and election administration.

This Appendix is incorporated into the Notice by reference.

II. DOCUMENTED POST-CERTIFICATION RECORD CHANGES

The attached analyses compare successive official statewide voter-file snapshots for the same certified federal election.

The analyses identify documented changes including, where applicable:

- voter-history records changing from **Vote** to **No Vote**;
- voter-history records changing from **No Vote** to **Vote**;
- vote-history records added following certification;
- vote-history records deleted following certification;

- modifications to voter-registration records;
- and other documented record-level changes appearing between successive official statewide voter-file releases.

These documented changes are derived directly from official State records.

They are reproducible using the same official datasets supplied by the State.

III. STATUTORY SIGNIFICANCE

The existence of documented post-certification record changes does not, standing alone, establish that any particular change violated federal law.

Federal law requires election officials to maintain implementation records sufficient to identify, explain, document, and reconstruct the activities producing the documented record changes identified in this Appendix. The absence of those records, or the inability to produce them, is itself information responsive to this Notice and should be expressly identified in the State's written response.

Accordingly, documented changes appearing within official election records require corresponding implementation records sufficient to identify:

- the nature of each change;
- the date and time the change occurred;
- the authority under which the change was made;
- the official, office, system, or process responsible for the change;
- the records documenting the change;
- and the statutory or administrative basis supporting the action.

Absent those implementation records, neither the State nor the public can independently determine whether the documented changes reflect lawful administrative corrections, implementation of established procedures, system operation, administrative error, or other causes.

IV. REQUIRED IMPLEMENTATION RECORDS

The documented record changes identified in the attached reports require corresponding implementation records sufficient to permit the State, the public, and any reviewing authority to determine:

- identity of records reviewed in reaching the State's conclusions;
- when the change occurred;
- why the change occurred;
- who authorized the change;
- who executed the change;
- what source records supported the change;
- what quality-control or verification procedures were performed;
- whether the change was manually or automatically generated;
- whether the change modified previously certified election records;
- whether prior values were preserved;
- whether audit records exist documenting the complete transaction history;
- database transaction logs;
- database change-history records;
- import transaction logs;
- export transaction logs;
- synchronization logs;
- replication logs;
- system event logs;
- archival snapshots;
- backup and recovery records sufficient to reconstruct affected transactions;
- exception reports generated during implementation;
- reconciliation reports;
- quality-control reports;

- automated workflow logs;
- identity of all databases, applications, services, and repositories containing implementation records;
- identity of all electronic systems reviewed in preparing the State's response; and
- whether the documented change complied with the State's written voter-list maintenance procedures and applicable federal law.

If any implementation activity was performed by an automated process, software application, third-party vendor, contractor, cloud-hosted service, or other electronic system, the State should identify that system, the records maintained concerning its implementation activities, and the records relied upon in preparing its response to this Notice.

The implementation records requested in this Appendix are consistent with the categories of records DOJ has publicly identified as necessary to document voter-list maintenance programs and federal election administration.

Accordingly, if the State concludes that any requested category does not exist, has not been maintained, or cannot be produced, U4F requests that the State identify:

- the specific record category unavailable;
- the reason the record does not exist;
- the legal authority supporting its nonexistence or destruction;
- and whether any alternative record documents the same implementation activity.

V. RELATIONSHIP TO DOJ GUIDANCE

The records requested in this Appendix are consistent with the categories of implementation and preservation records that the United States Department of Justice has identified as necessary to document the administration of federal elections and voter-list maintenance programs.

The requested records are also consistent with Congress's requirement that election officials maintain records concerning the implementation of voter-list maintenance activities and preserve records relating to acts requisite to voting.

Accordingly, this Appendix seeks the documentation necessary to explain the documented changes appearing within the State's own official records, rather than requesting speculation or unsupported conclusions concerning those changes.

VI. LIMITATIONS

The attached analyses identify documented changes appearing within official State records.

The analyses do not independently establish that any particular change violated federal law.

They identify record-level changes requiring corresponding implementation records and explanatory documentation sufficient to determine whether the documented changes were lawfully implemented, properly documented, and preserved in accordance with federal law.

ILLINOIS-SPECIFIC POST-CERTIFICATION CHANGE SUMMARY

The incorporated Illinois Vote Tampering Report compares successive official Illinois voter-history records and identifies the following documented post-certification changes.

2024 General Election: 254,027 total documented changes between the January 24, 2025 and May 13, 2026 voter-record snapshots, consisting of 109,976 Vote-to-No-Vote changes, 15,119 No-Vote-to-Vote changes, 111,268 voter/ballot deletions, and 17,664 voter/ballot additions.

2022 General Election: 288,447 total documented changes across the January 25, 2023 to October 13, 2023 and October 13, 2023 to October 15, 2024 comparisons.

2020 General Election: 472,581 total documented changes across the January 25, 2023 to October 13, 2023 and October 13, 2023 to October 15, 2024 comparisons.

These figures identify documented changes requiring investigation and corresponding implementation records; consistent with Sections III and VI above, they do not independently establish that any particular change violated federal law.

VII. INCORPORATED REPORTS

Illinois Vote Tampering Report

(Document Date: June 10, 2026)

Electronic Exhibit 1 (USB Media)

Illinois Vote Tampering machine-readable supporting dataset

EXHIBIT B

Illinois Acknowledgment Email

September 4, 2026 email acknowledging receipt and identifying the statutory cure deadline.

Gmail Gregory Stenstrom <gregorystenstrom@gmail.com>

NVRA Notices

2 messages

GeneralCounsel <GeneralCounsel@elections.il.gov> Fri, Sep 4, 2026 at 1:36 PM
To: "harryhaury@protonmail.com" <harryhaury@protonmail.com>, "gregorystenstrom@gmail.com" <gregorystenstrom@gmail.com>, "reneemazer@gmail.com" <reneemazer@gmail.com>
Cc: GeneralCounsel <GeneralCounsel@elections.il.gov>

Good Afternoon,

On August 24, 2026, the Illinois State Board of Elections received the attached Notice of Violations and Demand for Corrective Action Pursuant to 52 U.S.C. § 20510(b). On September 3, 2026, the Board received the attached Notice of Evidence Preservation Obligations from Renee Mazer, purported counsel for Unite4Freedom.

Pursuant to Federal Rule of Procedure 6(a)(1), the 20-day cure period under the NVRA expires on September 14, 2026.

As a courtesy, please be advised that records pertaining to the canvass and tabulation of election results are in the possession of the local election authorities, not the State Board of Elections. Contact information for each of Illinois' local election authorities can be found at https://www.elections.il.gov/ElectionOperations/ElectionAuthorities.aspx.

Heidi Poyer

Legislative Counsel

Illinois State Board of Elections

217.558.1755

217.685.5726 (cell)

2 attachments

Document_260824_161151.pdf
724K

Document_260903_102251.pdf
214K

Harry Haury <harryhaury@protonmail.com> Fri, Sep 4, 2026 at 4:15 PM
To: Gregory Stenstrom <gregorystenstrom@gmail.com>
Cc: "reneemazer@gmail.com" <reneemazer@gmail.com>, "jodie.zitko@usa4freedom.org" <jodie.zitko@usa4freedom.org>, "ken.zitko@usa4freedom.org" <Ken.Zitko@usa4freedom.org>

EXHIBIT A-EX-0028

Sent from Proton Mail for iOS.

-------- Original Message --------
[Quoted text hidden]

EXHIBIT A-EX-0022

EXHIBIT C

Preservation and Litigation-Hold Letter

September 2, 2026 preservation demand directed to Illinois officials and custodians.

September 2, 2026

VIA ELECTRONIC MAIL AND FEDEX PRIORITY OVERNIGHT, SIGNATURE REQUIRED

ADDRESSEES

The Honorable JB Pritzker
Governor
Office of the Governor, State of Illinois
401 South Second Street
Springfield, IL 62706

The Honorable Kwame Raoul
Attorney General
Office of the Attorney General, State of Illinois]
115 South LaSalle Street,
Chicago, IL 60603
civilrights@ilag.gov

The Honorable Alexi Giannoulias
Secretary of State
Office of the Secretary of State, State of Illinois
~~**501 South Second Street,**~~ 213 State Capitol
Springfield, IL 62756
agiannoulias@ilsos.gov

Bernadette Matthews
Executive Director / Chief State Election Official
State of Illinois NVRA Designated Chief State Election Official
2329 South MacArthur Boulevard
Springfield, IL 62704-4503
~~webmaster@elections.il.gov~~ bmatthews@elections.il.gov

Re: Notice of Evidence Preservation Obligations — National Voter Registration Act (52 U.S.C. § 20501 *et seq.*), Help America Vote Act (52 U.S.C. § 20901 *et seq.*), and the Voting Rights Act of 1965 (52 U.S.C. § 10101 *et seq.*); Response to Notice of Violations Dated August 19, 2026

Dear Governor Pritzker, Attorney General Raoul, Secretary of State Giannoulias, and Executive Director / Chief State Election Official Matthews:

This firm represents Unite4Freedom ("Unite4Freedom") in connection with the Notice of Violations regarding compliance with the National Voter Registration Act of 1993 ("NVRA"), 52 U.S.C. § 20501 *et seq.*, that was previously transmitted to the State of Illinois on or about August 19, 2026 (the "Notice of

Violations"). This letter is directed to the State of Illinois]; the Office of the Governor of the State of Illinois; the Office of the Attorney General of the State of Illinois; the Office of the Secretary of State of the State of Illinois; and the Executive Director / Chief State Election Official, each in their official capacity, together with each of their respective agents, employees, contractors, vendors, and custodians of records (collectively, "Defendants"). This letter is a formal demand that Defendants immediately take all steps necessary to identify, preserve, and protect from destruction, alteration, or loss any and all records, documents, communications, and data — in whatever form or medium such materials are created, received, or maintained — that relate in any way to the subject matter of the Notice of Violations and to Defendants' compliance with the NVRA, the Help America Vote Act of 2002 ("HAVA"), 52 U.S.C. § 20901 *et seq.*, and the Voting Rights Act of 1965 ("VRA"), 52 U.S.C. § 10101 *et seq.* (collectively, the "Preserved Records").

I, STATEMENT OF INTENT TO SUE

This letter further serves as formal notice, pursuant to Section 11(b) of the NVRA, 52 U.S.C. § 20510(b)(1), that Unite4Freedom intends to commence a civil action against Defendants in an appropriate United States district court if the violations identified in the Notice of Violations dated August 19, 2026 are not fully remedied within the applicable statutory cure period. The NVRA authorizes a person aggrieved by a violation to bring such an action if the violation is not corrected within 90 days after a State receives written notice of the violation, or within 20 days after receipt of such notice if the violation occurred within 120 days before the date of an election for Federal office. 52 U.S.C. § 20510(b)(2).

Unite4Freedom intends to exercise this right in full absent a satisfactory resolution of the violations identified in the Notice of Violations, and reserves all rights and remedies available to it under the VRA, the NVRA, HAVA, and applicable state law, including the right to seek declaratory and injunctive relief, attorneys' fees and costs, and any other relief a court deems appropriate. Because litigation against Defendants is therefore reasonably anticipated, Defendants' duty to preserve the Preserved Records described in this letter arises independently under common-law spoliation doctrine, in addition to the statutory preservation and production obligations described in Section II below, and that duty applies with equal force to every Defendant regardless of which Defendant is ultimately named in any complaint.

II. STATUTORY BASIS FOR PRESERVATION

The NVRA itself imposes an affirmative, ongoing record-retention obligation. Section 8(i)(1) of the NVRA requires each State to "maintain for at least 2 years and to make available for public inspection ... all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters". 52 U.S.C. § 20507(i)(1) (emphasis added). This is the completeness standard the Department of Justice applies when assessing a State's compliance, and it governs the scope of the records that must be preserved in response to this letter.

Separately, the Civil Rights Act of 1960, 52 U.S.C. § 20701, requires every election officer to "retain and preserve", for twenty-two (22) months following any general, special, or primary election for federal office, all records and papers that come into that officer's possession relating to any application, registration, or other act requisite to voting, and makes those records subject to inspection, reproduction, and copying upon a written demand by the Attorney General specifying the basis and purpose for the request. 52 U.S.C. §§ 20701, 20703. That demand may be enforced in federal district court. 52 U.S.C. § 20705. The Attorney General likewise has independent enforcement authority under Section 11 of the NVRA. 52 U.S.C. § 20510.

HAVA imposes complementary obligations, including the requirement that the statewide voter registration database be coordinated on a regular basis with State records on felony status and death, consistent with NVRA list-maintenance requirements. 52 U.S.C. § 21083(a)(2). Records reflecting that coordination, and the procedures and audit trails underlying it, fall squarely within the scope of this preservation demand.

III. SCOPE OF RECORDS TO BE PRESERVED

The preservation obligation described in this letter applies, without limitation, to all records — whether in **paper or electronic form**, and regardless of the software, system, custodian, or location in which such records are created, received, stored, or maintained — that are necessary to validate the State's compliance with the VRA, the NVRA, and HAVA. This includes, but is not limited to:

- The statewide voter registration list and all historical snapshots, exports, and version histories of that list;
- All records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters, as described in 52 U.S.C. § 20507(i)(1), including list-maintenance mailings, notices, and responses;
- Records of registrations, cancellations, transfers, rejections, and purges, including the basis and source data for each such action;
- Records reflecting coordination between the statewide voter registration database and other State agency records, including motor vehicle, public assistance, corrections, vital records (death), and felony-status data, under NVRA § 5 and HAVA § 303(a)(2);
- Policies, procedures, protocols, training materials, and internal guidance concerning voter list maintenance, registration processing, and NVRA/HAVA/VRA compliance;
- Correspondence, memoranda, and communications (including emails, text messages, instant messages, and messages sent via any ephemeral or auto-deleting messaging application) among or between State officials, county or local election officials, vendors, contractors, and any other person concerning the subject matter of the Notice of Violations;
- Contracts, statements of work, and communications with any third-party vendor or contractor that performs list-maintenance, data-matching, or registration-processing services on the State's behalf, together with that vendor's or contractor's own underlying records;
- Audit logs, metadata, database change logs, and system-access records reflecting who made changes to voter records, when, and why;
- Backup tapes, archived files, and legacy-system data that would otherwise be subject to a routine retention or deletion schedule; and
- Any other document or data compilation that would be responsive to, or that was created in response to, the Notice of Violations.

IV. DOJ'S INTERPRETATION OF "AUDITABILITY" AND ITS EXTENSION TO VOTING SYSTEM RECORDS

The Department of Justice has taken the position, including in recent Civil Rights Division demand letters issued to state election officials, that a State's NVRA and HAVA compliance cannot be assessed from registration records alone, and that the record-preservation and record-production obligations described above extend to the full universe of records that establish the *auditability* of the State's voting and tabulation process. DOJ has grounded this position in HAVA's voting-system requirements, which mandate that any

voting system used in a federal election "produce a permanent paper record with a manual audit capacity for such system" and that the paper record "shall be available as an official record for any recount conducted with respect to any election in which the system is used." 52 U.S.C. § 21081(a)(2). DOJ has cited a State's obligation to demonstrate compliance with this and other HAVA "minimum requirements," see 52 U.S.C. §§ 21081–21083, as independent grounds for demanding production of the underlying system- and ballot-level records that make that audit capacity meaningful, rather than registration records alone.

DOJ has likewise construed the Civil Rights Act of 1960's reference to records relating to "any application, registration, payment of poll tax, or *other act requisite to voting*", 52 U.S.C. § 20701 (emphasis added), to reach beyond registration paperwork to the records generated when a ballot is cast, scanned, tabulated, and canvassed — on the theory that casting and counting a ballot is itself an "act requisite to voting." Consistent with that reading, DOJ has separately demanded ballots, ballot receipts, and ballot envelopes directly from local election officials under the CRA. In light of this stated position, Unite4Freedom treats the following categories of voting-system and audit-trail records as squarely within the scope of the Preserved Records, in addition to the registration-related records identified in Section III above:

- Cast Vote Records ("CVRs"), including the underlying ballot-level tabulation data for every contest and every voting method (in-person, provisional, absentee/mail, and any other), together with the CVR export files, layout/definition files, and any documentation necessary to interpret them;
- Electronic pollbook logs, including voter check-in and check-out records, activation-code or ballot-issuance logs, provisional-ballot logs, and any synchronization or reconciliation logs between electronic pollbooks and the statewide voter registration database;
- Voting machine and tabulation-system logs, including system event logs, error logs, and chain-of-custody logs for each device used in casting, scanning, or tabulating ballots;
- Database change logs and audit trails for the statewide voter registration system and any tabulation or election-management system, reflecting every addition, modification, or deletion and the identity of the user or process that made it;
- Ballot images captured by optical scanners or other voting equipment, including full-resolution images of both the front and back of each ballot, for every voting method;
- Software and firmware loads, version histories, configuration files, and cryptographic hash values for every voting, tabulation, and election-management system component in use, together with certification records, vendor change logs, and records of any patch, update, or configuration change applied to that software;
- Physical ballots in every category — voted, spoiled, rejected, provisional, and absentee/mail — together with ballot envelopes, ballot receipts, chain-of-custody logs, and any risk-limiting audit or post-election audit records and work papers; and
- Any other record that DOJ has identified, or could reasonably be expected to identify, as necessary to establish the auditability of the State's voting, tabulation, and canvassing processes.

V. PRESERVATION INSTRUCTIONS

To ensure compliance with this demand, each addressee is instructed to take the following steps immediately upon receipt of this letter:

- Suspend any automatic deletion, overwriting, recycling, or destruction protocol — including routine records-retention schedules, email auto-purge settings, and ephemeral-messaging auto-delete functions — that could result in the loss of any Preserved Record;
- Issue a written litigation-hold notice to every employee, official, agent, and contractor who may have custody or control of Preserved Records, and confirm in writing that such notice has been distributed;
- Refrain from deleting, discarding, altering, erasing, overwriting, relocating, or otherwise disposing of any Preserved Record, whether in paper or electronic form, including metadata associated with electronic records;
- Preserve electronic records in their native, original format, including all associated metadata, and refrain from any action that would alter a record's metadata, including "last modified" or "last accessed" dates, except as unavoidably caused by routine, good-faith access;
- Identify and secure any records currently stored on legacy systems, decommissioned hardware, or media scheduled for replacement or disposal, and preserve that hardware or media, or a forensically sound copy of its contents, before any replacement or disposal occurs; and
- Direct any third-party vendor or contractor in possession of Preserved Records to comply with the same preservation obligations described in this letter.

VI. DURATION AND SCOPE OF THIS DEMAND

Several of the categories identified in Section IV, including system event logs, database change logs, and electronic pollbook logs, are, by default, subject to shorter retention or automatic overwrite cycles under vendor default settings or routine IT practice than the 22-month period fixed by 52 U.S.C. § 20701. To the extent any such default cycle would result in loss of these records before the expiration of this hold, each addressee is instructed to override or suspend that cycle immediately, regardless of whether the affected system is operated directly by a Defendant or by a county, vendor, or contractor on a Defendant's behalf.

This preservation demand is effective immediately and shall remain in effect until Unite4Freedom or its counsel provides written notice releasing Defendants from this obligation, or until the underlying matter is finally resolved, whichever occurs later. This letter is not a comprehensive statement of the records that may ultimately be requested in discovery, through a public-records request, or through a demand under 52 U.S.C. § 20703, and it does not waive, limit, or substitute for any other right to obtain records under applicable state or federal law, including state public-records or open-records statutes.

VII. CONSEQUENCES OF NONCOMPLIANCE

Please be advised that the failure to preserve records identified in, or reasonably encompassed by, this letter may result in spoliation of evidence and may expose Defendants to sanctions, adverse-inference instructions, fee-shifting, and other remedies available under applicable law, both in connection with the anticipated civil action described in Section I above and in any other proceeding. Unite4Freedom reserves all rights and remedies, including the right to seek judicial relief to compel preservation or production of records, in the event this demand is not honored in full.

Please direct all questions regarding this letter, and any correspondence confirming compliance with the preservation obligations described above, to the undersigned at the contact information listed above.

Sincerely,

Renée Mazer

Renee Mazer
PA Bar No. 57676
Counsel for Unite4Freedom

EXHIBIT D

Illinois Substantive Response and High-Level Overview

Complete September 14, 2026 State response addressing Plaintiffs' analyses, Illinois voter-list-maintenance structure, custodians, and the promised supplemental response, followed by the two-page high-level overview.

STATE BOARD OF ELECTIONS

STATE OF ILLINOIS

2329 S. MacArthur Blvd.
Springfield, Illinois 62704
217-782-4141
TTY: 800-964-3013
Fax: 217-782-5959

69 W. Washington St., Suite LL08
Chicago, Illinois 60602
312-814-6440
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BOARD MEMBERS
Laura K. Donahue, Chair
Rick S. Terven, Sr., Vice Chair
Jennifer M. Ballard Croft
Cristina D. Cray
Tonya L. Genovese
Catherine S. McCrory
Jack Vrett
Casandra B. Watson

EXECUTIVE DIRECTOR
Bernadette M. Matthews

September 14, 2026

Unite4Freedom & Harry Haury

harryhaury@protonmail.com
via U.S. mail and email

Gregory Stenstrom

gregorystenstrom@gmail.com
via U.S. mail and email

Carbon copy to:
Renee Mazer

reneemazer@gmail.com
via U.S. mail and email

Re: Response to NVRA notice received 8/24/26

Unite4Freedom, Mr. Haury, Mr. Stenstrom,

The Illinois State Board of Elections ("SBE" or "Board") received your notice on August 24, 2026. The notice alleges violations of provisions of the National Voter Registration Act, 52 U.S.C. § 20501 *et seq.* ("NVRA"). First, you allege violations of NVRA Section 20507(i)'s provision on public disclosure of voter registration activities. *See id.* at § 20507(i). But the Board cannot have violated an obligation to produce documents that you never requested until now, rendering your notice premature and ineffective. Second, you allege a violation of NVRA Section 20507(a)(4), which requires states to "conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters by reason of" death or change of address. *See id.* at § 20507(a)(4). Although the NVRA imposes no duty to explain the State's list maintenance program beyond production of existing records, as a courtesy, this letter describes some of the tools that SBE and local election authorities use to maintain an accurate voter registration list, in full compliance with both federal and State laws. Illinois's voter list is updated at least ***daily*** with new and amended registrations and at least ***weekly*** based on new information about existing voter eligibility. Because of

these mighty efforts, elections in Illinois are fair, trustworthy, and in compliance with Section 20507(a)(4). *See id.*

Illinois enhances public confidence in elections by designating trusted local officials to maintain and update individual voters' registrations within their jurisdictions. Illinois voters feel confident that their elections are fair and accurate when their interests are safeguarded by local officials familiar with their area and with whom they can interact on a regular basis. As a result of this local approach to voter registration and list maintenance, most of the information and records you seek are within the realm of Illinois's 108 local election authorities, which make individual voter eligibility determinations. SBE's roles with respect to voter lists under the Illinois Election Code include forwarding voter registration applications to local election authorities for them to research and input as appropriate, maintaining the technical aspects of the electronic statewide voter database, and providing resources and information for the local election authorities to use in analyzing initial and continuing individual voter eligibility determinations. The NVRA violations you allege are addressed further at the end of this letter.

About the Board

The Board is an eight-member bipartisan entity providing "general supervision over the administration of the registration and election laws throughout the State" of Illinois. Ill. Const. Art. III, § 5; *see also* 10 ILCS 5/1A-1, 1A-2. By law, four members of the Board must be from the Governor's party, and four must be from the party receiving the second-highest number of votes. The Board's membership must be from within and outside Cook County. The Board acts by majority vote, which means its actions must be bipartisan and represent geographic diversity. The Board is also independent; its members serve four-year terms and are not subject to oversight by or direction from public officials or political bodies.

New Voter Registration and Eligibility Determinations in Illinois

Online voter registration applications submitted to SBE online must be forwarded to the county clerk or board of election commissioners having jurisdiction over the applicant's voter registration within two days of receipt. 10 ILCS 5/1A-16(b), 1A-16.5(h)(2). In lieu of completing an online voter registration application with SBE, a voter may submit a voter registration application through the office of their local election authority, designated temporary places of registration, deputy registrars, the Illinois Secretary of State, or other designated government agencies. *See id.*, *e.g.*, 1A-16.7, 4-6, 4-6.2, 5-5, 6-29. Registration is also available at polling places during early voting and on election day, *id. e.g.*, 4-50, 5-50, 6-29, 6-100.

Each election authority must "accept Voter Registration Applications tendered to it under circumstances complying with the provisions of the National Voter Registration Act of 1993..." 26 Ill. Adm. Code 216.30(b). Upon receipt, local election authorities must ensure the applicant is eligible to vote. To be eligible to vote in Illinois, an individual must be a U.S. citizen, in most cases have resided in Illinois and in the election district for the 30 days preceding the election, and be at least 18 years old on

the date of the general or consolidated election. 10 ILCS 5/3-1.[1] Convicted felons are ineligible to vote while incarcerated. *Id.* at 3-5; *see also* 730 ILCS 5/5-5-5. Local election authorities determine the qualifications of voters within their jurisdictions, and, if they are qualified, register them. 10 ILCS 5/4-10, 5-9, 6-37. To ensure voters are properly identified, SBE routinely performs searches of the American Association of Motor Vehicle Administrators ("AAMVA") database to verify information such as social security number for every voter. SBE also provides local election authorities with access to AAMVA searching to ensure the authenticity of voter information.

In processing voter registration applications, the local election authorities also ensure registering the applicant will not create a duplicate voter registration as follows:

> Upon receipt of the online voter registration application, the county clerk or board of election commissioners having jurisdiction over the applicant's voter registration shall promptly search its voter registration database to determine whether the applicant is already registered to vote at the address on the application and whether the new registration would create a duplicate registration. If the applicant is already registered to vote at the address on the application, the clerk or board, as the case may be, shall send the applicant by first class mail, and electronic mail if the applicant has provided an electronic mail address on the original voter registration form for that address, a disposition notice as otherwise required by law informing the applicant that he or she is already registered to vote at such address. If the applicant is not already registered to vote at the address on the application and the applicant is otherwise eligible to register to vote, the clerk or board, as the case may be, shall: (1) enter the name and address of the applicant on the list of registered voters in the jurisdiction; and (2) send by mail, and electronic mail if the applicant has provided an electronic mail address on the voter registration form, a disposition notice to the applicant as otherwise provided by law setting forth the applicant's name and address as it appears on the application and stating that the person is registered to vote.

10 ILCS 5/1A-16.5(i).

Once the local election authority has confirmed an individual is eligible to vote and enters their data electronically, the local election authority's individual voter registration system then transfers the voter data to the Illinois Voter Registration System ("IVRS"). SBE maintains the technological aspects of IVRS, while the input and removal of voter data is handled by the local election authority. *See generally id.* 1A-25. Registration information maintained by each election authority's individual system must be synchronized with the statewide voter list in IVRS at least

[1] Your Appendix A mentions age discrepant registrants. Illinois law authorizes a person who is 17 years old on the date of a caucus, general primary election, or consolidated primary election and who is otherwise qualified to vote at that caucus, general primary, or consolidated primary, including voting a vote by mail, grace period, or early voting ballot with respect to that general primary or consolidated primary, if that person will be 18 years old on the date of the immediately following general election or consolidated election for which candidates are nominated at that primary. 10 ILCS 5/3-6(a). Illinois law also establishes a pre-registration system for future voters beginning at the age of 16. *Id.* at 3-6(b). These provisions may impact the age discrepant registration concern you raise.

once every 24 hours. *Id*. 1A-25(a)(4). Illinois' bottom-up structure allows trusted local election officials to maintain control over their jurisdictions' registrations, while ensuring a centralized database is maintained at the state level in compliance with all applicable federal laws.

Voter List Maintenance

The NVRA seeks to maximize voter participation and remove unnecessary barriers to voter registration by permitting citizens to register to vote in everyday interactions with the government, such as while updating a driver's license. The NVRA also requires states to conduct a reasonable list maintenance program to remove ineligible voters from voter rolls. The Board shares the NVRA's twin goals of removing ineligible voters without disenfranchising any eligible voter. In Illinois, the Board works closely with the State's 108 local election authorities to maintain accurate voter lists. This collaboration takes advantage of the unique capabilities of each election authority. The Board leverages its expertise by providing local election authorities with a wealth of information for conducting effective list maintenance, facilitating updates to individual voters' registrations, providing oversight of the list maintenance program, and maintaining the technological aspects of the State's electronic voter list. The local election authorities, which maintain familiarity with their counties, determine voter eligibility, send voters within their jurisdiction any required confirmation notices, update registrations of individual voters, including due to a change of address, and cancel registrations in the event of a voter request, death, or ineligibility of the voter, or following the biennial systematic list maintenance program to remove ineligible voters, all in compliance with the NVRA. 52 U.S.C. § 20507(a)(4), (b)-(d); 26 Ill. Adm. Code 216.40(f)-(g), 216.50(b).

a. Resources Used for List Maintenance

Illinois relies on data from several federal and state agencies to update its statewide electronic voter list housed in IVRS. As set forth below, these resources ensure the accuracy of IVRS.

Illinois participates in the Electronic Registration Information Center ("ERIC") to ensure Illinois election officials receive the information needed for effective list maintenance. *See* 10 ILCS 1A-16.8(a). ERIC is a nonpartisan consortium of state election officials from 27 states and the District of Columbia. Every 60 days, the Board securely shares voter registration data, as well as data provided by the Office of the Illinois Secretary of State, with ERIC. ERIC matches Illinois's voter list data against SOS data, other member states' data, the U.S. Social Security Administration's Master Death List, and the U.S. Postal Service's National Change of Address ("NCOA") program. ERIC generates reports identifying voter registration records that may be inaccurate or out of date, including records of deceased voters and voters who have moved from one ERIC member jurisdiction to another. In addition to helping identify ineligible voters and maintain more accurate voter rolls, ERIC helps detect possible illegal voting, which is used to initiate criminal investigation and possible prosecution.

SBE also uses weekly data from the Illinois Department of Corrections to generate potential matches of registered voters with incarcerated felons, as well as monthly data from the Illinois Department of Public Health to generate potential matches of registered voters with deceased individuals.

If these resources identify voters who may be ineligible to vote, local election authorities review the information and—if appropriate—cancel ineligible registrants, following all applicable state and federal laws regarding notification to affected voters, described in the next section.

Through these layered safeguards and multiple data sources, Illinois maintains accurate voter registration records while protecting eligible voters, consistent with state and federal laws.

b. List Maintenance via Direct Notices to Voters

Local election authorities also conduct list maintenance by sending direct mailings to every voter every two years to confirm each registered voter remains eligible to vote. Each election authority must maintain a list of all voters to whom a forwardable confirmation of address notice has been sent. 26 Ill. Adm. Code 216.40(f). Additionally, when an ERIC match indicates a voter has relocated within Illinois, the local election authority or authorities send notices to both the new and former addresses. 10 ILCS 5/1A-16.8. In the event of an out-of-state match or NCOA match, forwardable confirmation notices are sent to the voter's apparent former address. If a voter's new registration cannot be successfully merged with an existing registration, an NVRA confirmation notice is sent, and the voter's registration is cancelled due to a change of address as part of Illinois's systematic program to remove ineligible voters if the voter fails to respond to a forwardable confirmation notice, and subsequently does not vote in two consecutive general federal elections, as the NVRA requires. *See* 52 U.S.C. § 20507(d)(1).

From 2021-2022, Illinois removed 692,003 voters from its registered voter list, representing a removal of 7.9% of Illinois registered voters. During that time-period, Illinois removed the ninth highest number of registered voters of U.S states and territories. Illinois's multilayered approach to voter list maintenance is working.

Concerns Identified in Your Provided Data and Appendices A-B

Your letter requests that certain concerns relating to voter registration be remedied within 20 days under Section 20510, 52 U.S.C. § 20510. SBE has numerous concerns with this request, including the following three.

First, federal law prohibits systematic removal of the names of ineligible voters from the official lists of eligible voters in the 90 days preceding a federal primary or general election. *Id.* § 20507(c)(2). Although limited exceptions to this prohibition exist, it appears the type of mass purge of voters you propose may presently be unlawful and could risk disenfranchising lawful voters on the eve of the November 2026 election.

Second, as explained above, voter eligibility determinations must be made by local election authorities under Illinois law. This limits the Board's ability to further the remedies you seek, as the Board lacks authority to change the content of individual voters' registration records.

Third, much of the information and data you have provided is unclear. The Board's Division of VRS reviewed the two files you provided with your complaint. Neither has headers, and it is difficult to

ascertain what data each column purports to represent, making it difficult to understand what the data demonstrates. Although one can assume the purpose of certain columns, Column 9 contains either a number that ranges from -4 to 124 or has no value, and we are unable to ascertain what is being conveyed. In the case of duplicates, you have not provided the matching voter information that would permit a comparison to aid a local election authority's investigation into whether there is a potential duplicate.

In Appendix A[2], we are uncertain what it means to have a questionable inactive status, invalid or illogical registration date, or questionable address, making your concerns difficult to understand. Voting while inactive is lawful and should raise no concerns. Even if clearer data was provided, it is local election authorities that determine voter eligibility, including addresses, and process and update registrations.

As to Appendix B[3], your concerns appear related to records showing whether each voter voted in a particular election. All ballots in Illinois are created, completed by voters, tabulated, and preserved at the local election authority level. Each election authority is responsible for recording whether or not an individual voted at each election and transferring that information into IVRS. SBE's data on voter participation is provided to it by the election authority. Your concerns regarding whether voters voted at certain elections should be directed to the relevant Illinois local election authorities in which you located alleged discrepancies.

Your Notice under NVRA Section 20507(a)(4)

As described throughout this letter, Illinois operates a robust and thorough list maintenance program to remove voters from the statewide list for reasons of death or change of residence as contemplated by Section 20507(a)(4). 52 U.S.C. § 20507(a)(4). Through its partnerships with ERIC and Illinois's 108 local election authorities, all voters' registration information is routinely compared to the U.S. Social Security Administration's Master Death List and the U.S. Postal Service's NCOA program data. SBE provides these potential matches to local election authorities, along with potential matches to death records from the Illinois Department of Public Health, to ensure each jurisdiction has the most current information possible from which to confirm voters' continued eligibility, including changes based on death or change of residence. If a voter is rendered ineligible, the election authorities remove the voter from the list in compliance with all legal requirements. This list maintenance program easily meets the requirements of Section 20507(a)(4). As noted throughout this letter, issues with individual voters' registrations can be remedied by local election authorities, not SBE, as SBE lacks statutory authority to alter individual registrations. Because of the NVRA prohibition on systematic

[2] It is likely that alleged inconsistencies in registration dates as mentioned in Appendix A are due to differing practices used by the 108 election authorities for recording registration dates (*e.g.*, last voter-initiated date, original registration date, last change on registration record date, etc.). Each local election authority is better situated to clarify which date is supplied as the registration date based on their system.

[3] Appendix B appears to be derived from a statewide voter list that consists entirely of then-current active and inactive voters and does not contain all voters that voted in the November 2024 general election. As voters' registrations are cancelled, and other registrations become active, the active/inactive list continues to change. It is possible that an occasional clerical error may be corrected in records of who voted in a particular election, but this is not a common occurrence. Individual election authorities may be able to clarify changes in any of their resident voters' records.

voter list maintenance in the 90 days before an election, some of these items cannot result in changes to the voter registration list until after the November election. *Id.* § 20507(c)(2).

Your Notice under NVRA Section 20507(i) Is Ineffective

Your notice claims the Board violated the NVRA's public access provision – but you never requested any list maintenance records from the Board prior to sending the notice. The NVRA limits the right to bring a private right of action to "a person who is aggrieved by a violation of this chapter" who has provided "written notice of the violation to the chief election official of the State involved." 52 U.S.C. § 20510(b)(1). No prior NVRA public records request means there has been no violation, and your August 2026 notice is ineffective as to your public access allegations.

New Requests for List Maintenance Records

Local election authorities verify voter eligibility and update individual voters' records, and they do not report to SBE the reason for each determination. To the extent you are seeking details of eligibility determination or alteration of any individual voter's registration record, we recommend you reach out to the relevant local election authority. Under Illinois law, "[e]ach election authority shall keep all records concerning the implementation of programs and activities conducted to maintain the accuracy and currency of voter registration files for at least two years." 26 Ill. Adm. Code 216.40(f). A list of contact information for all 108 election authorities is available here: https://www.elections.il.gov/ElectionOperations/ElectionAuthorities.aspx

The Board is in possession of some records relating to list maintenance. I am attaching with this letter an overview of Illinois's voter list maintenance program, the manual SBE publishes for election authorities on the operation of IVRS, the ERIC member agreement, and ERIC bylaws. Illinois voter lists are available for purchase through SBE, with certain personally identifiable information redacted in accordance with the court rulings in *Public Interest Legal Foundation v. SBE*, 589 F.Supp.3d 932 (C.D. Ill. 2002) and No. 20-cv-3190, 2022 WL 1174099 (C.D. Ill. Apr. 20, 2022). More information about ordering voter lists is available here: https://www.elections.il.gov/VotingAndRegistrationSystems/ComputerizedVoterData.aspx.

Board staff is conferring with ERIC about the potential release of certain ERIC reports used for list maintenance purposes. Many of those reports cannot be released to the public under state and federal law, including under the Driver's Privacy Protection Act, 18 U.S.C. § 2721 *et seq*., federal Social Security Administration Limited Access Death Master File Regulations, Section 203 of the Bipartisan Budget Act of 2013, 42 U.S.C. § 1306c, and associated regulations administered by the National Technical Information Service, 15 C.F.R. Part 1110, and federal statutory privacy provisions under the Nondisclosure of Lists of Names and Addresses Act, 39 U.S.C. § 412 and the Privacy Act, 5 U.S.C. § 552a.

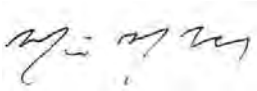
As to your requests for certain technical data, the Office of the General Counsel is conferring with VRS and Information Technology staff on what records exist. Some of the items you request may not be "list maintenance records" within the meaning of Section 20507(i) and would not fall within the

scope of the NVRA. Please expect an additional letter from SBE staff further updating you on your Section 20507(i) request.

I do not understand your request for records on "the completeness of the State's public-inspection obligations under the National Voter Registration Act." I would appreciate further elaboration on what type of records you seek in that request.

As to your requests for "Written Explanation of Documented Record-Level Conditions" beginning on page 7 of your notice, "Written Disposition" beginning on page 8, and "Request for Written Response" on page 11, the NVRA imposes no duty to provide written explanations beyond production of existing records. I have included extensive information in this letter about the State's list maintenance program solely as a courtesy. And to reiterate, details of individual voter list maintenance determinations and characteristics beyond what is contained in IVRS are not available at the SBE level. If you contact local election authorities, and any is unwilling to produce existing list maintenance records, we ask that you contact SBE at that time to seek a resolution.

Sincerely,



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General Counsel
Illinois State Board of Elections
(312) 814-6440

Illinois State Board of Elections
Voting and Registration Systems Division

Illinois Voter List Maintenance

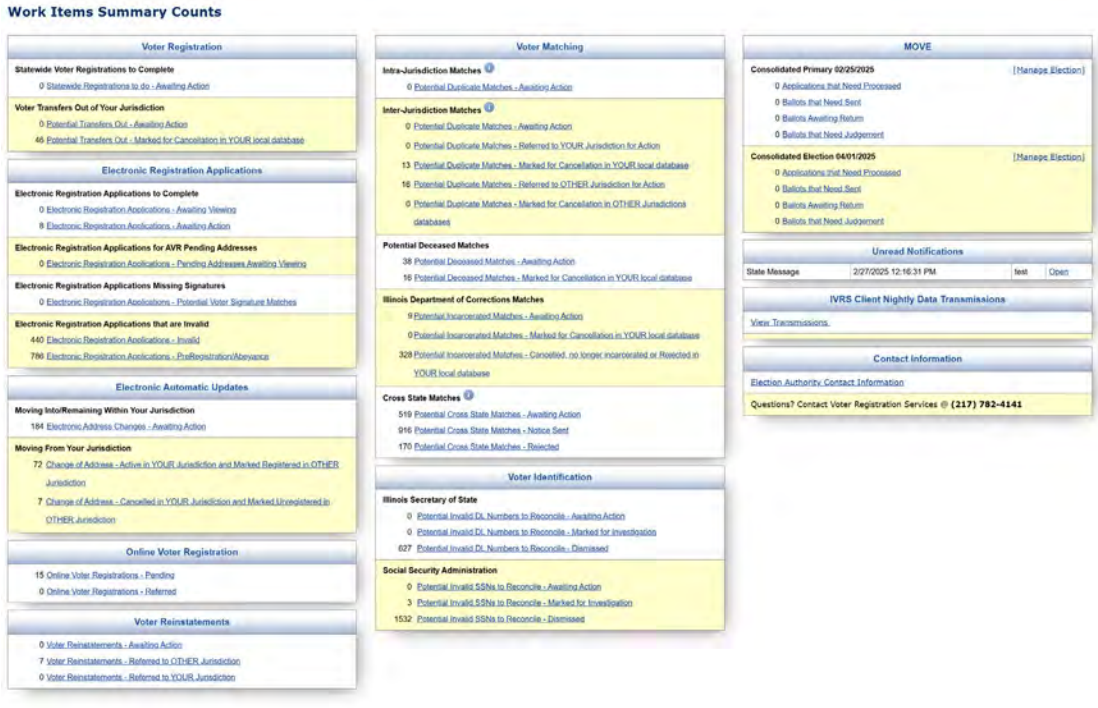
High-Level Overview of the Illinois State Board of Elections' Role and Oversight

Purpose:
This document provides a high-level overview of voter list maintenance activities in Illinois and the role of the Illinois State Board of Elections (ISBE) in supporting, overseeing, and coordinating these efforts with local Election Authorities (EAs). It is intended for external dissemination to provide transparency into the processes, safeguards, and responsibilities associated with maintaining accurate voter registration records.

Overview of ISBE Responsibilities:
The Illinois State Board of Elections supports voter list maintenance by operating and maintaining the Illinois Voter Registration System (IVRS), conducting statewide and interstate data matching, providing potential matches to local Election Authorities for review, ensuring compliance with state and federal law, and offering training, technical support, and public access to voter list data.

ISBE identifies and distributes potential matches related to duplicate registrations, voter transfers, deceased voters, incarcerated voters, and SSN or driver's license verification issues. ISBE also coordinates all data exchanges with the Electronic Registration Information Center (ERIC).

IVRS Work Item Summary:
Local Election Authorities access voter list maintenance items through the IVRS Work Item Summary dashboard, which consolidates matches generated by ISBE and ERIC. The dashboard displays current and historical work items, match categories, and resolution status. Each item requires review and action by the local Election Authority.



Illinois State Board of Elections
Voting and Registration Systems Division

Core Voter List Maintenance Processes:
Voter Transfers and Reinstatements: Daily matching identifies voters who may have moved or registered in another Illinois jurisdiction. Local EAs confirm identity and initiate transfers or reinstatements.

Duplicate Registration Identification:
ISBE runs daily duplicate-matching processes, supplemented by ERIC reports. Local EAs investigate and merge or cancel records as appropriate.

Deceased Voter Identification:
Matches are provided from IDPH death certificate data and ERIC/SSA files. Local EAs investigate then either cancel the registrations or reject matches after.

Incarcerated Voter Matches:
Weekly IDOC data identifies potentially incarcerated voters. Local EAs investigate and cancel records only when incarceration is confirmed.

SSN and Driver's License Verification:
Verification is conducted through AAMVA/SSA and the Illinois Secretary of State. Discrepancies are referred to local EAs for review.

Automatic Address Updates:
ERIC NCOA and In-State Update reports trigger address updates, with voter notification and reversal safeguards.

Interstate Voter Registration Matches:
ERIC identifies voters registered in multiple states. Illinois initiates voter notifications consistent with NVRA requirements.

Registration Systems Supporting Accuracy:
ISBE operates the Paperless Online Voter Application (POVA) and Automatic Voter Registration (AVR) systems, improving data accuracy and reducing duplicate registrations.

Training, Oversight, and Public Access:
ISBE Voting and Registration Systems staff provide training, technical assistance, documentation, oversight of unresolved work items, ERIC compliance monitoring, post-election data validation, and public access to voter lists as required by law. Staff also forwards applications for registration and cancellation requests to local election authority for processing.

Conclusion:
Voter list maintenance in Illinois is a shared responsibility between ISBE and local Election Authorities. Through layered safeguards, multiple data sources, and statutory protections, Illinois maintains accurate voter registration records while protecting eligible voters.

EXHIBIT E

Illinois Voter Registration System User Manual

Full IVRS User Manual as produced in the supplied Illinois paper package.

Ex. A

IVRS User Manual



Illinois State Board of Elections

Voter Registration Systems 2022

Updated 08/2022

IVRS USER MANUAL TABLE OF CONTENTS

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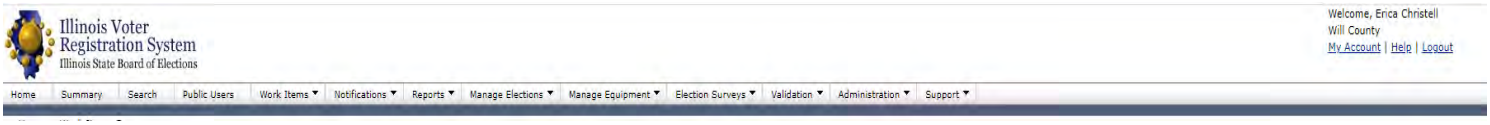
IVRS BASIC FUNCTIONS

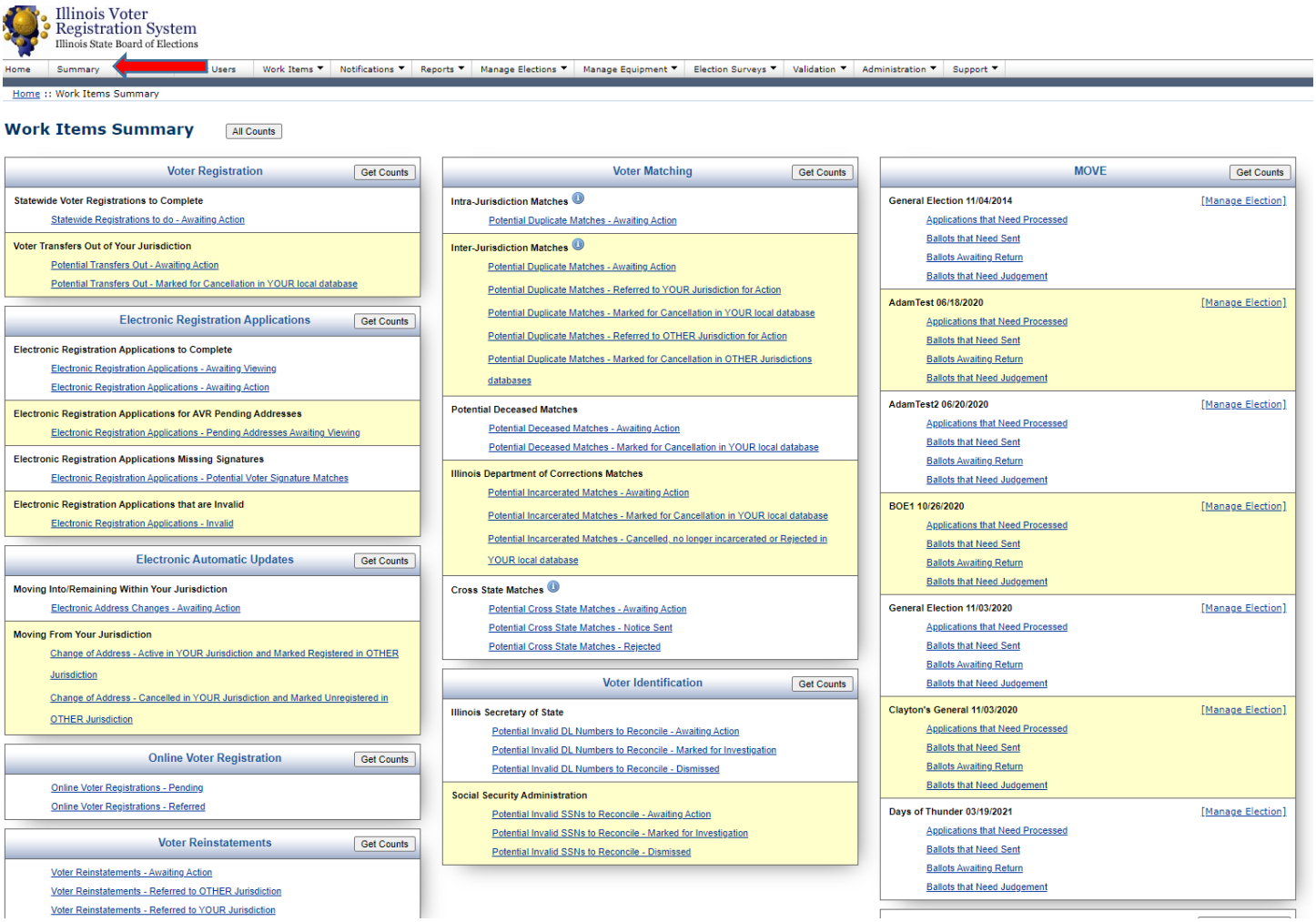
The Illinois Voter Registration System (IVRS) provides a support menu bar. The menu in this section will differ slightly depending on the type of user profile you have within IVRS. For the examples below, we will be illustrating a Jurisdiction Admin User menu bar. This example provides you with the basic functions within IVRS.



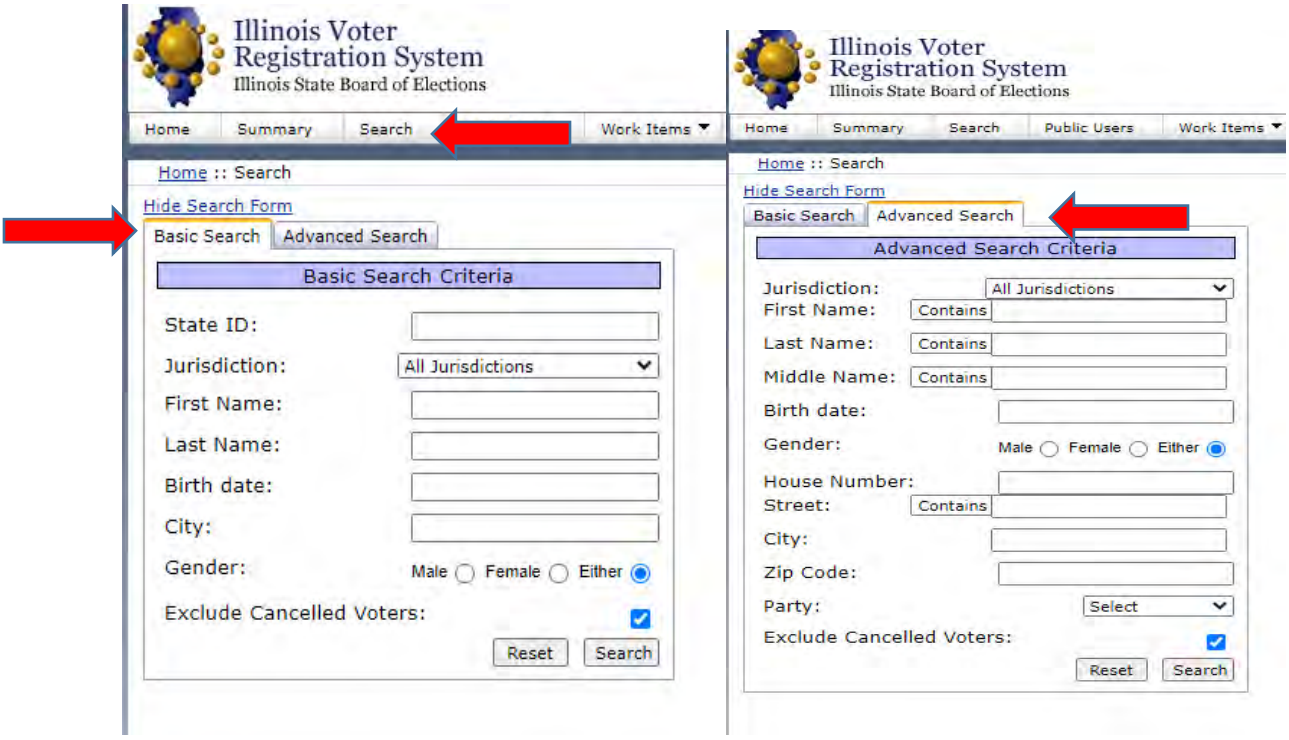
The Home tab provides a welcome message and contact information for all Election Authorities as well as the Voter Registration Division of the State Board of Elections.



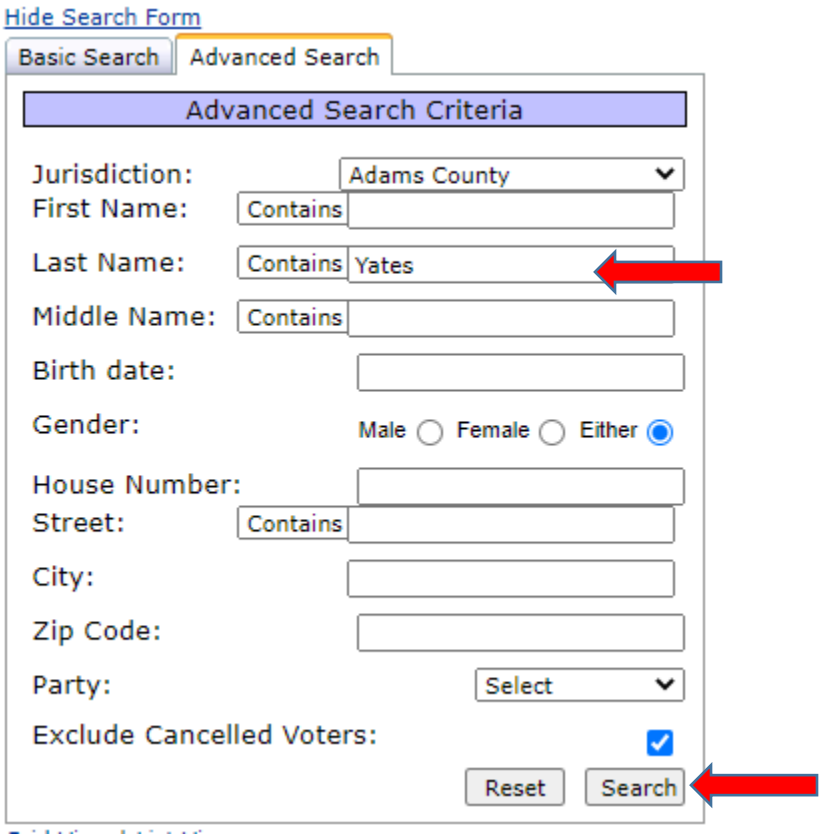
Selecting the Summary tab will provide you with your "Work Items Summary". The Work Item Summary is the primary source for items that will require some type of action. Information that is displayed here comes from several different sources. Please refer to the Work Item Summary section of this document.



The Search tab will allow you to perform a search on a voter record. Once selected, enter the voter information in the appropriate fields. This can be done using the "Basic Search" or "Advanced Search". The Advanced Search option provides more search criteria, such as enhanced name searching and full address.

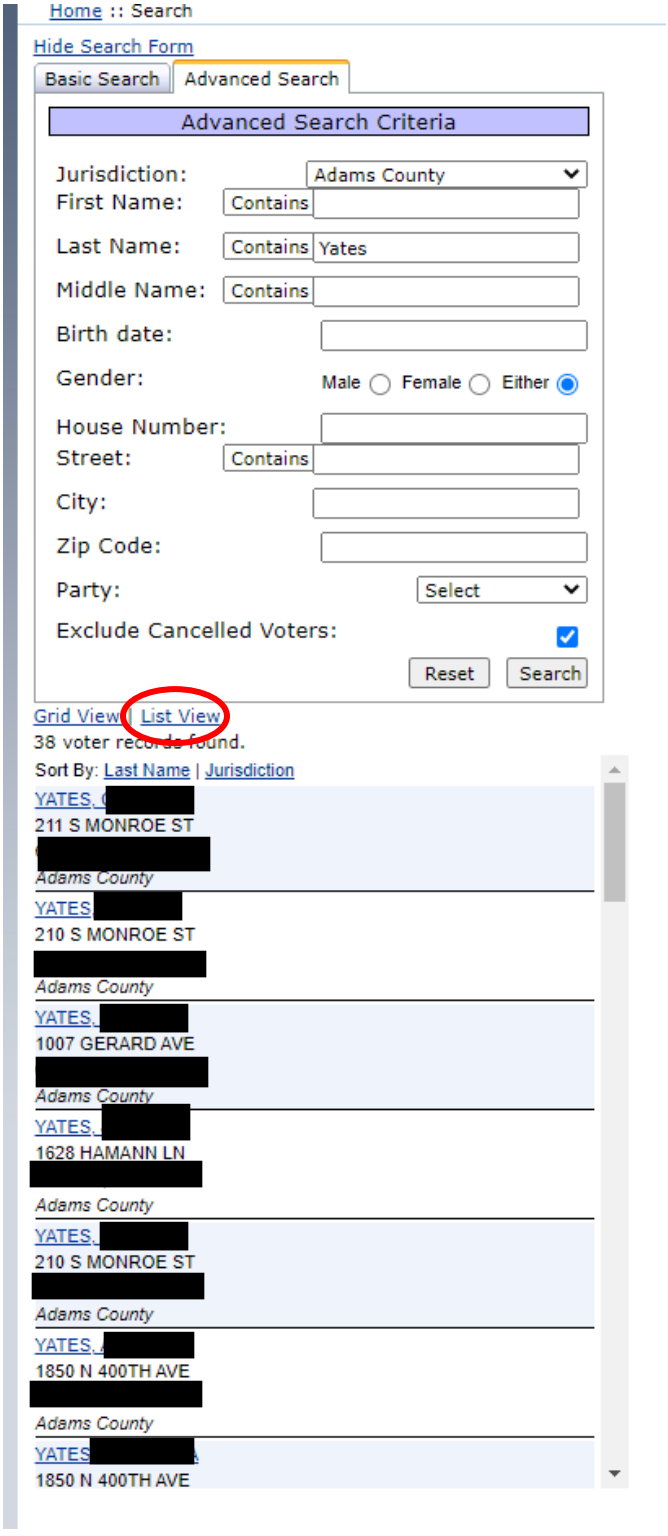


Once the criteria is entered select the search button to populate the results.

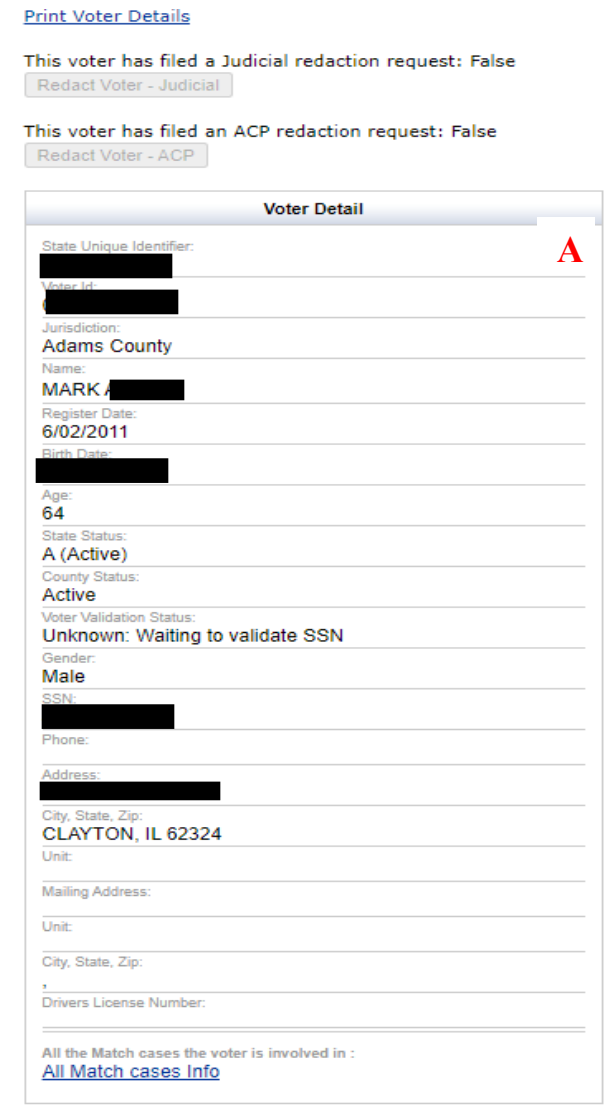


The results of a search will be displayed based on the criteria used in your search function. The records can be displayed in either a Grid View or a List View. A grid view will provide name, date of birth and last four of SSN if on file, by choosing select, details will appear for the voter. A list view will provide name and address. To select a voter in the list view, click the voter's name and the detail screen will populate.

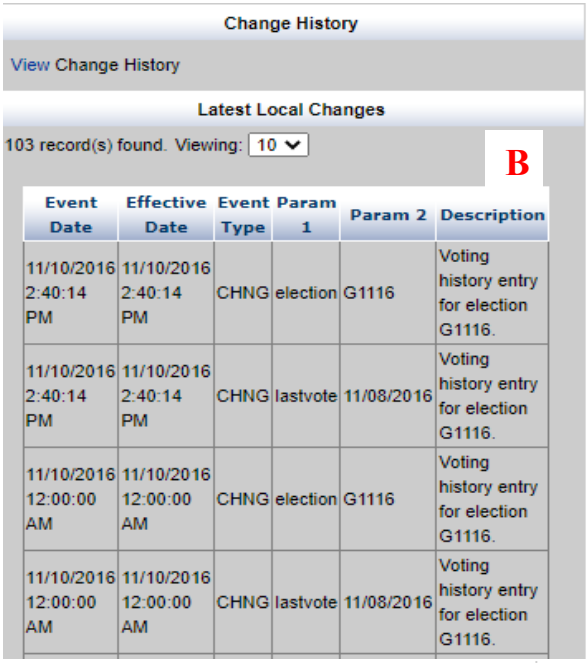


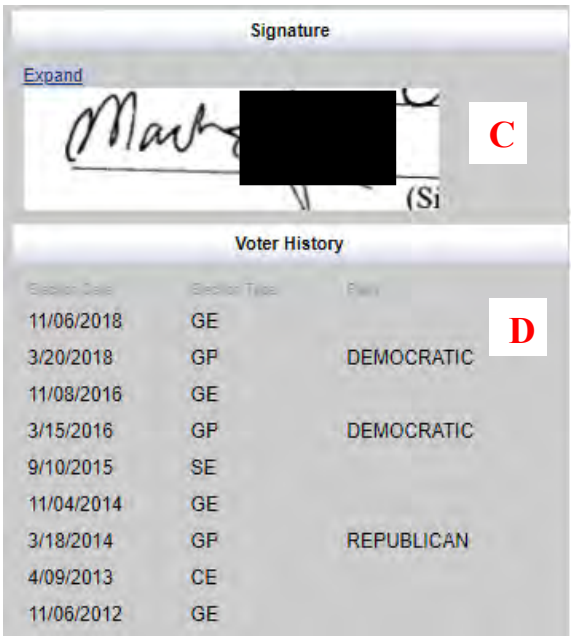


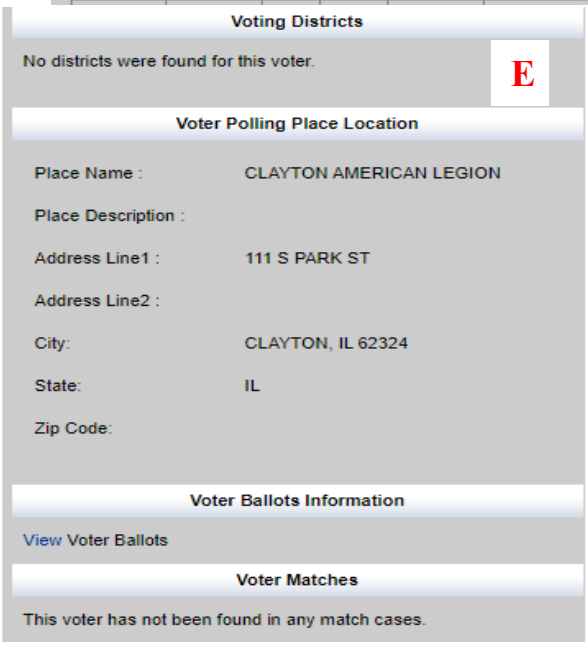
After selecting a voter, you will be presented with the detail information for that voter. There are several sections to take note of on this screen.



A. This area shows you the registration details for the voter.
B. This provides you a history of changes to the record.
C. If the voter's signature is on file, it will be displayed here.
D. Provides vote history for the voter.
E. Provides the districts which the voter resides in, polling locations, and if any Early, Grace or Absentee ballots were cast.





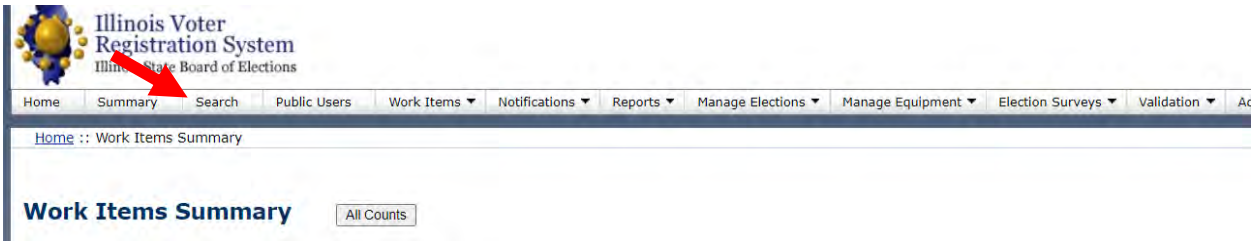


The Illinois Voter Registration System (IVRS) has built in functionality to redact two classifications of voters, judges and certified members of the Address Confidentiality Program (ACP). The ACP is administered by the Illinois Attorney General's Office and is available to victims of domestic abuse or sexual assault. The latest update to IVRS allows you, the election authority, to redact these voters within IVRS. Redactions in IVRS are limited to "Jurisdiction Admin" and "Jurisdiction User" privileges. You should only be redacting voters for which you are responsible for.

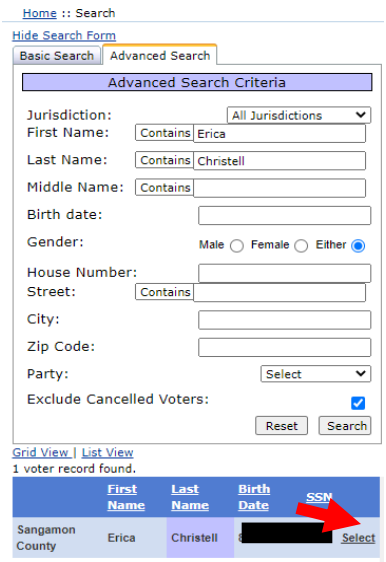
Judicial and ACP redactions are only to be used under very specific circumstances. Judicial redactions, covered by the Judicial Privacy Act (705 ILCS 90), allows judges to make written request to have contact information for themselves and members of their immediate family redacted and protected from public dissemination. Certified members of the ACP (750 ILCS 61/1 et. Seq., 10 ILCS 5/20-3), however, are entitled to have all information redacted and protected from public dissemination. Certified ACP members should supply a special registration paper form (R-19ACP) that may appear on red paper. ACP members are provided with a post office box where they can receive mail, but the member will also need to supply you with their residential address so you know which ballot style they are entitled to receive. As an election authority, you are one of the only governmental entities allowed to receive a legitimate address of an ACP member, so it is imperative that the member's information be protected at all times.

Important Note: Prior to redacting a voter in IVRS, you will need to ensure the voter is registered in your local registration system so the voter can be found in IVRS. If you have registered the voter in your local registration system and the voter cannot be found in IVRS, please contact the Division of Voting and Registration Systems to trigger a batch run of voters in IVRS.

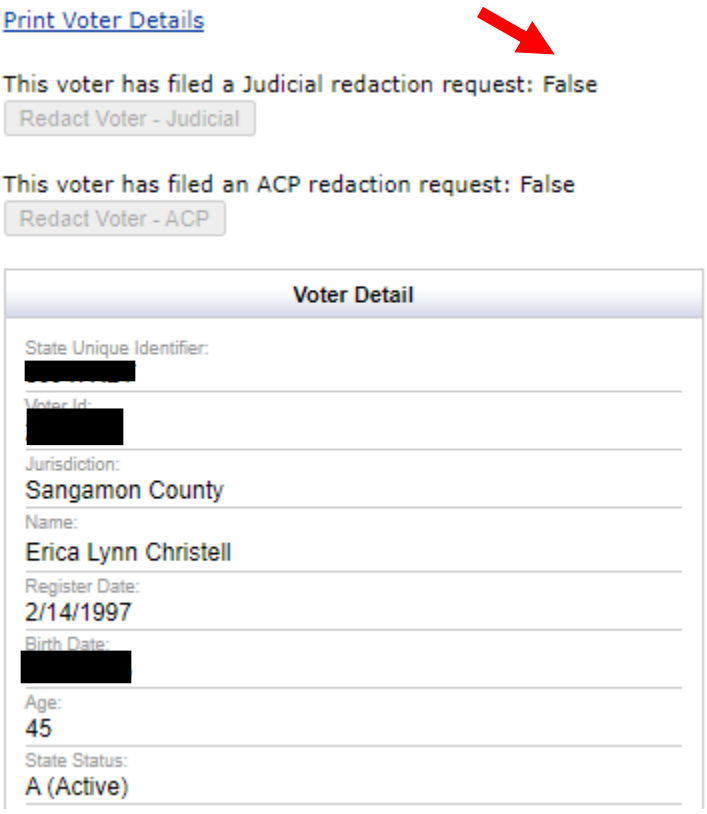
Step 1: Locate the voter in IVRS you want to redact. To accomplish this, first click "Search" from your Work Items Summary.



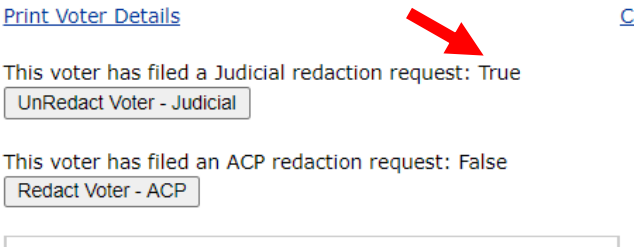
You will then be presented with a "Basic Search" and "Advanced Search." The SBE recommends utilizing an "Advanced Search." After locating your voter that you want to redact, click "Select."



Step 2: Enact either Judicial Redaction or ACP Redaction. When a voter is not redacted, the voter details will show "False" for both Judicial and ACP Redaction, such as this:



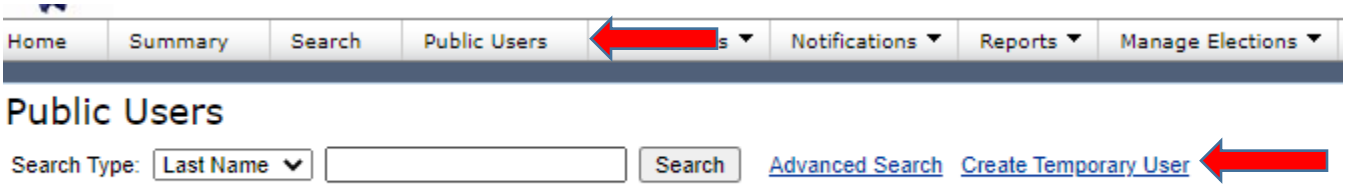
To mark a voter for either Judicial Redaction or ACP Redaction, simply click "Redact Voter" for either "Redact Voter – Judicial" or "Redact Voter – ACP." After doing so, the redaction you chose will show "True," such as the example below:



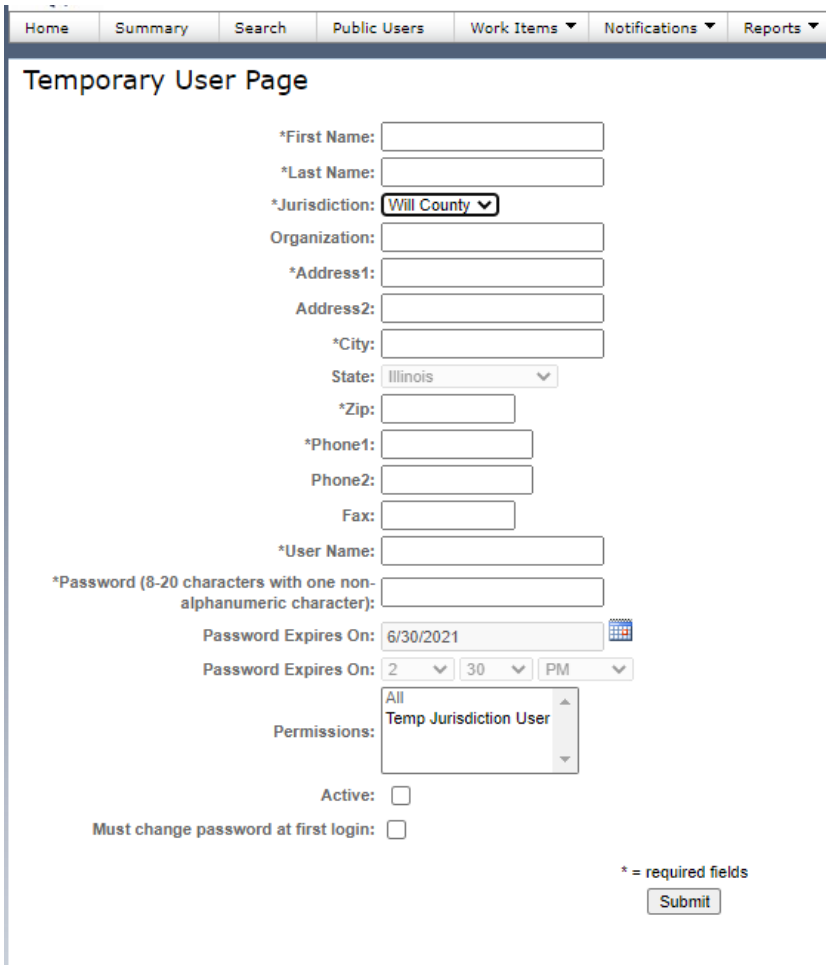
If you want to un-redact a voter, you simply click "UnRedact Voter." As a reminder, initiating Judicial Redaction will redact the voter's contact information in the statewide registration system and initiating ACP redaction will redact all information from public dissemination in the statewide registration system for the voter.

Important Note: When attempting to redact a voter in IVRS, you may find that the voter is already redacted. This has likely occurred because an "SBE Admin" user has already redacted the voter.

The Public Users function allows you to create temporary (such as members of the public wishing to review registration records) users for your jurisdiction or to search for temporary users already created.



When selecting "Creating Temporary User" you will be directed to a Temporary User Page where a new user can be created within your jurisdiction. These users are generally members of the public requesting to view voter records within your jurisdiction. For security purposes, it is imperative that you set an expiration date on these users as they should not maintain access into IVRS for a long period of time.

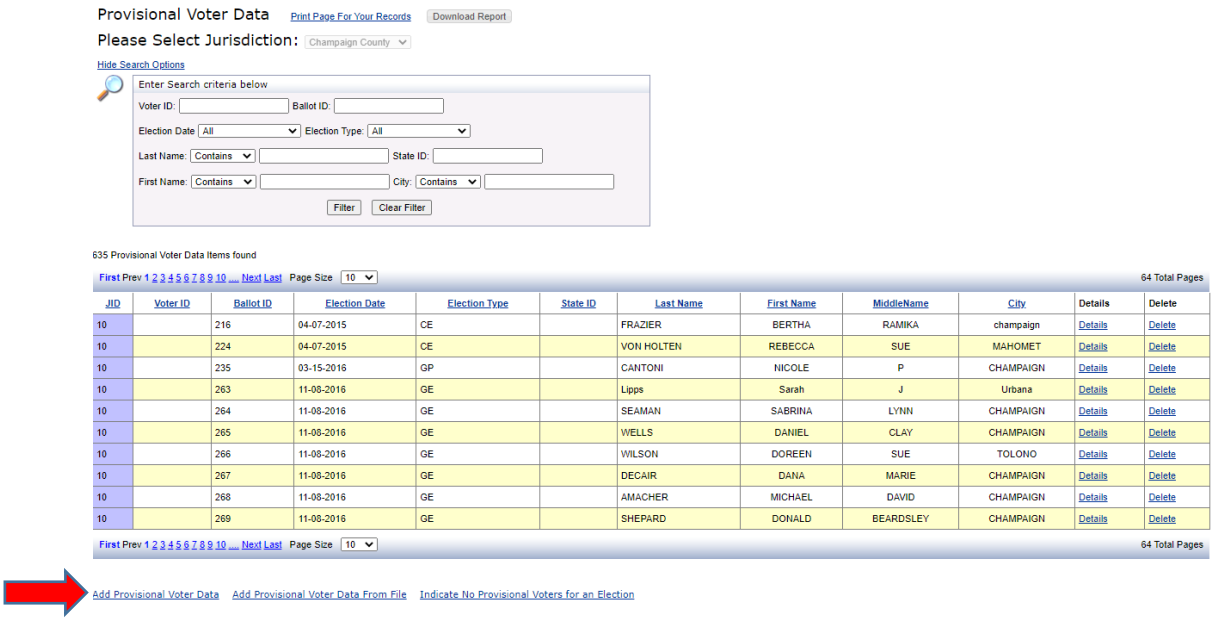


The Work Items tab contains several drop down options.

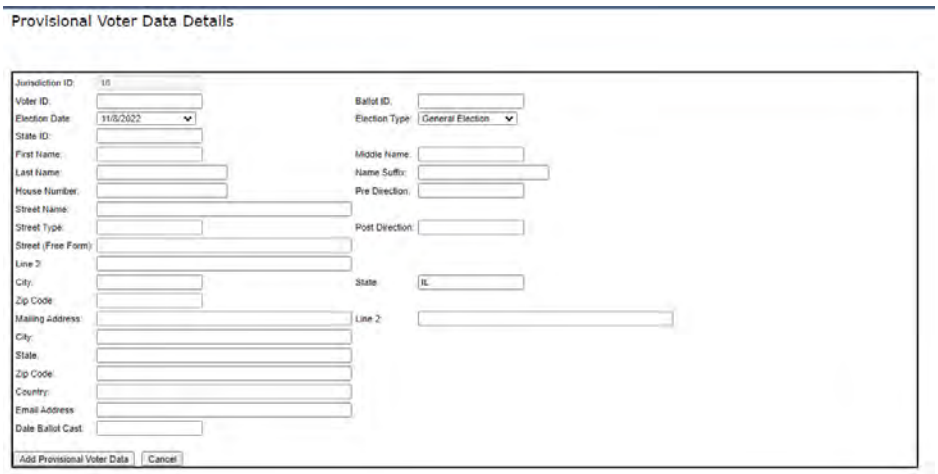


Voter Matching & Voter Identification will direct you to your work items that are located in your Work Items Summary. This is another pathway to view those items that are awaiting action.

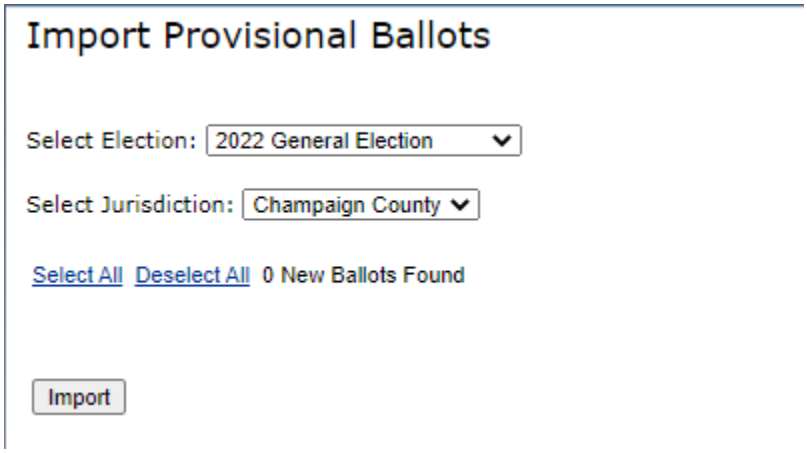
Entering Provisional Voter Data will take place through your local system. **Within 48 hours following an election your Provisional Voter Data must be entered into your local system.** A Ballot ID and a local Voter ID are required to be assigned to each record along with Election Date, Election Type, Last Name, First Name, and City. Once you enter Provisional Voter Data into your local system, those Provisionals will be visible to political action committees with IVRS Pre Election Ballot Request access accounts. They will then be available on our website for the public to view the status through the Provisional Ballot Search. This can also be achieved through IVRS by selecting Provision Voter Data, then Add Provisional Data.



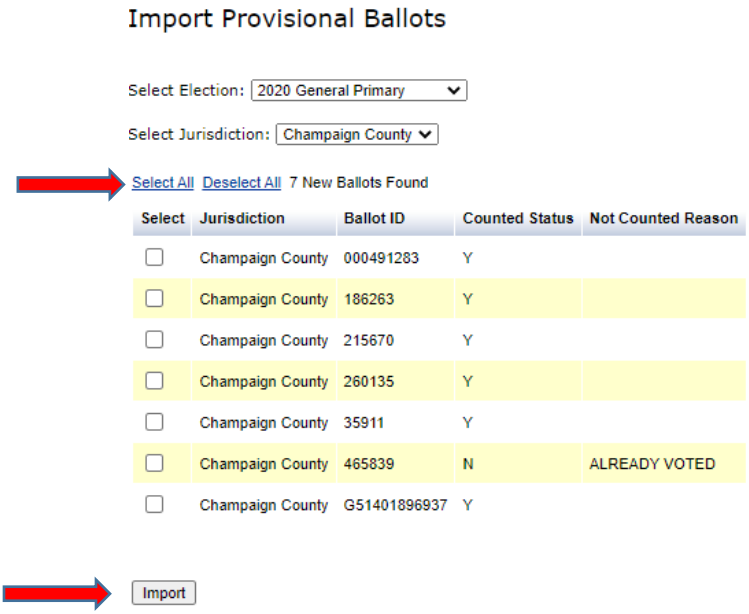
Please note, that all Provisional Voter Data much match exactly.



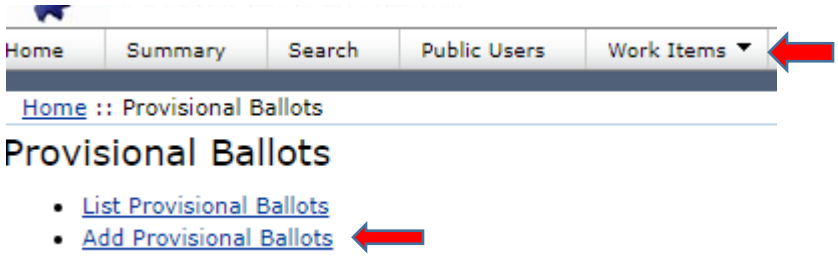
Entering Provisional Ballots can be achieved through a upload from your local using the Import Provisionals from your drop-down.



By Selecting All then selecting Import, all provisional ballots will be uploaded through the nightly batch process into IVRS.



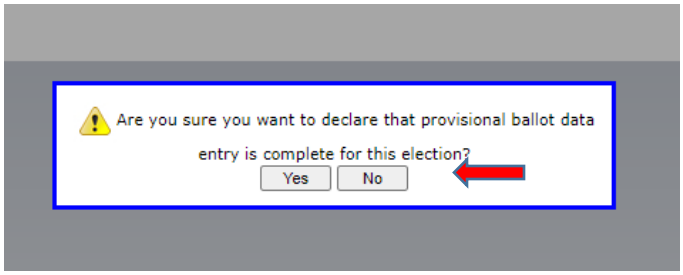
After you have entered all provisionals in your local system, you must "Declare Data Entry is Complete". This atep is achieved by going into your Work Items then Add Provisional Ballots.



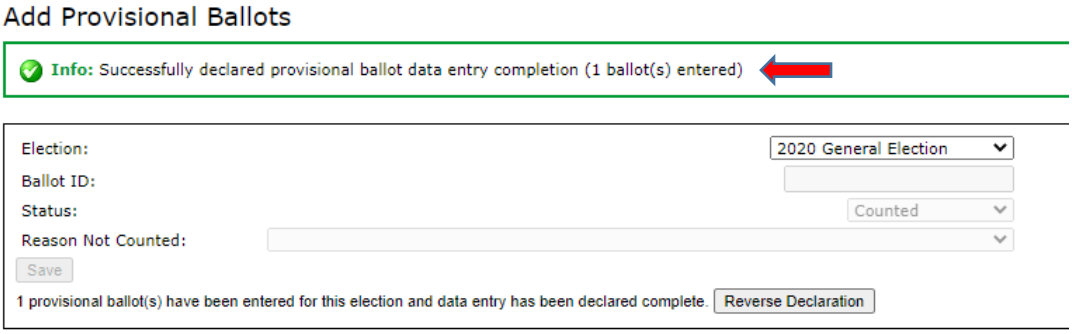
Select your Election from the drop-down and then Declare your Data Entry is Complete.



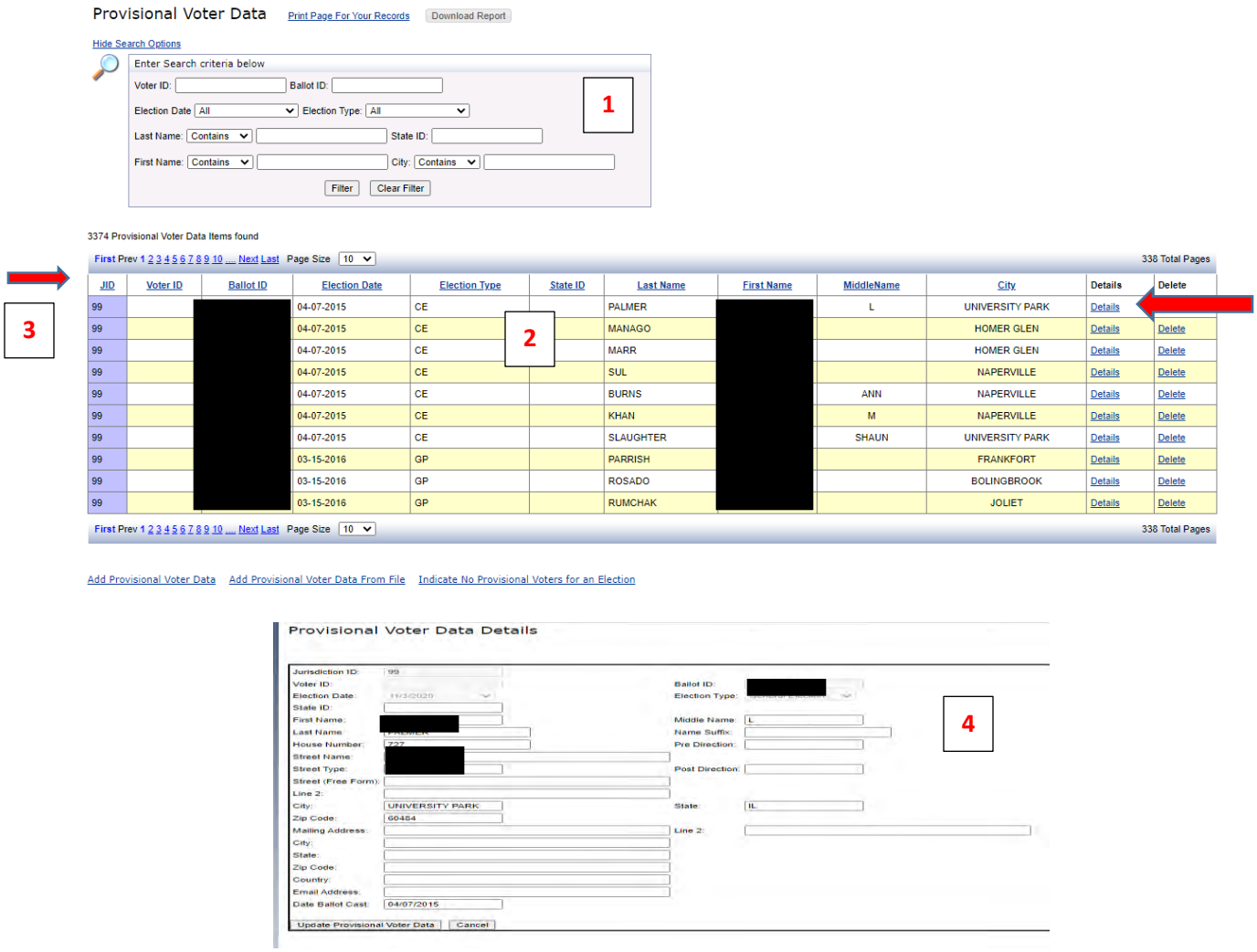
A notification box will populate to verify that you would like to declare that your provisional are complete for this election.



After you have declared your provisional data entry is complete, you will be provided an informational message.



Provisional Voter Data allows you to view a list of provisional ballots. Entering search criteria in the search box (see illustration 1) will provide a search for a specific provisional. A list of provisional data will automatically populate (see illustration 2), which can be sorted by clicking on the blue title tabs (see illustration 3). By selecting "Details" highlighted in blue in the far right corner of the record, you will have the ability to view the Provisional Voter Data Details (see illustration 4).



Pre-Election Ballot Request (PBR) is the information displayed to Political Action Committees (PAC) for your jurisdiction. The SBE is required to provide access to various information, as outlined below, and this is done through secure access via the CMTE site. A PAC must be on file and maintain an "Active" committee status with SBE's Campaign Disclosure Division. A committee may request to access the CMTE site by making application.

The Pre-Election Ballot Requests (such things as Vote by Mail applications, Early Voters, and Grace Period Voters) page is simply a resource tool for Election Authorities to view the information available to committees. Election Authorities may find it a convenient source of information or an additional resource to look up and find information for a specific election date, voter request type or a specific voter rather than in your local system.

Upon opening the PBR page you will see there are three tabs to choose from:

- Pre-Election Ballot Request Search-Vote by Mail applicants, Early Voters, and Grace Period Voters
- Provisional Voter Data Search-Information on ***who*** cast a Provisional Ballot
- Paperless Online Voter Application Search-Information on who applied to register online

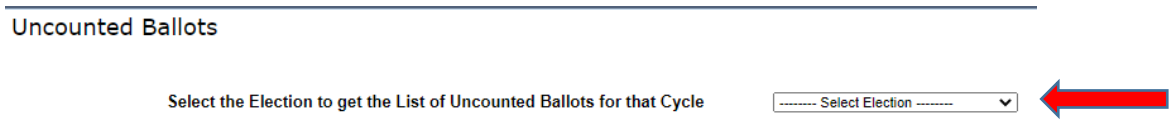


After completing the desired fields, select the search button to populate the information. The illustration below provides an example of the fields which are displayed.

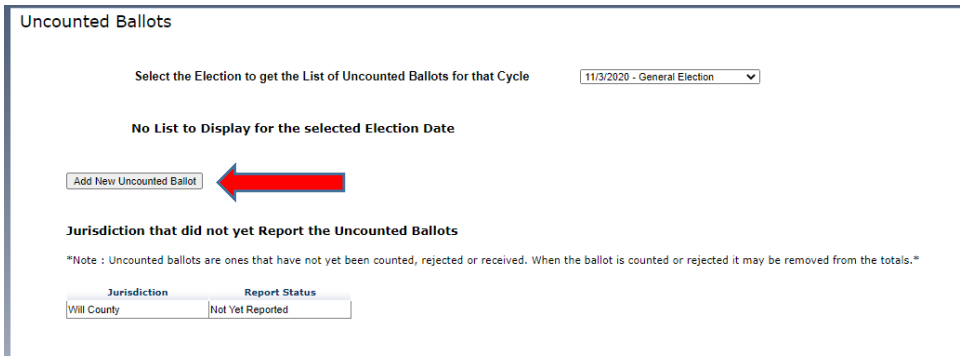


The same process should take place for the other two options, Provisional Voter Data Search and Paperless Online Voter Application Search.

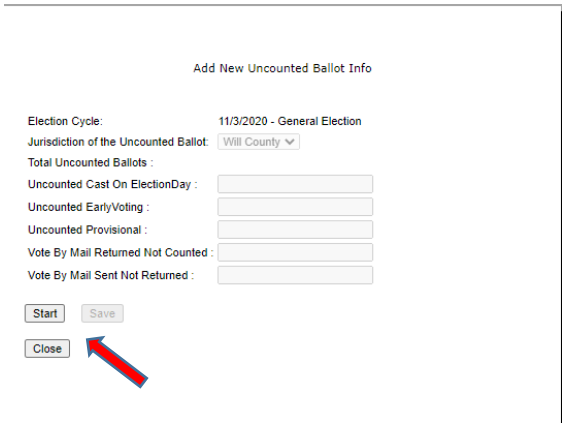
Uncounted Ballots This is the area where you will update the required information for Uncounted Ballots following each election. These are defined as outstanding ballots that still have the possibility of being counted. The requirement states "no later than 48 hours after the closing of polling locations on Election Day and each business day thereafter until the period for counting provisional and vote by mail ballots has ended." (10ILCS 5/1-9.2). Select the election in which you are updating from the drop down.



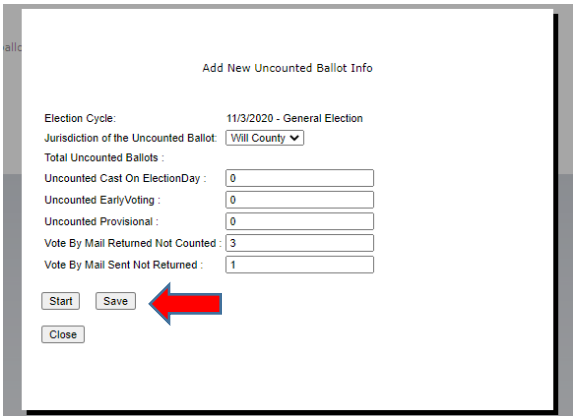
To add, select Add New Uncounted Ballot.



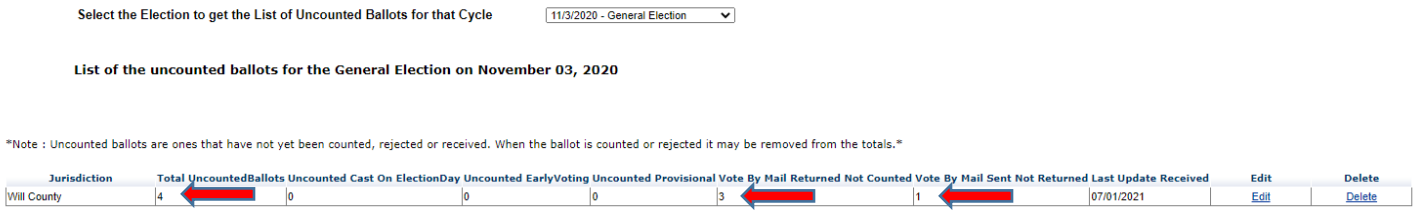
Select start to continue onto the survey.



Complete the categories with the most up-to-date counts. If you select “Close” the pop up will close without saving any input. If you select “Save” the pop up will close while saving and totaling your counts.

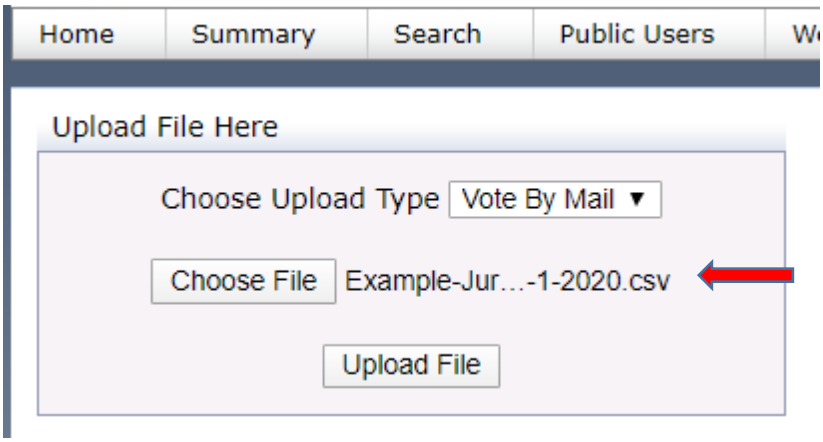


You have now reported your uncounted ballots. NOTE: This should be completed daily following each election, for a total of 14 days or until uncounted ballots are at zero.

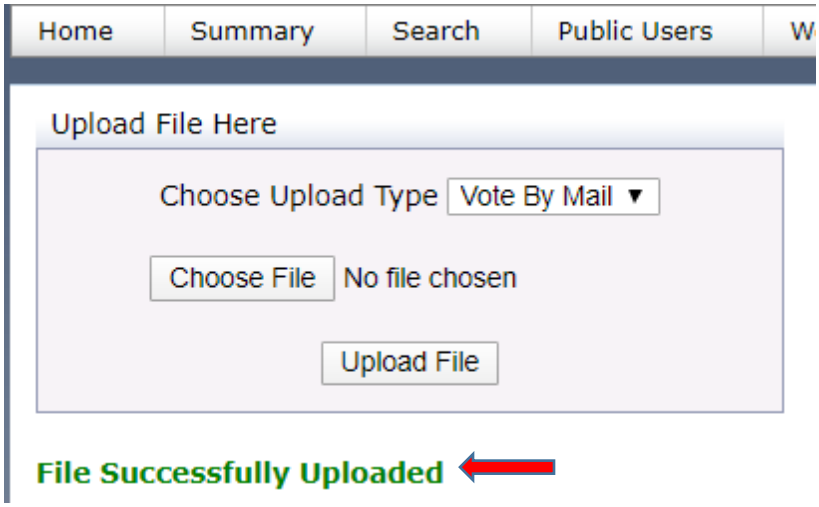


Jurisdiction Upload allows you to upload your electronic list of electors who were sent VBM applications to the State Board of Elections [10 ILCS 2B-50(a)]. These were required to be submitted on three occasions for the 2020 Election Cycle. **This functionality remains in place for future needs, however, this requirement no longer exist.**

You will have the option to first "Choose File." At this point, you will locate and select the appropriate .CSV file you want to upload. There are no specific requirements for naming your file, but it may be helpful to include both your jurisdiction name and the date the file was created.



When the file is successfully uploaded, a message will appear at the bottom of your screen.

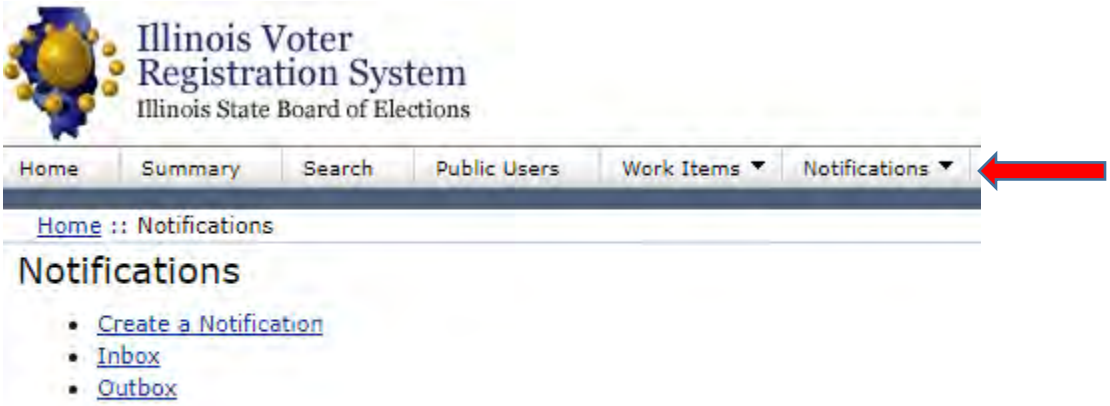


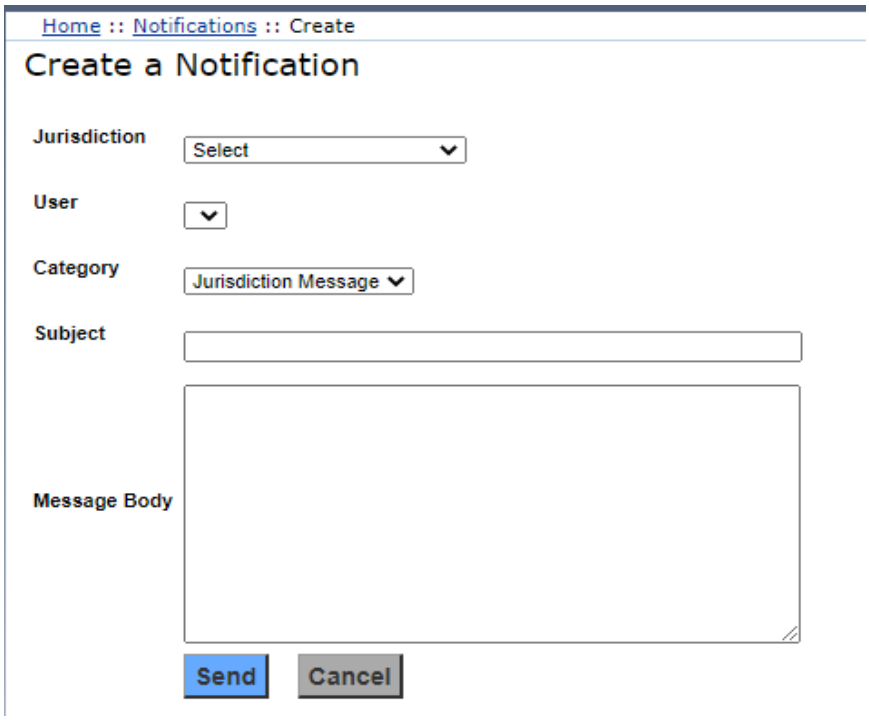
The Notifications tab will allow you to communicate with other IVRS users in regards to records or other pertinent information. From the notification tab you can accomplish three things.

Create a notification – acts as an internal email system within IVRS.

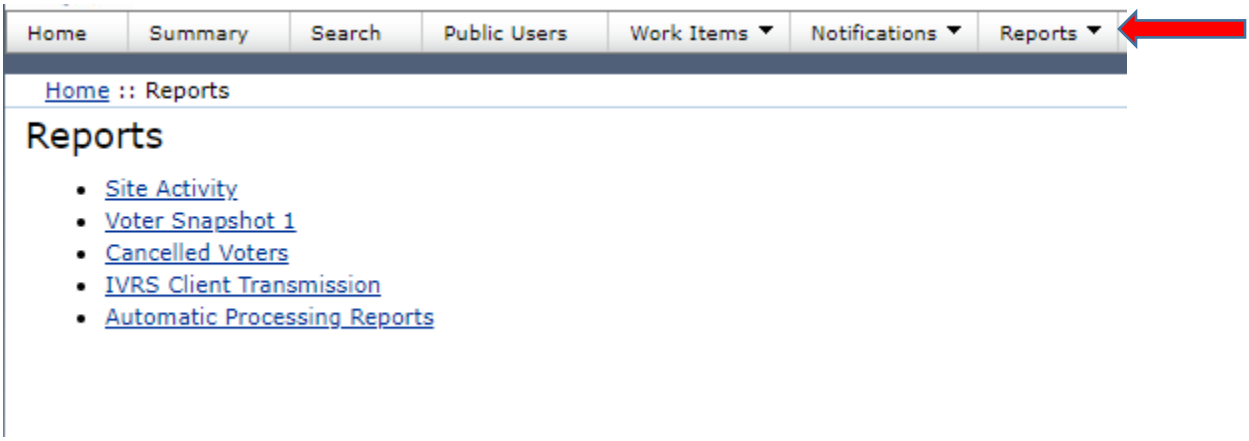
Receive notifications (Inbox) – notifications sent to you from other IVRS users.

Track Notifications (Outbox) – maintains messages you have sent to other IVRS users.

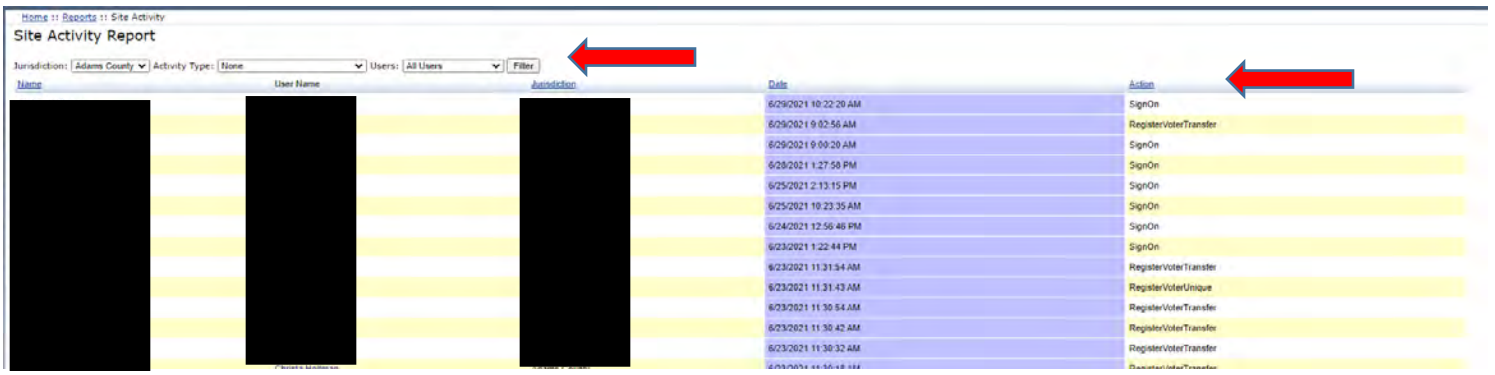




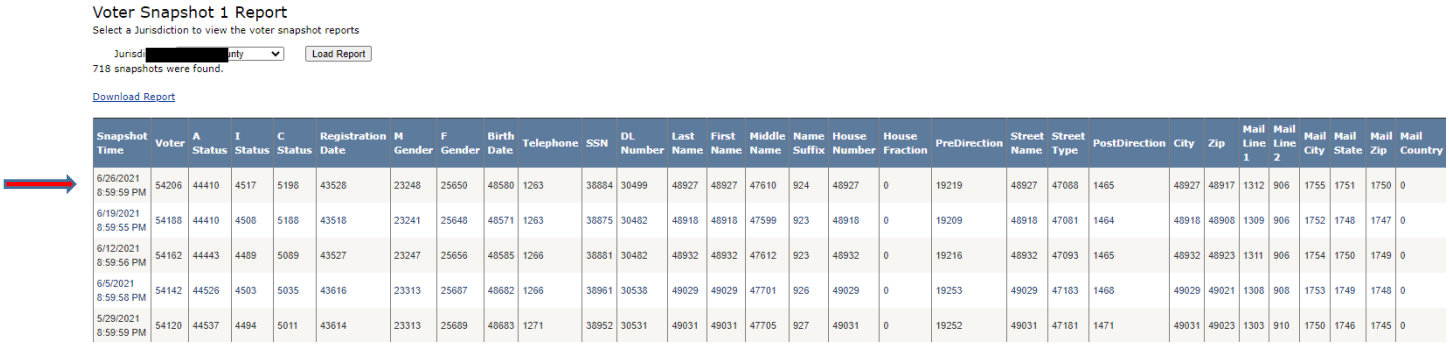
The Reports tab will provide five different types of reports for your jurisdiction.



The first report is the site activity report, which will allow you to view which IVRS users are logging into IVRS and the actions they are taking. Again, this can be filtered by the drop down provided above the report and then sorted by selecting the blue header tabs.



The second report, Voter Snapshot 1, will provide a snapshot of daily voter counts. These numbers are reflected by the day in the far left column.



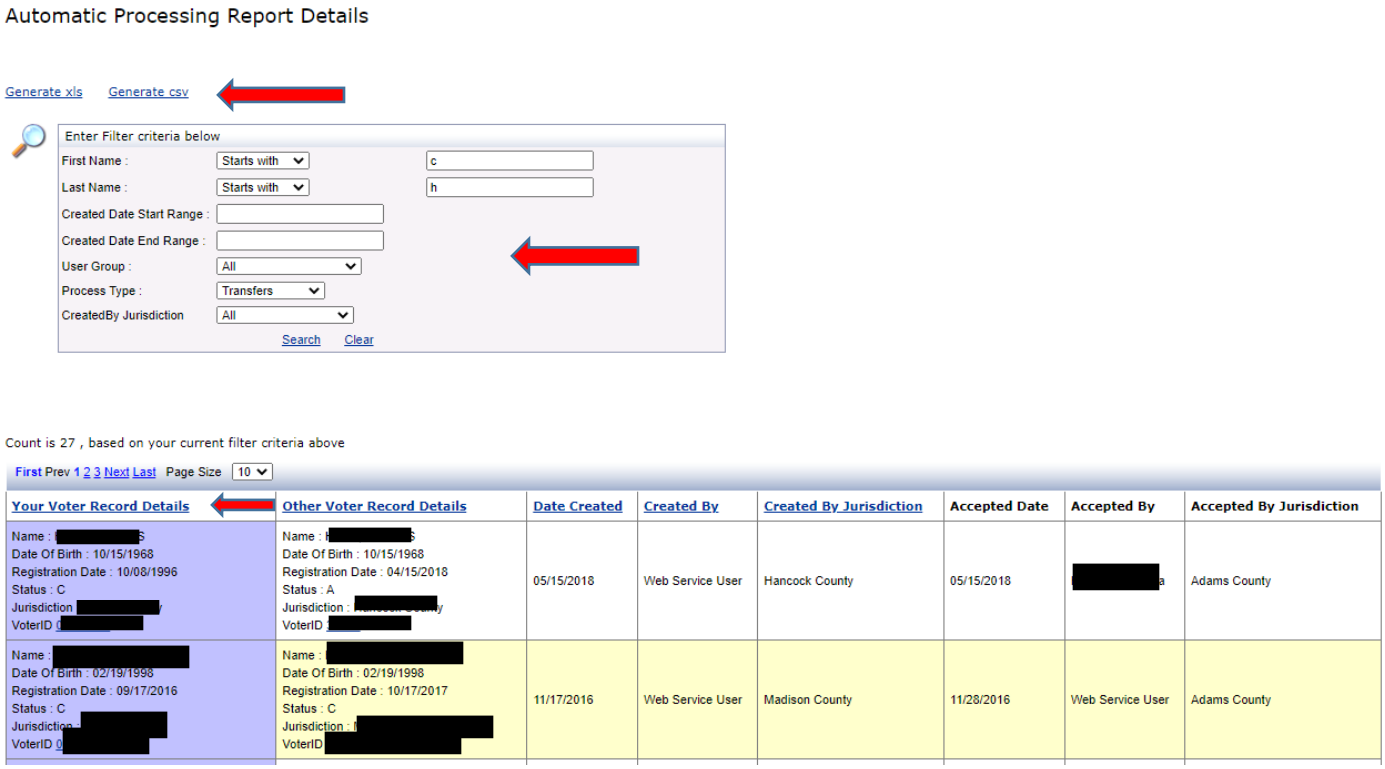
The third report, Cancelled Voters Report, will provide records that have been cancelled on the date chosen in the "Cancelled Voters for" date box.



The fourth report, IVRS Client Transmission, will provide a summary of the batches processed from your local database into IVRS. This can be filtered by timeframe and then sorted by the blue header tabs.



The final report, Automatic Processing Report Details, will provide details on records you have accepted by other jurisdictions. Again, this can be filtered in the criteria box and sorted by the blue header tabs. You can also generate an Excel or CSV file of the records.

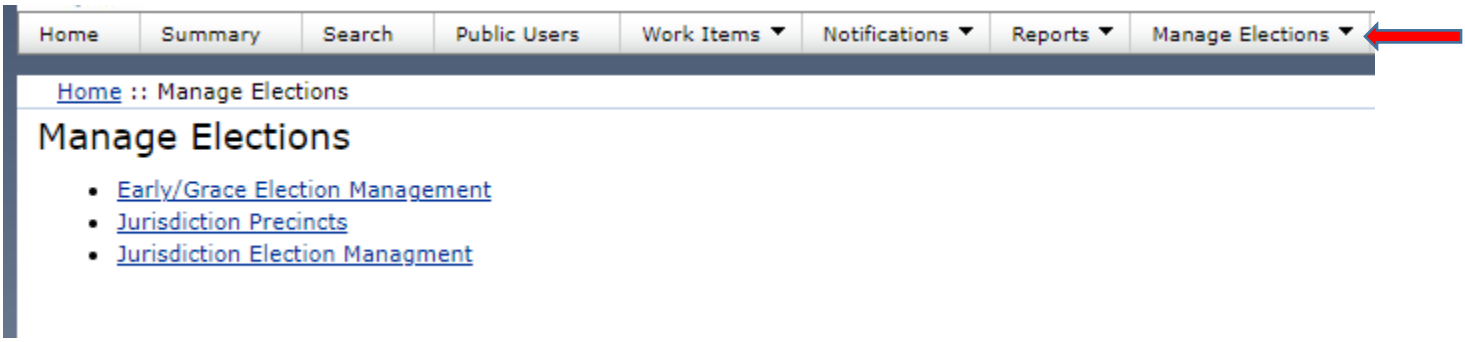


The Manage Elections tab contains three main categories;

Early & Grace Election Management

Jurisdiction Precincts

Jurisdiction Election Management.

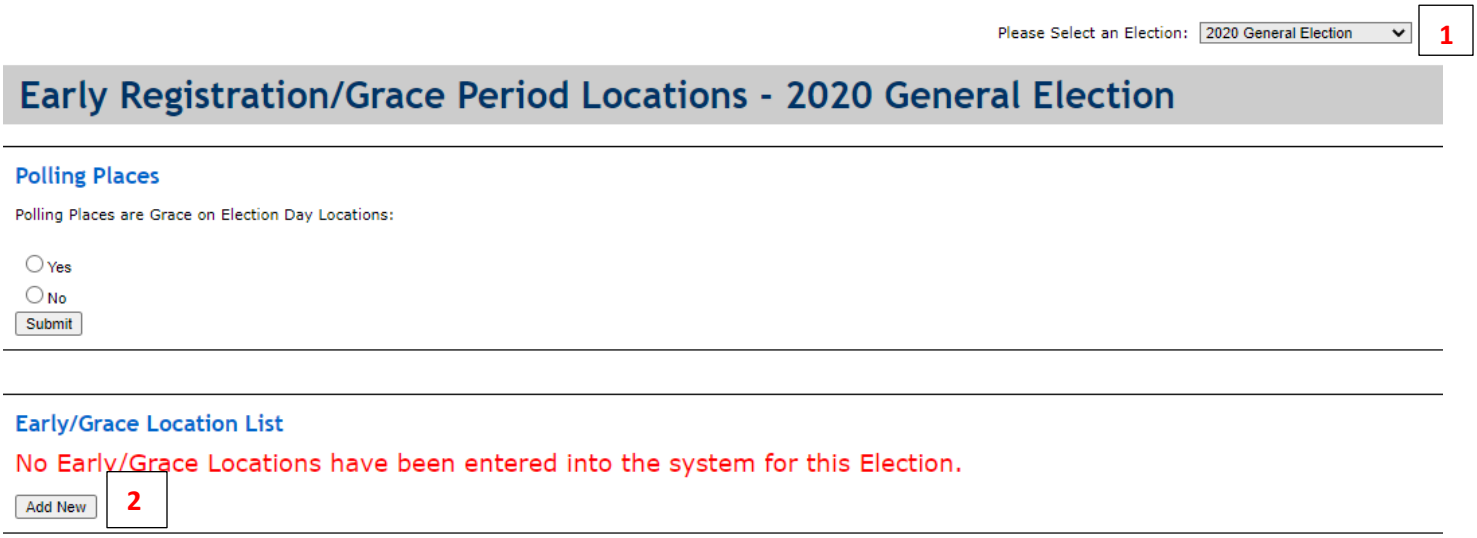


Early/Grace Election Management allows you to enter your early, grace period, and Election Day vote center polling locations.

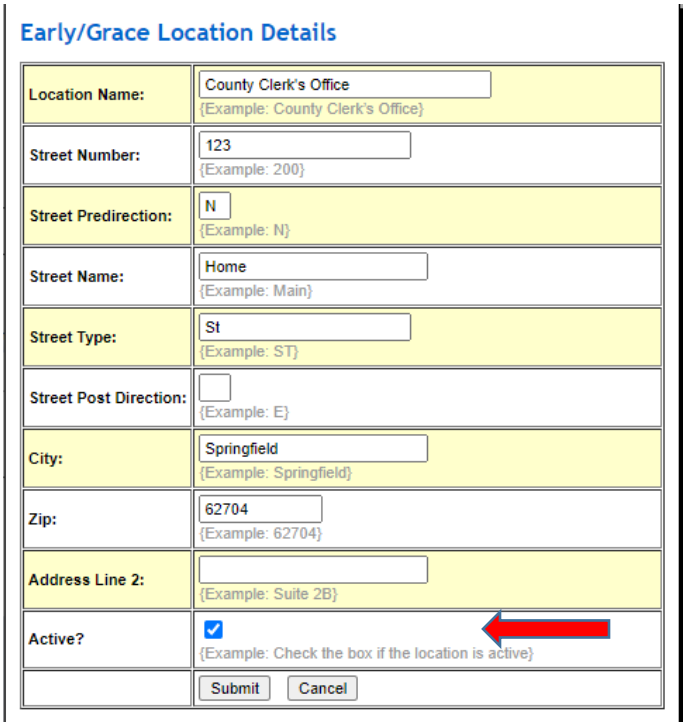
Note: If you have previously entered the location in another election, you may use the Early Grace Election Transfer to move the location to the current election. See Early Grace Election Transfer for instructions.



After selecting Early/Grace Management, you will select an Election from the drop down (see illustration 1). Once you have selected your election, you will click the "Add New" (see illustration 2)



Enter each one of your Early/Grace locations into the detail box. Once you have entered the information you must check the **ACTIVE** box before submitting. This allows the entry to populate to the SBE public website.



Early/Grace Location Details

Location Name:	County Clerk's Office {Example: County Clerk's Office}
Street Number:	123 {Example: 200}
Street Predirection:	N {Example: N}
Street Name:	Home {Example: Main}
Street Type:	St {Example: ST}
Street Post Direction:	{Example: E}
City:	Springfield {Example: Springfield}
Zip:	62704 {Example: 62704}
Address Line 2:	{Example: Suite 2B}
Active?	{Example: Check the box if the location is active}
	Submit Cancel

After you submit your entry, IVRS will redirect you back to the Early/Grace Locations. The location you entered will be visible under your "Early/Grace Location List". Repeat this process until all your locations have been entered. **Please check the appropriate box in illustration 1, to indicate whether or not your in precinct polling places allow Grace Period registration on Election Day.**



Please Select an Election: 2020 General Election

Early Registration/Grace Period Locations - 2020 General Election

Polling Places

Polling Places are Grace on Election Day Locations: 1

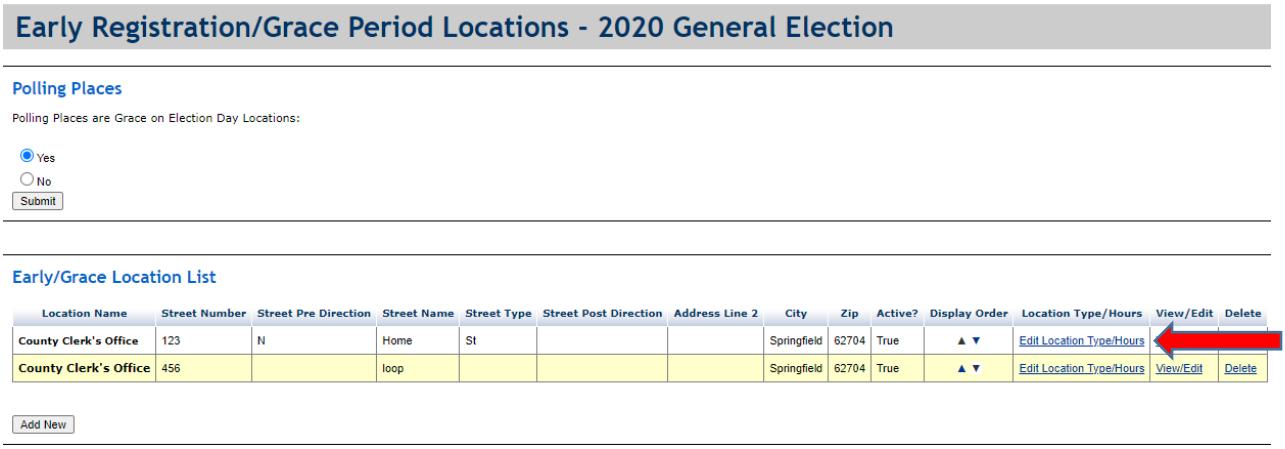
Yes
No
Submit

Early/Grace Location List

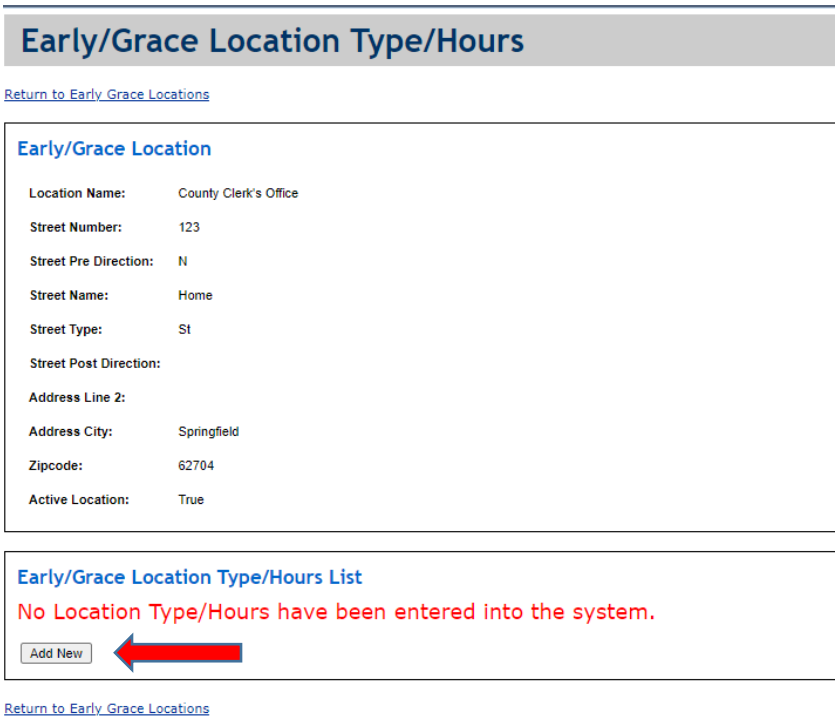
Location Name	Street Number	Street Pre Direction	Street Name	Street Type	Street Post Direction	Address Line 2	City	Zip	Active?	Display Order	Location Type/Hours	View/Edit	Delete
County Clerk's Office	123	N	Home	St			Springfield	62704	True	▲ ▼	Edit Location Type/Hours	View/Edit	Delete

Add New

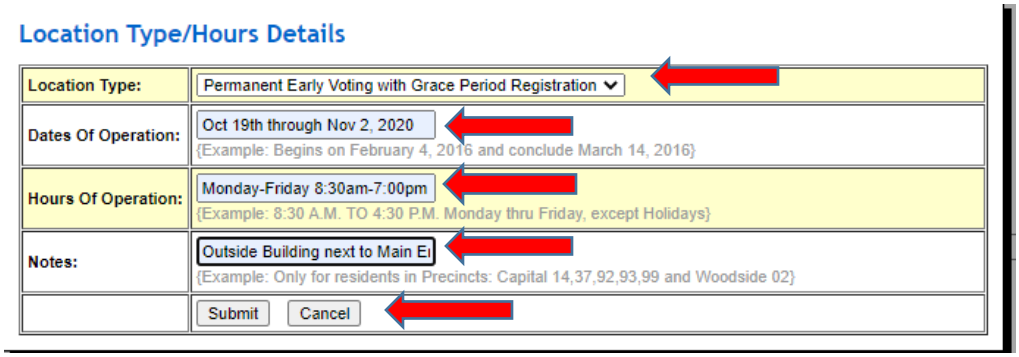
To select your location type and enter the hours of operation, select the blue text "Edit Location Type/Hours. This will need to be done for each location you have entered into IVRS.



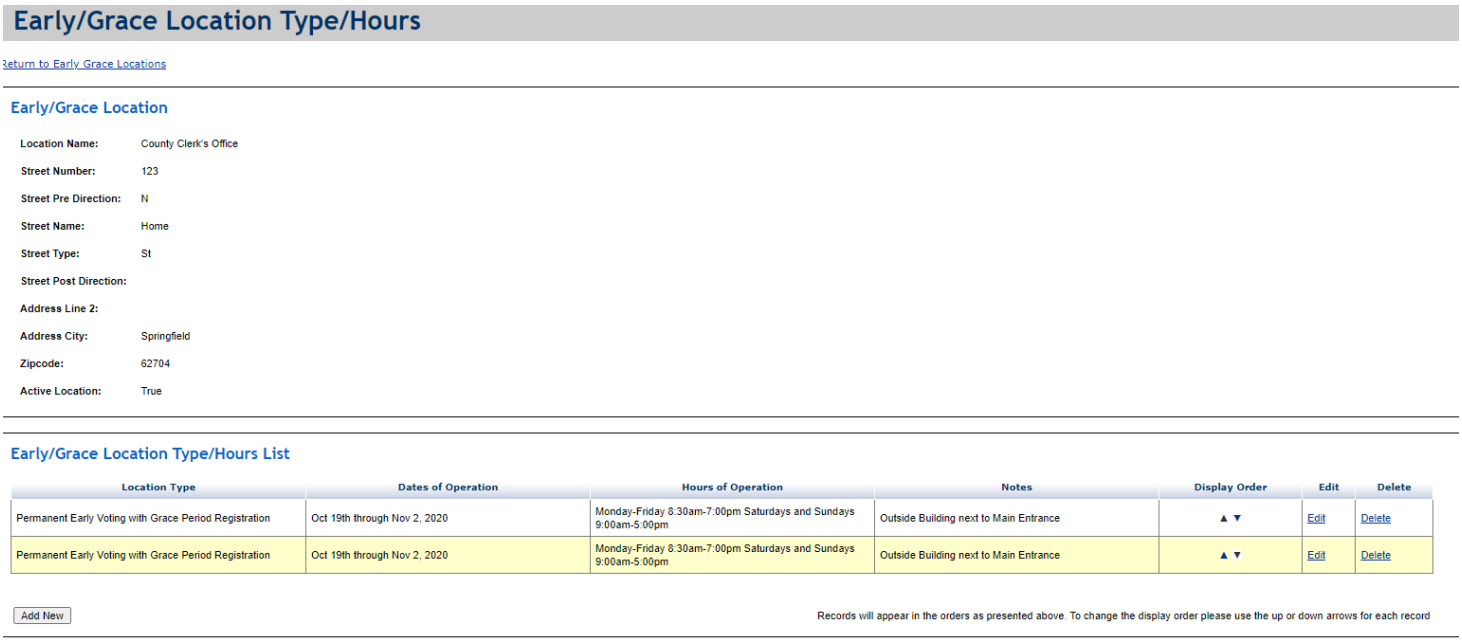
Select "Add New" to enter your information.



Complete the required fields in the detail box and submit (see example below).



The example below shows the location, type, hours and any notes that you included.



Early/Grace Location Type/Hours

Return to Early Grace Locations

Early/Grace Location

Location Name:	County Clerk's Office
Street Number:	123
Street Pre Direction:	N
Street Name:	Home
Street Type:	St
Street Post Direction:	
Address Line 2:	
Address City:	Springfield
Zipcode:	62704
Active Location:	True

Early/Grace Location Type/Hours List

Location Type	Dates of Operation	Hours of Operation	Notes	Display Order	Edit	Delete
Permanent Early Voting with Grace Period Registration	Oct 19th through Nov 2, 2020	Monday-Friday 8:30am-7:00pm Saturdays and Sundays 9:00am-5:00pm	Outside Building next to Main Entrance	▲ ▼	Edit	Delete
Permanent Early Voting with Grace Period Registration	Oct 19th through Nov 2, 2020	Monday-Friday 8:30am-7:00pm Saturdays and Sundays 9:00am-5:00pm	Outside Building next to Main Entrance	▲ ▼	Edit	Delete

Add New

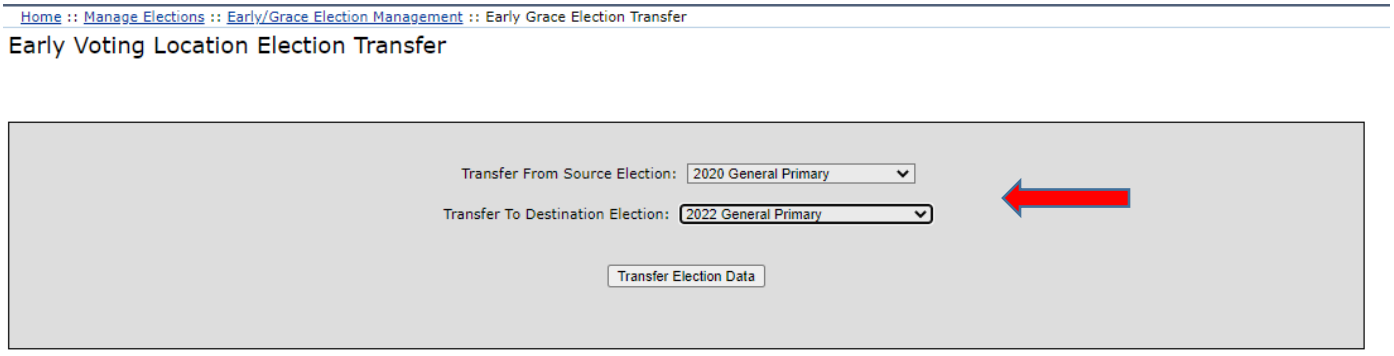
Records will appear in the orders as presented above. To change the display order please use the up or down arrows for each record

The Early Grace Election Transfer will allow you to transfer Early/Grace Location information from one Election to another. This can save time by not having to reenter locations before each election.



Early/Grace Election Management

- Early Grace Locations
- Early Grace Election Transfer



Home :: Manage Elections :: Early/Grace Election Management :: Early Grace Election Transfer

Early Voting Location Election Transfer

Transfer From Source Election: 2020 General Primary

Transfer To Destination Election: 2022 General Primary

Transfer Election Data

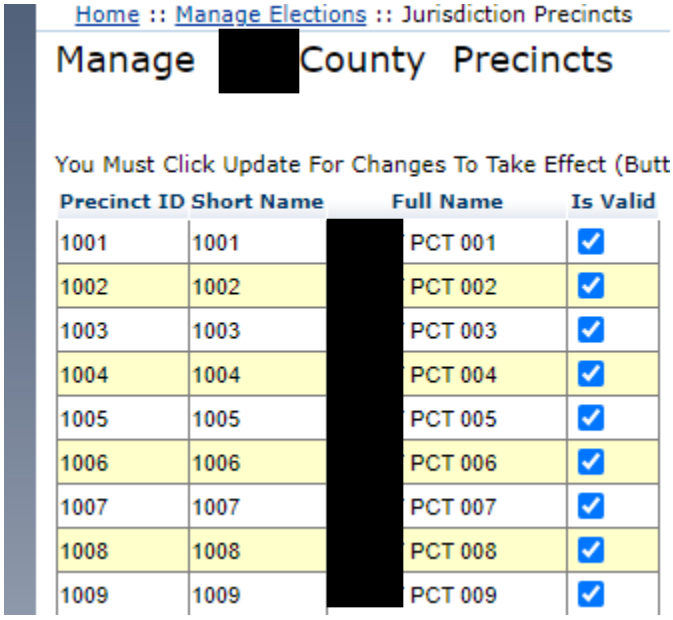
NOTE: If a transfer occurs, all locations will need to be updated with the correct election dates and hours.

To verify your Early Voting/Grace Period Registration was successfully entered into IVRS, please visit the SBE Public Website.

Jurisdiction Precincts will allow you to see all valid precincts within your jurisdiction.



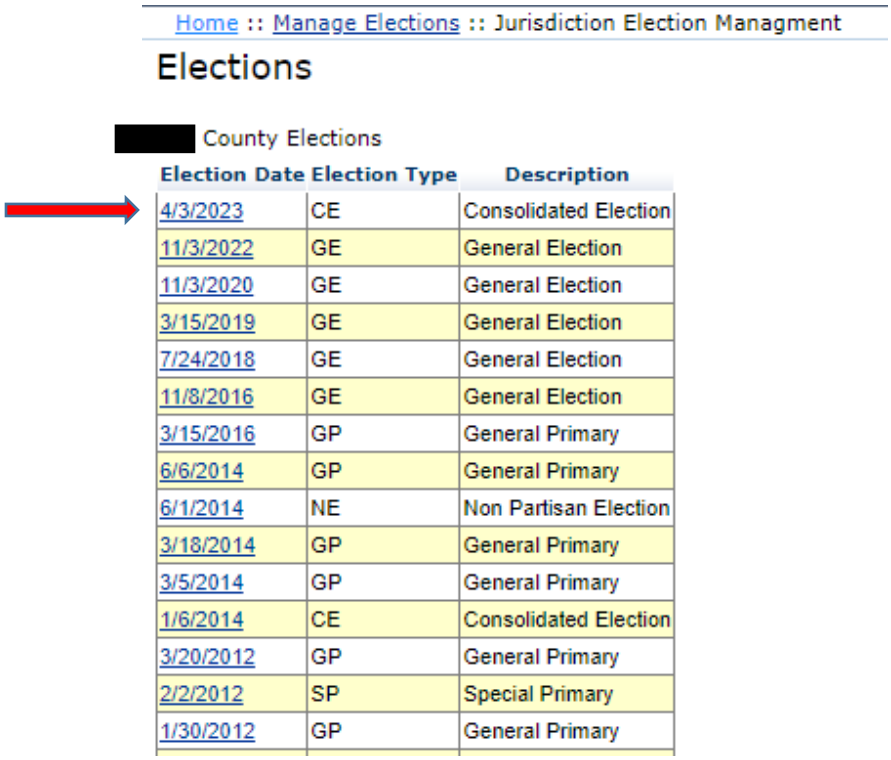
Once selected, a listing will populate. From this tab you can update your precincts.



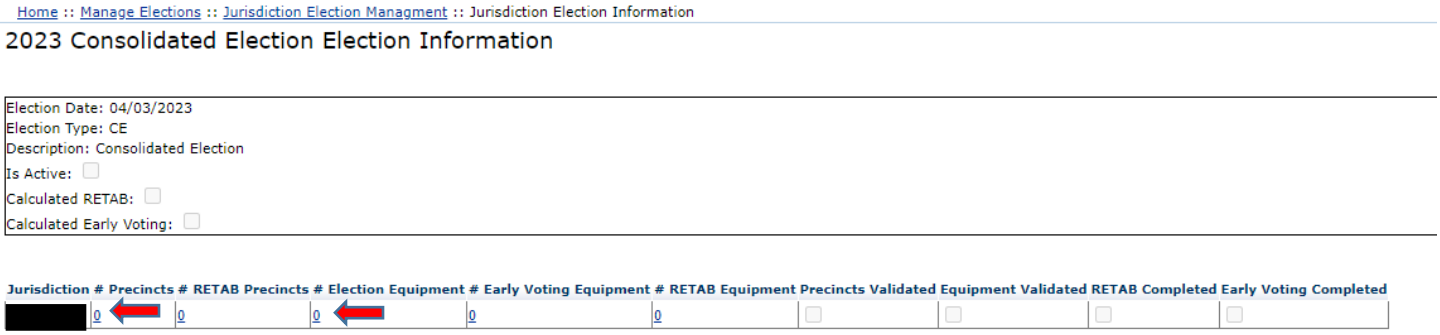
Jurisdiction Election Management is your entry point for adding your precincts and equipment to an Election.



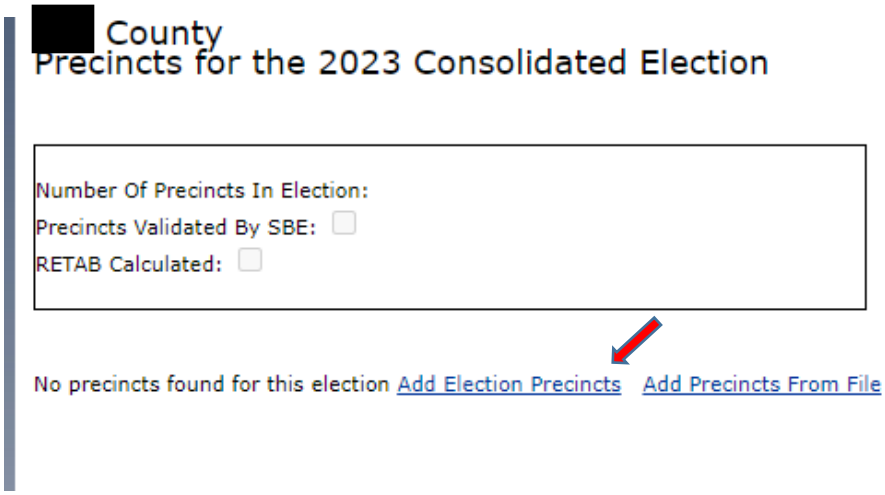
To add this information you will select the Election Date in blue text.



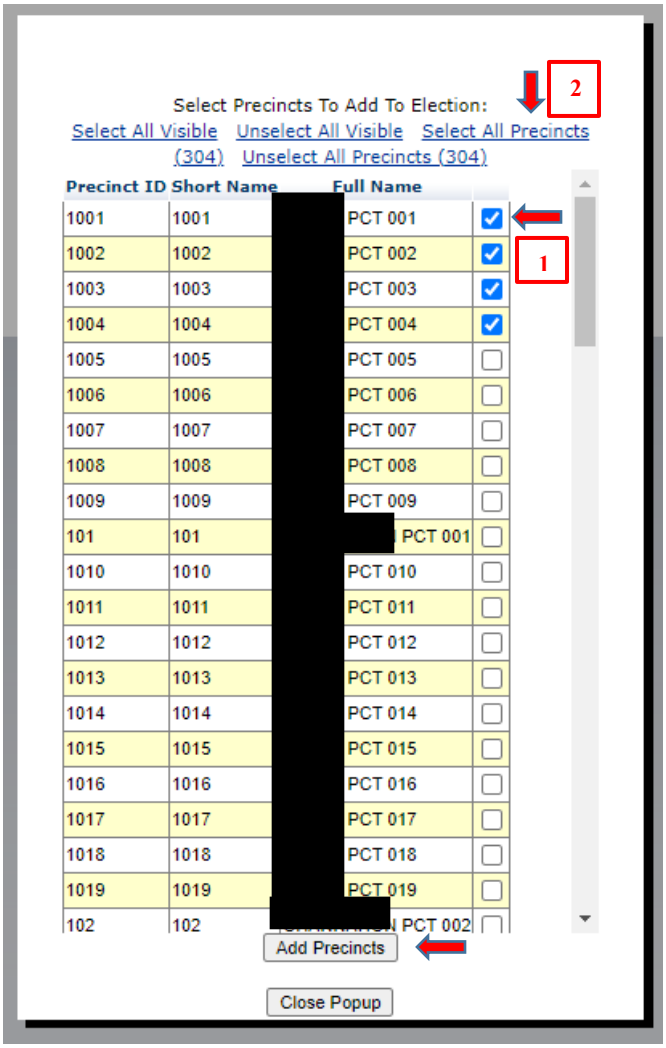
Once selected, you will be directed to your jurisdiction election information. From here, you will add your precincts and equipment by selecting the blue 0 under the fields. **NOTE: You will only add precincts and election equipment.**



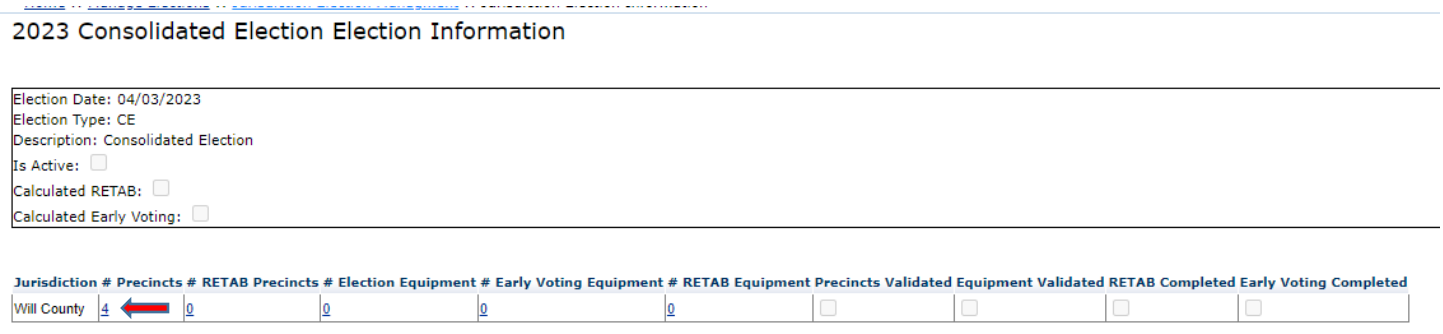
To add your precincts, select the blue 0 under # Precincts shown above. Select “Add Election Precincts”



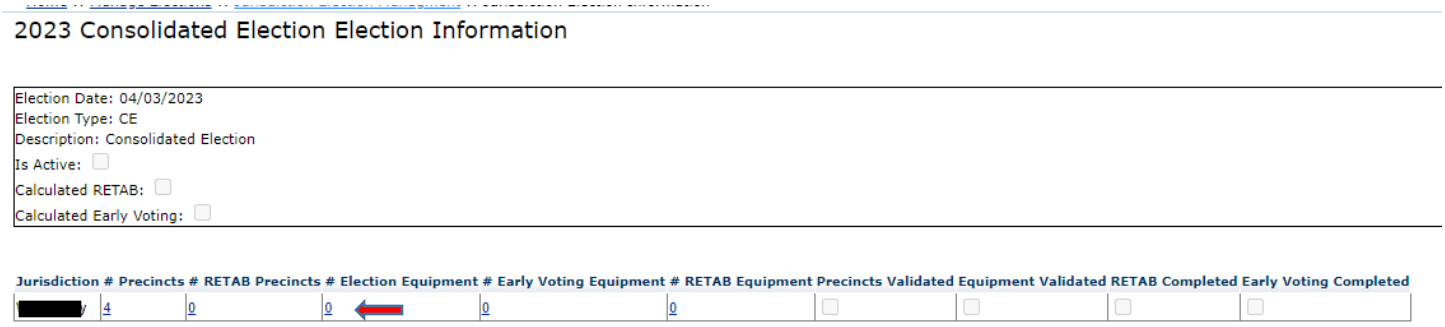
Precincts can be added by checking them individually (see illustration 1), or by "Select All Precincts" (see illustration 2). Select Add Precincts at the bottom to continue.



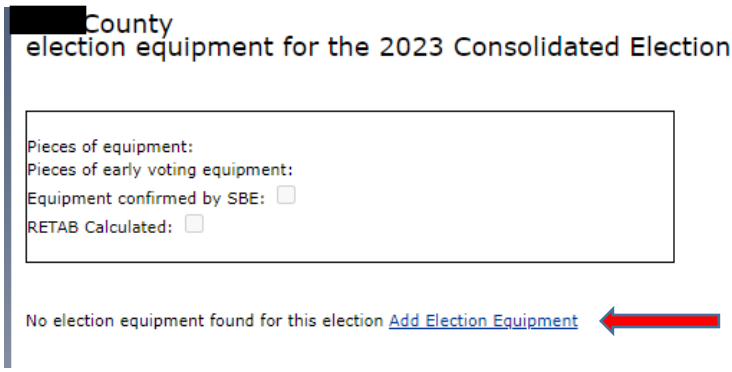
The precincts you have added are now visible in the Jurisdiction Election Information tab.



You will follow the same process to add your equipment. Select the blue 0 under # Election Equipment.

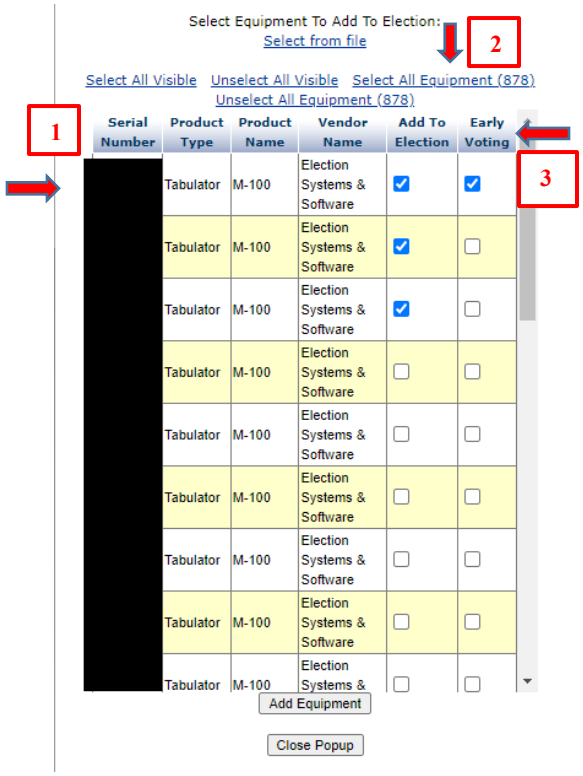


Select "Add Election Equipment"

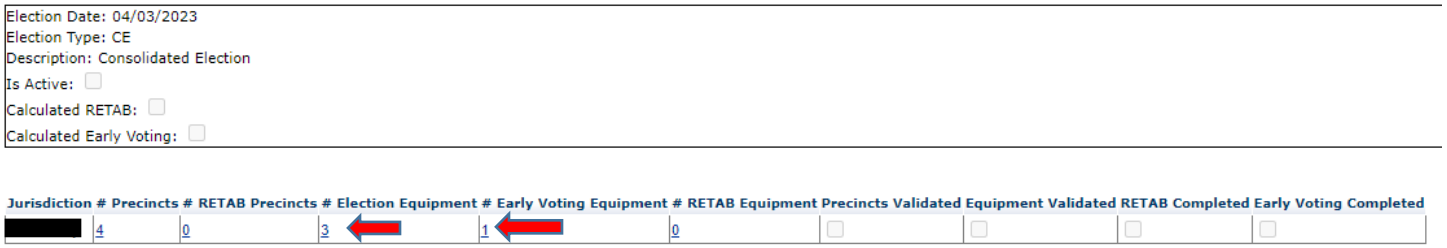


Equipment can be added by checking them individually based on serial number (see illustration 1), or by "Select All Equipment" (see illustration 2). Early Voting Equipment should also be indicated, by checking the Early Voting box (see illustration 3). Select Add Equipment at the bottom to continue.

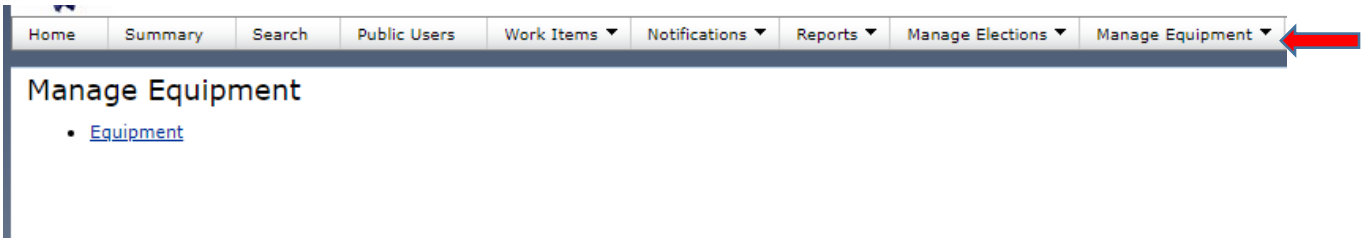
NOTE: Only tabulators should be selected for Early Voting. This will randomly select your jurisdictions RETAB.



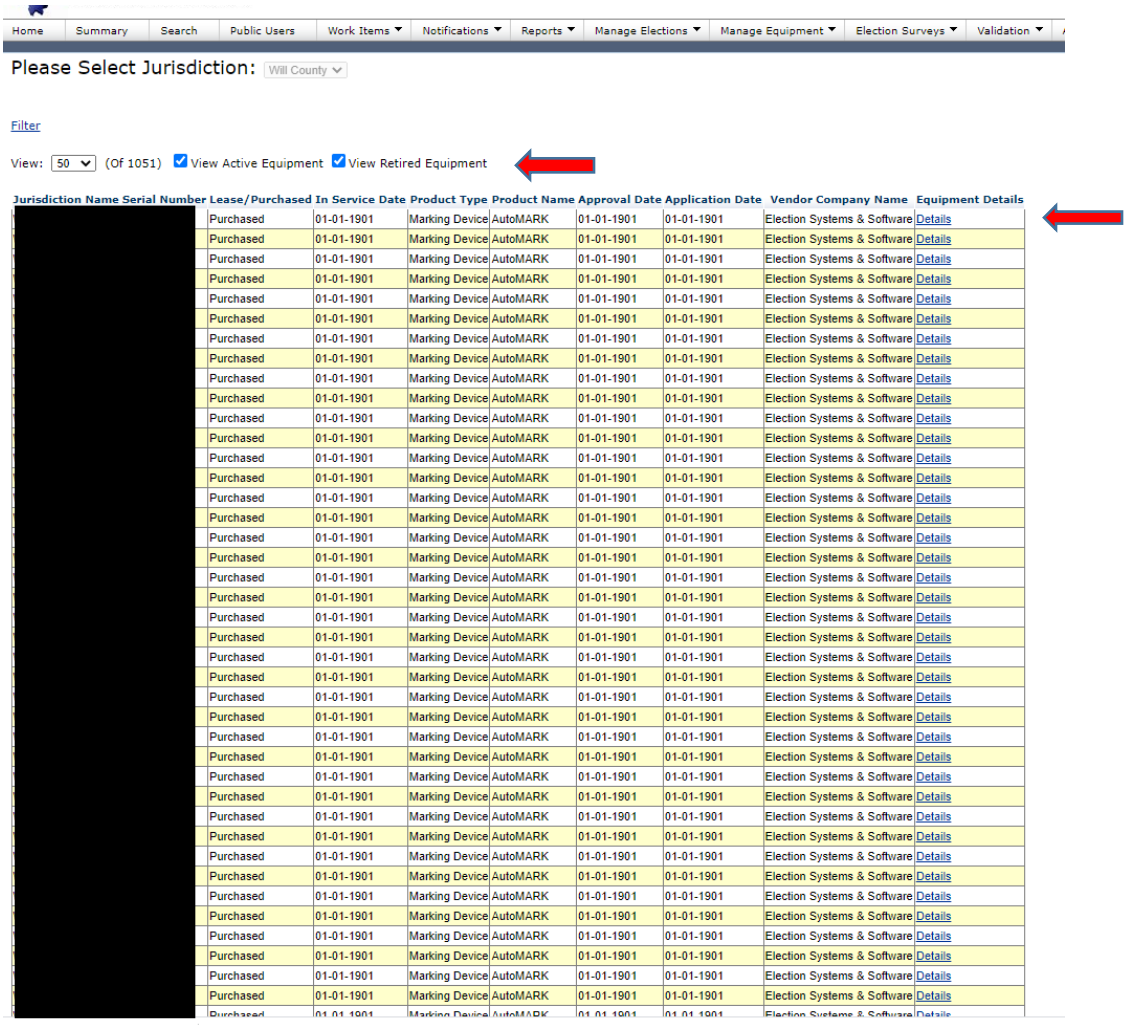
The Elections Day and Early Voting Equipment you have added are now visible in the Jurisdiction Election Information tab.



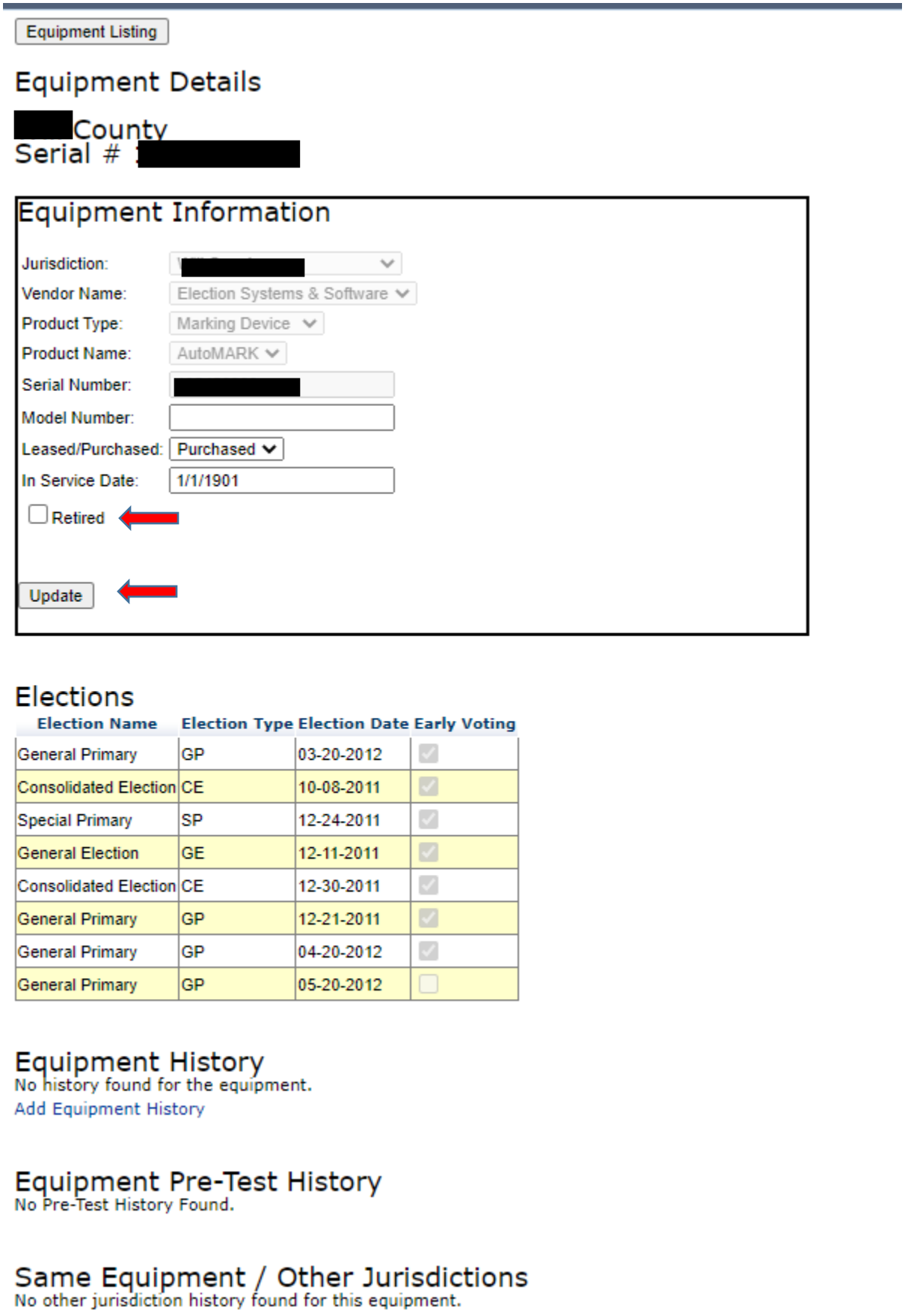
The Manage Equipment tab acts as an inventory of your active and retired election equipment and accessories.



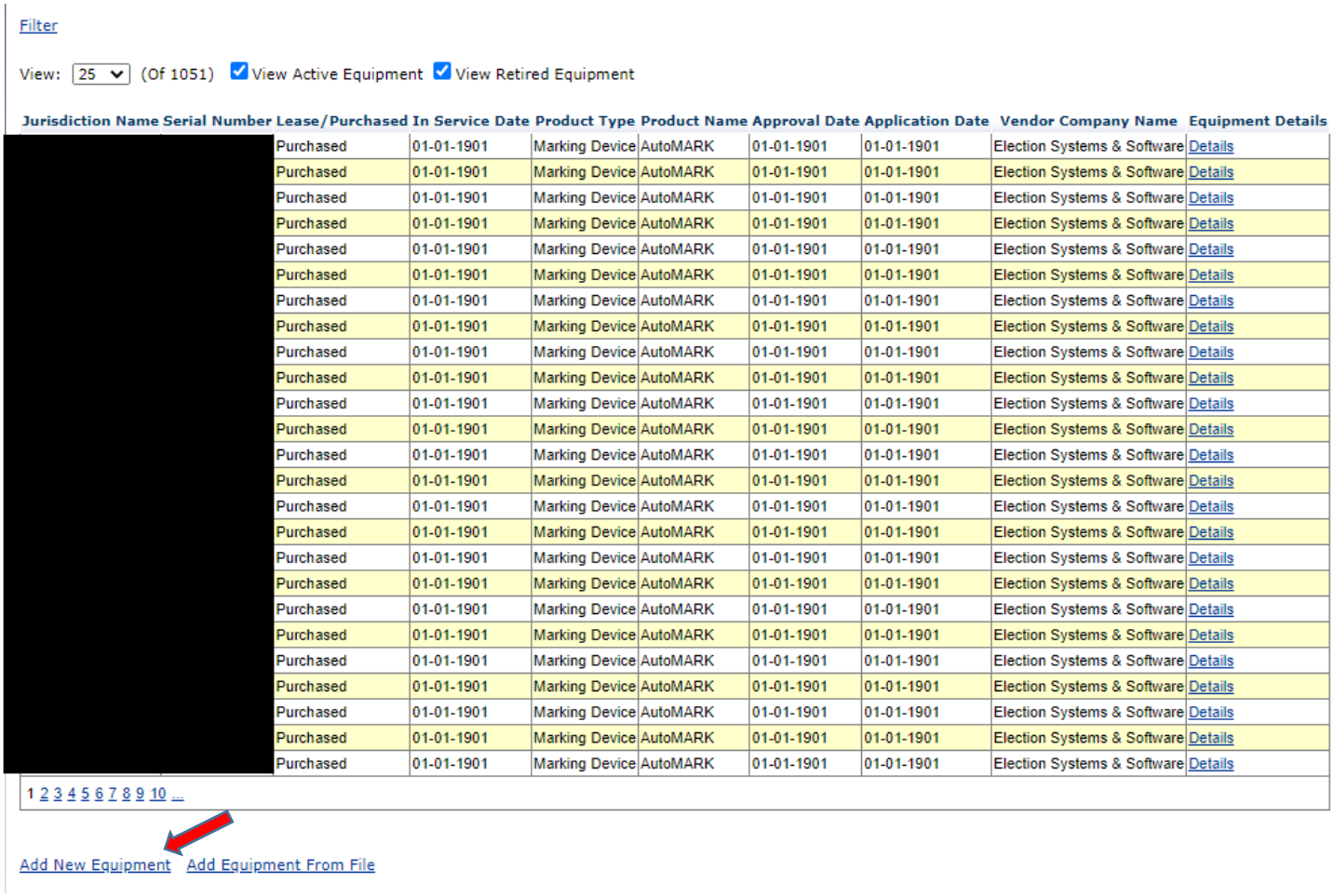
Selecting "Equipment" will provide a list of your jurisdictions equipment. You can make a selection by filtering the Active or Retired equipment. The Equipment Details column will allow you to see details on each piece of equipment.



Details provided as illustrated below. Here you can update or retire equipment as well.



The Manage Equipment tab also allows your jurisdiction to add new equipment as necessary. This can be achieved by a single entry or by adding equipment from a file. To add a single piece of equipment, select "Add New Equipment" at the bottom of the equipment page.



Filter

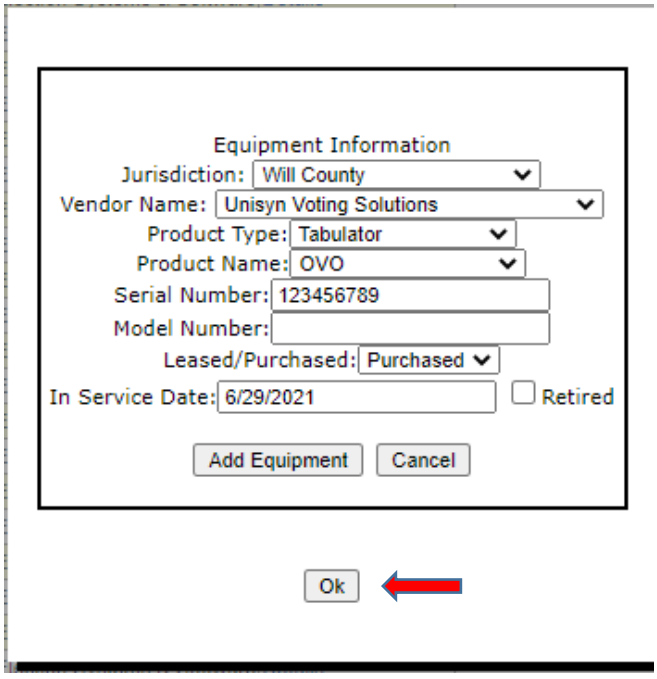
View: 25 (Of 1051) View Active Equipment View Retired Equipment

Jurisdiction Name	Serial Number	Lease/Purchased	In Service Date	Product Type	Product Name	Approval Date	Application Date	Vendor Company Name	Equipment Details
[redacted]		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Marking Device	AutoMARK	01-01-1901	01-01-1901	Election Systems & Software	Details

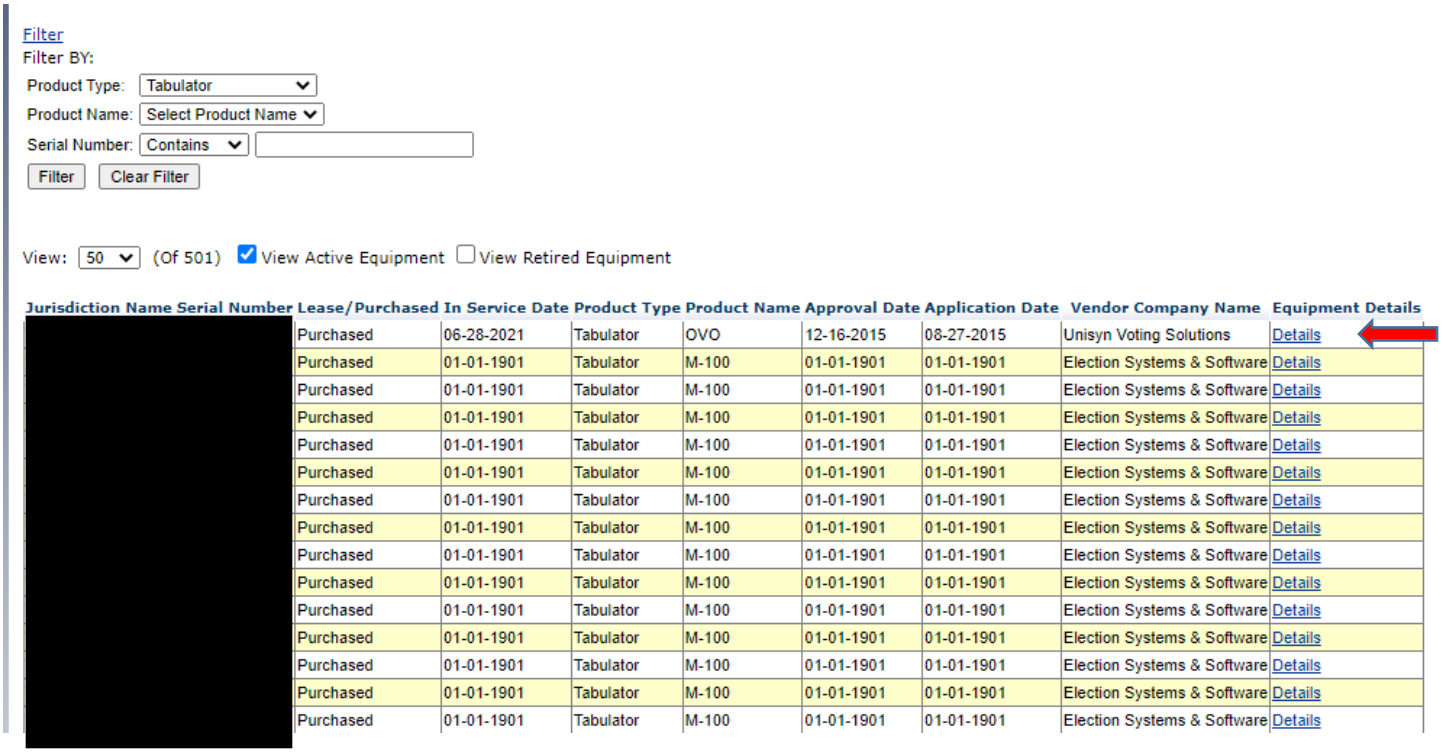
1 2 3 4 5 6 7 8 9 10 ...

Add New Equipment Add Equipment From File

After selecting "Add New Equipment", you will utilize the drop down features in the Equipment Information box. Select the ok button at the bottom to continue.



The new piece of equipment was added successfully and can be viewed.

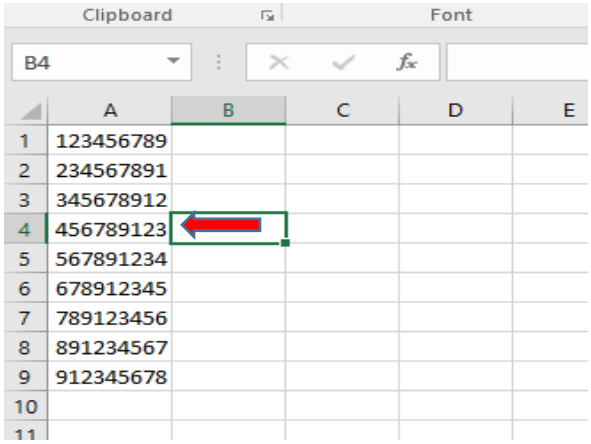


Filter
Filter BY:
Product Type: Tabulator
Product Name: Select Product Name
Serial Number: Contains
Filter | Clear Filter

View: 50 (Of 501) View Active Equipment View Retired Equipment

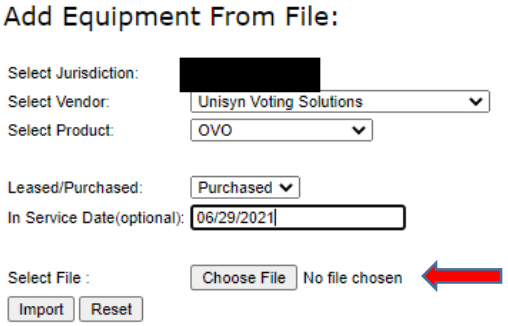
Jurisdiction Name	Serial Number	Lease/Purchased	In Service Date	Product Type	Product Name	Approval Date	Application Date	Vendor Company Name	Equipment Details
[redacted]		Purchased	06-28-2021	Tabulator	OVO	12-16-2015	08-27-2015	Unisyn Voting Solutions	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details
		Purchased	01-01-1901	Tabulator	M-100	01-01-1901	01-01-1901	Election Systems & Software	Details

To "Add Equipment From File", your equipment should be sorted by type of equipment (i.e. tabulators, ballot marking device, etc..) and will need to be listed by serial number in one single column of an Excel spreadsheet. Each type of equipment will require a separate spreadsheet.



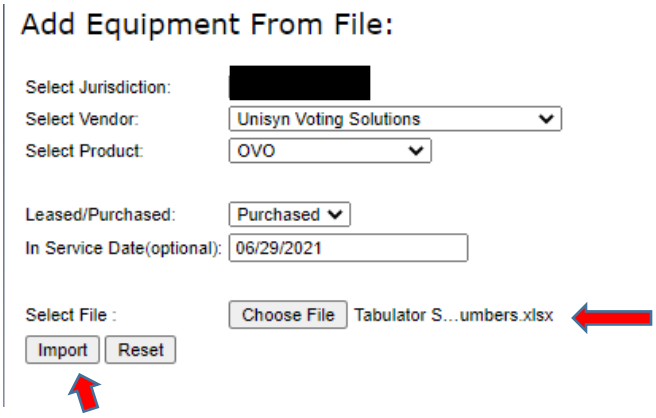
Clipboard Font
B4

	A	B	C	D	E
1	123456789				
2	234567891				
3	345678912				
4	456789123				
5	567891234				
6	678912345				
7	789123456				
8	891234567				
9	912345678				
10					
11					



Add Equipment From File:

Select Jurisdiction: [redacted]
Select Vendor: Unisyn Voting Solutions
Select Product: OVO
Leased/Purchased: Purchased
In Service Date(optional): 06/29/2021
Select File : Choose File No file chosen
Import | Reset



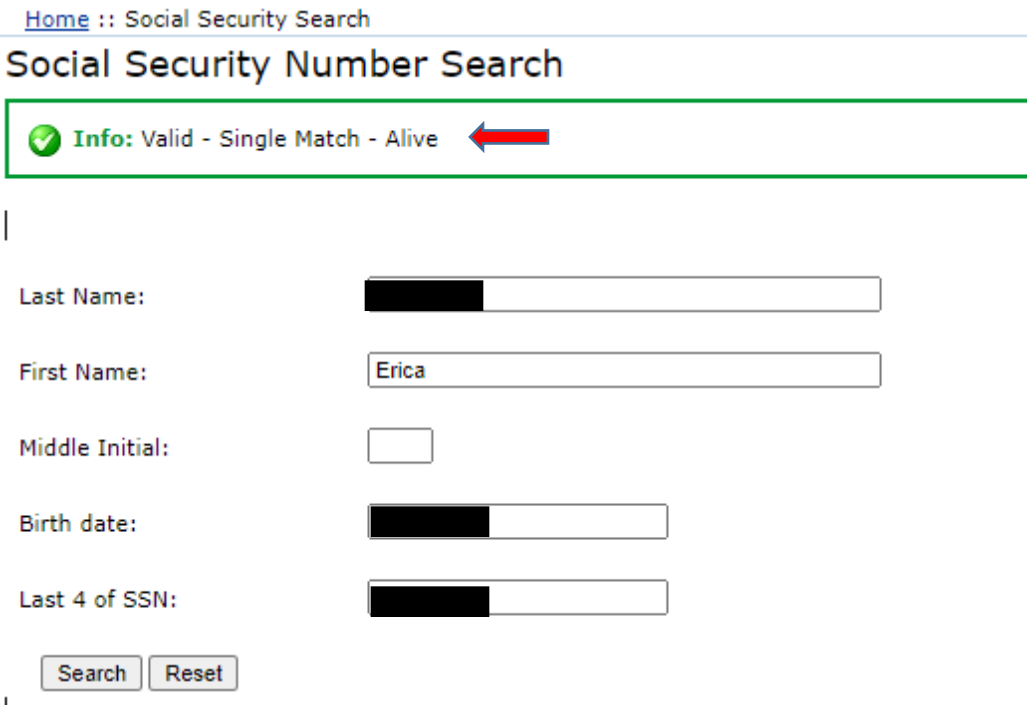
Add Equipment From File:

Select Jurisdiction: [redacted]
Select Vendor: Unisyn Voting Solutions
Select Product: OVO
Leased/Purchased: Purchased
In Service Date(optional): 06/29/2021
Select File : Choose File Tabulator S...umbers.xlsx
Import | Reset

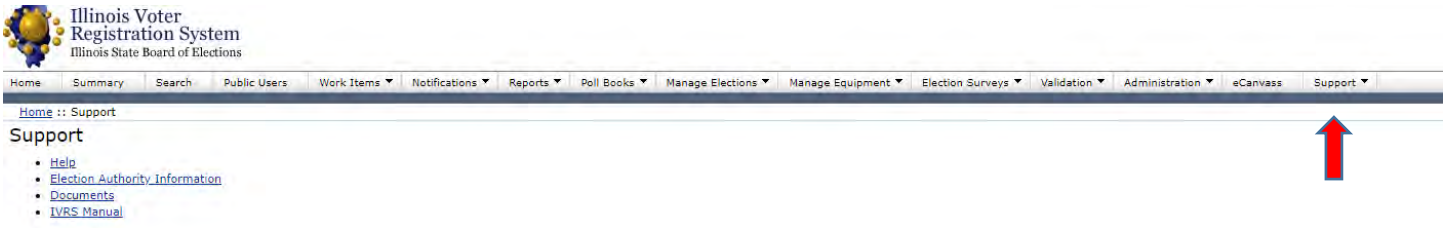
The Validation tab is used to validate an individual voter's information with the Social Security Administration.



Select the Social Security Search to populate the search menu. If the match is valid or invalid an informational message will be displayed. Utilizing this information you should take necessary action on the record.



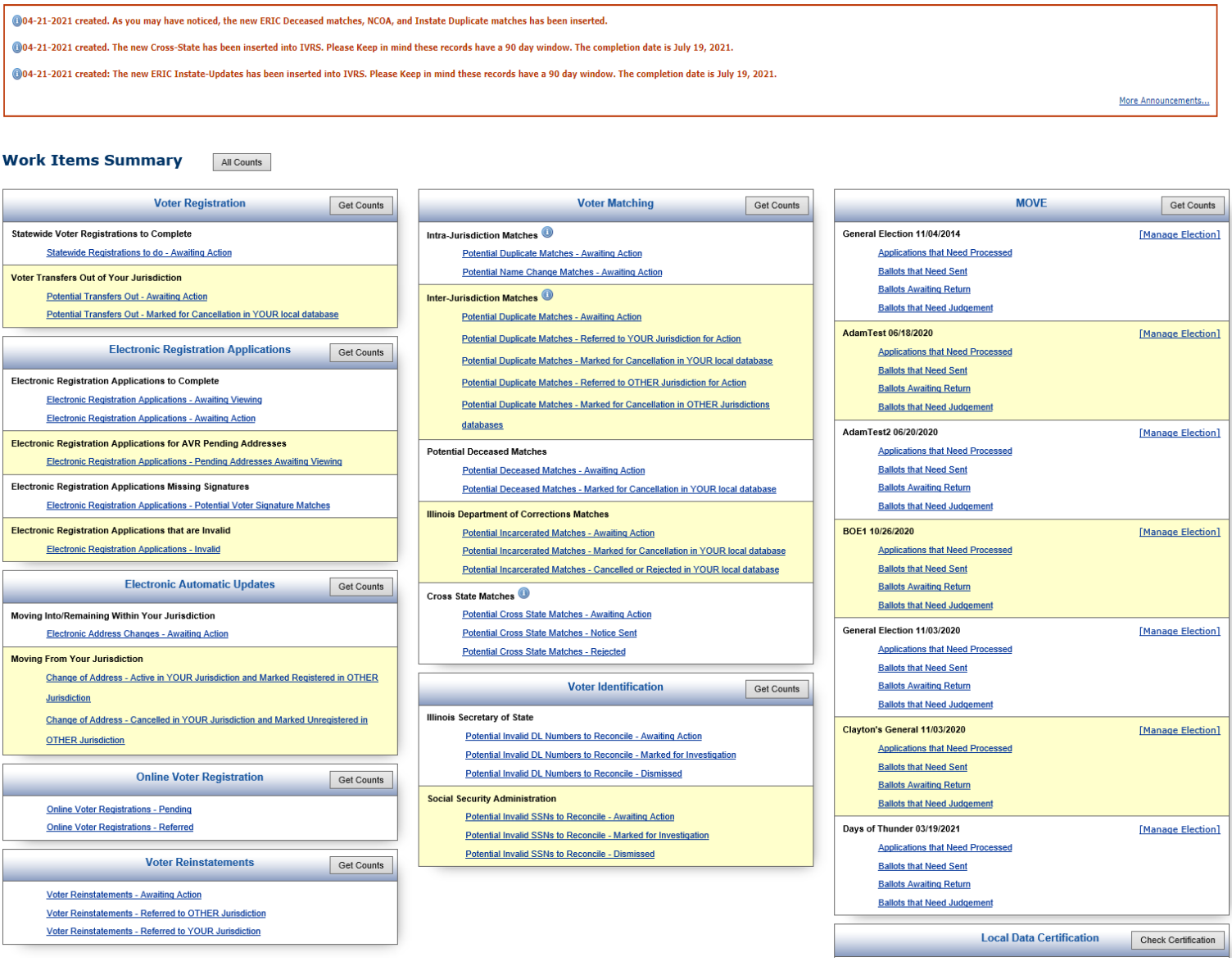
The Support tab will provide you with basic support information such as, Election Authority Information, Important SBE provided documents as well as IVRS training materials.



INSTRUCTIONS FOR THE WORK ITEM SUMMARY

The Work Item Summary should be reviewed by an IVRS user within your jurisdiction on a consistent basis. The following instructions will review each work item or what are commonly referred to as "buckets". This guide should provide clarity and provide a better understanding of the Work Item Summary and allow the user(s) more confidence while taking action on each specific item. Included in these instructions will be examples and illustrations to help explain each action item. On occasion, items that require special attention will have a notification displayed in red text within the announcement section above the Work Item Summary.

It should be noted, that some of the items in the following categories will affect other jurisdictions until you resolve them.

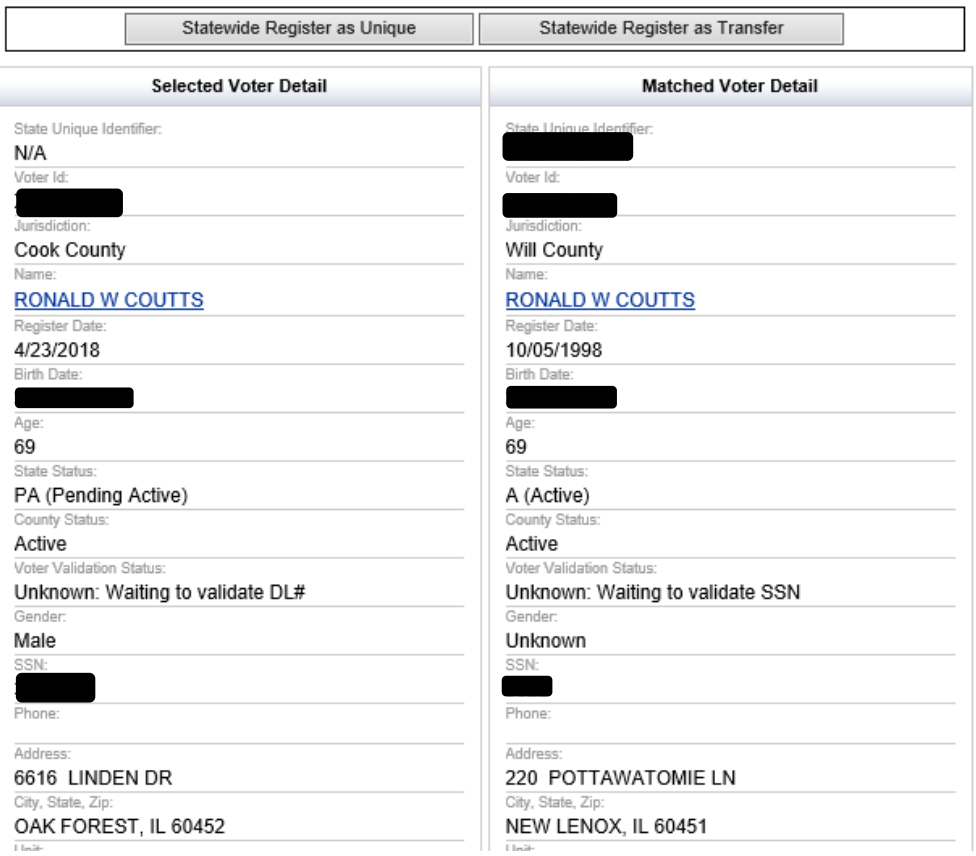


VOTER REGISTRATION

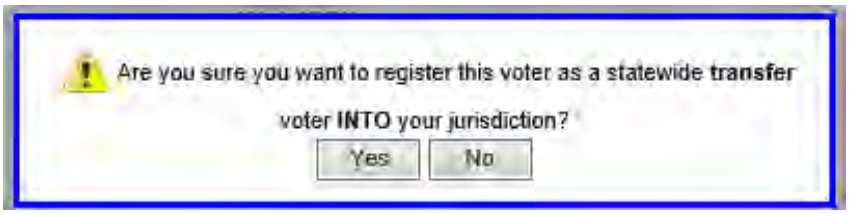


This bucket contains Statewide Registrations to Complete, records where a potential match was identified through the batch process against an existing registration. These will require action in order for your record to be completed. Records appear in this bucket if an error occurs with your web-services, or a statewide search for a duplicate registration was not completed. This may occur if there was an error in your search or the connection was interrupted. If voters appear in this section you will have to go through the process manually for the records to be assigned an SUID number, in order to be registered.

When you "Select" each voter, you will receive a more detailed screen that will allow you to either register them as **"Unique":** they will receive a new SUID and will be considered a new voter to the State, as you believe the voter details do NOT match and are different people**, OR** you can choose to **"Transfer":** you believe they are the same person but are more recently registered in your jurisdiction. Request of this transfer will be sent to the other jurisdiction to either confirm or deny. (See example of "**Statewide Register as Transfer**")



IVRS has matched these voters due to the DOB and SSN match. If you agree that this is a match, you would select "Statewide Register as Transfer" at the top of the voter detail, informing IVRS and the other jurisdiction that you believe this to be the same person. This will register this voter as a "Statewide transfer INTO your jurisdiction".



A confirmation notice will appear. If you choose to register this voter as a statewide transfer, select yes. The information provided states that the voter registered in Cook County on 04/23/2018, which is more recent than the registration in Will County, which was 10/05/1998. Therefore, this voter should be confirmed as a statewide transfer. However, not all local systems reflect the most current registration date. If the other jurisdiction challenges the transfer, a conversation between the election authorities will be required in order to determine in which jurisdiction the voter resides.

Extra attention needs to be given to the records that appear to be duplicates, Sec. 302 4/B iii of the Help America Vote Act (HAVA) requires "duplicate names are eliminated from the computerized list"

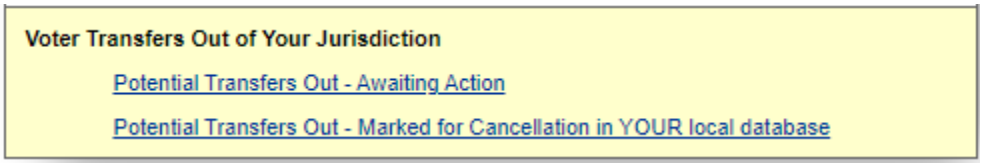
If you believe these voters are two separate people, you will select "Statewide Register as Unique". This will assign a new SUID to that voter and they will be registered as a new voter in your system, while allowing the other voter to remain active in the other jurisdiction.

Voter Transfers Out of Your Jurisdiction – Potential Transfers Out –Awaiting Action, contains voters that other jurisdictions are notifying you, have moved out of your jurisdiction and into theirs. Here you will select "view case" to get a better look and respond with action.

The voter record on the *left* is the record within your jurisdiction and the voter on the *right* is the possible match in another jurisdiction. Upon working these, you will be deciding whether or not to **accept** or **reject** the match.

Accepting the transfer means that you are allowing the voter record to complete the transfer from your jurisdiction to another. This will mark the record to be canceled in your local database and allow the other jurisdiction's record to become active. (i.e. the registration date for the other county is more current, meaning most likely the voter has moved and registered in their new jurisdiction). Again, not all local systems reflect the most current registration date in the voter registration system. A conversation between the election authorities may need to take place to decide what jurisdiction the voter belongs to.

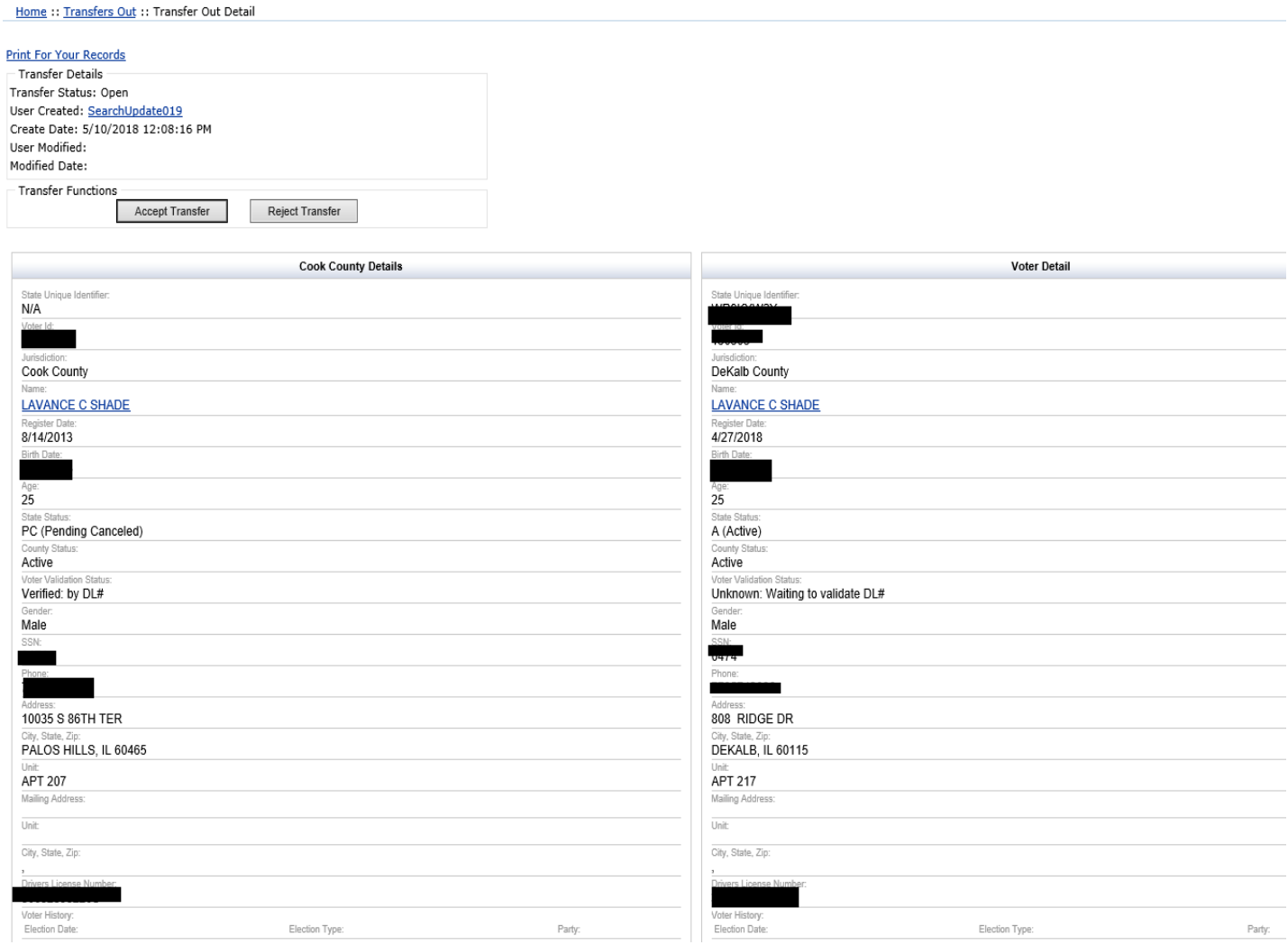
Rejecting the transfer will have no effect on your record since it will remain active, but will most likely result in communication between yourself and the other jurisdiction. When rejecting the transfer, you are retaining this voter as an active voter and NOT allowing transfer to another jurisdiction.



As you can see in the **below example**, DeKalb County is waiting for a decision to **accept** or **reject** this transfer. Notice, that the older registration date of 8/14/2013 in Cook County is now showing a **"PC-Pending Canceled"** status. While the more current registration date of 04/27/2018 in DeKalb County is **"Active".**

When coming to a decision: you can see that the DOB and SSN are the same which leads you to believe this is the same person. Signature comparison is also recommended.

In the example below, you would accept the transfer which will allow the voter to be one step closer to being fully canceled in Cook County.



Home :: Transfers Out :: Transfer Out Detail

Print For Your Records

Transfer Details
Transfer Status: Open
User Created: SearchUpdate019
Create Date: 5/10/2018 12:08:16 PM
User Modified:
Modified Date:

Transfer Functions
Accept Transfer | Reject Transfer

Cook County Details		Voter Detail	
State Unique Identifier:	N/A	State Unique Identifier:	[redacted]
Voter Id:	[redacted]		
Jurisdiction:	Cook County	Jurisdiction:	DeKalb County
Name:	LAVANCE C SHADE	Name:	LAVANCE C SHADE
Register Date:	8/14/2013	Register Date:	4/27/2018
Birth Date:	[redacted]	Birth Date:	[redacted]
Age:	25	Age:	25
State Status:	PC (Pending Canceled)	State Status:	A (Active)
County Status:	Active	County Status:	Active
Voter Validation Status:	Verified: by DL#	Voter Validation Status:	Unknown: Waiting to validate DL#
Gender:	Male	Gender:	Male
SSN:	[redacted]	SSN:	[redacted]
Phone:	[redacted]	Phone:	[redacted]
Address:	10035 S 86TH TER	Address:	808 RIDGE DR
City, State, Zip:	PALOS HILLS, IL 60465	City, State, Zip:	DEKALB, IL 60115
Unit:	APT 207	Unit:	APT 217
Mailing Address:		Mailing Address:	
Unit:		Unit:	
City, State, Zip:	,	City, State, Zip:	,
Drivers License Number:	[redacted]	Drivers License Number:	[redacted]
Voter History:		Voter History:	
Election Date: / Election Type: / Party:		Election Date: / Election Type: / Party:	

<u>Voter Transfers Out of Your Jurisdiction - Potential Transfers Out – Marked for Cancelation in YOUR local database</u> is the next section. This is where you will see the voters who have been accepted as transfers out of your jurisdiction and, as such, are also marked to be canceled in your local database. Your local registration system is set up to complete this task automatically, usually overnight (see Vendor for details), in which case you will likely not need to perform this task. However, if your system has failed to complete this, the records will start to increase. Best practices would be to check the counts often to make sure this number does not increase.

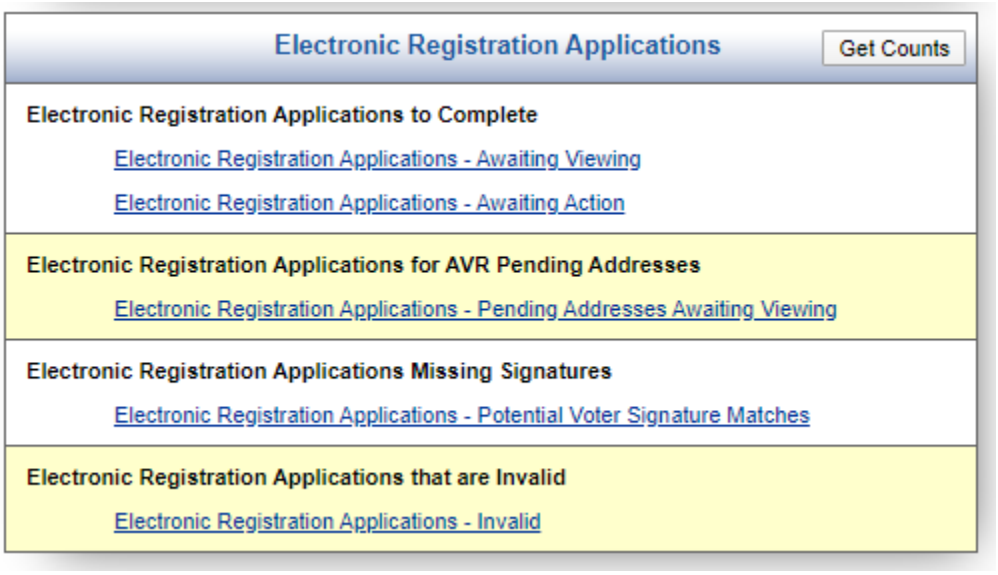
ELECTRONIC REGISTRATION APPLICATIONS (ERA)

Illinois voter registration applicants who apply as a new voter or apply to update their registration either online-Paperless Online Voter Application system (POVA) or at a state agency (such as the Secretary of State-SOS), are processed as Electronic Registration Applications in IVRS.

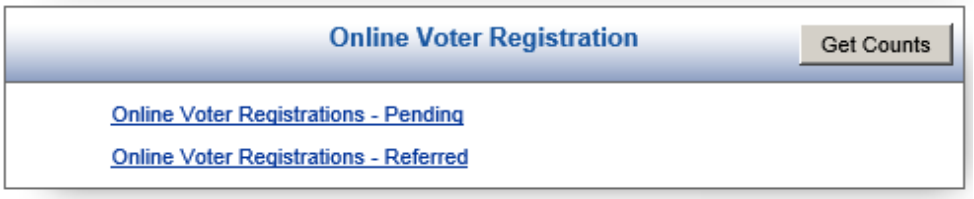
You are able to monitor your ERA "buckets" on the IVRS website. Under 10ILCS 5/1A-16.5 you have FIVE business days to process and send out the notices for any registration obtained through ERA. If you are waiting on your vendor to complete the electronic interaction between your local Election Management System (EMS) and IVRS, you must use the *Individual Records Processing* method until such time as the electronic interaction is available.

There are two buckets in IVRS in which you handle electronic registration applications.

The first bucket is Electronic Registration Applications, formerly known as Paperless Online Voter Applications, which holds applications submitted online (POVA) and in person at a Secretary of State Driver's Services facility (SOS). When you receive these, you will need to print out the record(s) for your office. If the SOS check has been completed successfully, the voter's signature will be attached with the record.



The second online bucket is Online Voter Registration, which still requires the voter to mail you his/her application. If a person is unable to use POVA or does not have an Illinois driver's license or State ID, the system will direct the applicant to the mail in voter registration form, which clearly informs the applicant of the need to print, sign and mail in the application to the local election authority. If an application never arrives, it will fall off of the Online Voter Registration bucket in roughly nine months' time.



Methods of Handling Electronic Registration Applications

ERA applications may be processed in any one of three different ways: "Web Services," "Individual Records Processing," or "Batch Processing" It is up to each Election Authority to discuss with its internal IT Department or Vendor which method is available/preferred. When working with Web Services or Batch Process Download, your vendor or internal IT Department will be able to assist you with the specific instructions for your system.

Web Services

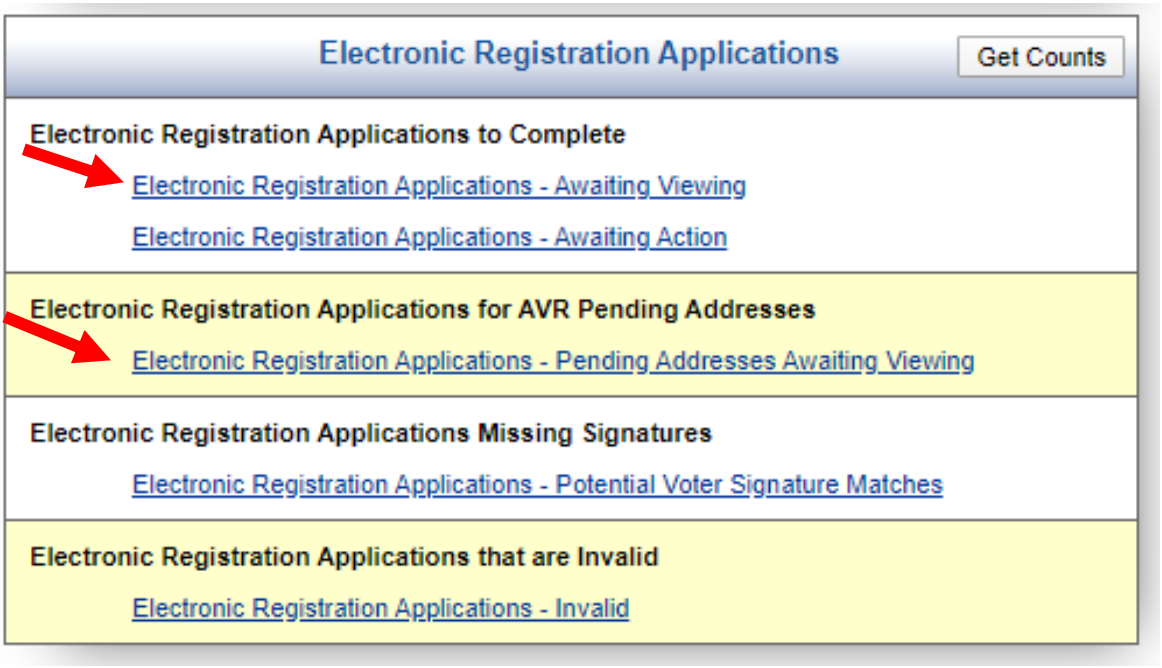
The programming for Web Services is a behind the scenes application that runs in your existing local registration system. It will be installed by your vendor and configured to seamlessly upload and process ERA applications, which will have an 'ova' xml tag identifying them as electronic applications. The programming extracts the information from the electronic application(s) to be processed. **Note: Electronic Registration Applications for AVR Pending Addresses cannot be processed through web services at this time.**

Individual Record Processing

At this time, some of you will be processing ERA applications using "Individual Records Processing." This process is similar to the way a jurisdiction currently handles a paper application.

Below is the bucket for Electronic Registration Applications (ERA).

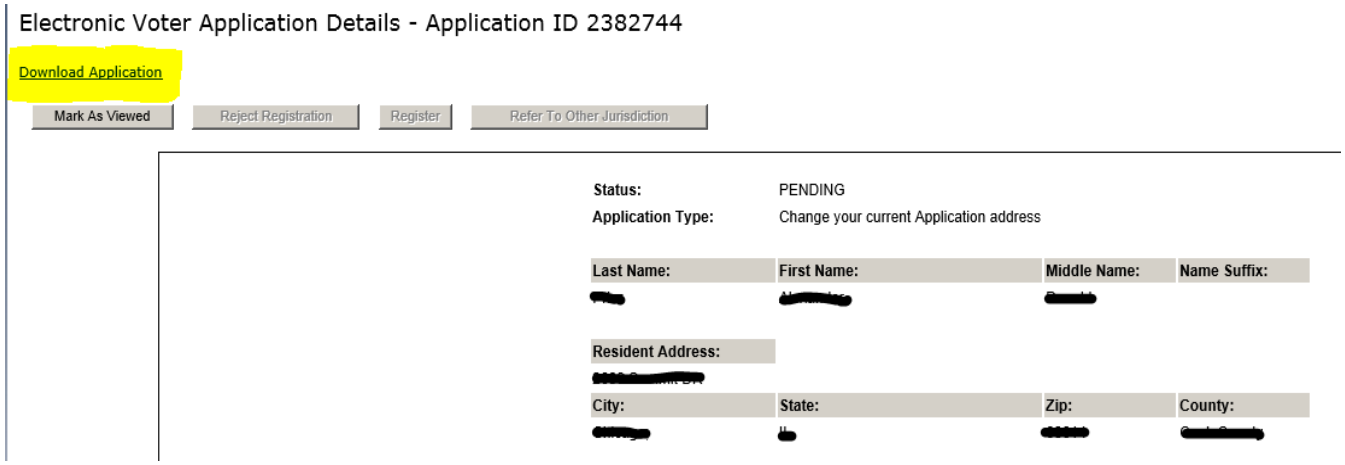
1. Click on the first bucket, "Electronic Registration Applications – Awaiting Viewing" for all standard ERA applications or click on the second bucket, "Electronic Registration Applications for AVR Pending Addresses" to work with applications that have addresses requiring further investigation.

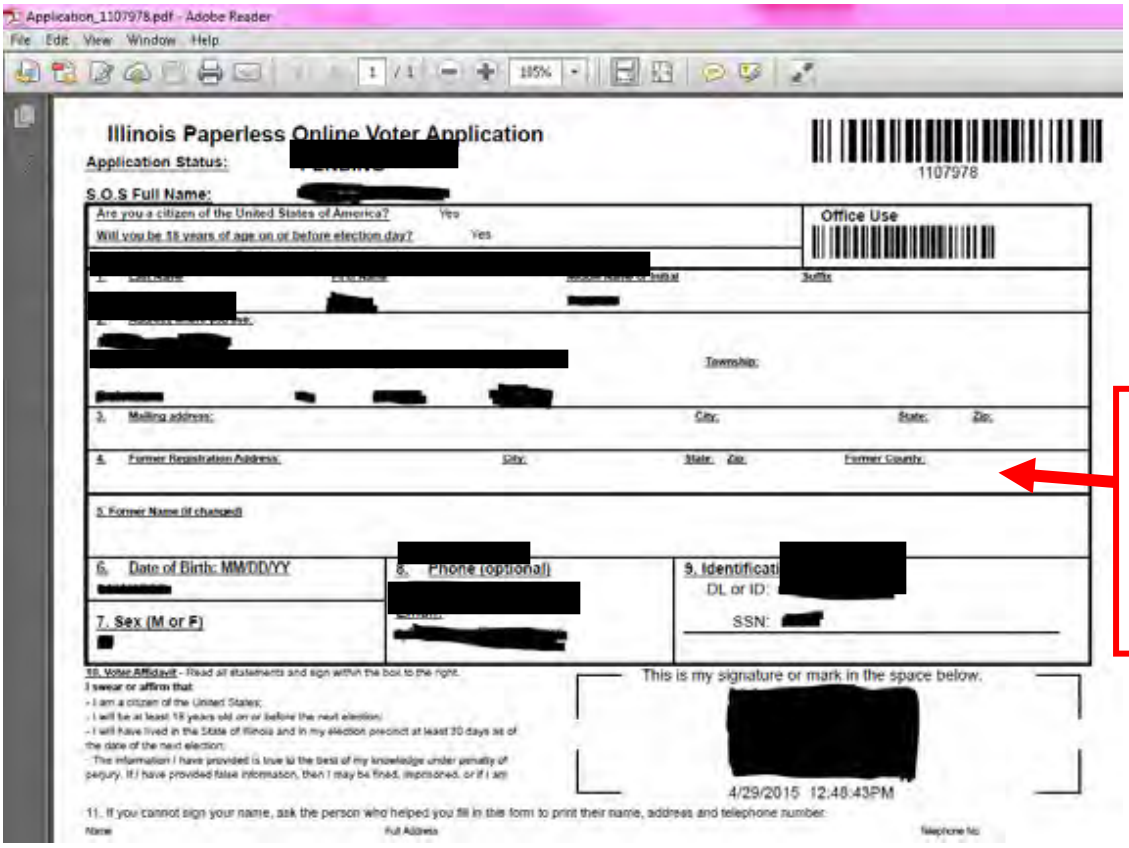


2. Click on the "App ID" of the Voter you would like to review:



3. Select "Download Application" (Depending on the browser you are using, when you click to "Download Application" you may have to "Allow Popup" in order to view the PDF generated.) Print it out in order to process the registration. After you download an application, the "Mark as Viewed button will automatically be selected and the application will move to your "Awaiting Action" bucket.



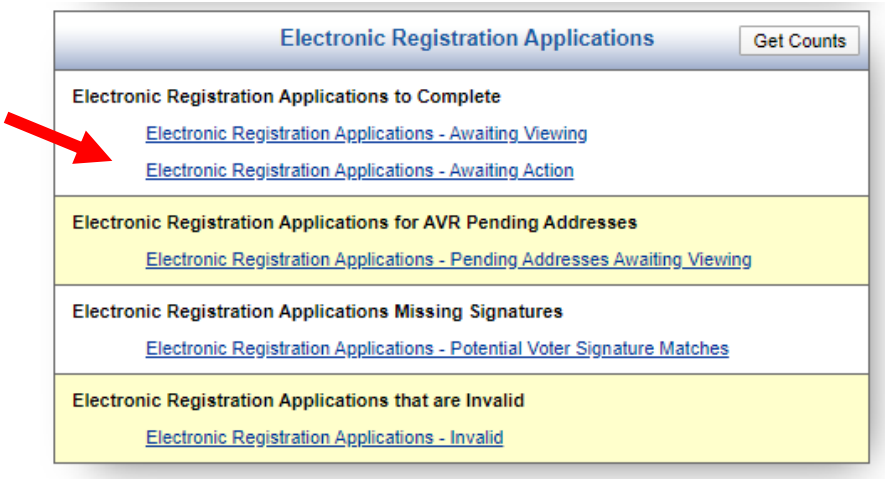


This is an example of the PDF Application that will be provided. This application should be retained.

If you have determined that the applicant will be registered in your jurisdiction, you will need to register the applicant in your local voter registration system and record the local ID number before going on to the next section. **Special Note:** Please indicate in your local system the Source of the application, "OVA," "350," "NCOA," "EISU" or another agency which will be identified by the new Agency Code on the application. It is imperative to utilize the correct agency code when registering these voters.

If the application is to be rejected or referred to another jurisdiction, instructions are listed later in these instructions.

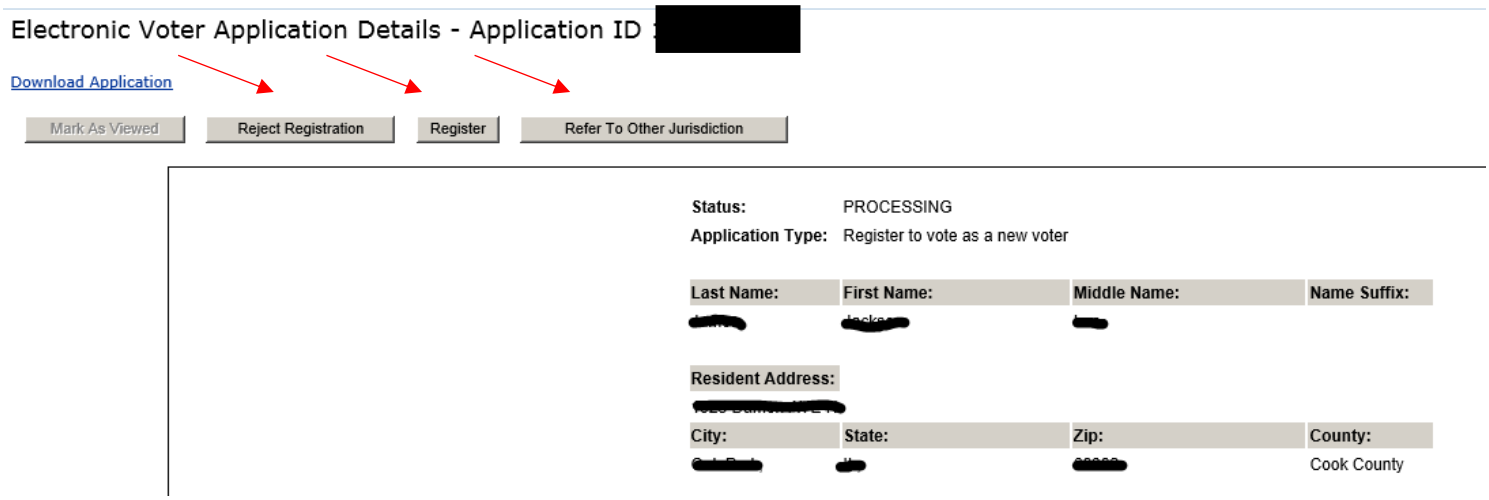
4. The application will now appear in "Electronic Registration Applications- Awaiting Action"



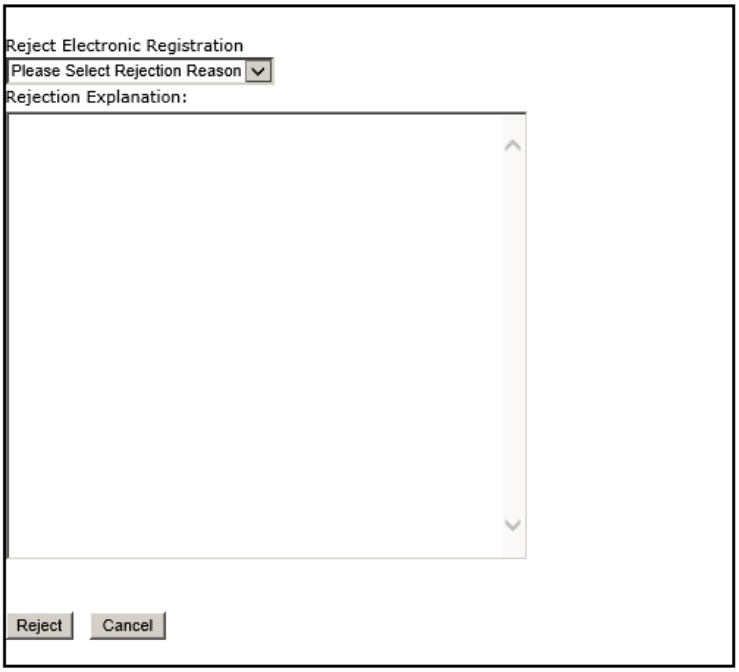
5. Open up the application like before:



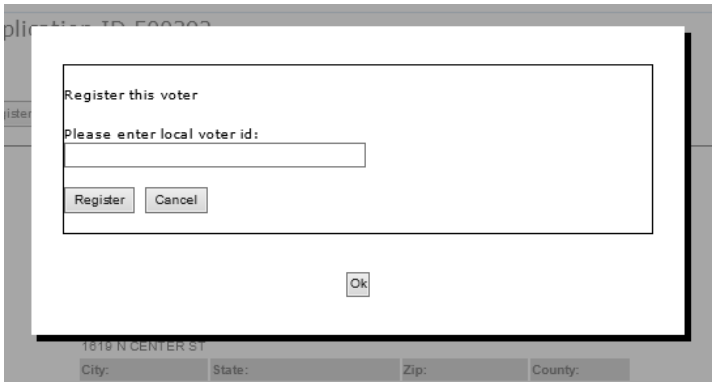
6. Select the appropriate action for Rejecting, Registering, and Referring the application are available for you to use:



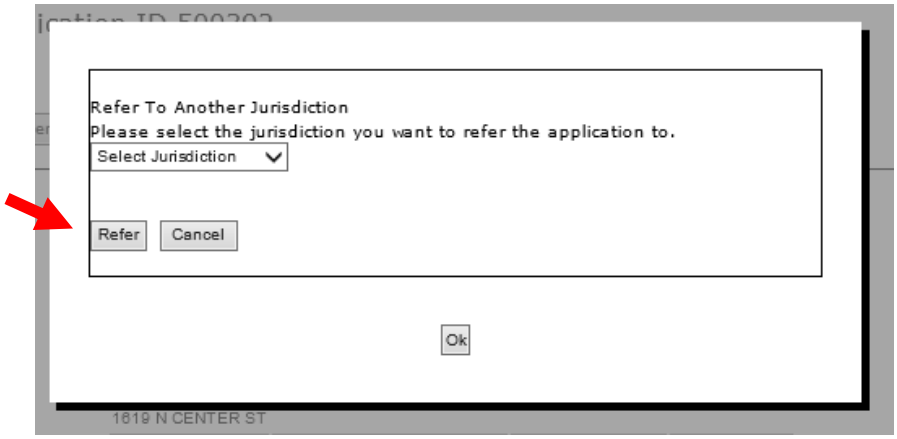
7. To reject, you will need to choose a reason from the drop down menu. The choices are "not signed," "incomplete," "duplicate," and "does not qualify." There is also a free form dialog box to enter further information:



8. To register, you will need to enter the Local ID your system assigned to the voter: (This step can be skipped if the appropriate Source is indicated in your local system. Following the nightly batch process, the system will match your registration to the appropriate application record and mark them as registered.)



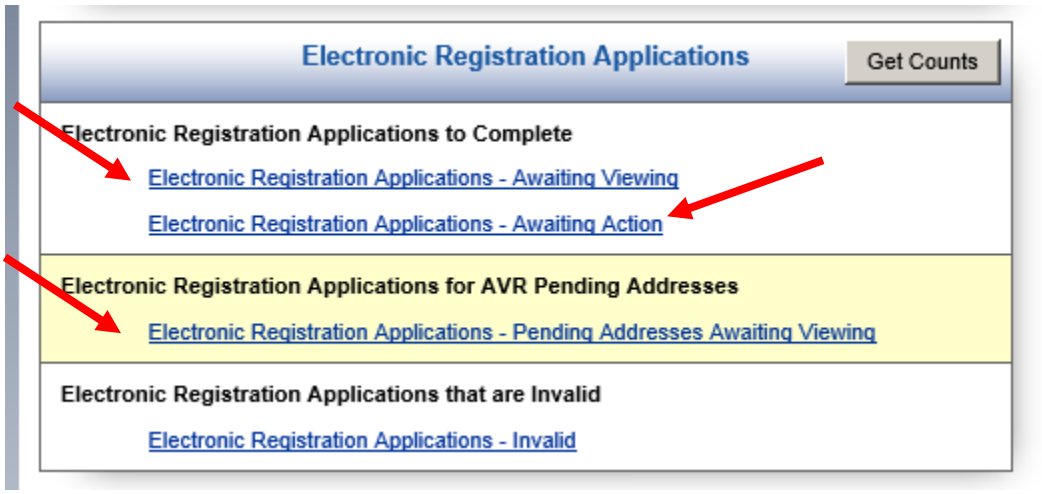
9. When you refer, simply choose the jurisdiction you believe the application belongs to from the drop down list and select "Refer":



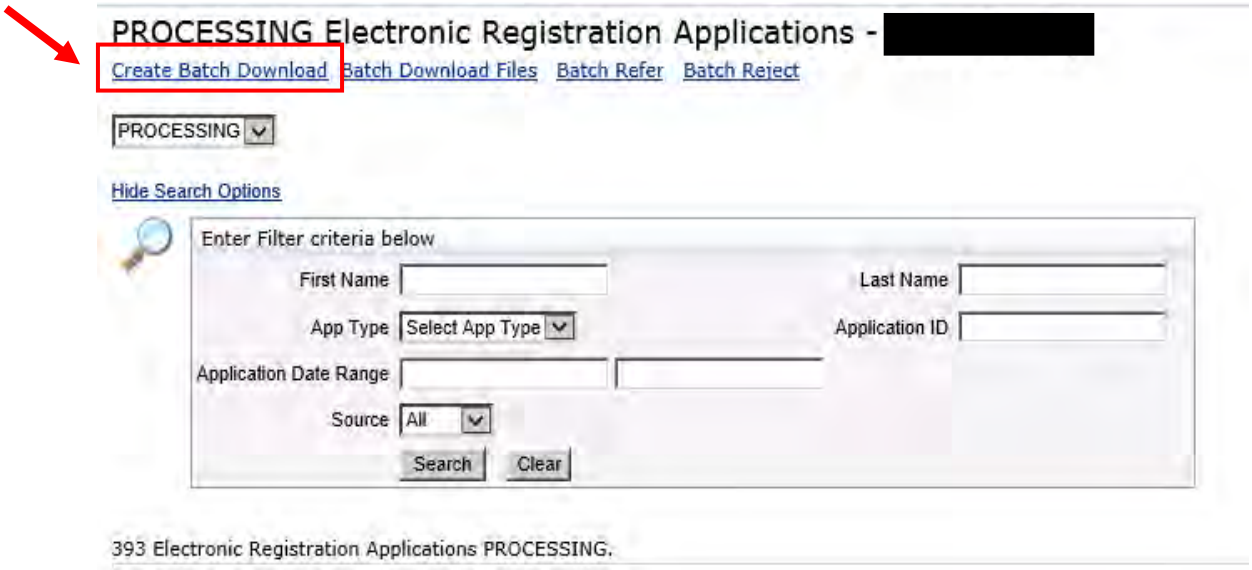
Batch Download

The Batch Download method is incorporated into the current SBE IVRS website and is offered to those jurisdictions which wish to process applications in bulk. This method allows a jurisdiction to download a zip file from IVRS for processing (note: make sure you have the proper software for unzipping a file). Though this method still requires a batch file to be processed, data entry may be minimized. Batch Downloads can later be accessed for bulk in house processing, referring to other jurisdictions, or to mass reject files already reviewed by the jurisdiction.

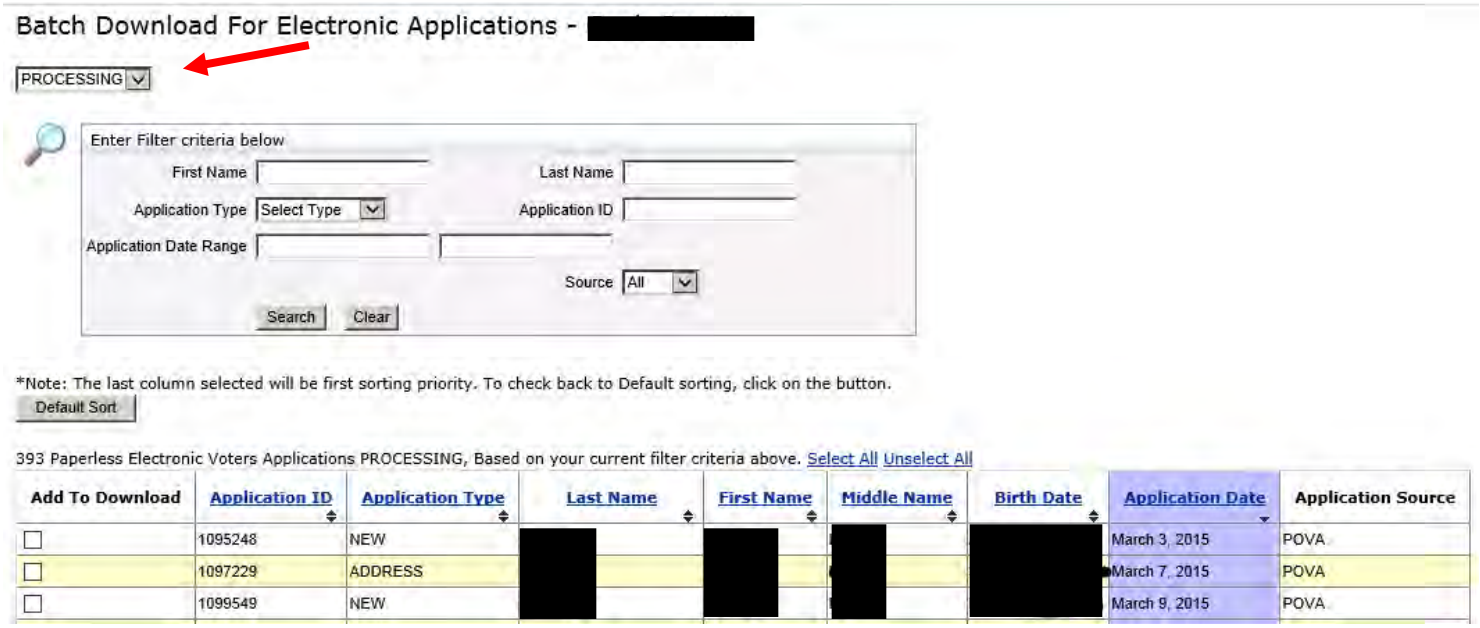
1. To get into Batch Download you can go through either "Electronic Registration Applications-Awaiting Viewing," "Electronic Registration Applications – Awaiting Action," or "Electronic Registration Applications for AVR Pending Addresses" depending on which data you plan to work with:



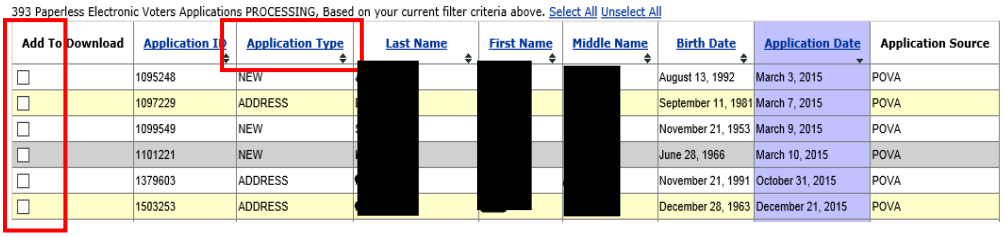
2. Select "Create Batch Download"



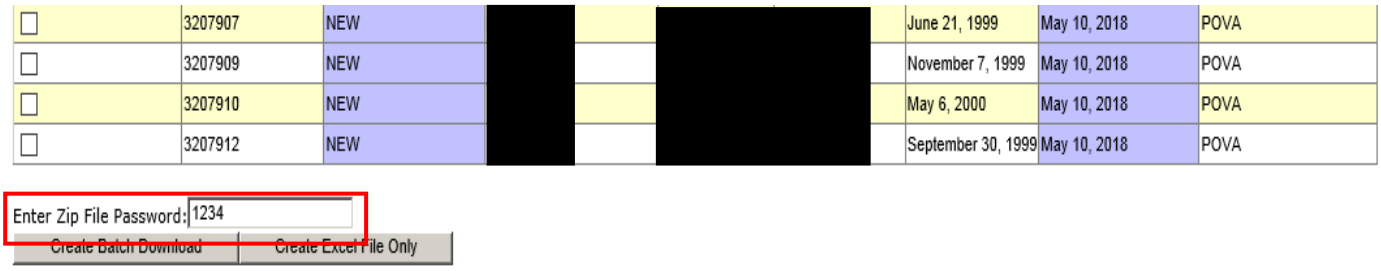
3. Select which applications you would like to work with through the drop down box. The drop down menu offers "Pending," "Processing," and "Invalid":



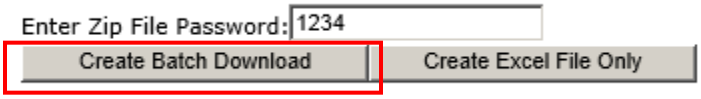
4. Next you will need to choose your specific records. This can be done by "selecting all" or clicking the box next to the individual records desired. Individually selecting records works well when you would like to choose them based on "Application Type":



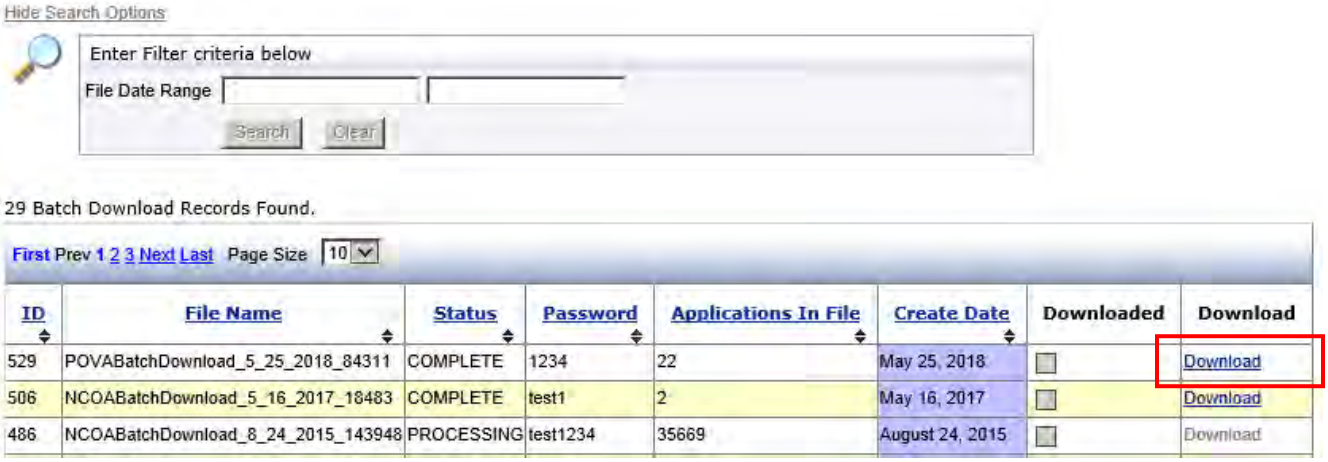
5. After selecting your files, you will have to create a password, at the bottom of the page that will be used for the file.



6. Click the "Create Batch Download" button. This will take you to the Batch Download Records Page:

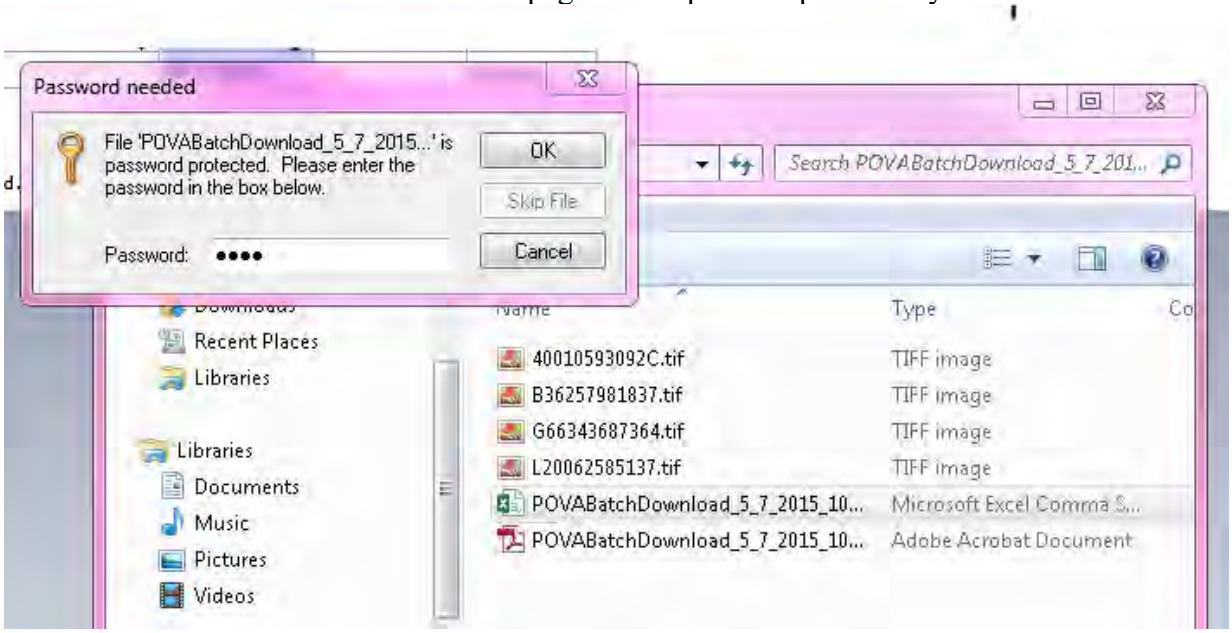


7. This is the Batch Download page. Select the "Download" link. Depending on the file size, it may take a while to create. When the Download button lights up blue it is ready:



ID	File Name	Status	Password	Applications In File	Create Date	Downloaded	Download
529	POVABatchDownload_5_25_2018_84311	COMPLETE	1234	22	May 25, 2018	☐	Download
506	NCOABatchDownload_5_16_2017_18483	COMPLETE	test1	2	May 16, 2017	☐	Download
486	NCOABatchDownload_8_24_2015_143948	PROCESSING	test1234	35669	August 24, 2015	☐	Download

8. The file that is downloaded from this page will require the password you created:



If the file wasn't already saved in the proper designated places, it may be found in your "Downloads" folder. You can cut it from here and paste it into the appropriate folder so that it is easier to locate.

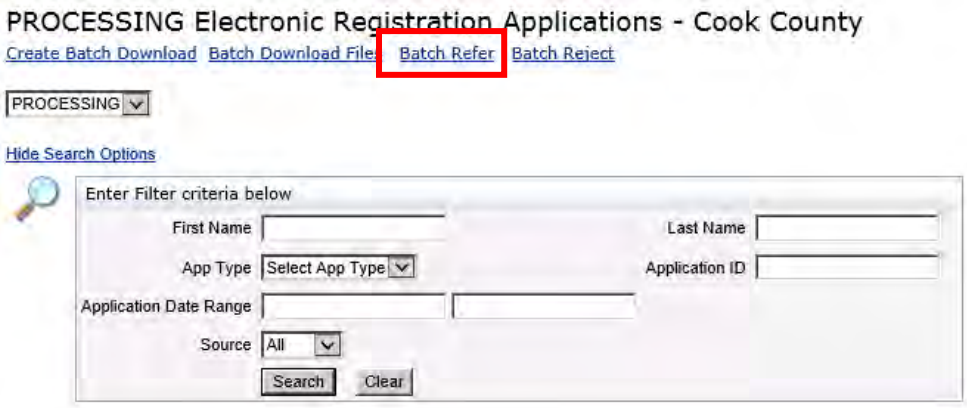
Files will need to be unzipped, especially if you plan on using them for "Batch Refer" or "Batch Reject." Please consult your IT Department for instructions on unzipping files if needed.

BATCH REFER

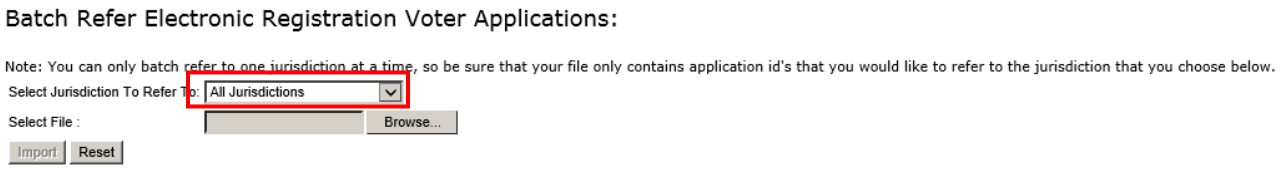
If you would like to send, or "refer" multiple applications to another Election Authority, the "Batch Refer" method allows you to process these applications in bulk. In order to Batch Refer applications, a file will have to be first downloaded onto your computer, using the "Batch Download" method.

1. Go back into Batch Download through either "Electronic Registration Applications - Awaiting Viewing" or "Electronic Registration Applications – Awaiting Action," depending on which data you plan to work with.

2. Select "Batch Refer":



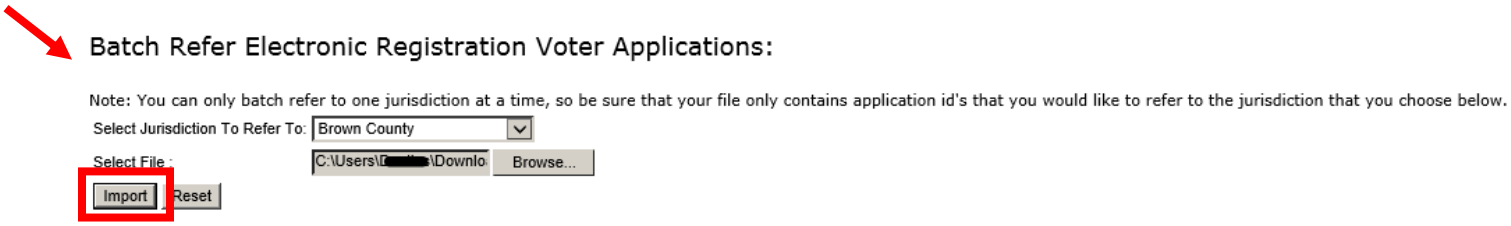
3. From the drop-down menu, select the Jurisdiction to which you are referring the applications:



4. Click "browse"- to find the file on your computer:

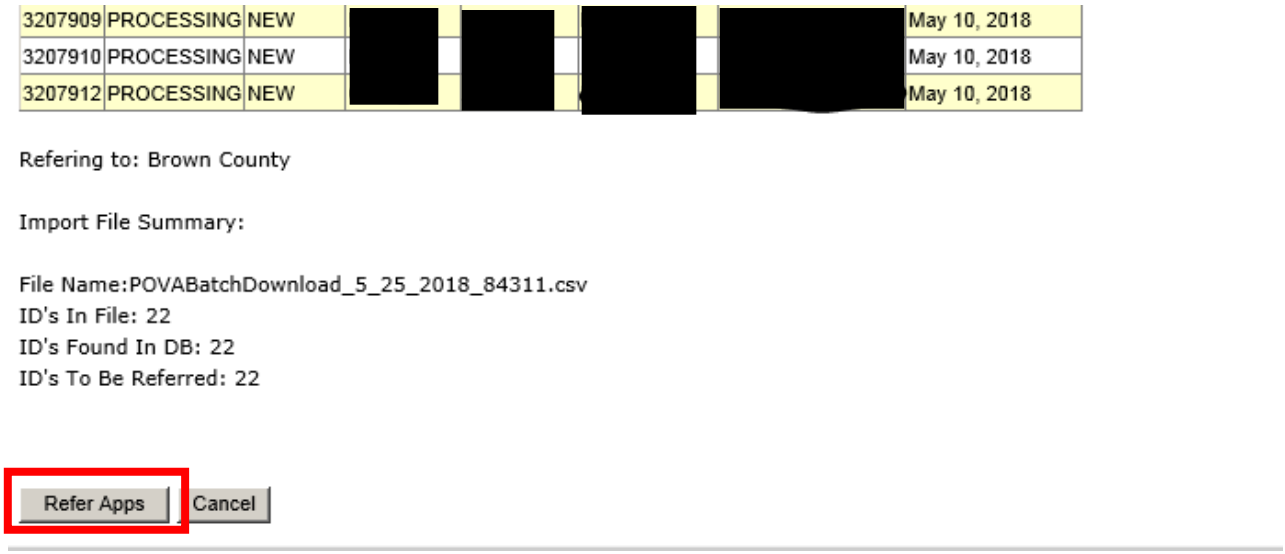


5. Select "Import." The files will now be imported to IVRS:



As indicated above, you can only batch refer to one jurisdiction at a time. Please make sure the applications you want to refer only contain application ID's for the jurisdiction you are referring to.

6. You will be taken to the following page. Make sure to review the jurisdiction that it is being referred to, the app types, and the amount of files. After you have confirmed everything is correct, click "Refer Apps" on the bottom:

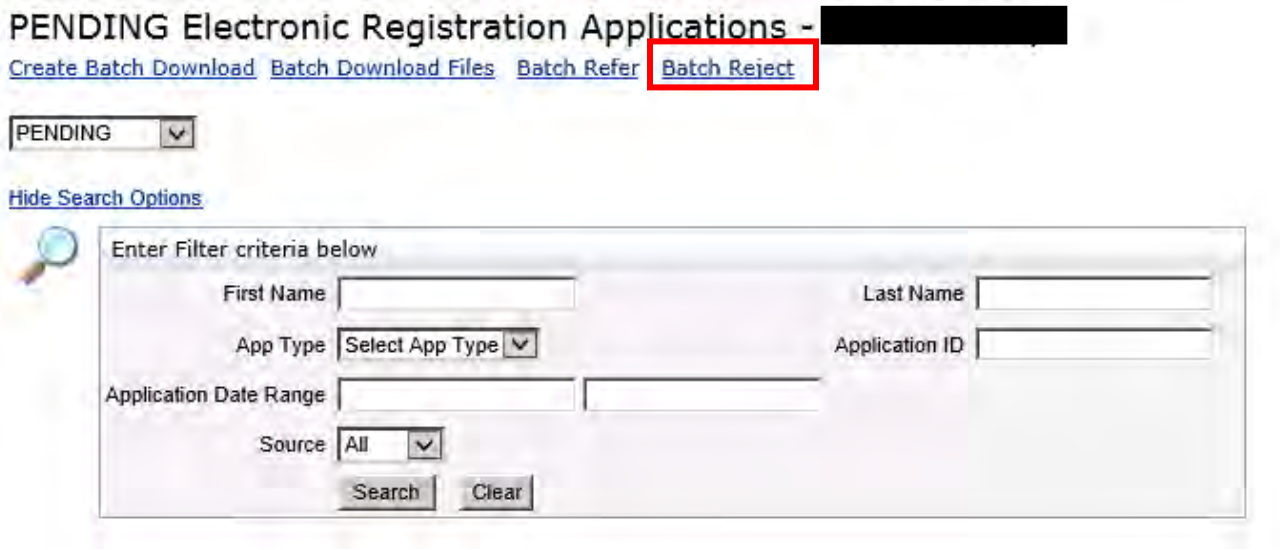


BATCH REJECT

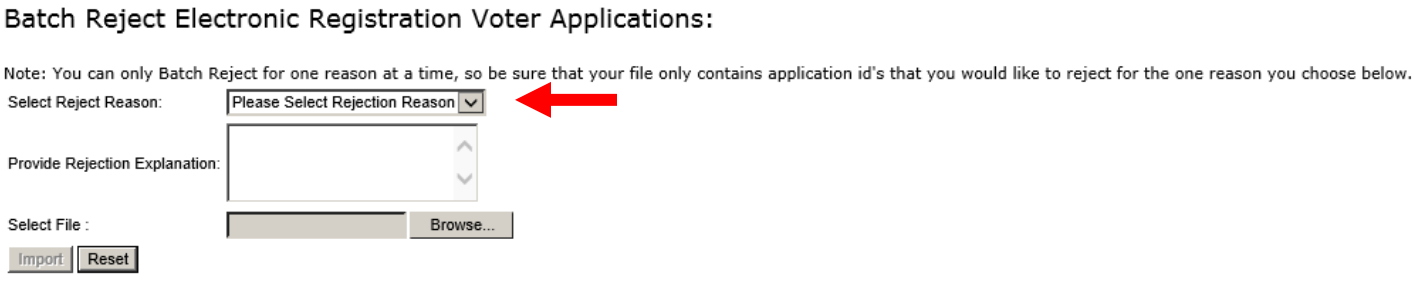
You can also reject an entire batch of applications through the "Batch Reject" method. To process these applications, complete the following:

1. Go back into Batch Download through either "Electronic Registration Applications - Awaiting Viewing" or "Electronic Registration Applications – Awaiting Action," depending upon which data you plan to work with.

2. Select "Batch Reject":

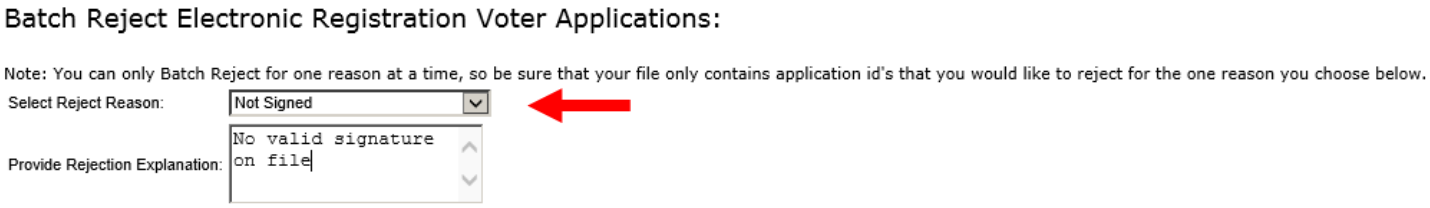


3. You will be brought to the following page. Select the reason from the drop down menu. The choices are "Not Signed," "Incomplete," "Duplicate," and "Does Not Qualify":

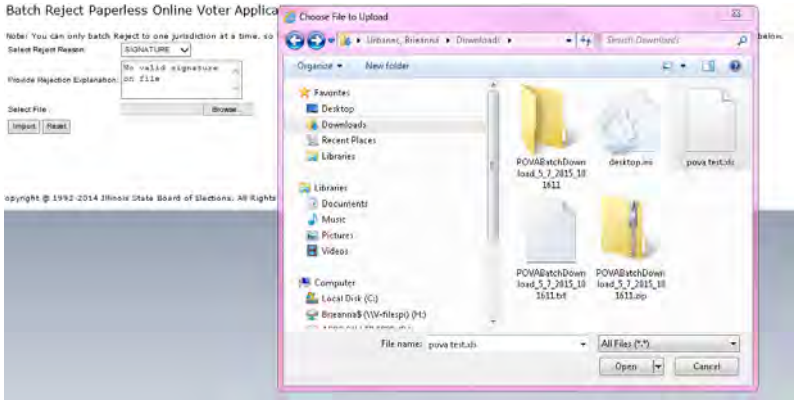


As indicated above, you can only batch reject for one reason at a time. Please make sure the applications you want to reject only contain application ID's for the same reject reason.

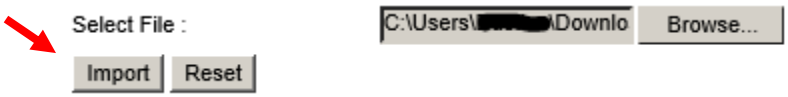
4. Enter an explanation for why the application is being rejected (this must be done before it will allow you to submit it):



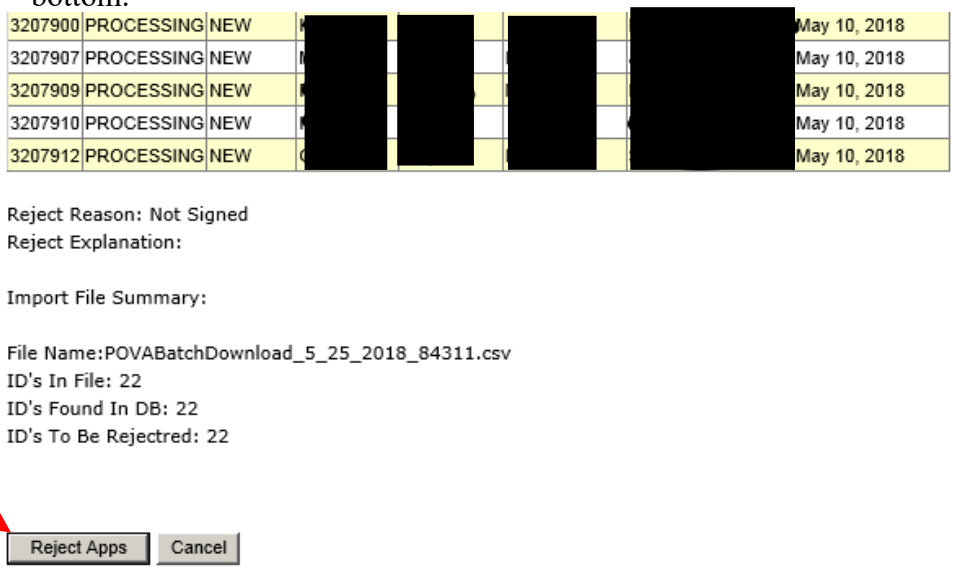
5. Click "browse" and find the saved batch file:



6. Click "Import":



7. You will be brought to this following page. Make sure to review the rejection reason, the app types, and the amount of files. After you have confirmed everything is correct click "Reject Apps" on the bottom.



ELECTRONIC REGISTRATION APPLICATIONS (ERA) MISSING SIGNATURES

There are instances where voter registration applications originating from an agency will be missing a signature. 10ILCS 5/1A-16.7(e) creates provisions for the handling of these records and authorizes the retrieval of a signature from the statewide database. An IVRS bucket titled "Electronic Registration Applications – Potential Voter Signature Matches" has been created to begin the processing of Illinois voter registration applications that do not contain a signature.

Under 10ILCS 5/1A-16.5 you have only FIVE business days to process and send out the notices for any registration obtained through ERA. These instructions will demonstrate the process for handling applications without a signature. When accessing this bucket, you will be provided with potential matches, if they exist, for registered voters who are likely a match with the agency application which is missing a signature. If you believe a match exists in this bucket, you can make a match and the signature will be attached to the new application. If there is no match, the application will still become a Pending registration and you will need to apply the provisions outlined in 10ILCS 5/1A-16.7(e) for Pending Signature Registrations. All work for this bucket must be accessed through the IVRS website.

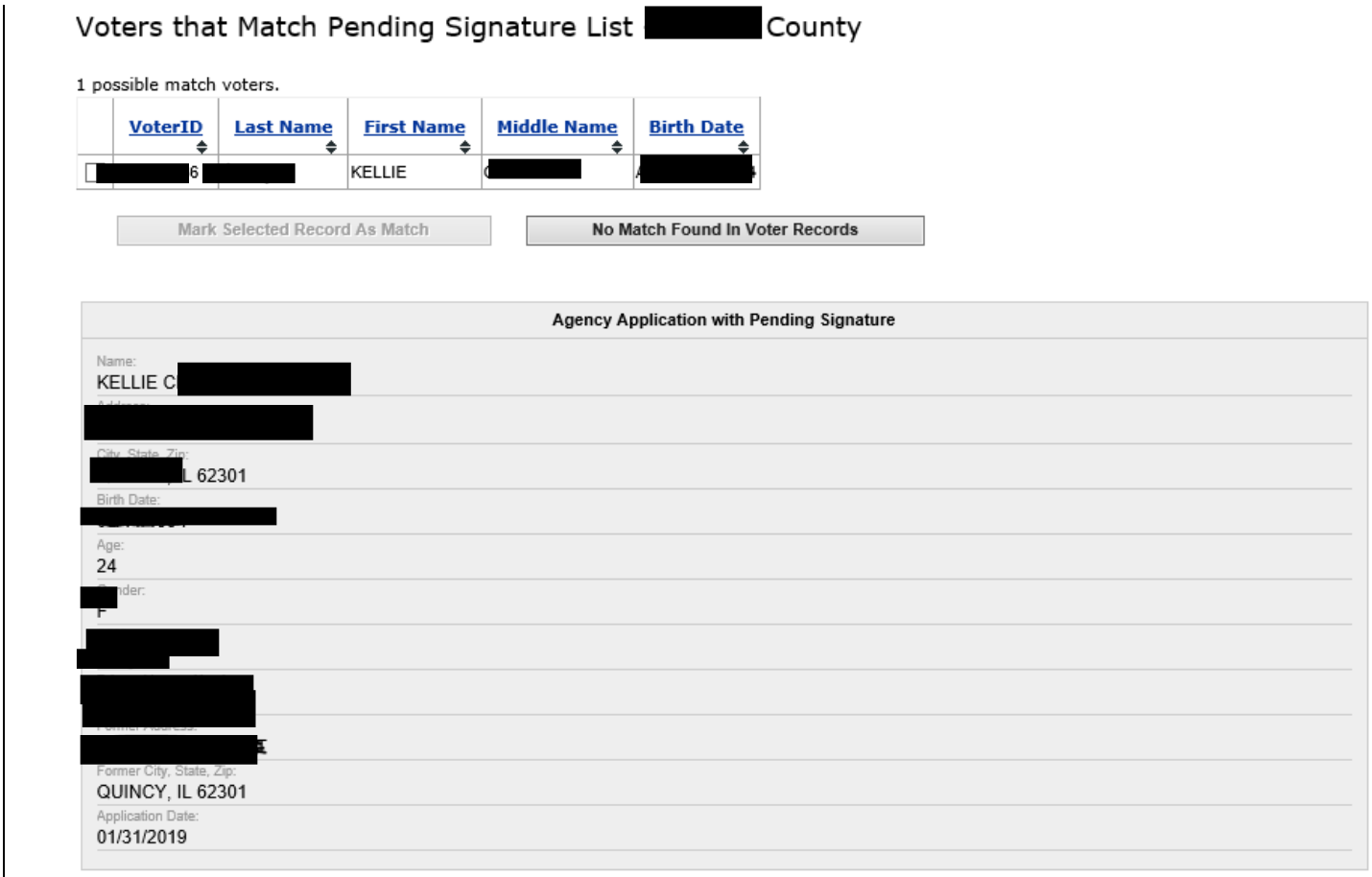
This is the bucket in IVRS which handle Electronic Registration Applications Missing Signatures.



Once you access this bucket, you will be able to view a list of Pending Signatures applications.



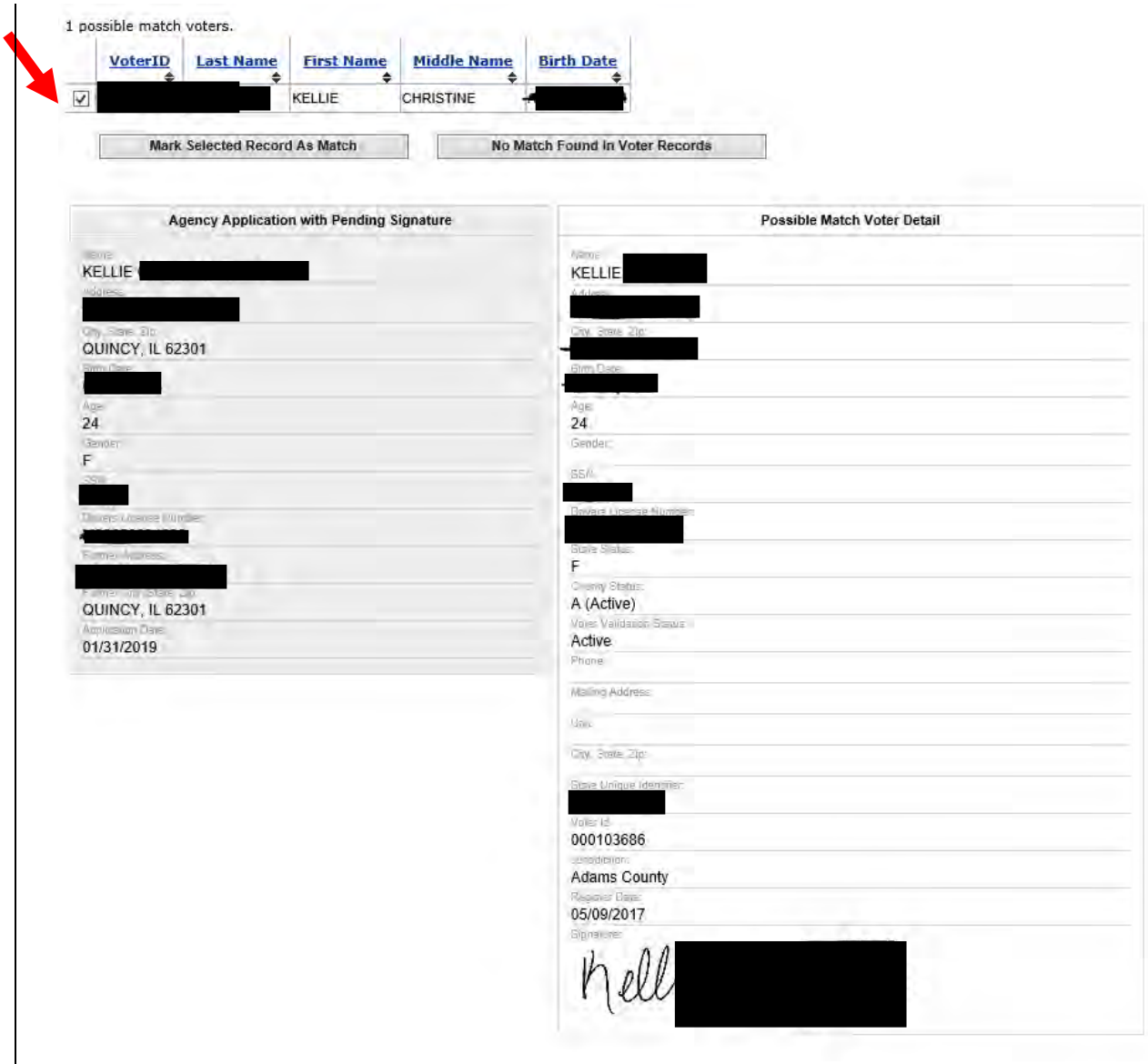
After selecting an application, you will be presented with the following page:



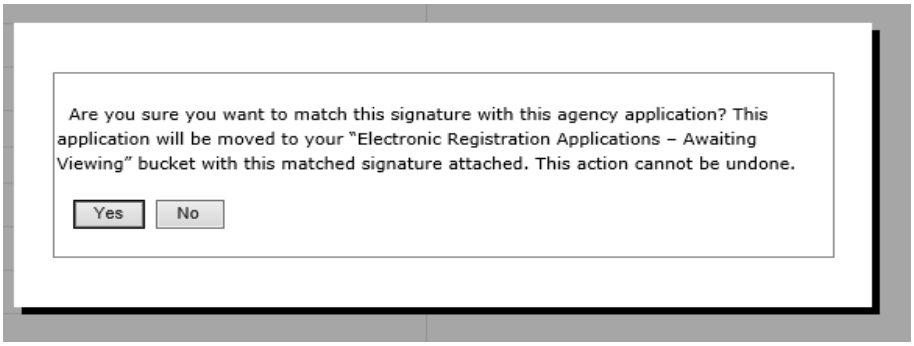
This portion of the page presents details from the POTENTIAL matches:



Once you select a record to view you will be able to compare the NEW application details (on the left) with the POTENTIAL matched voter record (on the right). You will want to compare the details, such as name, date of birth, and additional details that may be available, such as last 4 SSN, Driver's License Number, and Former Address.

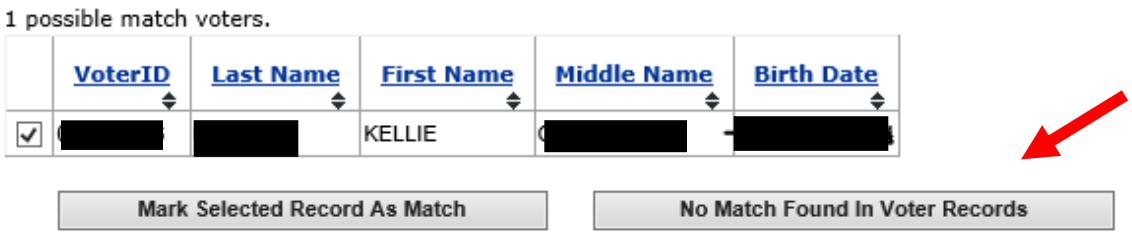


If you believe this voter is a match, and you want to attach the signature to the pending agency application, you can "Mark Selected Record as a Match." Once you do, you will be presented with the following message:

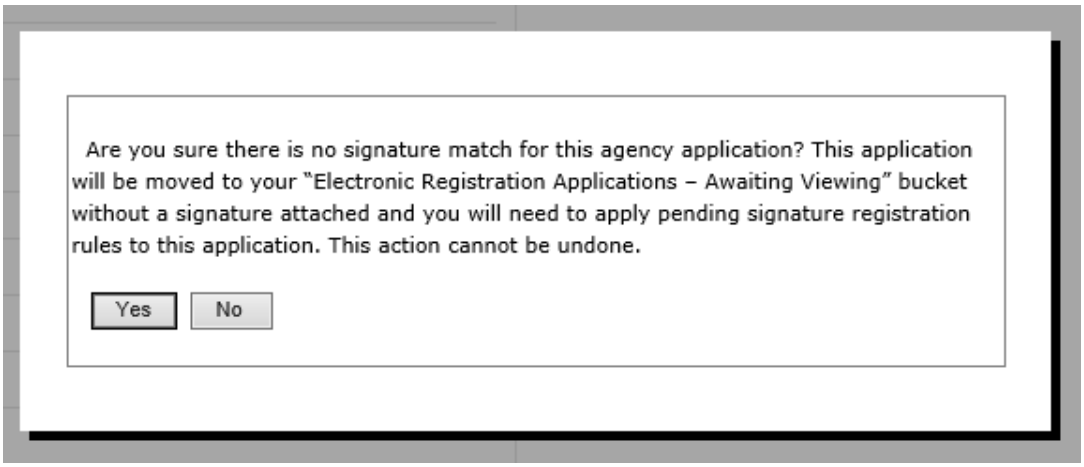


As you can see, once you confirm the match, the application will move to a "Pending" status in your "Electronic Registration Applications – Awaiting Viewing" bucket and you will process the application as you process your standard "Electronic Registration Applications."

If you determine there are NO potential matches available, you will select the "No Match Found In Voter Records." PLEASE NOTE: This action should not be taken for each potential match, but should only occur once if there is no matches available at all.



Once you select the "No Match Found in Voter Records" Option, you will see the following message:



As you can see from the message, if there is no match available, the record will still be transferred to your "Electronic Registration Applications – Awaiting Viewing" bucket. When there is no match available, you will need to apply Pending signature rules, which according to 10ILCS 5/1A-16.7(e),

"The applicant must be notified that his or her registration will remain in a pending status, and the applicant will be required to provide identification that complies with the federal Help America Vote Act of 2002 and a signature to the election authority on Election Day in the polling place or during early voting."

It is recommended to obtain the signature, along with the appropriate documentation as soon as feasible to fully complete the voter's registration.

Whenever you accept a match, or confirm that there are no available matches, you will return to your available Pending Signatures list and you can proceed to your next application.

Pending Signatures for Electronic Registration Applications [redacted] County

630 Electronic Registration Applications Pending Signature.

First Prev 1 2 3 4 5 6 7 8 9 10 ... Next Last Page Size 10 63 Total Pages

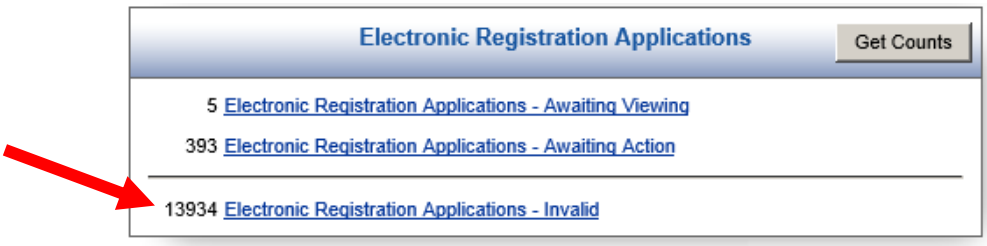
App ID	App Type	Last Name	First Name	Middle Name	Birth Date	Application Date	Jurisdiction Received Date	Status	Agency Code
[redacted]	ADDRESS	[redacted]	DORIS	E	[redacted]	January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		JESSICA	A		January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		RUBY	F		January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		MAKENZY	R		January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		CASEY	S		January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		KEYRO	ANTONIO		January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		KENYA	KR		January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		KELLIE	CHRISTINE		January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		SARAH	BETH		January 31, 2019	January 31, 2019	PENDINGSIG	350
	ADDRESS		CHANDRA	NICKOLE		January 31, 2019	January 31, 2019	PENDINGSIG	350

First Prev 1 2 3 4 5 6 7 8 9 10 ... Next Last Page Size 10 63 Total Pages

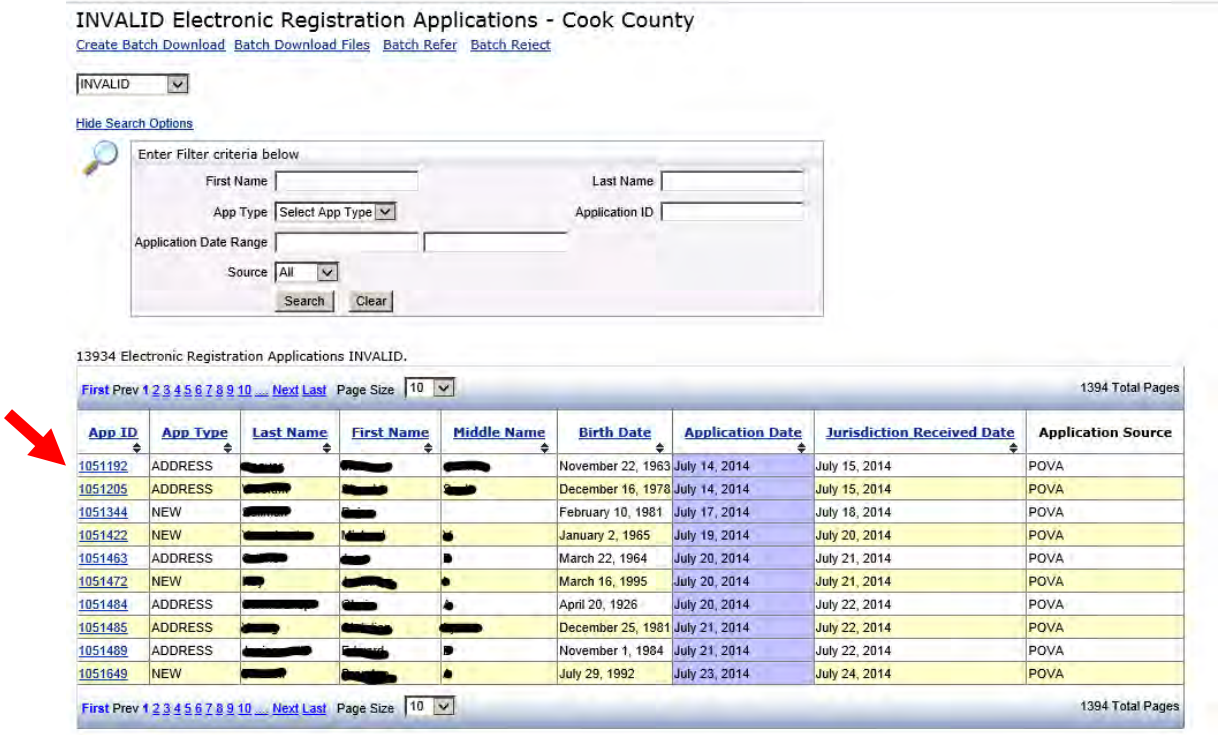
Invalid Electronic Registration Applications

OVA applications end up in this section when they are found to be Invalid because of a mismatch with the Secretary of State (SOS) database. These should be treated as incomplete registrations. This means that you may contact the applicant to inform him/her that their registration is incomplete. Secretary of State "350" applications end up in this section when they are found Invalid because they were submitted by an applicant under the age allowed to apply to register to vote.

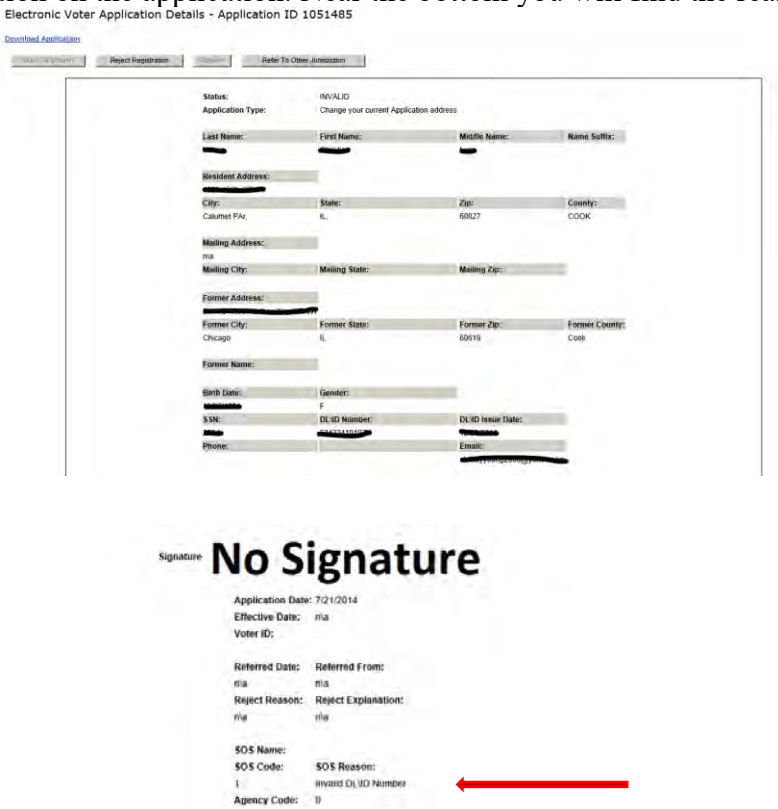
1. Open "Electronic Registration Applications –Invalid"



2. Here you can select the App ID to view the application:



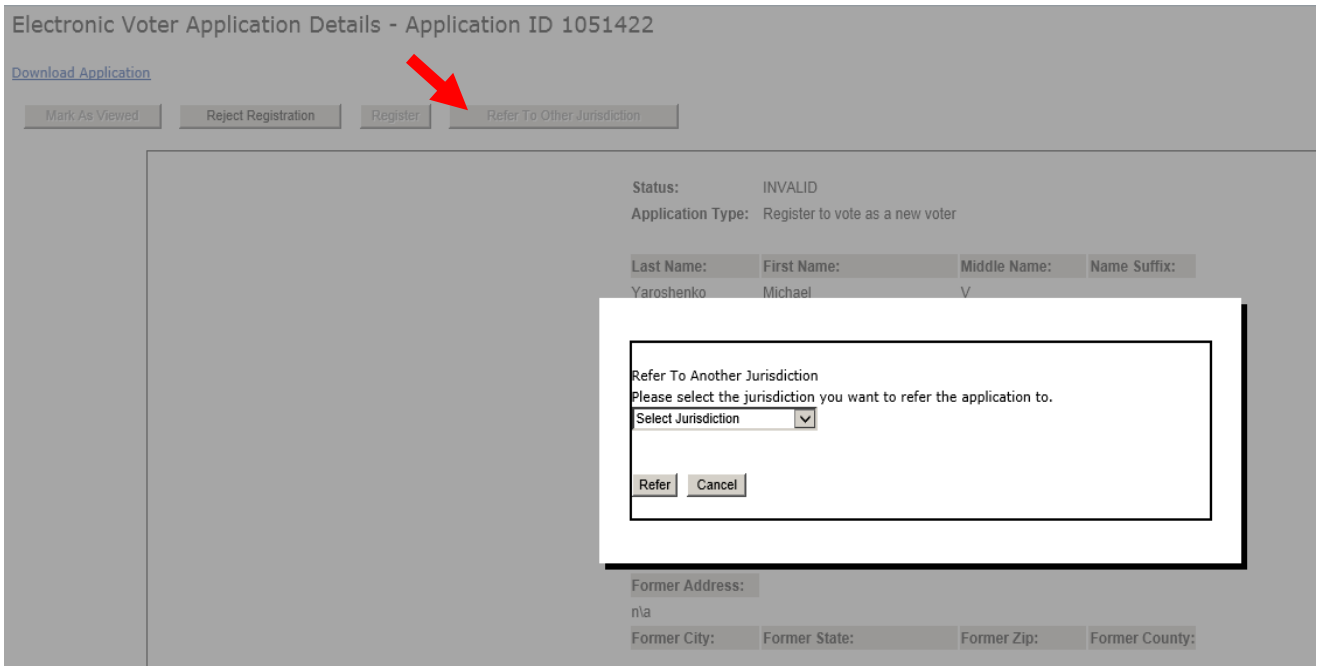
3. Review the information on the application. Near the bottom you will find the reason it was rejected:



4. You can download the application so that you may print it out for further investigation and/or filing.



5. If you determine the voter belongs in a different jurisdiction, select "Refer to other jurisdiction." A box will pop up that will allow you to select the jurisdiction from a drop-down menu. Select the jurisdiction and click refer:

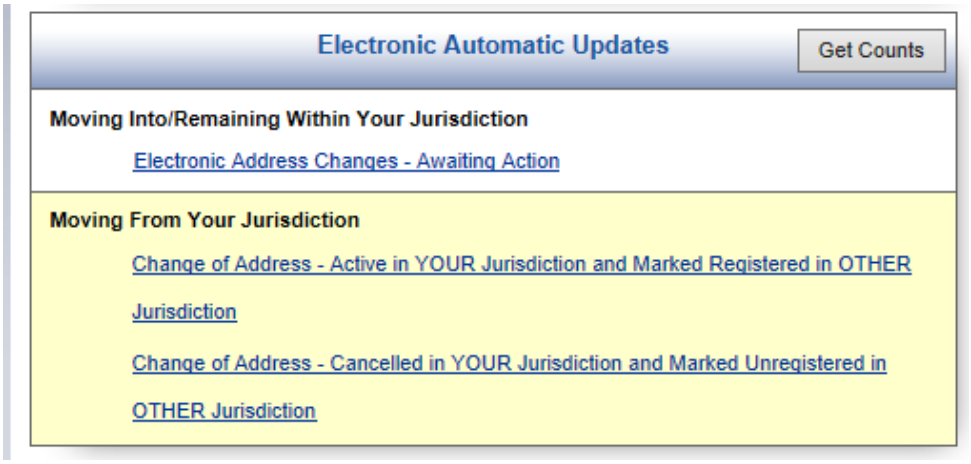


6. You may select "Reject Registration" after an attempt to reach the voter has been made. This will create a pop-up screen. You must select a reason from the drop-down menu (not signed, incomplete, duplicate, does not qualify) and give further explanation (ex: no signature on file) before you will be allowed to click "reject."

INSTRUCTIONS FOR (ERIC)/NCOA-IN STATE UPDATES (EISU)

10ILCS 5/1A-45 requires the State Board of Elections to enter into an agreement with ERIC and 10ILCS 5/1A-16.8 requires the ERIC In-State Updates (EISU) report to be treated in the manner as the National Change of Address (NCOA) automatic updates. The ERIC agreement requires the outreach (in this case, the automatic update of registration) of those identified in their report to be completed within 90 days of the report being provided to the State Board of Elections. **It is imperative that the records are processed through the system correctly in order for IVRS to properly track the data required. If the terms of the agreement are not met by the 90 day deadline the State of Illinois may face removal from the program.**

The voter registration files from your jurisdiction have been compared to identify updated addresses for existing registrants. The information is now available in the newly named Electronic Automatic Updates bucket in IVRS. These voters have been deemed inaccurate or out-of-date, with your voter registration files **at the time of the comparison**; 1A-16.8 states that an election authority shall automatically register any voter who has moved into its jurisdiction from another jurisdiction in Illinois or update the registration if they have moved within its jurisdiction. The processing of all records in the "Electronic Automatic Updates" bucket will be handled the same as the prior NCOA "bucket". The applications are now separated by NCOA and ERIC Instate Updates and will default to the ERIC Instate Updates as these have the 90-day clock for processing.



When a voter is shown to have moved into your jurisdiction or an address has been changed due to NCOA or EISU, the statute states:

> ***The election authority whose jurisdiction includes the new registration address provides the voter an opportunity to reject the change in registration address through a mailing, sent by non-forwardable mail, to the new registration address. (10ILCS 5/1A-16.8)***

If the voter rejects the transfer of their registration based on your mailing; the address change record should be reverted back to the original registration address, or the new registration should be cancelled. Instructions on reverting a record based on rejection of change, are discussed later.

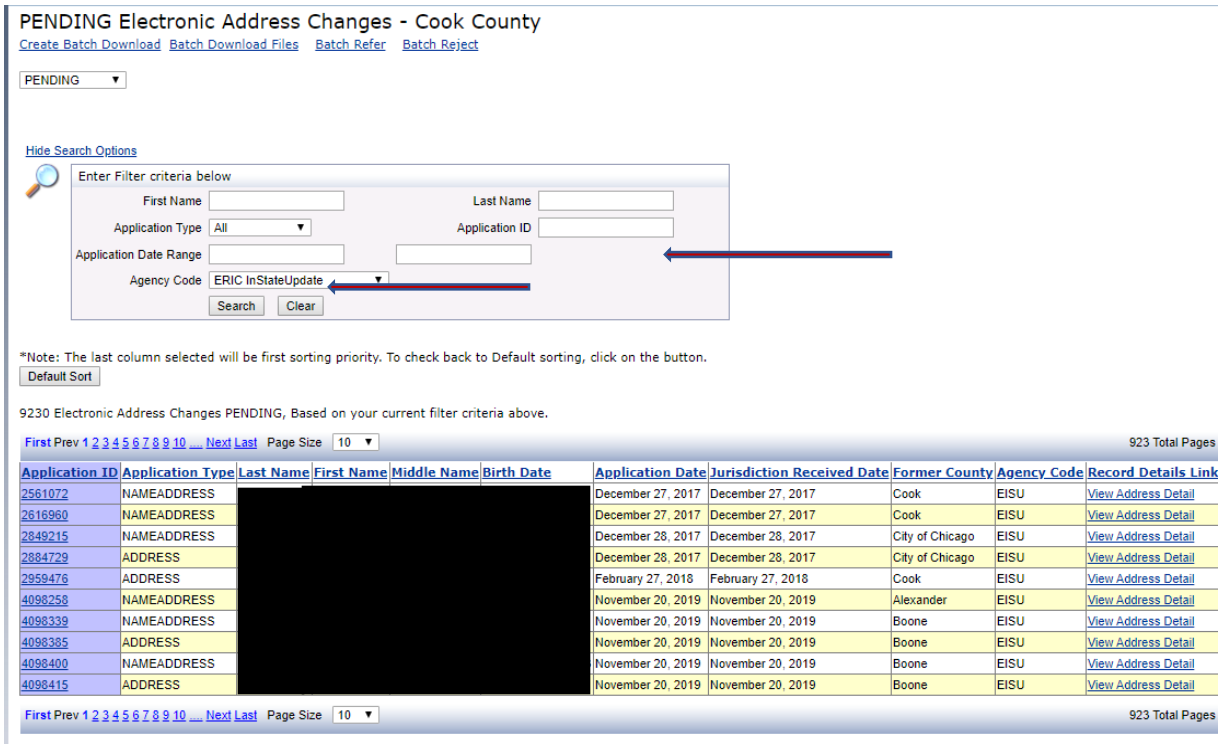
The data will default to ERIC, there are now NCOA and ERIC data in the same bucket however the records remain separate and will have to be located using the function below.

It has been brought to our attention that the ERIC data also includes name changes within the original file. Name changes are not considered an automatic update, at the very least these records will need outreach notifications. Instructions on how to process the data that include a name change are found on page 43 of this manual.

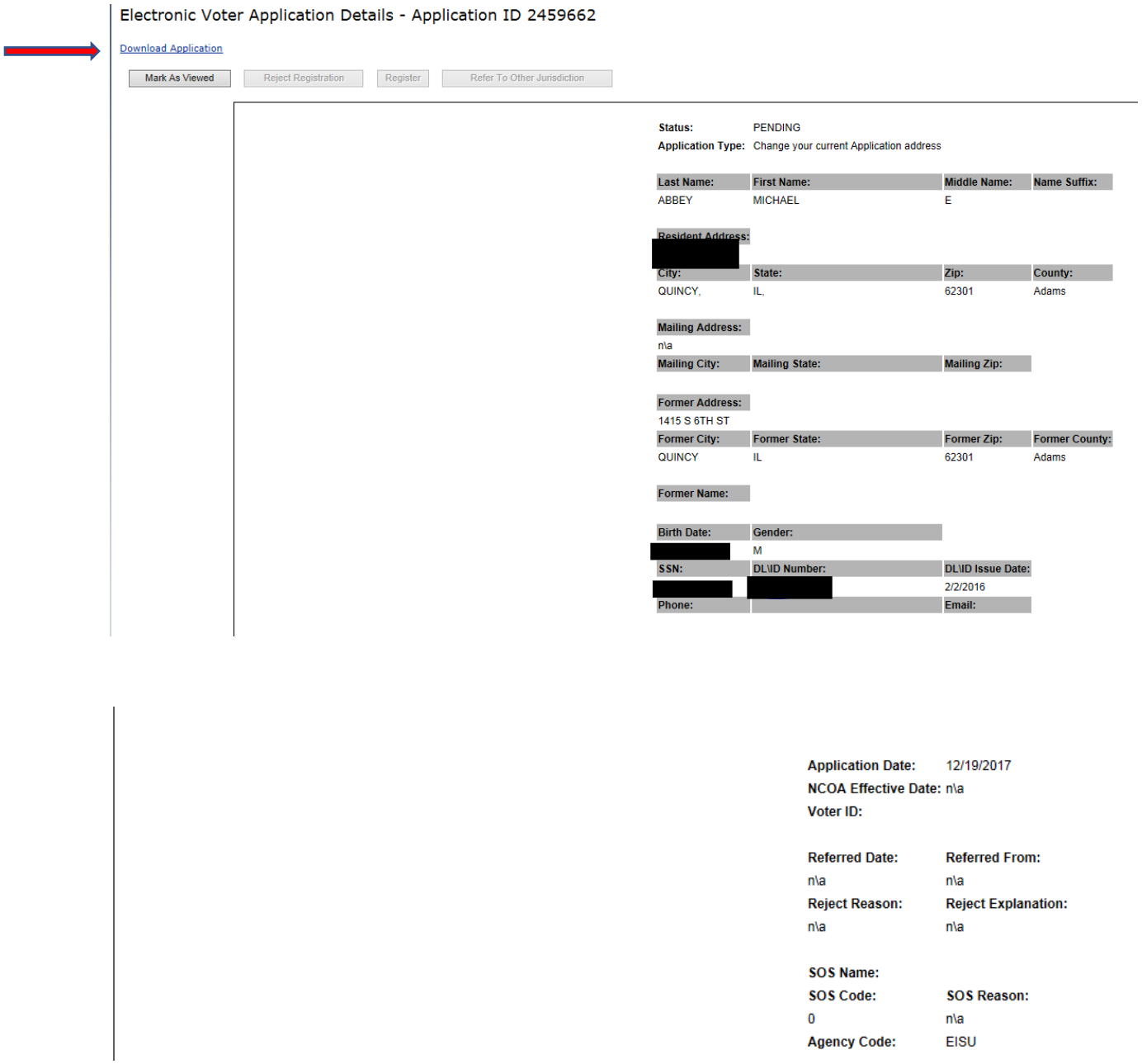


1. On the first page you have the option of choosing “Pending” “Processing” -“Registered” or “Rejected”, from the drop-down menu.

   Pending are those not yet viewed by you or your staff.
   Processing are those that have been marked as viewed or downloaded to print.
   Registered and **Rejected** are completely processed applications.



2. In the search box you have the option now to select the “Electronic App Type” either NCOA or ERIC In-State Updates. Once you have chosen the criteria click the search button to return the desired data. All columns are sortable, click the blue underlined header that you would like in a particular order. To open the record, click the “App ID” to the left of the page



Electronic Voter Application Details - Application ID 2459662

Download Application

Mark As Viewed | Reject Registration | Register | Refer To Other Jurisdiction

Status: PENDING
Application Type: Change your current Application address

Last Name:	First Name:	Middle Name:	Name Suffix:
ABBEY	MICHAEL	E	

Resident Address: [redacted]

City:	State:	Zip:	County:
QUINCY,	IL,	62301	Adams

Mailing Address: n\a

Mailing City:	Mailing State:	Mailing Zip:

Former Address: 1415 S 6TH ST

Former City:	Former State:	Former Zip:	Former County:
QUINCY	IL	62301	Adams

Former Name:

Birth Date:	Gender:
[redacted]	M

SSN:	DL\ID Number:	DL\ID Issue Date:
[redacted]	[redacted]	2/2/2016

Phone:	Email:

Application Date: 12/19/2017
NCOA Effective Date: n\a
Voter ID:

Referred Date:	Referred From:
n\a	n\a

Reject Reason:	Reject Explanation:
n\a	n\a

SOS Name:

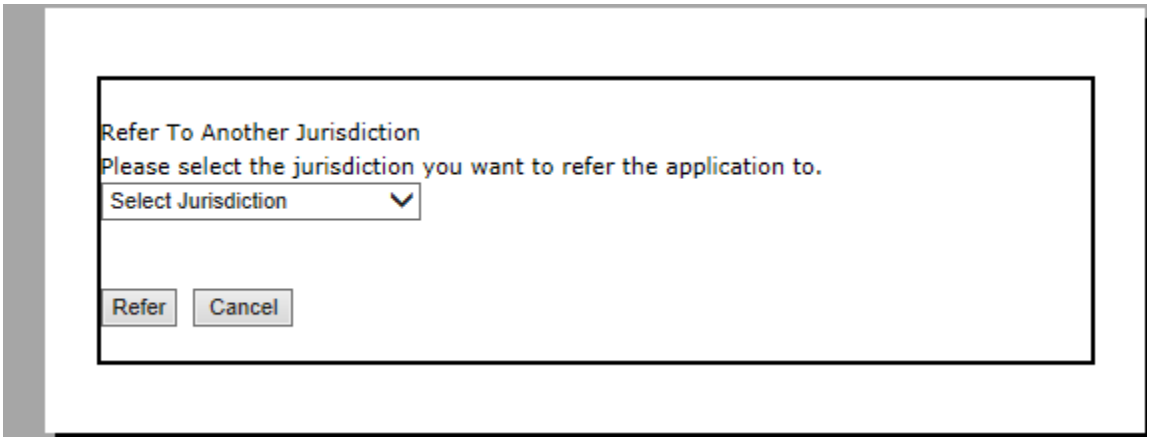
SOS Code:	SOS Reason:
0	n\a

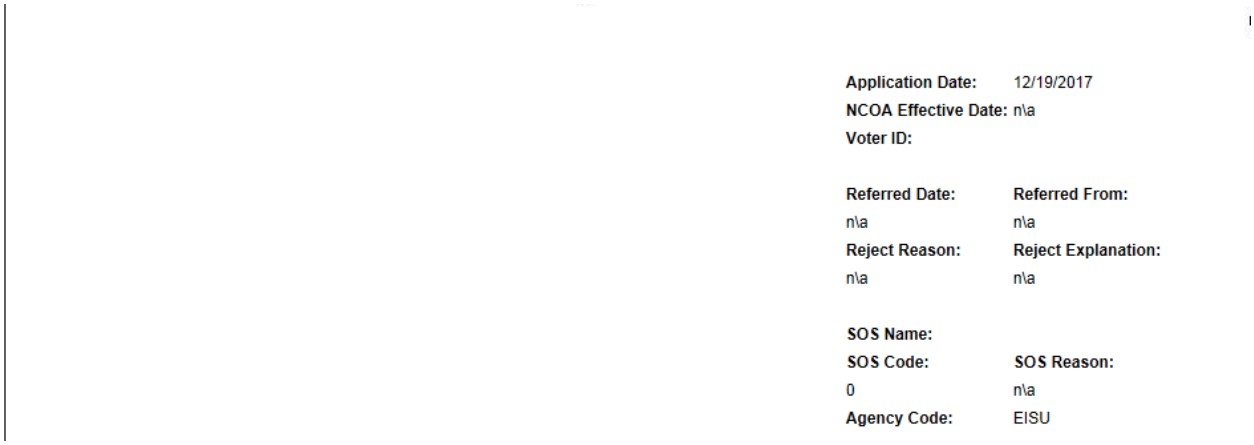
Agency Code: EISU

The application above is a sample of the record. Check to determine if the "Resident Address" is in your jurisdiction. If the address is within your jurisdiction you will either click "Mark as Viewed" at the top or click "Download the Application" depending on the method used. This application will now be moved to the "processing" section in the drop down at the top of the page.

DO NOT REJECT THE RECORD IF IT DOES NOT BELONG IN YOUR JURISDICTION

If the record belongs to another jurisdiction, click "Mark as Viewed" and the other buttons will activate, then select "Refer to Other Jurisdiction". Select the jurisdiction the record belongs to from the drop-down and click "Refer".



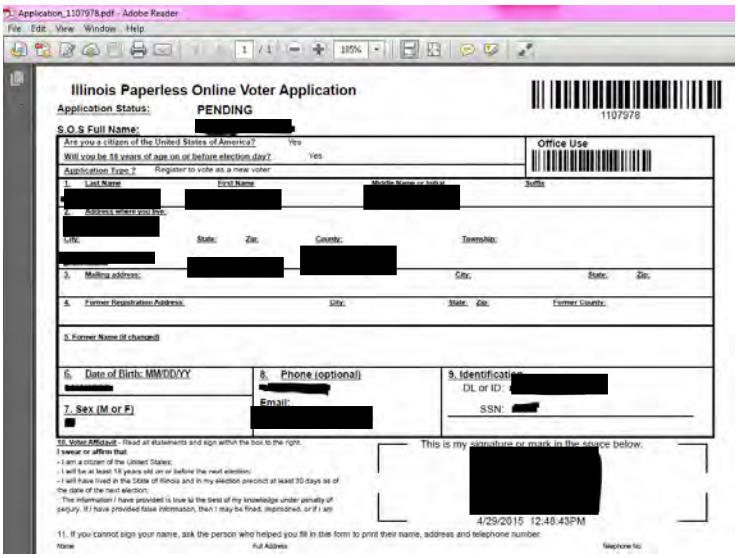


Under the signature image, please disregard the SOS items as they are not applicable to the NCOA/EISU portion. The Application Date is when the record was matched against ERIC data. The Effective Date is the date of the address change by the individual. The "Agency Code" will be either NCOA or EISU.

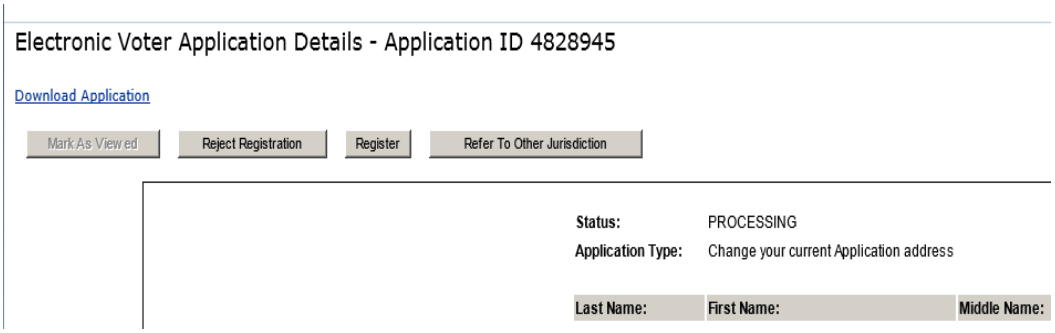
Select "Download Application" (Depending on your browser you may have to "Allow Popup" in order to view the PDF generated.)



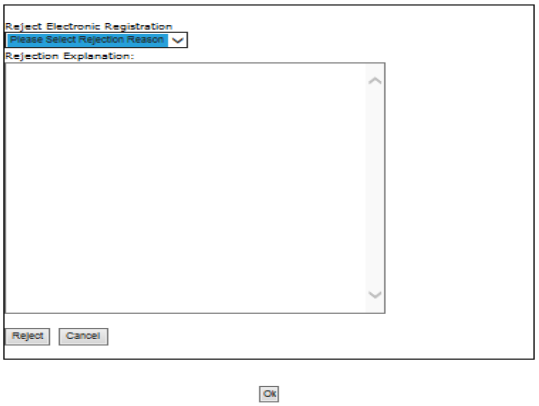
This is the PDF Application it will create. This is the application that you will use in your files. Print it out and treat it similarly to a mail-in registration. Determine if the record will be rejected, registered or referred to another jurisdiction.



After clicking “download application” or “Mark as Viewed”, buttons for Rejecting, Registering, and Referring the application will appear:



To **reject**, choose a reason from the drop-down menu. Sometimes you will need to open a previously registered through NCOA/EISU for a voter because the voter refused the registration or is now deceased. The choices are "Deceased," "Undeliverable," "Refuse Change of Address," "New Registration on File" and "Not a Residential Address." Enter further information in the text box if needed:



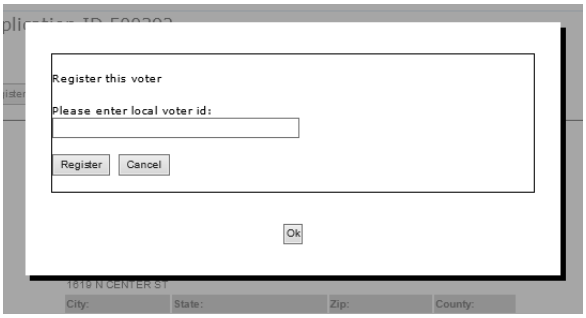
***If a signature is missing from the NCOA /EISU application, please contact our VRS Division**

****Do not "Reject" records containing an address for another jurisdiction.**

If the voter was previously registered, this will reverse the NCOA/EISU registration; the "other" jurisdiction will be notified of the rejection and will then reinstate/un-cancel so the voter stays registered in the "other" jurisdiction.

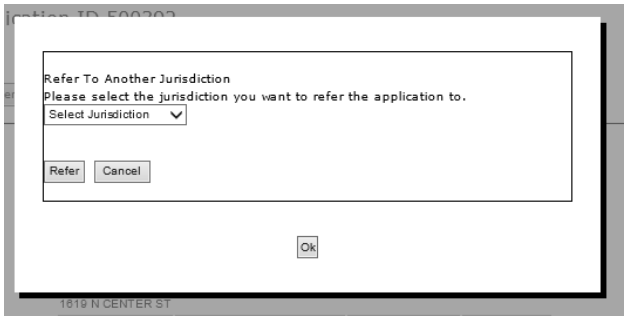
If the record has been determined to be the same person, first update the registration/change of address in your local system. *If your VR system gives you the ability* ***to mark the "Source" as NCOA/EISU*** *then IVRS is designed to automatically mark these as "Registered" without you needing to complete the next step below.*

Open the application up in IVRS. Select "**Register**" in the application screen, enter the Local ID your system assigned to the voter: (again, this step may not be necessary-see above)



*****It is essential for the work flow that these be marked as registered. That notifies the previous jurisdiction that the individual has been registered in another jurisdiction because of NCOA/EISU.**

You will occasionally find an address that does not belong to your jurisdiction– please refer this registration to the correct jurisdiction. Select "**Refer**" on the application screen. Choose the jurisdiction you believe the application belongs to from the drop down list and select "Refer":



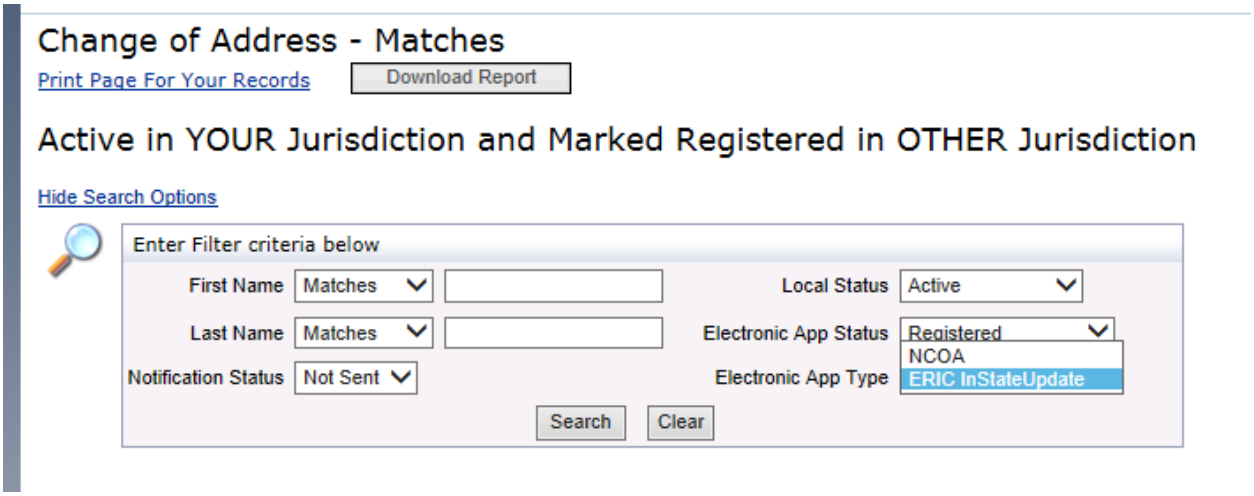
Electronic Automatic Updates – Moving From Your Jurisdiction: Change of Address Active in YOUR Jurisdiction and Marked Registered in OTHER Jurisdiction.

Once the "other" jurisdiction registers a voter that was currently registered in your jurisdiction, you will be notified in the second bucket. When a voter is shown to have moved out of your jurisdiction due to NCOA/EISU; a notice must be sent to the voter by forward-able mail to the previous registration address.

When the election authority whose jurisdiction includes the previous registration address is a different election authority, then that election authority provides the same opportunity through a mailing, sent by forward-able mail, to the previous registration address. (Notification requirements can be found in 1A-16.8 of the Code)

The "same opportunity" mentioned is to "provide the voter the opportunity to reject the change in registration address through a mailing".

The records in "Moving From your Jurisdiction" should not be cancelled until notification is received that the person has been registered in the "other" jurisdiction. The records will process through the "Transfers Out" of Your Jurisdiction" or "Inter-Jurisdiction Matches" sections of IVRS once the other jurisdiction has entered them in their local database and IVRS has found that registration to be a duplicate with your record.



The default display for "Moving from Your Jurisdiction" shows records marked as "Registered" by the other jurisdiction and still "Active" in your local system.

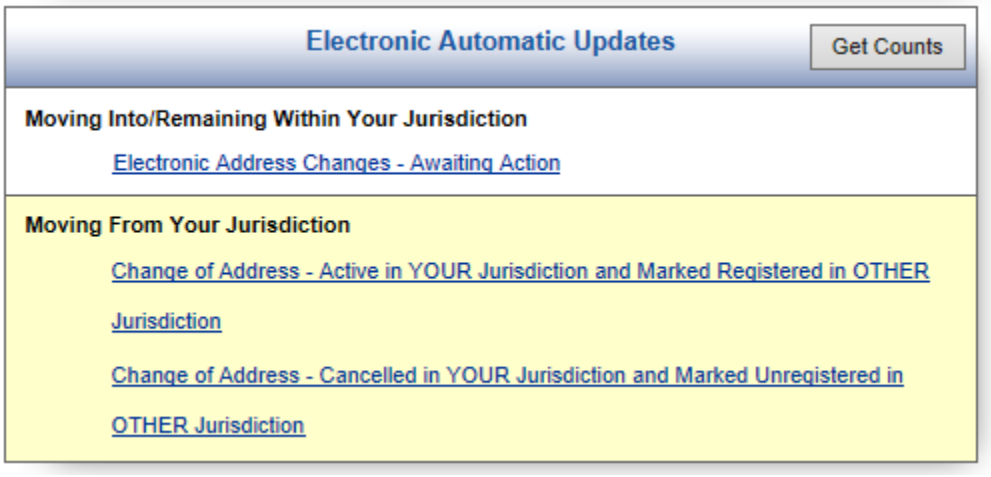
You can change your display at any time by selecting the drop downs for "Local Status "or "Electronic App Type" then hitting the "Search" button. The NCOA/EIUS statuses include "Registered," "Viewed", "Referred", "Rejected", "No Action Taken" or "Moved out of State", and "Unregistered".

You will want to view those marked as "Cancelled" in your local system and "Registered" as the NCOA or EISU Status, to ensure you have sent the proper mailing.

The list is printable for comparisons against the "Transfers Out of your Jurisdiction"

Change of Address - Cancelled in YOUR Jurisdiction and Marked Unregistered in OTHER Jurisdiction - This section pertains to voters who were registered due to NCOA or EISU in the "other" jurisdiction, and are later rejected by the "other" jurisdiction. These voters may have been cancelled in your jurisdiction, and in such case you will need to **reinstate** the voter.

It is important to follow the instructions below to ENSURE the data flows correctly.



The default screen will show Local Status "CANCELLED"; Electronic App Status "UNREGISTERED" depending on what data you are working on you must change the Electronic App Type in the drop down to ERIC Instate Update or NCOA.



Mark the voter record as "Set as Notified" (no actual notice needs to be sent, the purpose is to acknowledge action must be taken on the record and to move it to another category)

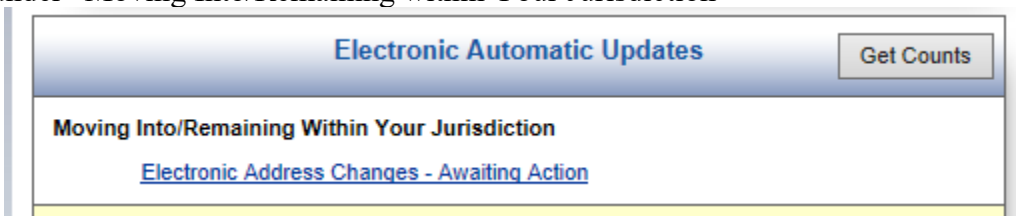


Once the above action has been taken, this voter will need to be reinstated/un-canceled in your local system.

BATCH DOWNLOAD

The Batch Download method is incorporated into the current IVRS website and is offered to those jurisdictions which wish to process applications in bulk. This method allows a jurisdiction to download a zip file from SBE's IVRS for processing (*make sure you have the proper software for unzipping the file*). Though this method still requires a batch file to be processed, data entry is kept to a minimum. Batch Downloads can later be accessed for bulk in-house processing, referring to other jurisdictions, or to mass reject files already reviewed by the jurisdiction.

Select under "Moving Into/Remaining within Your Jurisdiction



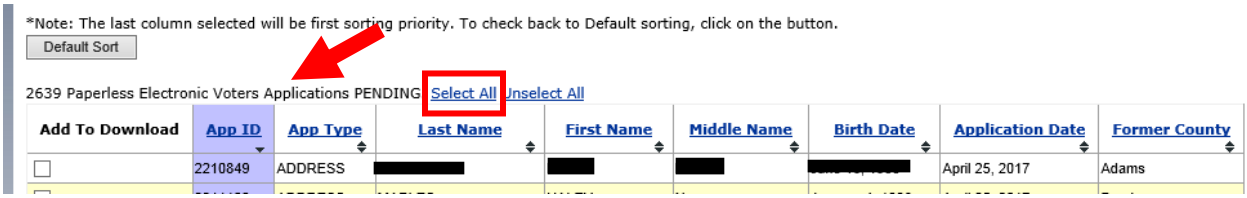
Select "Create Batch Download":



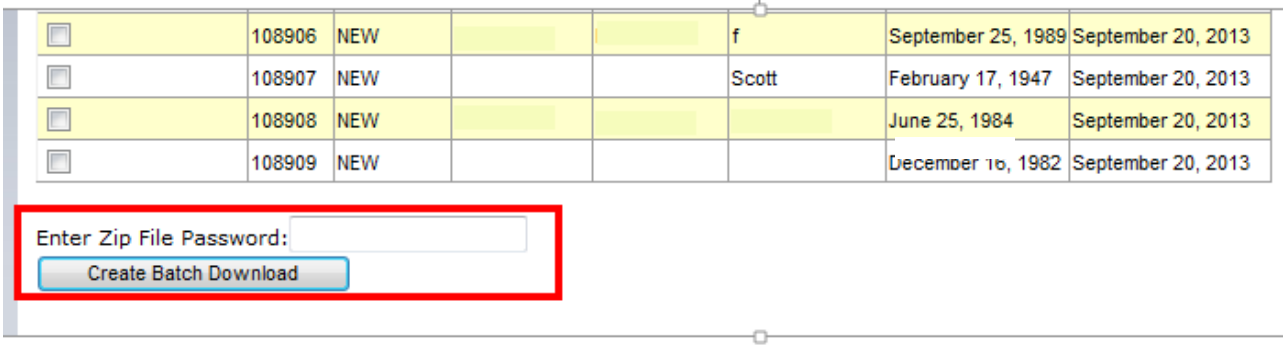
Select which applications you would like to work with through the drop down box. The drop down menu offers "Pending," "Processing," and "Invalid," "Registered" or "Rejected":



Next you will need to choose your specific records. This can be done by clicking "Select All" or clicking the box next to the individual records desired.



After selecting your files, you will have to create a password that will be used for the file

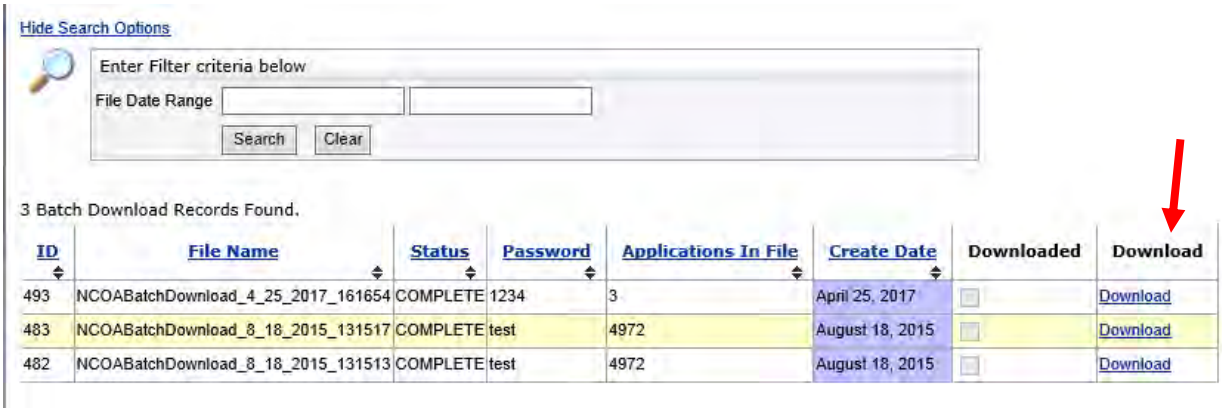


1. Select the "Create Batch Download" button. This will jump you to the Batch Download Records Page:

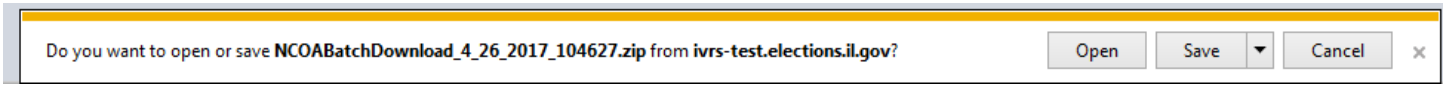


2. Select the "Download" link. Depending on the file size, it may take a while to create. When the Download button lights up blue it is ready:

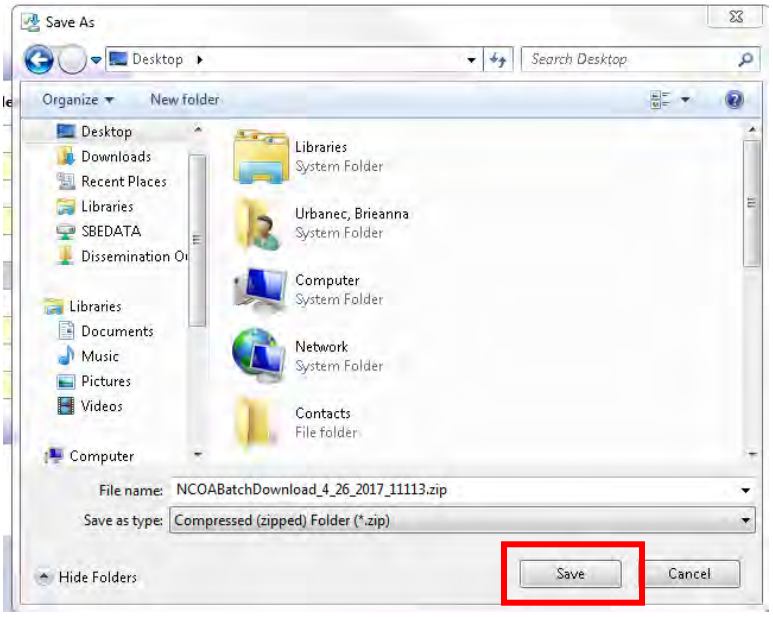
3.



3. Select the down arrow on the "Save" button. Select "Save As".



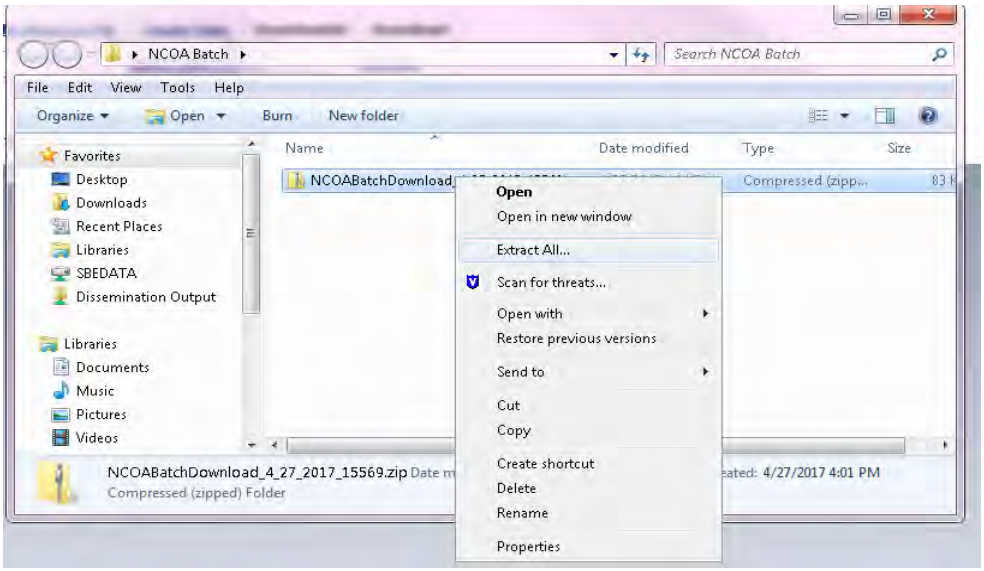
4. Choose the location you would like your file to be saved in then click “Save”



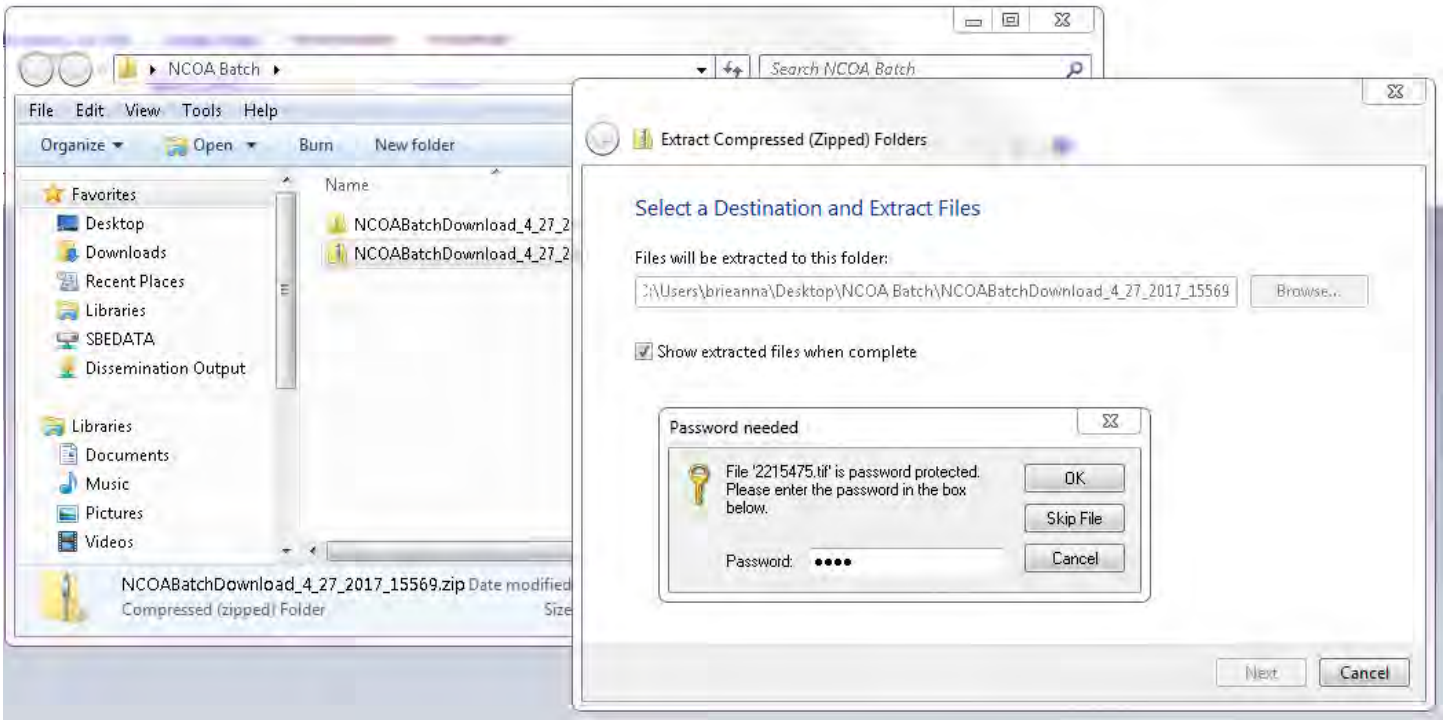
You will be returned to the previous page. Select “Open folder”



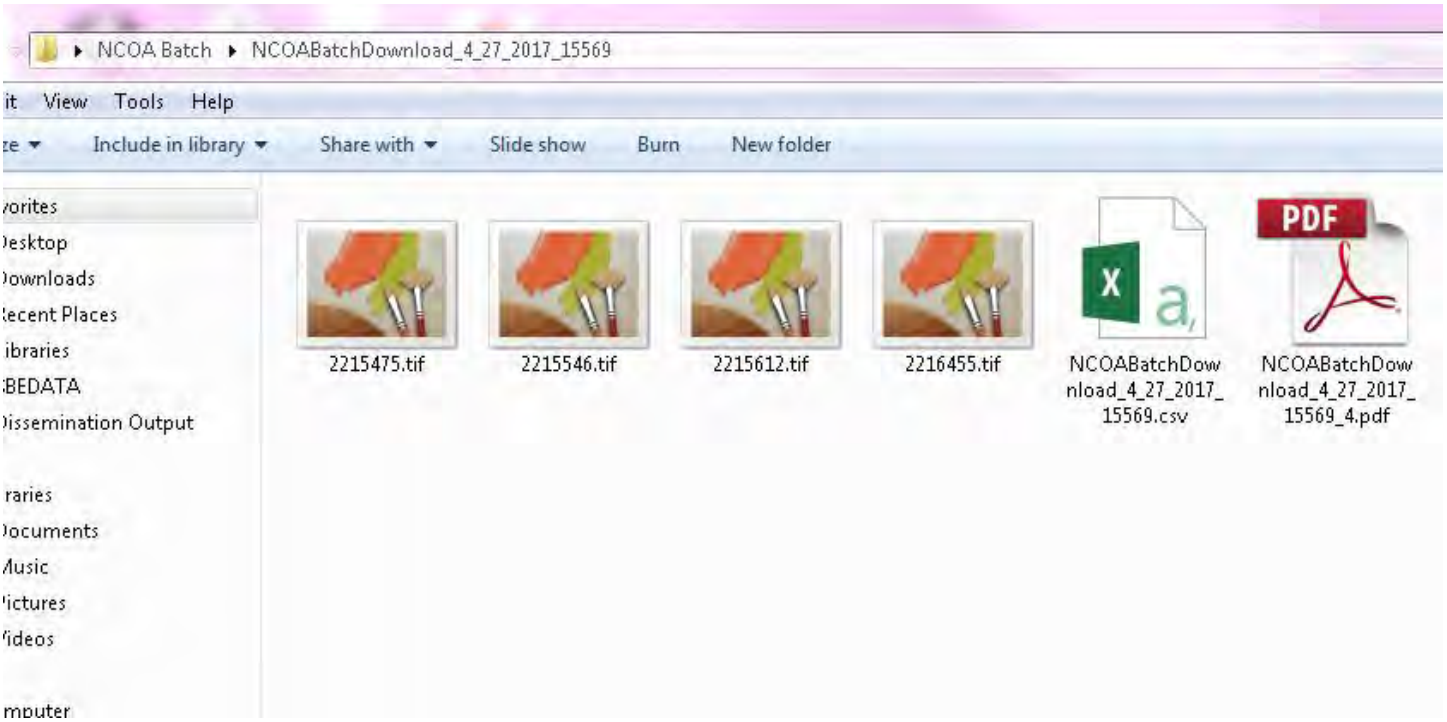
Files will need to be unzipped. Right click the batch download folder. Select “Extract All” or “Unzip”. Please consult your IT Department for instructions on unzipping files if needed.



Enter password created for Batch download

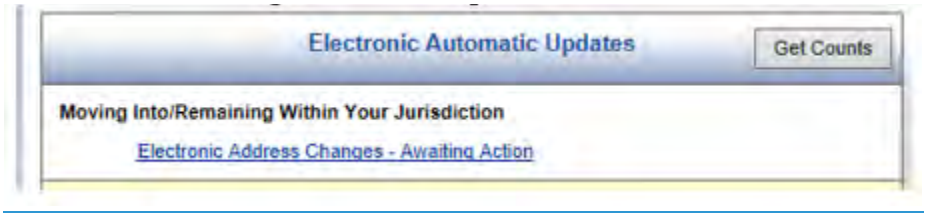


Now files can be opened and viewed

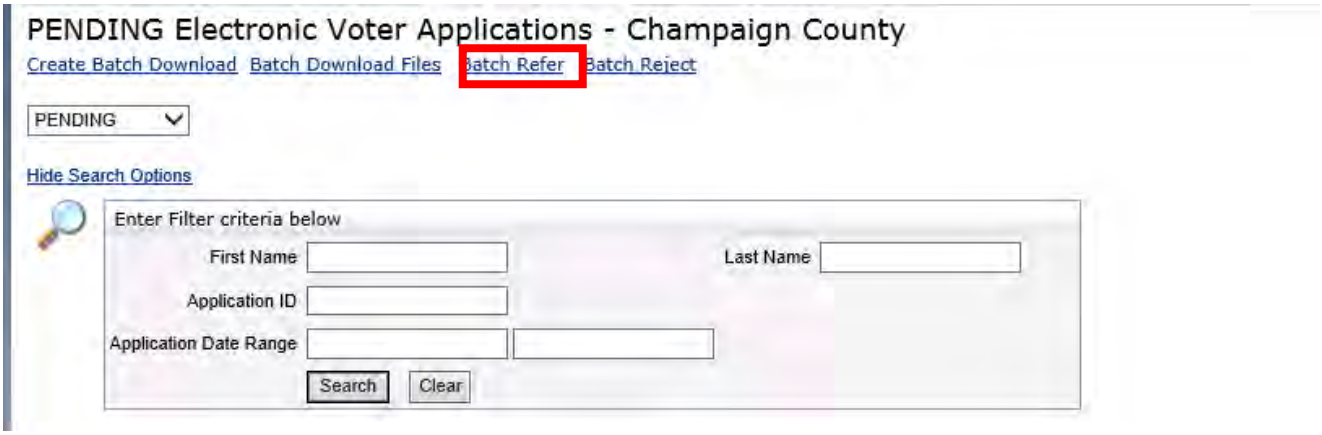


BATCH REFER

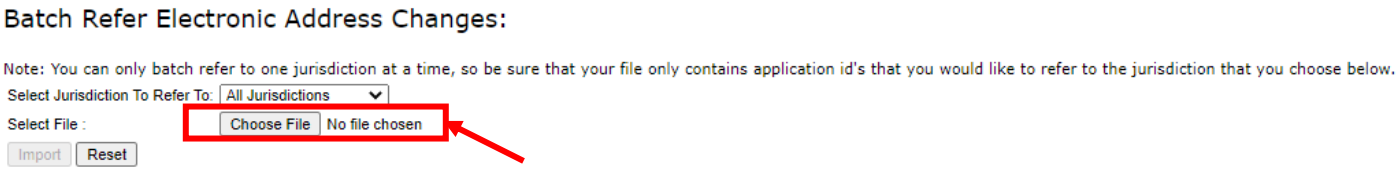
1. Select under "Moving Into/Remaining within Your Jurisdiction



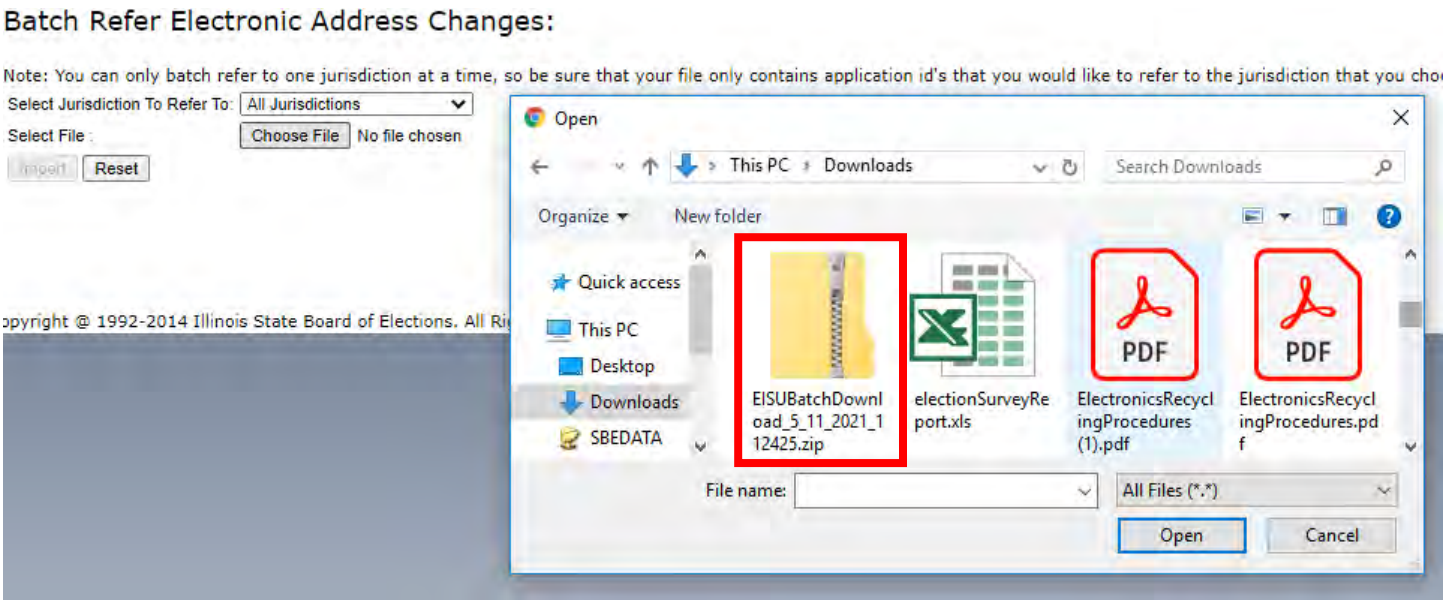
2. Select "Batch Refer":



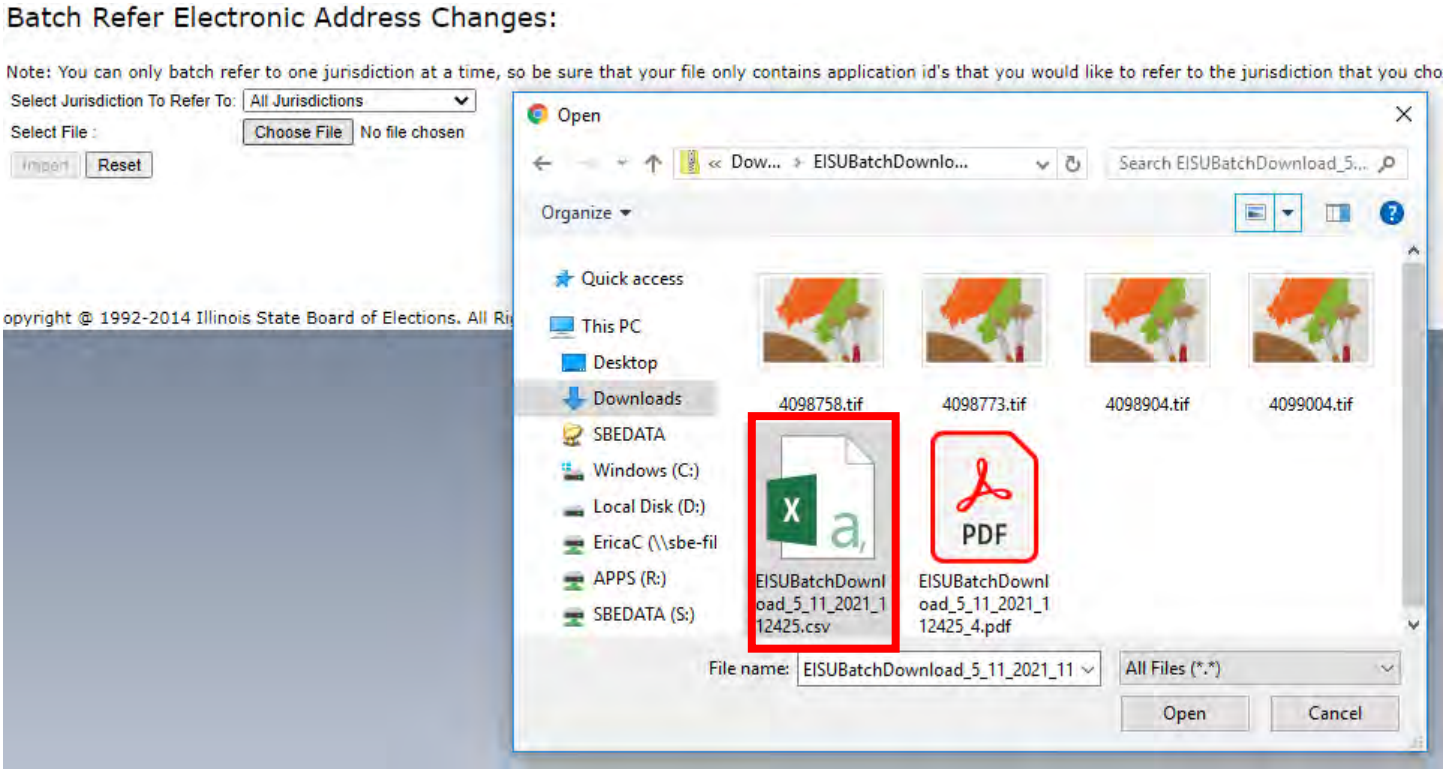
3. From the drop-down menu, select the Jurisdiction to which you are referring the applications:



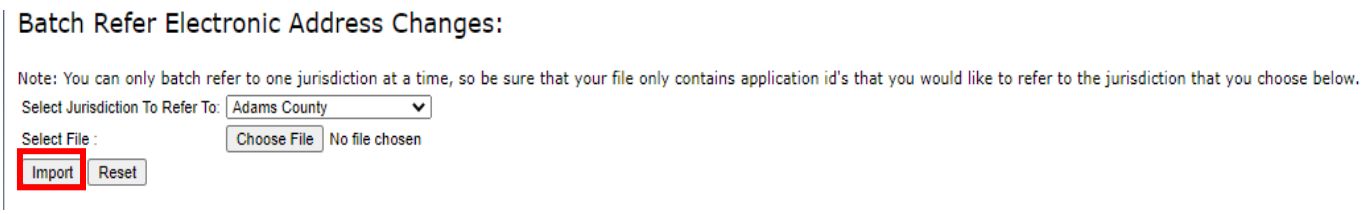
4. Click "choose file" to find the file on your computer: Open the batch download folder and select the CSV file



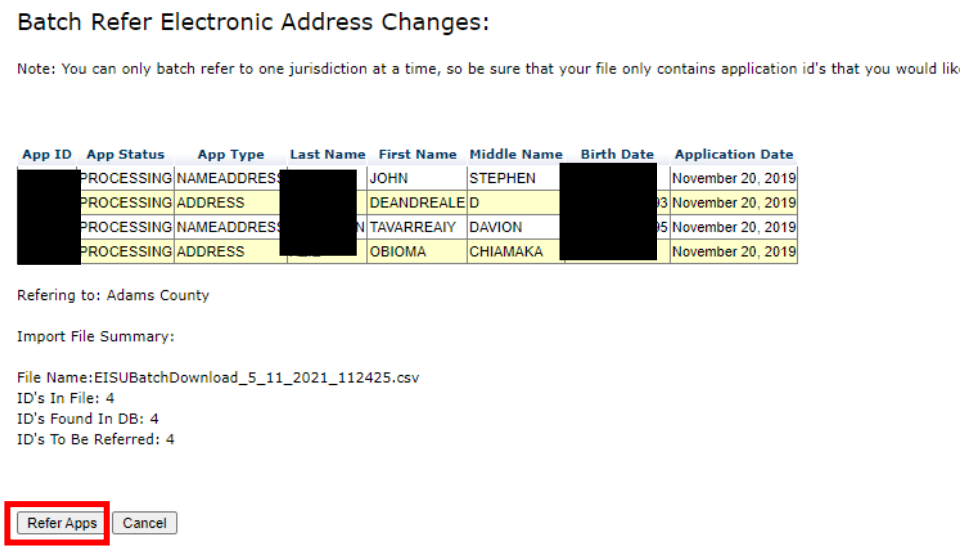
5. Files will need to be unzipped. Right click the batch download folder. Select "Extract All" or "Unzip". Please consult your IT Department for instructions on unzipping files if needed.



6. Select "Import". The files will now be imported to IVRS:

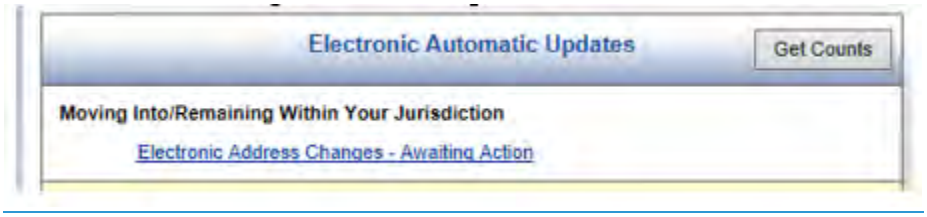


7. Review the jurisdiction that it is being referred to, the names, birthdates and the amount of files. After you have confirmed everything is correct, click "Refer Apps".

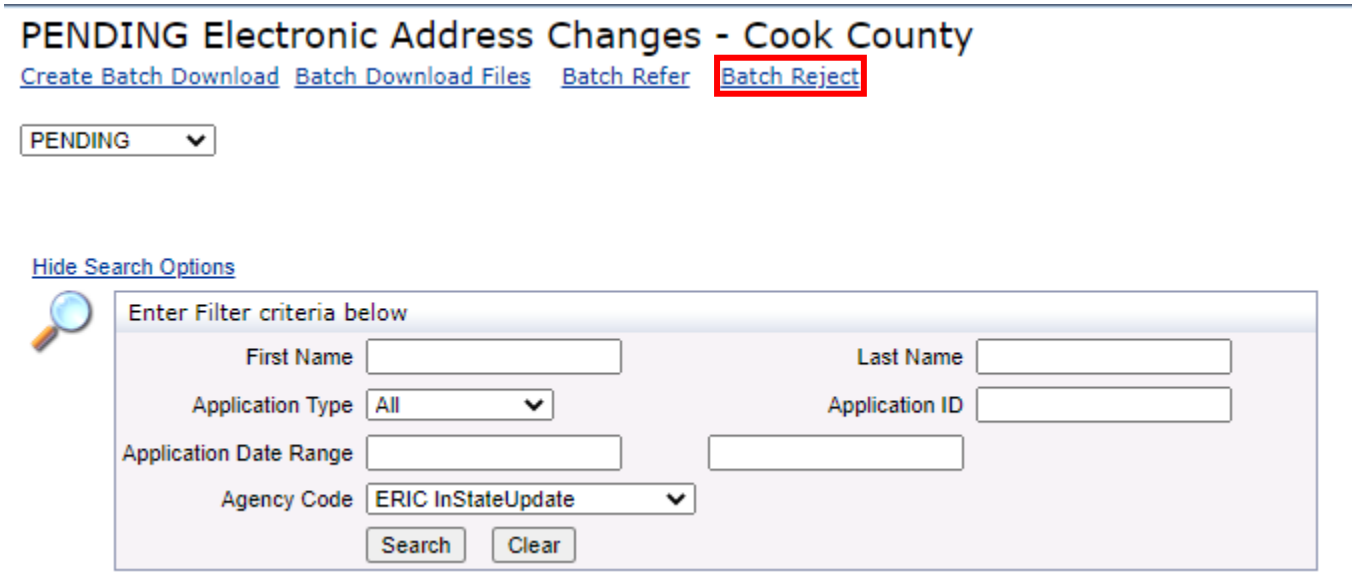


BATCH REJECT

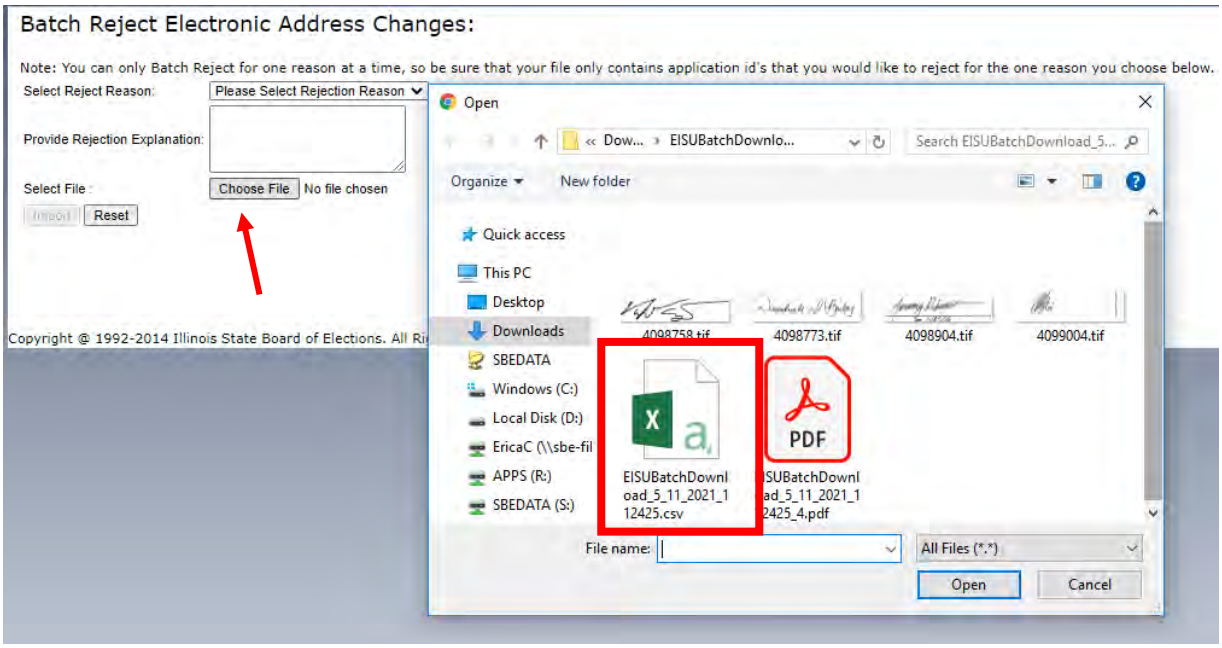
1. Select either option listed under "Moving Into/Remaining within Your Jurisdiction.



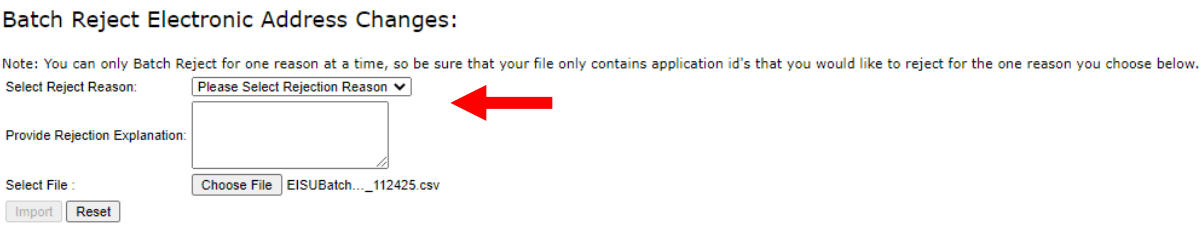
2. Select "Batch Reject":



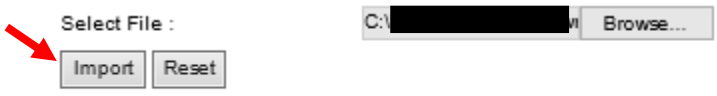
3. Click “Choose File” to find the file on your computer: Open the batch download folder and select the CSV file

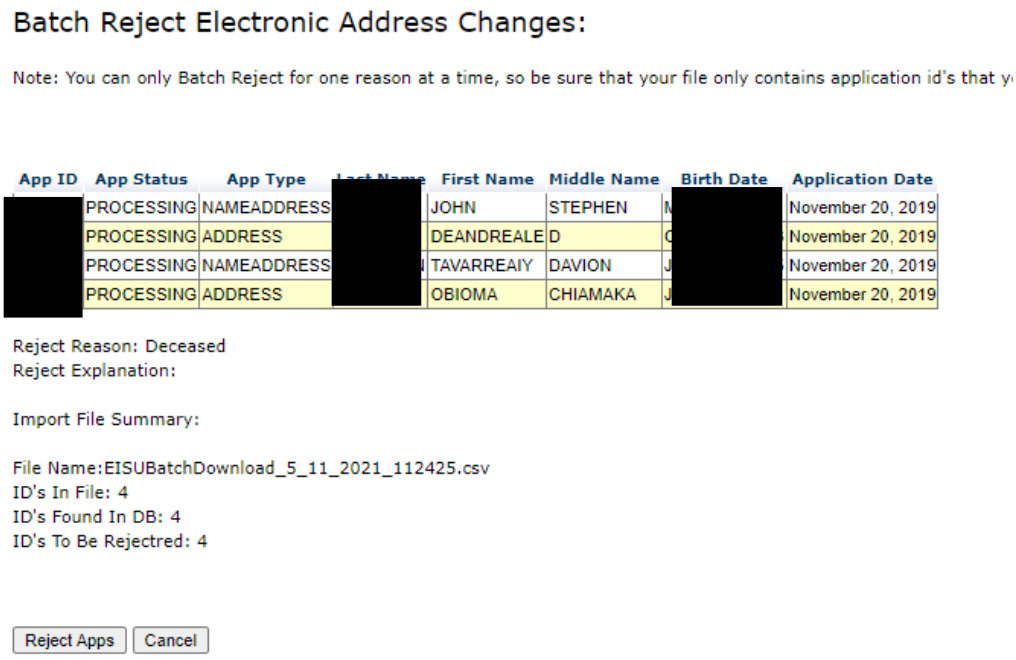


4. Select the reason from the drop down menu. The choices are “Deceased,” “Undeliverable,” “Refuse Change of Address,” and “New Registration on File.” Enter further information in the text box if needed:



5. Click “Import”:



6. Review the rejection reason, the names, and the amount of files. After you have confirmed everything is correct select “Reject Apps” on the bottom.
7. 

Batch Reject Electronic Address Changes:

Note: You can only Batch Reject for one reason at a time, so be sure that your file only contains application id's that y

App ID	App Status	App Type	Last Name	First Name	Middle Name	Birth Date	Application Date
[redacted]	PROCESSING	NAMEADDRESS	[redacted]	JOHN	STEPHEN	[redacted]	November 20, 2019
	PROCESSING	ADDRESS		DEANDREALE	D		November 20, 2019
	PROCESSING	NAMEADDRESS		TAVARREAIY	DAVION		November 20, 2019
	PROCESSING	ADDRESS		OBIOMA	CHIAMAKA		November 20, 2019

Reject Reason: Deceased
Reject Explanation:

Import File Summary:

File Name:EISUBatchDownload_5_11_2021_112425.csv
ID's In File: 4
ID's Found In DB: 4
ID's To Be Rejectred: 4

Reject Apps Cancel

WEB SERVICES

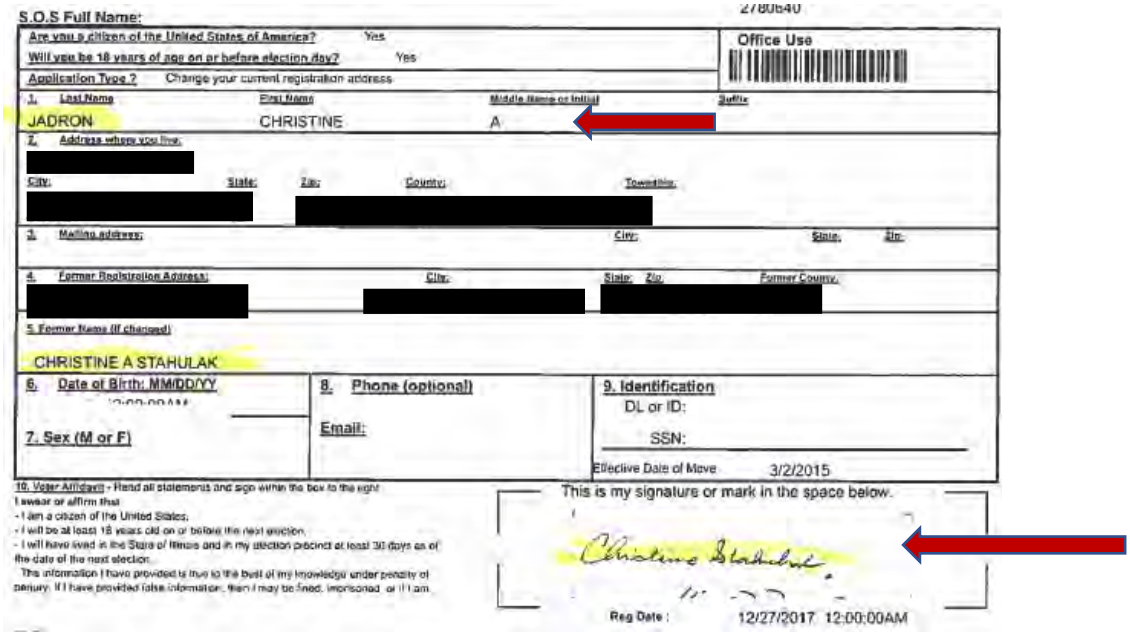
The programming for Web Services is a behind the scenes application that runs in your existing Election Management System (EMS). It will be installed by your current EMS vendor and configured to seamlessly upload and process NCOA/EISU applications. The programming extracts the information from IVRS with a “Source” of NCOA/EISU to be processed.

Due to the newest reject reasons not being sent out in POVA Web service specifications, if you feel a voter should be reverted back to the moving out of jurisdiction because of being a deceased voter, voter refuses change of address, card comes back undeliverable, or the registration address is not a valid address and you are using web services without the new reasons in place yet, then OTHER should be selected as the reject reason and for rejection description needs to start with the word “Undo”. If a voter has a newer registration on file just select Duplicate as your reject reason if you are still using the old codes. These reasons have already been limited on the IVRS web site, so if your jurisdiction doesn’t use web services for POVA, NCOA, or EISU then you will select the new reasons.

PROCESSING RECORDS THAT APPEAR TO HAVE A NAME CHANGE

Once the data has been compared through ERIC it may have been determined that the driver's license facility has a newer name on file for the voter than what is on file in IVRS. These "name change" records do not qualify for the automatic update. By examining the record below, you can see that the former name and the signature match, however the new name does not have an existing voter registration record in IVRS, therefore a correct signature for the person is missing. These types of records will need at a minimum some form of contact conducted to stay within the ERIC guidelines of voter outreach. Once the outreach has been completed the record will need to be rejected as "unable to obtain current signature". This new rejection reason is not to be used for applications that do not have a signature attached, that issue needs to be handled by calling the VRS Division at our office.

The example below show's a name change. The new name is on line 1 of the application; former name is on line 5, and the signature is the same as the former name. After an outreach has been sent, you will reject the registration s "unable to obtain current signature".


S.O.S Full Name:

Are you a citizen of the United States of America? Yes

Will you be 18 years of age on or before election day? Yes

Application Type ? Change your current registration address

Office Use

1. Last Name: JADRON | First Name: CHRISTINE | Middle Name or Initial: A | Suffix:

2. Address where you live:

City: State: Zip: County: Township:

3. Mailing address: City: State: Zip:

4. Former Registration Address: City: State: Zip: Former County:

5. Former Name (if changed): CHRISTINE A STAHULAK

6. Date of Birth: MM/DD/YY

7. Sex (M or F)

8. Phone (optional)

Email:

9. Identification

DL or ID:

SSN:

Effective Date of Move 3/2/2015

10. Voter Affidavit - Read all statements and sign within the box to the right

I swear or affirm that

- I am a citizen of the United States,
- I will be at least 18 years old on or before the next election,
- I will have lived in the State of Illinois and in my election precinct at least 30 days as of the date of the next election.

This information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, then I may be fined, imprisoned, or (if I am

This is my signature or mark in the space below.

Christine Stahulak

Reg Date: 12/27/2017 12:00:00AM

Illustrated in the next few samples are different examples of records that may be contained in the data. Hyphenated names will be in the listing, these will need to be examined to determine if the name has actually changed. If the name has indeed changed, an outreach will need to be sent to the voter and then you will reject the registration using the “unable to obtain current signature”.


S.O.S Full Name:

Are you a citizen of the United States of America? Yes

Will you be 18 years of age on or before election day? Yes

Office Use

Application Type ? Change your current registration address

1. Last Name: MURPHY BOREL | First Name: ANN | Middle Name or Initial: L | Suffix:

2. Address where you live: 2692 STONE CIR UNIT 105

City: [redacted] State: Zip: County: Township:

3. Mailing address: City: State: Zip:

4. Former Registration Address: City: State: Zip: Former County:

5. Former Name (if changed): ANN LOUISE BOREL

6. Date of Birth: MM/DD/YY 12:00:00AM

7. Sex (M or F) F

8. Phone (optional) Email:

9. Identification DL or ID: SSN:

Effective Date of Move : 7/29/2017

10. Voter Affidavit - Read all statements and sign within the box to the right. I swear or affirm that:
- I am a citizen of the United States
- I will be at least 18 years old on or before the next election.
- I will have lived in the State of Illinois and in my election precinct [redacted] the date of the next election.
- The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, then I may be fined, imprisoned, or if I am

This is my signature or mark in the space below.

You must sign and send

Reg Date : 12/27/2017 12:00:00AM

11. If you cannot sign your name, ask the person who helped you fill in this form to print their name, address and telephone number.

Other records have a difference of an initial versus the name completely spelled out, some the only difference will be a misspelling somewhere in the name fields. This information can be used to make updates to your records or in the case of a misspelling the validation tool in IVRS can be used to determine the correct name. These type of records should be marked as registered.


S.O.S Full Name:

Are you a citizen of the United States of America? Yes

Will you be 18 years of age on or before election day? Yes

Office Use

Application Type ? Change your current registration address

1. Last Name: GARVIN | First Name: MATTHEW | Middle Name or Initial: JOHN | Suffix:

2. Address where you live: [redacted] State: Zip: County: Township:

3. Mailing address: City: State: Zip:

4. Former Registration Address: City: State: Zip: Former County:

5. Former Name (if changed): MATTHEW J GARVIN

6. Date of Birth: MM/DD/YY 12:00:00AM

7. Sex (M or F) M

8. Phone (optional) Email:

9. Identification DL or ID: SSN:

Effective Date of Move 6/7/2016

10. Voter Affidavit - Read all statements and sign within the box to the right. I swear or affirm that:
- I am a citizen of the United States.
- I will be at least 18 years old on or before the next election.
- I will have lived in the State of Illinois and in my election precinct at least 30 days as of the date of the next election.

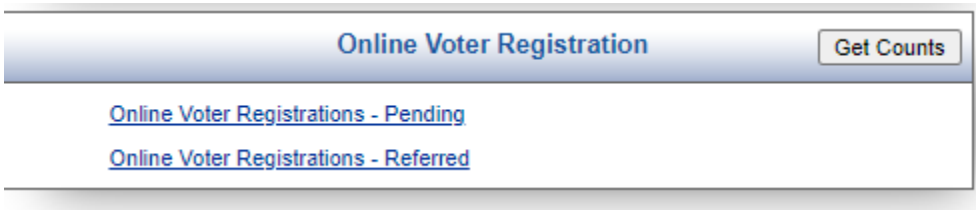
The information I have provided is true to my best of my knowledge under penalty of perjury. If I have provided false information, then I may be fined, imprisoned, or if I am

This is my signature or mark in the space below.

Reg Date : 12/27/2017 12:00:00AM

11. If you cannot sign your name, ask the person who helped you fill in this form to print their name, address and telephone number.

ONLINE VOTER REGISTRATION



The Online Voter Registration is a second choice for an applicant that does not meet the requirements to use POVA. The Online Voter Registration requires the voter to send the appropriate election authority their application containing a wet signature. Since the Online Voter Registration is dependent on receiving their application in the mail it is not under the 5-day requirement that The Paperless Voter Application must meet. If an application never arrives, the record will be removed off from the Online Voter Registration bucket in roughly nine months.

Print Page For Your Records Download Report

Hide Search Options

Enter Filter criteria below

First Name

Last Name

Registration Date Range

Vote By Mail Request All

Search Clear

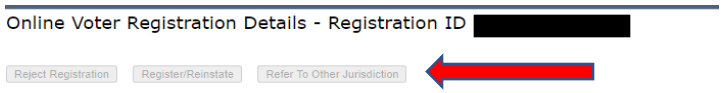
60 Online Voters Registrations PENDING.

First Prev 1 2 3 4 5 6 Next Last Page Size 10

Reg ID	Reg Reason	Last Name	First Name	Middle Name	Birth Date	Registration Date	Vote By Mail Request
[redacted]	ADDRESS	Bullock	Tara	[redacted]	December 7, 1979	August 15, 2017	No
	NEW	Raymond	Carter		May 7, 2000	September 26, 2017	No
	NEW	Batista	Martha		December 31, 1954	October 4, 2017	No
	NEW	rios	eric		July 28, 1995	October 12, 2017	No
	ADDRESS	boone	john		December 1, 1962	November 10, 2017	No
	NEW	Maynard	Damon		January 5, 1999	November 13, 2017	No
	ADDRESS	Banks	Latoya		March 11, 1982	November 24, 2017	No
	ADDRESS	Banks	Latoya		March 11, 1982	November 24, 2017	No
	NEW	Brudke	Robert		November 11, 1969	November 29, 2017	No
	ADDRESS	romero	isaac		April 3, 1977	December 5, 2017	No

First Prev 1 2 3 4 5 6 Next Last Page Size 10

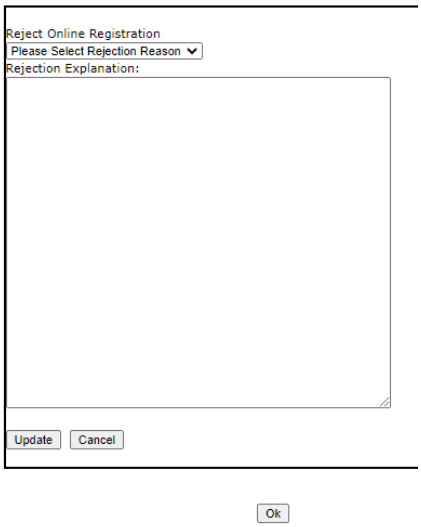
NOT ALL JURISDICTIONS UTILIZE THE ONLINE VOTER REGISTRATION BUCKET WITHIN IVRS. If your jurisdiction accomplishes this action through your local database, the action items will be grayed out (see illustration below). This bucket will be for informational use only, if an application is in this bucket, you can reach out to the voter to reinforce the fact that the application needs to be mailed in.



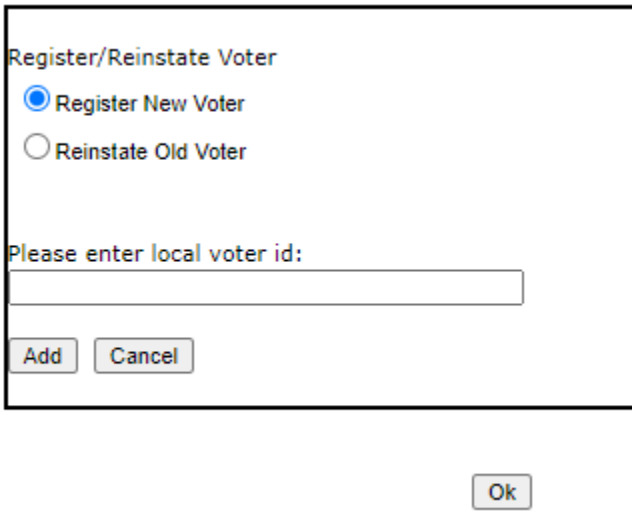
If your jurisdiction utilizes the Online Voter Registration bucket within IVRS, the following action items will be available.

Refer to Other Jurisdiction: this is used when a voter is trying to register with a jurisdiction (such as Cook County) when they should actually be registering with a different jurisdiction (such as City of Chicago) Always refer if the address is not in your jurisdiction, do not reject.

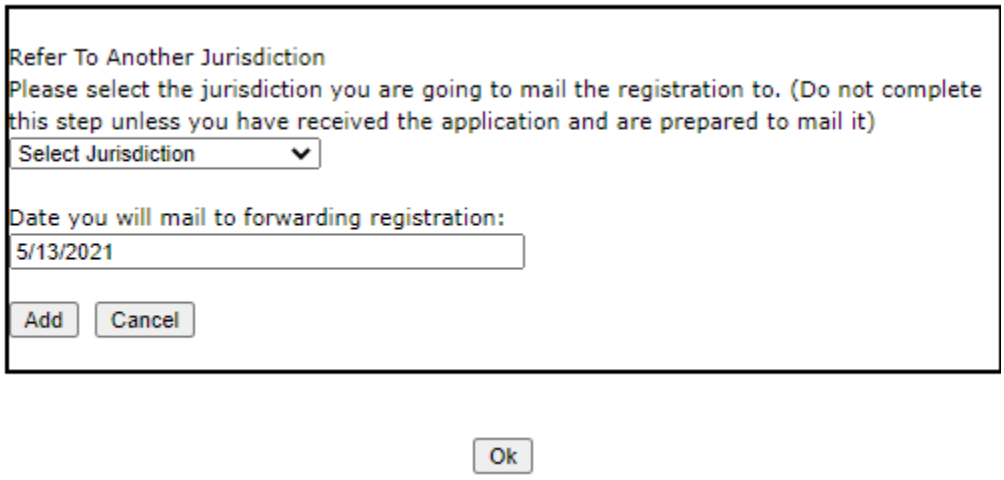
Reject Registration: may be missing key information that helps to identify the voter, select a reason from the drop down. You will need to add additional notes in the free form box below. Select update.



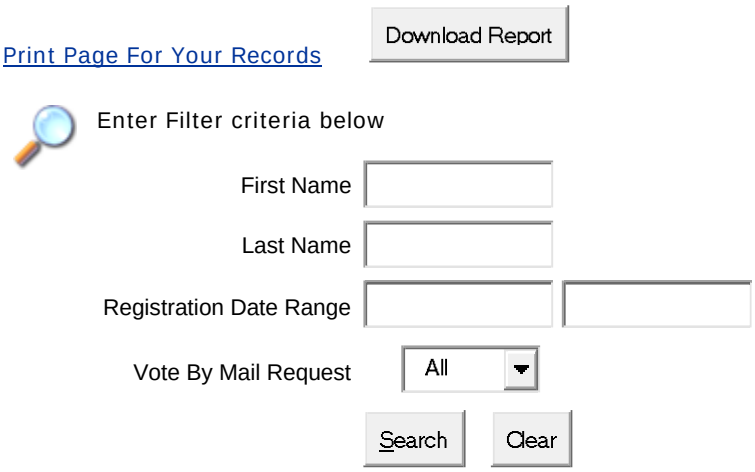
Register/Reinstate: If it is determined that the person will need to be registered after the mail in form is received, you will need to decide if this is a new registration or one that will need to be reinstated. You will need the local voter id to enter and then select add.



Refer to Other Jurisdiction: this is used when a voter is trying to register with a jurisdiction (such as Cook County) when they should actually be registering with a different jurisdiction (such as City of Chicago) Always refer if the address is not in your jurisdiction, do not reject. You will need the application to send to the other jurisdiction



Online Voter Registrations - Referred will provide you the applications that have been referred to other jurisdictions and the date.



79 Online Voters Registrations REFERRED.

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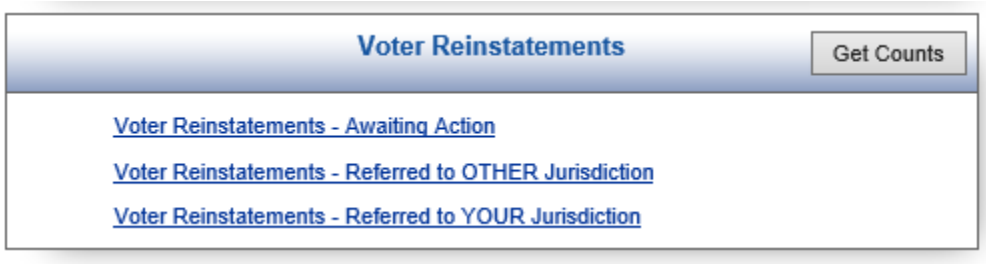
Reg ID	Reg Reason	Last Name	First Name	Middle Name	Birth Date	Registration Date	Vote By Mail Request
1532	NEW	[redacted]	Cristian		[redacted]	September 24, 2012	No
11401	NEW		James	Patrick		October 10, 2012	No
16008	NEW		Cynthia			October 10, 2012	No
16340	NEW		Timothy			October 15, 2012	No
13012	NEW		Myriad			October 17, 2012	No

VOTER REINSTATEMENTS

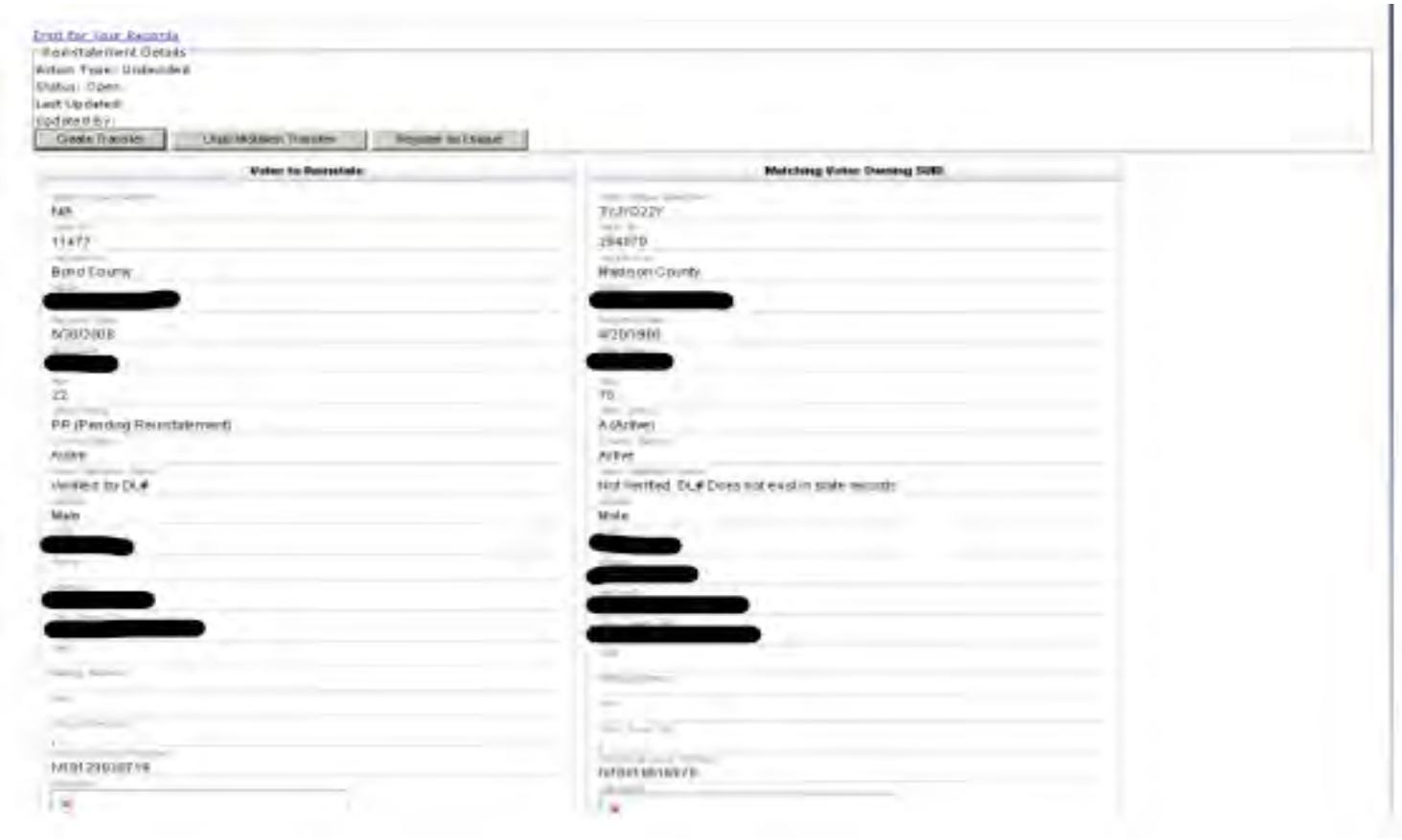
This feature has been implemented to more appropriately handle the situation where a voter in your database has been reinstated (local status has been set to Active or Inactive from the previous Cancelled or Removable status) by allowing you to make the decision on what action should be taken. Only those voter's whose SUID is in use by another voter in the State will show up in this bucket. For those voter's whose SUID is not in use by another voter, their SUID will automatically be assigned back to them.



Voter Reinstatements – Awaiting Action contain voters that have a record of "Active" again after a cancellation.



Choose a case you would like to work by selecting "View Case". After choosing a case to work, you will be able to compare the records from each jurisdiction.

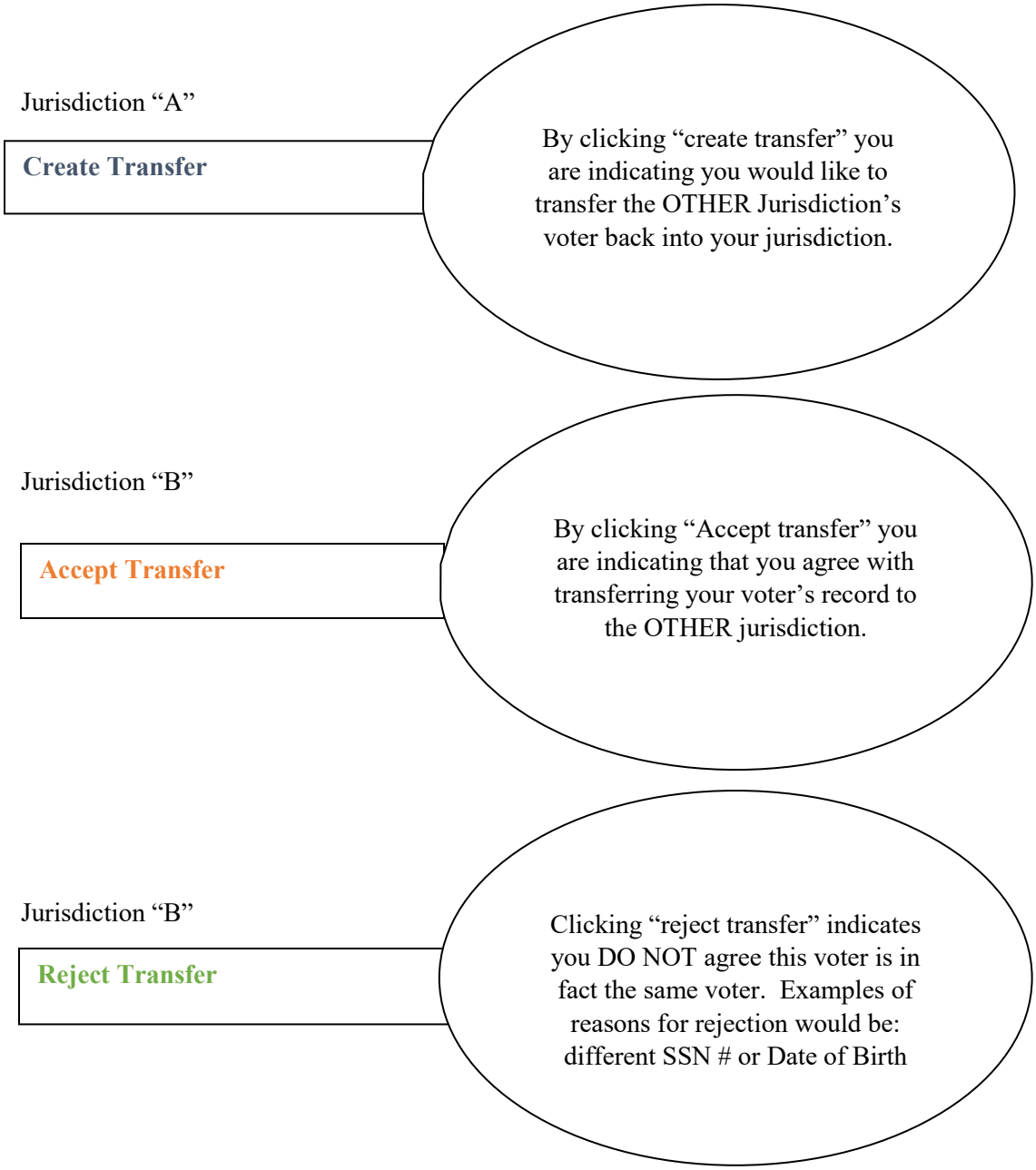


There are three options near the top of the box:

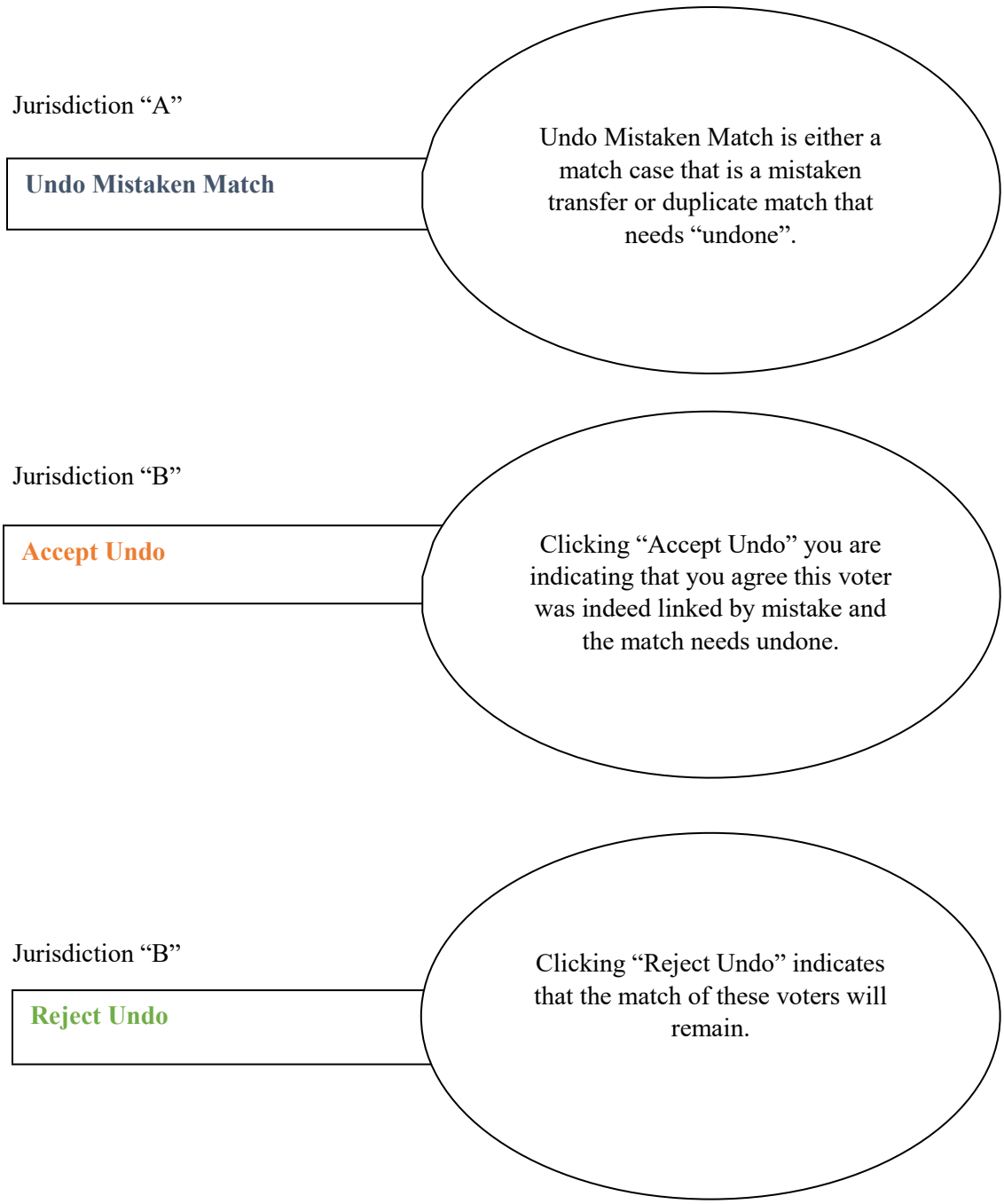
1. Create Transfer – You would like to transfer a voter from another jurisdiction back into your jurisdiction
    - Other jurisdiction can **Accept Transfer** – They agree and your voter record will become active
    - Other jurisdiction can **Reject Transfer** – They do not agree so your record will be returned for further action.
2. Undo Mistaken Transfer – You would like to undo a match that was previously made, where two separate voters were mistaken as one distinct voter and merged
    - Other jurisdiction can **Accept Undo** – They agree that the old match was a mistake and your voter will get their old SUID back while the other jurisdiction's voter will be assigned a new SUID
    - Other jurisdiction can **Reject Undo** – They disagree and the match require further action
3. Register as Unique
    - Unlinks the two voter records, assigning your voter a new SUID and allowing the other voter to keep the SUID that was once assigned to your voter. Use this when you do not want to affect the other voter's record any more.

(REFER TO FLOW CHART ON NEXT 3 PAGES- please note: Jurisdiction A and B)

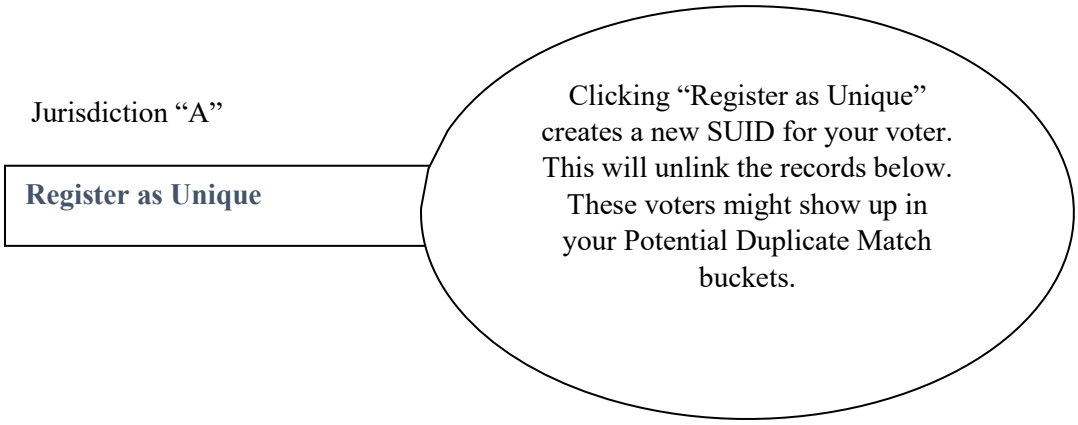
CREATE A TRANSFER- *Example*: This action is used to transfer a voter's record back to your jurisdiction. Use this when both records are for the same person and that person has moved back into your jurisdiction.



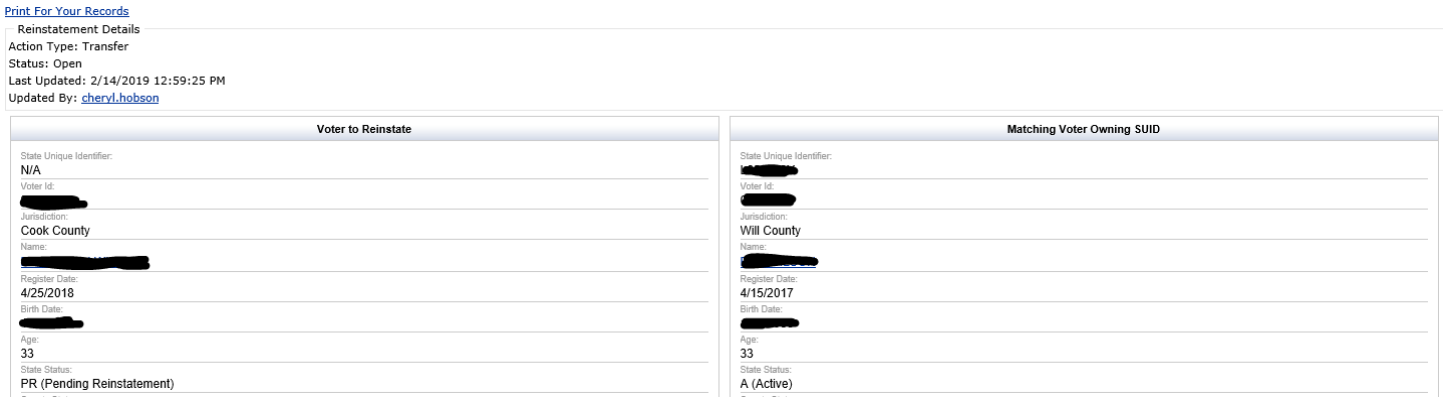
UNDO MISTAKEN MATCH *Example:* This feature will allow you to "undo a mistaken match" that was made within IVRS. Choosing this feature will allow you to unlink 2 voters who should **not** have been linked because they are two separate people. Clicking this button will cause your voter to get their SUID back and the other voter's record to be assigned a new SUID.



REGISTER AS UNIQUE *Example:* Clicking this option will assign a new SUID to your voter and unlink the connection with the other voter's record. The other voter's record will keep the SUID that was once assigned to your voter. Use this feature when you do NOT wish to affect the other voter's record any longer.

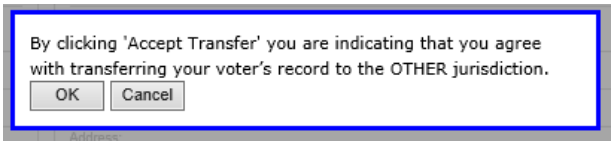


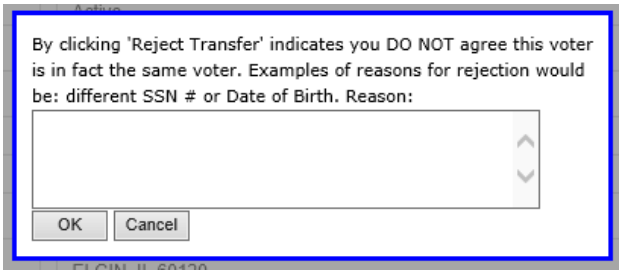
Voter Reinstatements – Referred to OTHER Jurisdiction will provide cases that have been viewed and referred/transferred to another jurisdiction. Notice - Action Type: Transfer



Voter Reinstatements – Referred to YOUR Jurisdiction will provide cases that have been referred to your Jurisdiction from another jurisdiction. Select "view case" and you will either "Accept" or "Reject" the transfer. If you are unsure if the voter should be transferred based on the information presented, contact the other jurisdiction to discuss.







VOTER MATCHING



Intra-Jurisdiction Matches - Potential Duplicate Matches – Awaiting Action this section is for records that look to be duplicate registration within your own local voter registration system. The first thing to determine is whether or not these records refer to the same person.

The examples below are standard matches you will see within this bucket.

The first is a potential name change, this happens usually when the person does not indicate they were registered under a different name.

The second example appears to be a typo in the first name.

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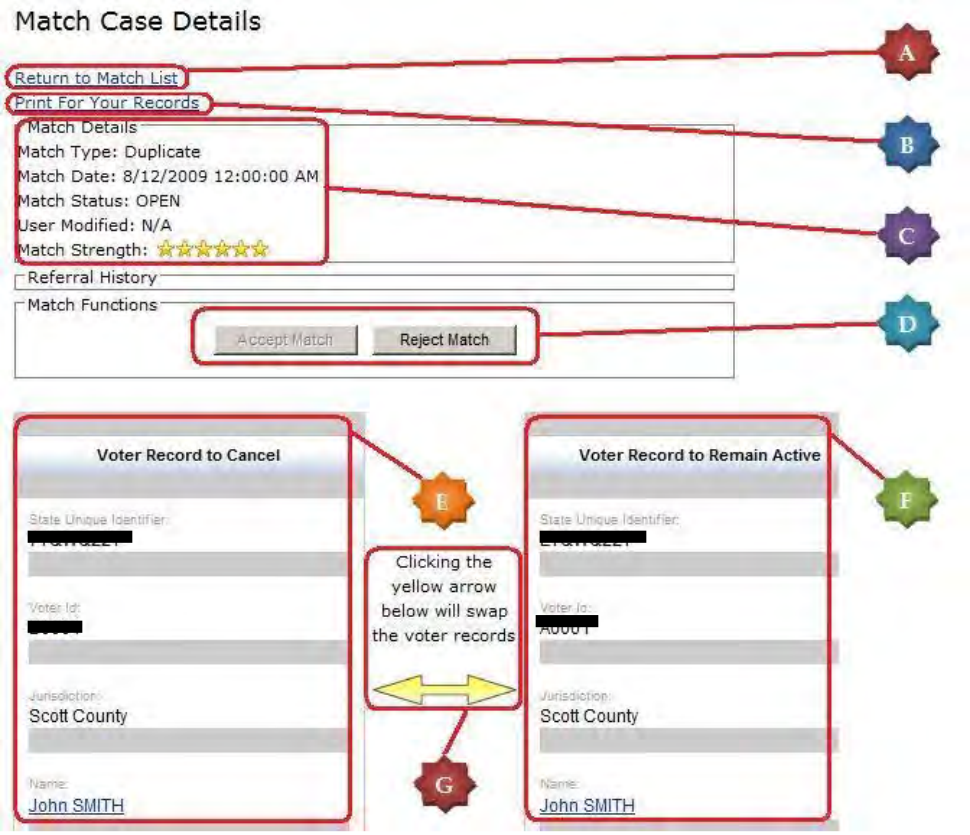
Match Strength	View Case	Reject Match	Older Record Details	Newer Record Details	Match Date	Days Open	Source
☆☆☆☆☆☆	View Case	Reject Match	Name: HOLTHAUS, MELINDA A Jurisdiction: Adams County Registration Date: 10/5/2004 Birth Date: [redacted] SSN: [redacted] Status: A	Name: RICHARDS, MELINDA A Jurisdiction: Adams County Registration Date: 11/2/2011 Birth Date: [redacted] SSN: [redacted] Status: A	06-20-2018	1083	ERIC Instate Match
☆☆☆☆☆☆	View Case	Reject Match	Name: CHANDLER, ELIZABETH J Jurisdiction: Adams County Registration Date: 6/8/2006 Birth Date: [redacted] SSN: [redacted] Status: A	Name: CHANDLER, ELIABETH J Jurisdiction: Adams County Registration Date: 7/13/2013 Birth Date: [redacted] SSN: [redacted] Status: A	06-20-2018	1083	ERIC Instate Match

You can see the basic information in the list. To select a case to work on, click **View Case**

Voter records are now side by side for comparison and, by default, the system has chosen the older record to be the one to be cancelled. When you choose to keep the record active you will need to merge the history and any other changes, so that the record is complete.



A. Return to Match List – this action will take you back to view all records.
B. Print for Your Records – This action will prompt a printable version.
C. Match Details – This will provide you with details on the match type, date, status and match strength.
D. Match Function – This area will allow you to make a decision.
E. View Record to Cancel – This will become the Cancelled Record.
F. View Record to Remain Active – This displays the record remaining Active.

This information will help you decide if these records are the same person or different: to help with this decision you will want to look at the DOB, SSN, name, signature and any other information to assist with the decision by clicking on the voter's name, you will be taken to the voter detail for that record. If the record is not the same person, reject the match.

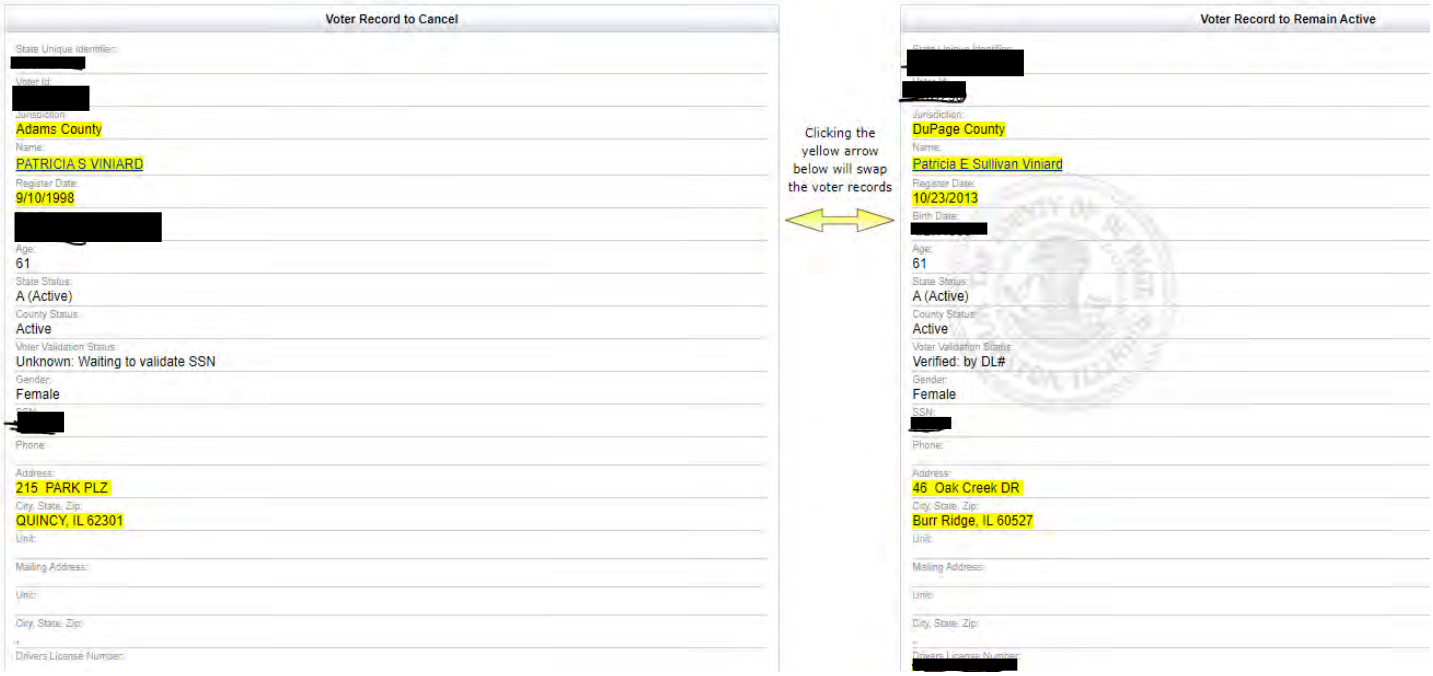
Inter-Jurisdiction Matches - Potential Duplicate Matches – Awaiting Action here you will see potential duplicate matches with voter records in other jurisdictions that need attention. The first screen you will see includes the search box as well as all the match results.



First Prev 1 2 3 4 5 6 7 8 9 10 ... Next Last Page Size 10 — 17 Total Pages

Match Strength	View Case	Reject Match	Older Record Details	Newer Record Details	Match Date	Days Open	Source
☆☆☆☆☆☆	View Case	Reject Match	Name: VINIARD, PATRICIA S Jurisdiction: Adams County Registration Date: 9/10/1998 Birth Date: [redacted] SSN: [redacted] Status: A	Name: Sullivan Viniard, Patricia E Jurisdiction: DuPage County Registration Date: 10/23/2013 Birth Date: [redacted] SSN: [redacted] Status: A	06-20-2018	1090	ERIC Instate Match
☆☆☆☆☆☆	View Case	Reject Match	Name: STIERKIN, GARY A Jurisdiction: Adams County Registration Date: 9/12/1996 Birth Date: [redacted] SSN: [redacted] Status: A	Name: Stierlin, Gary A Jurisdiction: Sangamon County Registration Date: 11/13/2015 Birth Date: [redacted] SSN: [redacted] Status: A	06-20-2018	1090	ERIC Instate Match

To work on one of the cases, click on **View Case** and you will see the voter record details underneath. You'll see that the older record, by default, is on the left and is assumed to be the one to cancel. You can switch these by clicking on the double arrow between the record details.



You have 3 options from which to choose:

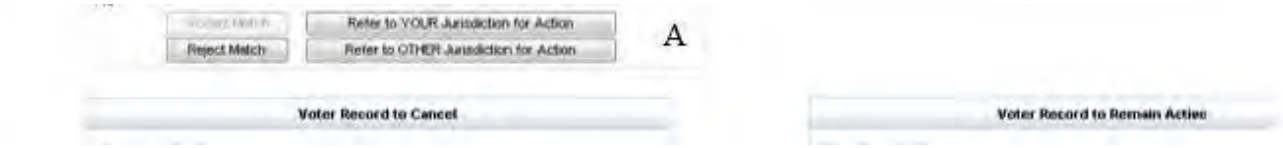
1. **Accept Match**
   - You have determined that the records refer to the same person, that your jurisdiction's record is the older of the two, and will be cancelled. This option will only be available if your record is on the left since that is the one that will be cancelled. You are not able to cancel the record belonging to another jurisdiction.
     After accepting, the match status will change to "Pending Confirmed" and the case will move to **Marked for Cancellation in YOUR local database**
2. **Reject Match**
   - The voters are different people and both records should remain active in their respective jurisdictions.
3. **Refer to OTHER Jurisdiction for Action**
   - This will move the case to the other jurisdiction for them to assess, as you believe the records are for the same individual and that your jurisdiction has the latest record, requiring the other jurisdiction to cancel their copy. If the other jurisdiction believes their record is the newest, they could refer it back to you again, which is where a phone call may be necessary.

Potential Duplicate Matches – Referred to YOUR Jurisdiction for Action these records are potential match cases referred from another jurisdiction who believed the match to be valid and thought that your record was the older record in need of cancellation.

To work on one of the cases, click on **View Case** and you will see the voter record details underneath. You'll see that the older record, by default, is on the left and is assumed to be the one to cancel. You can switch these by clicking on the double arrow between the record details.

You have 3 options from which to choose:

1. **Accept Match**
   - You determine that the records refer to the same person, that your jurisdiction's record is the older of the two, and will be cancelled. This option will only be available if your record is on the left since that is the one that will be cancelled. You are not able to cancel the record belonging to another jurisdiction.
     After accepting, the match status will change to "Pending Confirmed" and the case will move to **Marked for Cancellation in YOUR local database**
2. **Reject Match**
   - The voters are different people and both records should remain active in their respective jurisdictions.
3. **Refer to OTHER Jurisdiction for Action**
   - This will move the case to the other jurisdiction for them to assess and if they think their record is the newest, they could well refer it back to you again. If these transactions continue, a phone call to the other jurisdiction may be necessary.



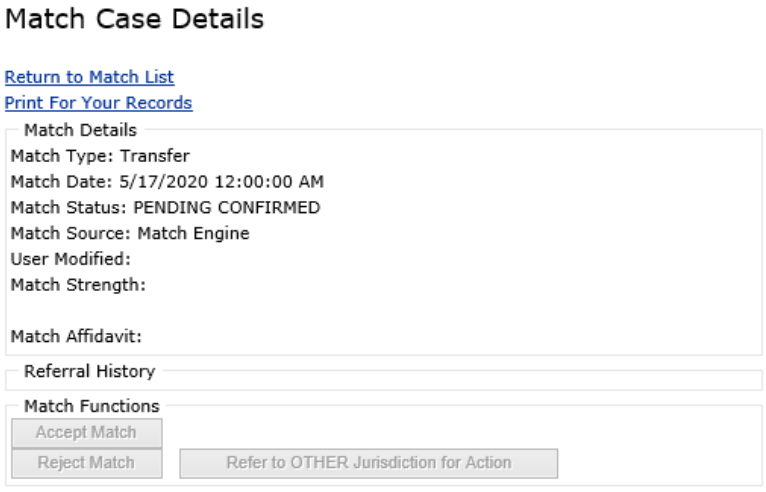
Potential Duplicate Matches – Marked for Cancellation in YOUR local database are cases that have been accepted as matches where your record is the older one and, as such, is set to be cancelled in your local database. This link requires no action and will just show all the matches that have been worked and are Pending Cancellation. (See PENDING CONFIRMED below)



Potential Duplicate Matches – Referred to OTHER Jurisdiction for Action are match cases that have been viewed and are waiting for another jurisdiction to decide. All you can do from here is take possession of the case, thereby moving it into your section, Referred to YOUR Jurisdiction for Action. To do so, click on View Case.

Potential Duplicate Matches – Marked for Cancellation in OTHER Jurisdictions databases are match cases that have been determined by another jurisdiction where they have accepted that their record is the older one and is waiting to be cancelled in their local database. Clicking on this will show these cases.

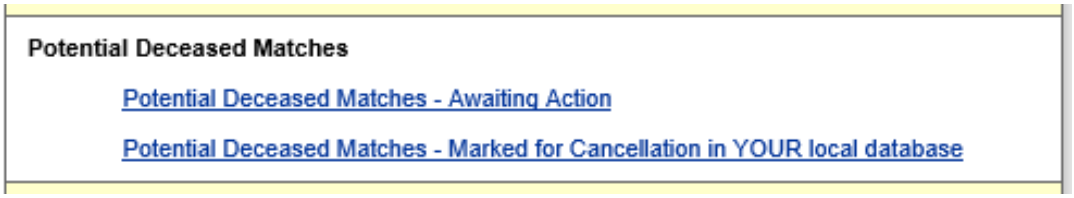
Click on "View Case", and you will see the following:



No action can be taken on this bucket and is for informational purpose.

POTENTIAL DECEASED MATCHES

Update for Processing Social Security Matches

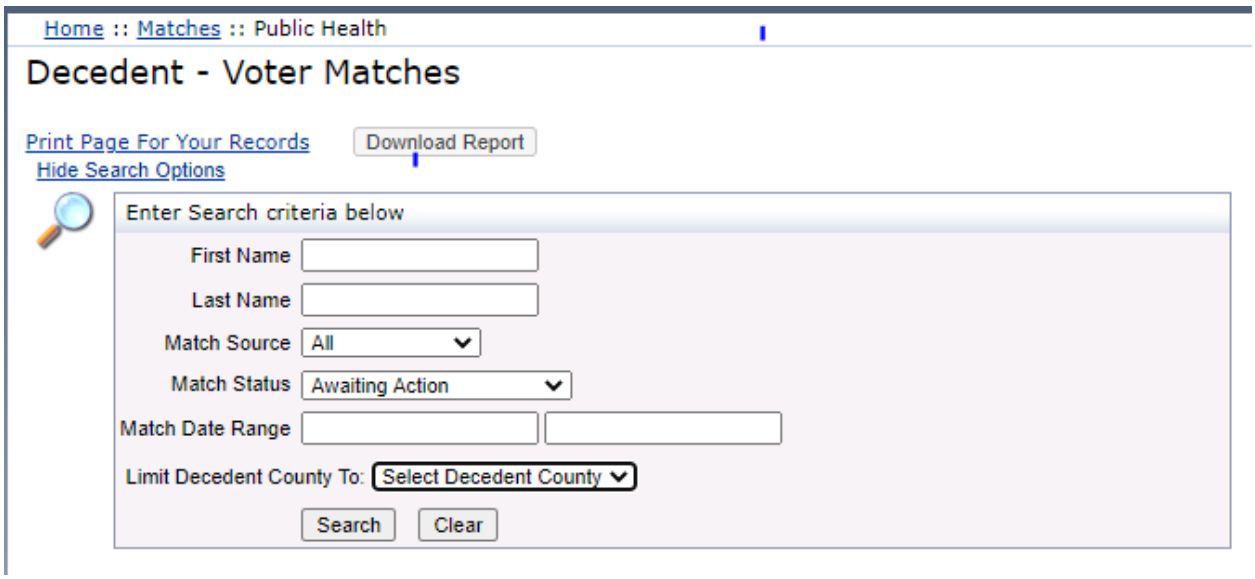


Note - Both buckets (**Potential Deceased Matches – Awaiting Action & Potential Deceased Matches – Marked for Investigation in YOUR local database)** have an option to "Download Report". This allows the ability to download specific record/s or all records within the specific bucket. **Keep in mind that this information contains PII so ensure any printed information is safeguarded and properly disposed of.**

In addition, to ensure uniformity, we've aligned the navigation/filtering to match the functionality of many other buckets. The specific options are shown below:

Match Source options - All, Public Health and Social Security
Match Status – Awaiting Action and Marked for Investigation
Match Date Range – Self explanatory
Limit Decedent County To: Drop down list

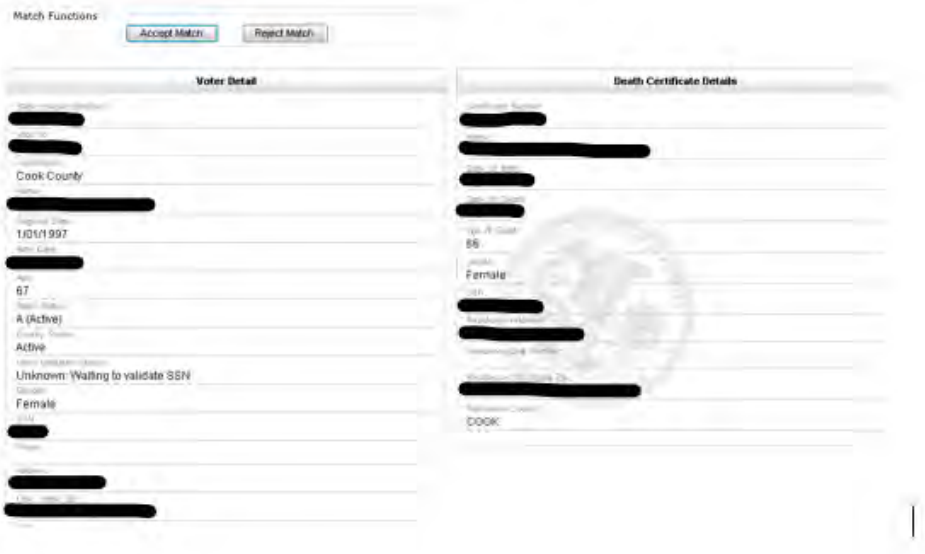
Additional options available - "Print Page For Your Records" and "Hide Search Options"



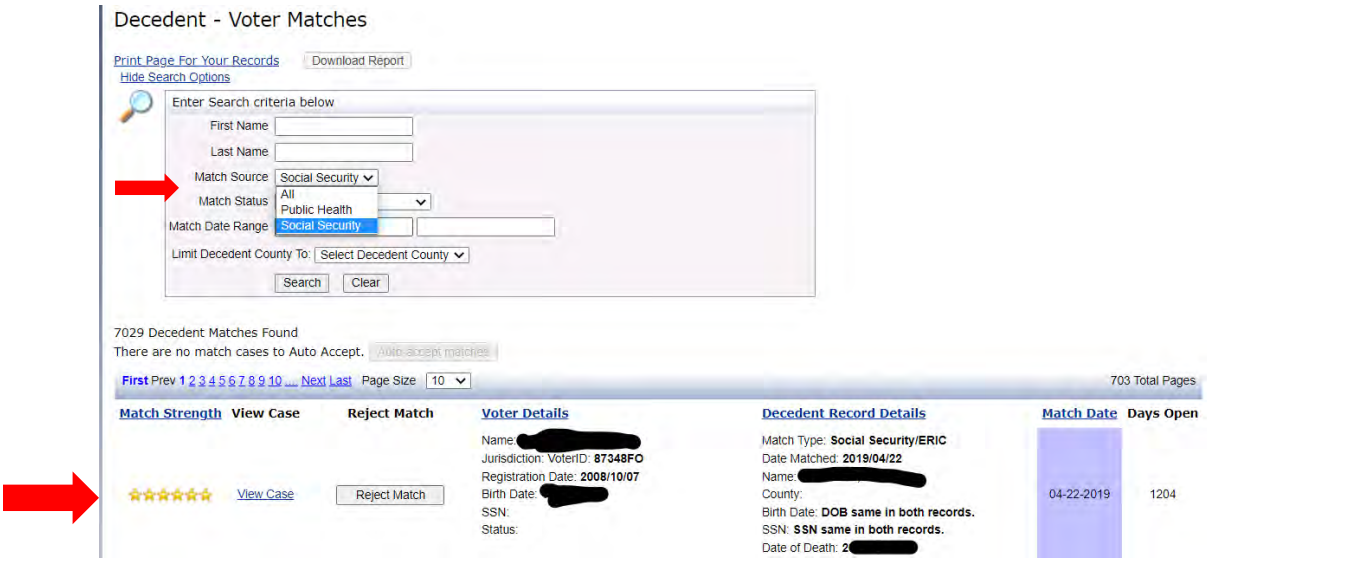
Potential Deceased Matches – Awaiting Action are potential deceased matches with details from electronic Death Certificate information provided monthly by Illinois Department of Public Health (IDPH) and/or reports from Social Security/ERIC. These will have different methods for handling of potential deceased matches.

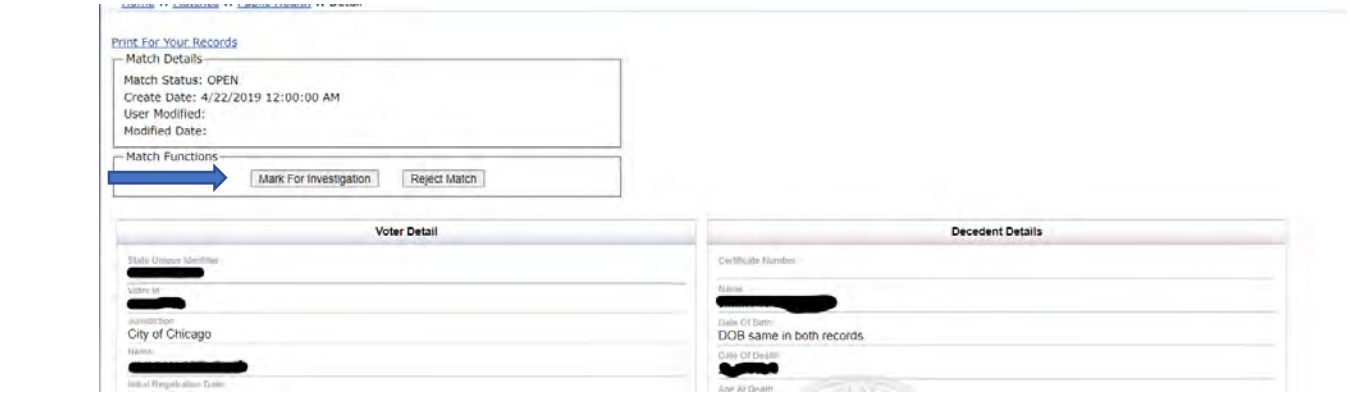
For IDPH matches, election authorities should cancel the registration of any deceased voter if you feel the records are a match. Be sure to print this page to save for your records or to scan into your local voter registration database. (10 ILCS 5/4-14.1, 5-9.1, 6-55 and Administrative Code Title 26, Part 216.50 (d) (5))

To work a case, click on **View Case** for more details. Click **Accept Match** if the death certificate details match your voter and you believe the registration should be cancelled, otherwise click Reject Match.

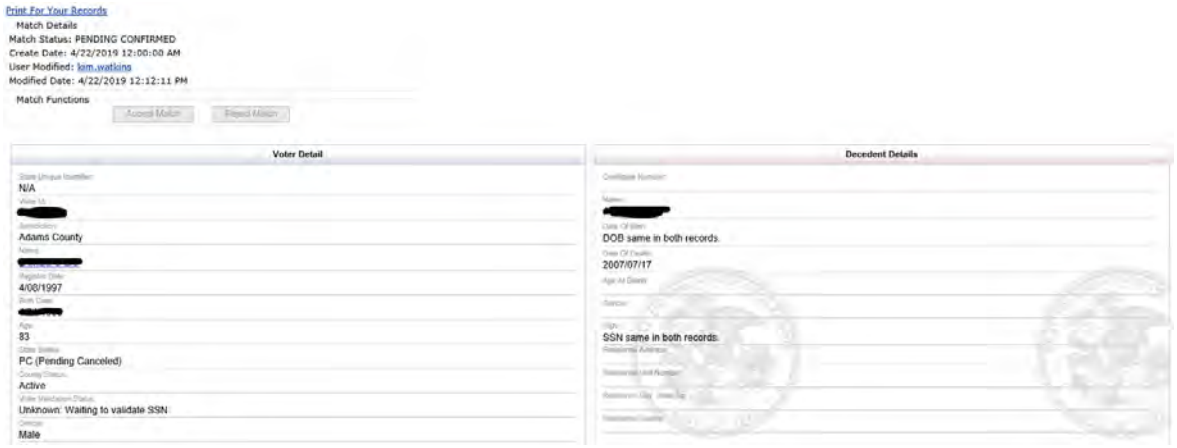


For Social Security/ERIC matches, when you click **View Case** you will have 2 options, **Reject Match** or **Mark for Investigation**. These records, as they do not contain an electronic death certificate, will require further investigation as well as the proper confirmation procedures under the National Voter Registration Act (NVRA) before cancellation of the records may occur.

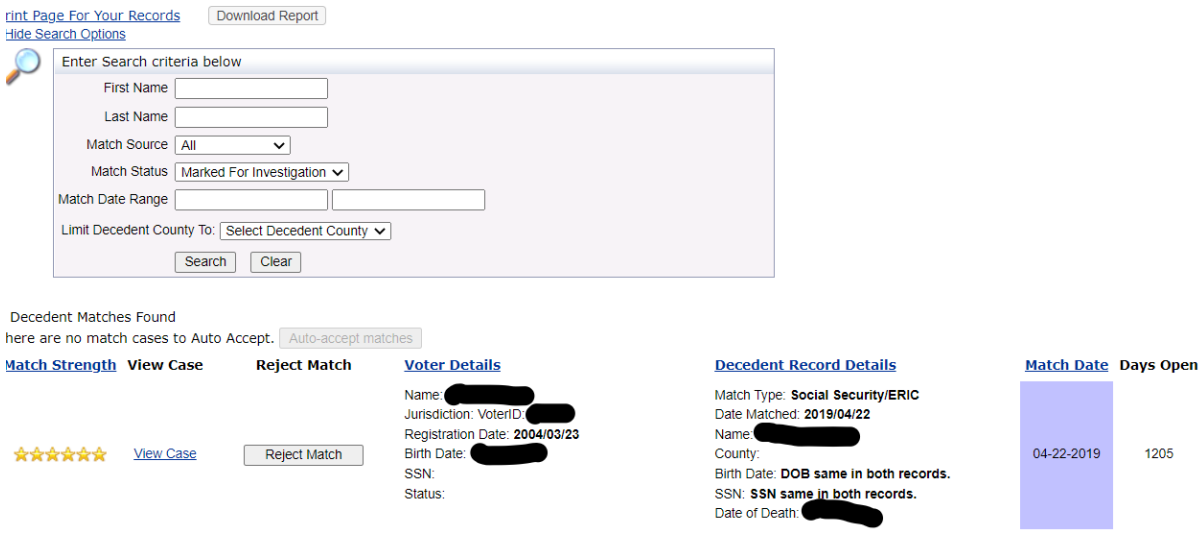




Potential Deceased Matches – Marked for Cancellation in YOUR local database here you can view cases that have already been accepted as matches and are pending cancellation in your local system. No action can be taken, this is just for informational purposes or printing if necessary.



Potential Deceased Matches – Marked for Investigation – through this filter, you can view cases that have been marked for investigation. The next action that can be taken is to **Reject Match** if information provided is not a match. If further investigation finds there is a match, then voter can be cancelled through local system if necessary.



ILLINOIS DEPARTMENT OF CORRECTIONS MATCHES

The **Illinois Department of Corrections Matches (DOC)** are divided into 3 sections as illustrated below:
Potential Incarcerated Matches – Awaiting Action
Potential Incarcerated Matches – Marked for Cancellation in YOUR local database
Potential Incarcerated Matches – Cancelled or Rejected in YOUR local database



The three sections are broken down one-by-one below. Within this section you will be able to view potential matches with voters who may have been convicted of a felony.

NOTE: These match records are based on information provided by the Department of Corrections (DOC) which was taken directly from the inmate without having been verified against any other records. Therefore, no attempt has been made by the DOC to verify the information that the inmate has provided; it is possible that the name and other identifying information provided by the inmate is false. Proceed with caution!

For example: You may see that a person has an **alias**, meaning DOC has identified this name with this record at some point in time and it has been matched to the voter record along with the DOB (Date of Birth) and SSN (Social Security Number).** (See example on page 4)

Go to your **Work Items Summary** page in IVRS. Within the "Voter Matching" portion of this page, locate the Illinois Department of Corrections Matches. Now, let's break down the three sections.

FYI- you will notice the new coding for the SSN view to further aid in protecting Personally Identifying Information (PII).

DOC Inmate Lookup

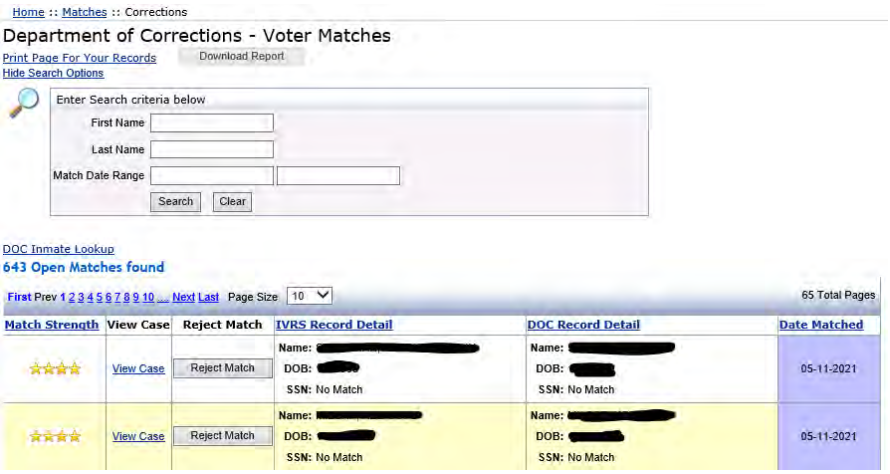
80 Open Matches found

First Prev 1 2 3 4 5 6 7 8 Next Last Page Size 10

Match Strength	View Case	Reject Match	IVRS Record Detail	DOC Record Detail	Date Matched
☆☆☆☆☆☆	View Case	Reject Match	Name: [redacted], BROCK MICHAEL DOB [redacted]1986 SSN: Match	Name: [redacted], BROCK DOB: [redacted]1986 SSN: Match	05-25-2021
☆☆☆☆	View Case	Reject Match	Name: [redacted]JOHN PATRICK DOB: [redacted] SSN: ****	Name [redacted]OHN P DOB [redacted] SSN: No SSN Exists to Match	05-25-2021

- The last four of the Social Security will be seen as **** in the SSN field due to redacting of PII.
- If the last four of the SSN is not available, the case will state "No SSN Exists to Match"
- If the record in both DOC and your voter registration system are the same, the return will state "Match"

Potential Incarcerated Matches – Awaiting Action will direct you to the Department of Corrections – Voter Matches screen. This area holds the current list of potential inmate voter records that will need reviewed for cancellations.



As you can see above, the "Download Report is "greyed out". This option is for such things as multiple users working the DOC Bucket. The links that are highlighted in blue will provide more details about the match case. These are designed to help you select the appropriate action, accept or reject. Below is more information on each action item.

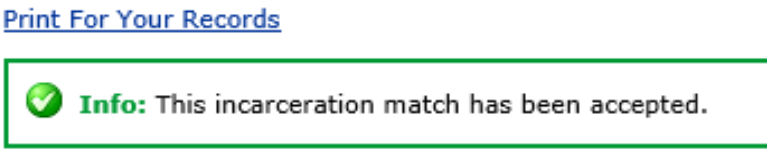
- **Print Page For Your Records:** Allows for printable documentation
- **Hide Search Options:** Will remove search options
- **DOC Inmate Lookup:** This will take you directly to the DOC website that will provide more information on the DOC records if needed.
- **Match Strength:** Relative strength level that IVRS believes this a likely match
- **View Case:** Here you will be able to work the case (Accept Match/Reject Match) and see a more details of that person's voter record which will allow you to compare the Voter Details to the Department of Corrections (DOC) record. (See chart below)
- **IVRS Record Detail:** Information from the IVRS data match
- **DOC Record Detail:** Information from the DOC data match
- **Date Matched:** The date the match was made between IVRS registration data and DOC inmate data.

Accepting the Match - to take action on these records, select View Case to examine the record.



Once the match case has been reviewed and you decide that the match is valid and the voter's record should be cancelled, complete the following steps.

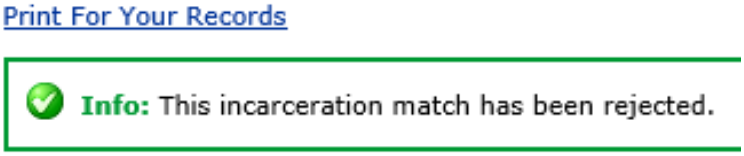
- Select "Accept" the match
- A window will appear asking you to confirm - Are you sure "Yes" – to confirm the match case ("No" to return to the match screen and not process the match case)
- A confirmation message will appear at the top of the page
- Notice, the "Match Status" has now changed to "Pending Confirmed"
- You will also have the option to print the page and keep a copy for your records



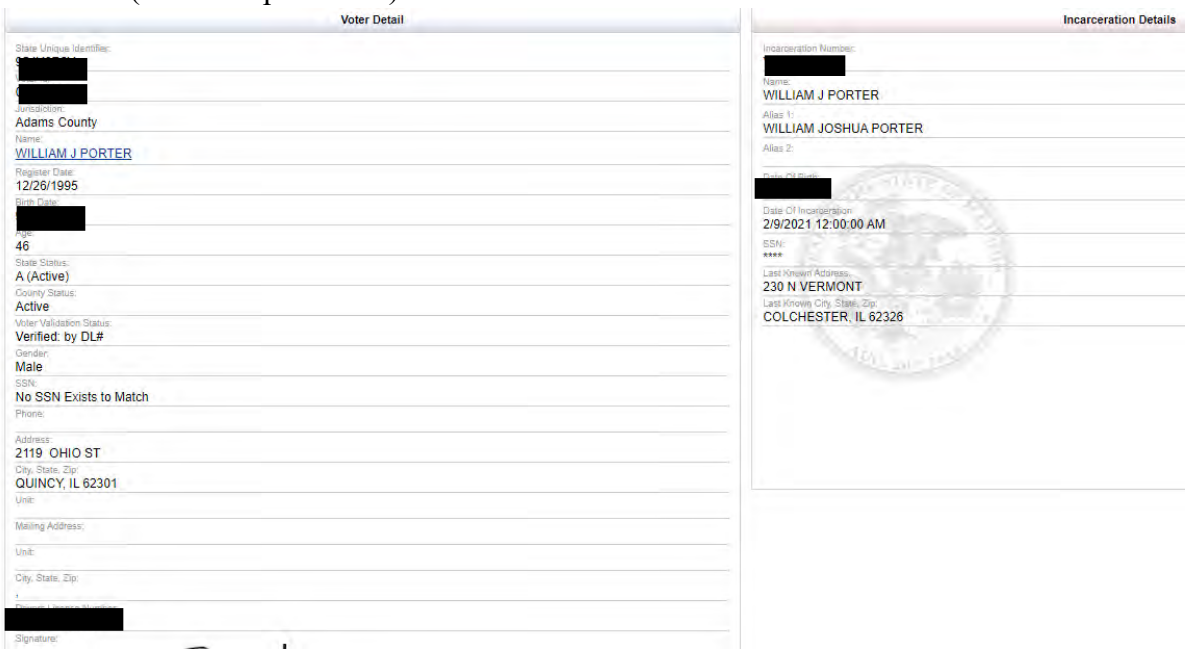
Rejecting the Match - If after reviewing the match case data you believe the match is NOT valid and the voter's record should NOT be canceled, take the following actions:

NOTE: Once you reject a match case, the voter's record will NEVER be matched to this particular Department of Corrections (DOC) record ever again. (BE CERTAIN THIS IS WHAT YOU WANT TO DO!)

- Click "Reject" the match
- A window will appear asking you to confirm- Are you sure "Yes" – to confirm the match case
- A confirmation message will appear at the top of the page
- Notice, the "Match Status" has now changed to "Closed Rejected"
- You will have the option to print the page and keep a copy for your records.

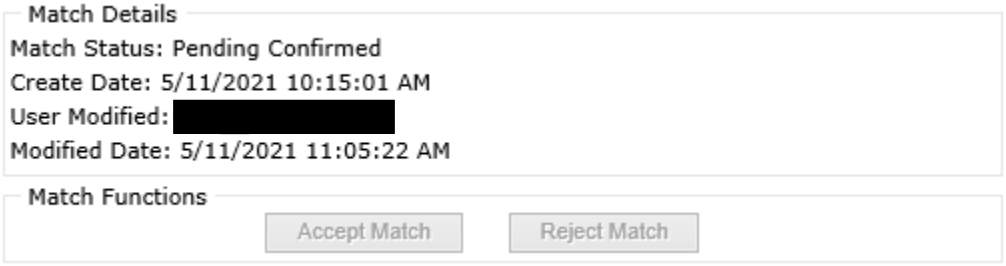


As mentioned on page 1, you may see that a person has an **alias**, meaning they have been identified with this name at some point in time by DOC. The match has been created as a potential match to the name along with the DOB and SSN. (See example below)

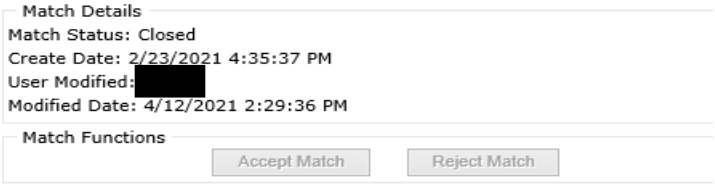


Potential Incarcerated Matches – Marked for Cancellation in YOUR local database provides records that have recently been accepted as matches with records from the Department of Corrections which are pending cancellation in your local database. There is no action that can be taken within this bucket and is for informational use only.

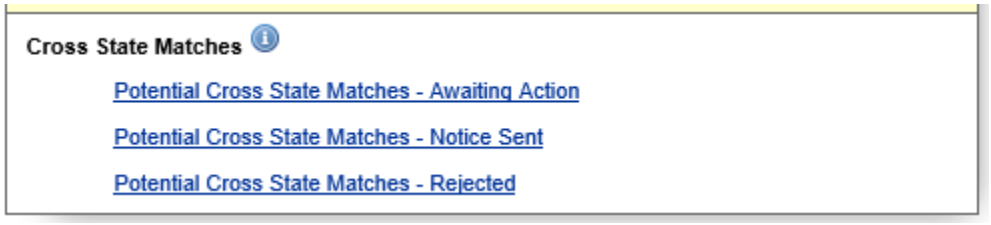
NOTE: If records persist in this area for more than 48 hours, your vendor may need to assist with triggering auto-cancellations.



Potential Incarcerated Matches – Canceled or Rejected in YOUR local database provides you with cases that have been previously accepted or rejected as matches with voters who have been convicted of a felony. (See example of match status below "Closed")

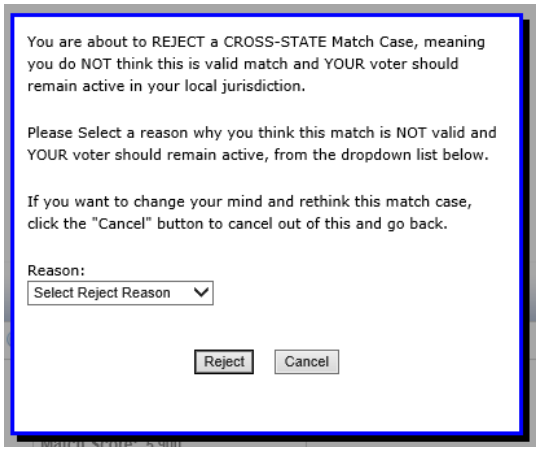


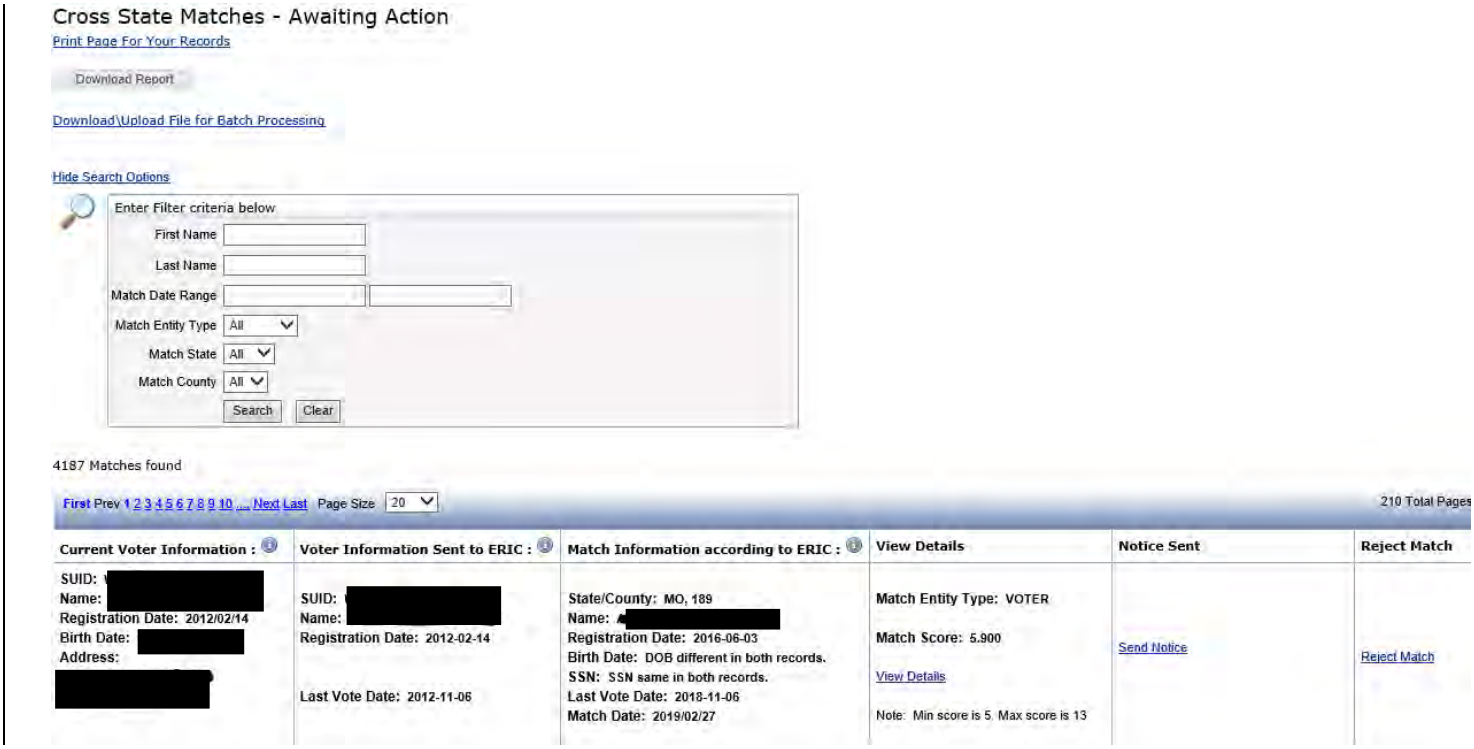
CROSS STATE MATCHES



Potential Cross State Matches – Awaiting Action are potential voters in your jurisdiction that may have moved to another State, the records of which have been matched through ERIC (Electronic Registration Information Center).

You will either reject the match OR send notice. **There is a 90-day requirement window, like all ERIC data**.

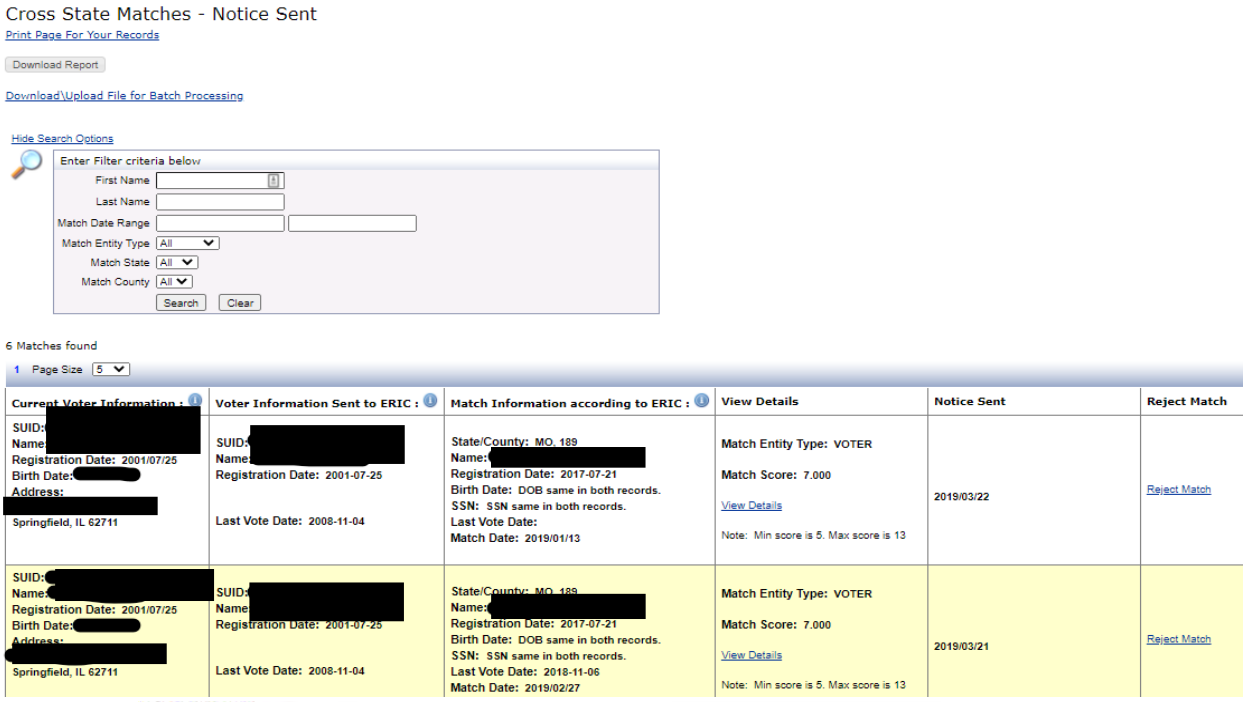


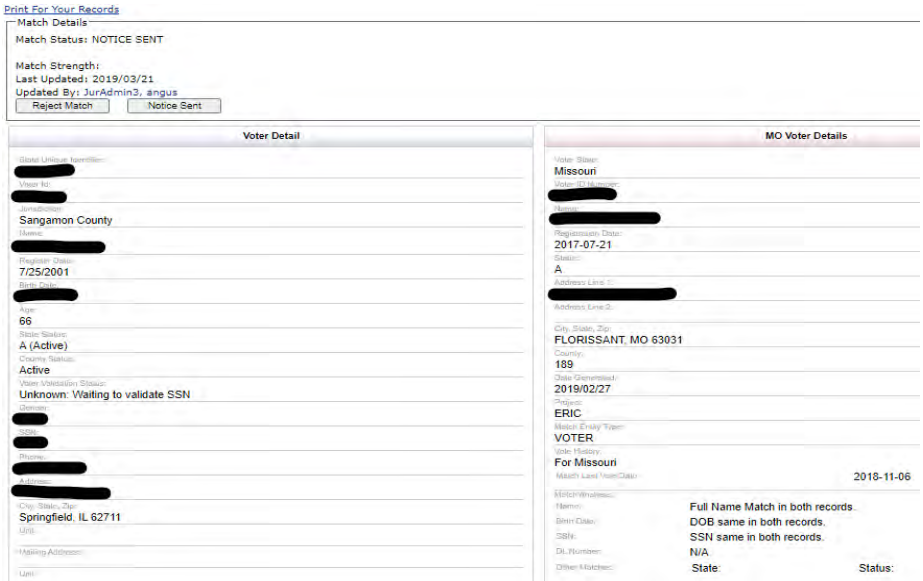


A notice will need to be sent to the address on file in your voter registration system if the record is **Active**, if the notice is returned with an address outside your jurisdiction then, an **R-26 confirmation** notice will need to be sent. If the voter is **inactive** in your local voter registration system, then the notice can be sent to the out of state address. These records cannot be cancelled based on the information in the Cross State Matches, unless all notices are sent and NVRA procedures are followed.

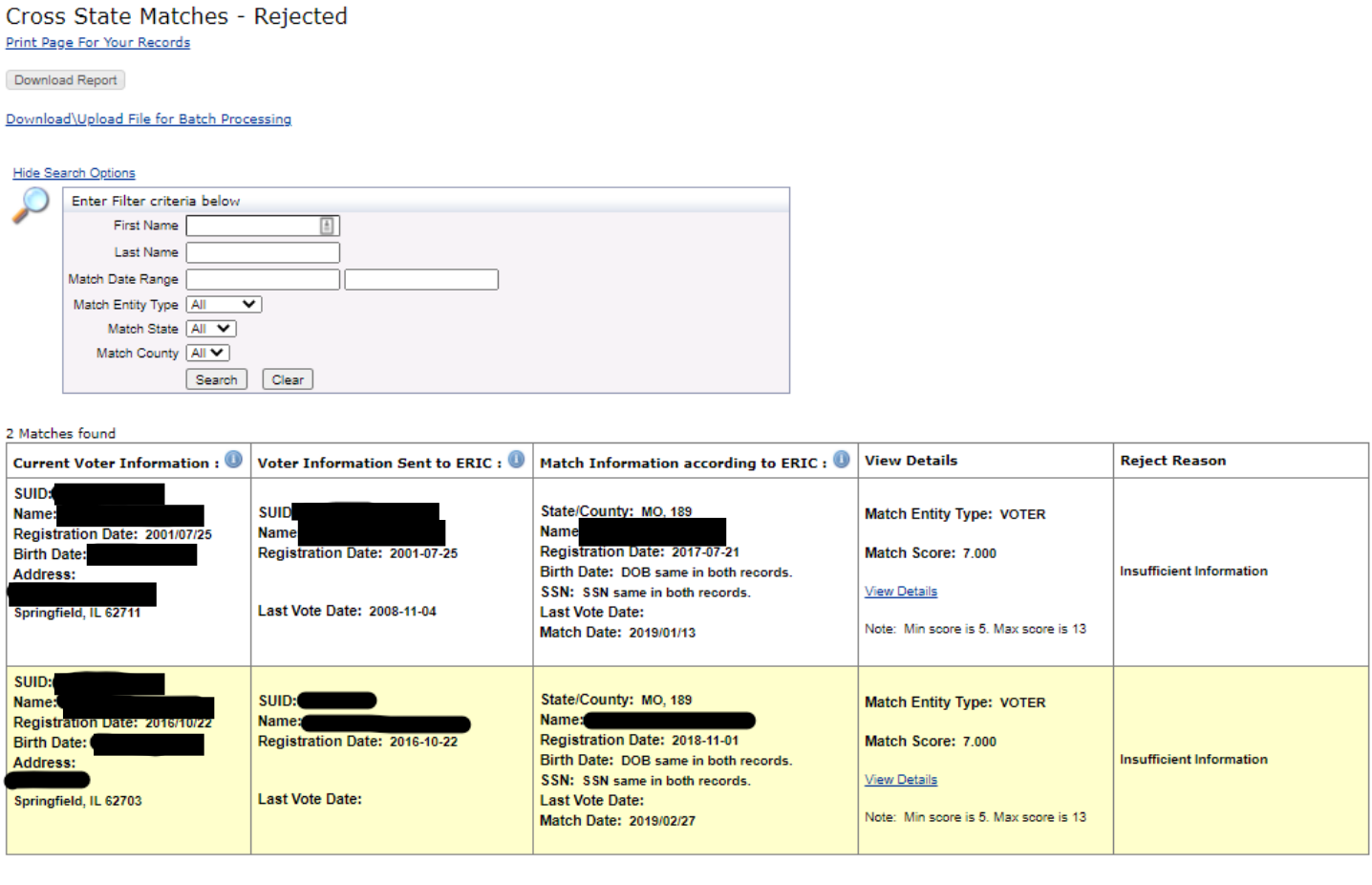
An option is available to **Download\Upload a File for Batch Processing**. This allows for a mass download of the chosen records which can then be marked as "Notice Sent" in Excel and uploaded back to IVRS which will then move the marked records to the Notice Sent bucket. The Match State and Match County are self-explanatory – NOTE: You will have to select a state under "Match State" before you can see anything under "Match County". Instructions are available within IVRS, which you will see after you choose this option.

Potential Cross State Matches – Notice Sent this action will allow you to **Reject Match** as well as **View Details**. If you choose the latter, you have another opportunity to **Reject Match**.





Potential Cross State Matches – Rejected provide you with the matches that have already been rejected. From this screen you are able to select **View Details** and from here you may select on **Notice Sent** which essentially cancels the prior rejection.



Cross State Matches - Rejected

Print Page For Your Records

Download Report

Download\Upload File for Batch Processing

Hide Search Options

Enter Filter criteria below

First Name

Last Name

Match Date Range

Match Entity Type All

Match State All

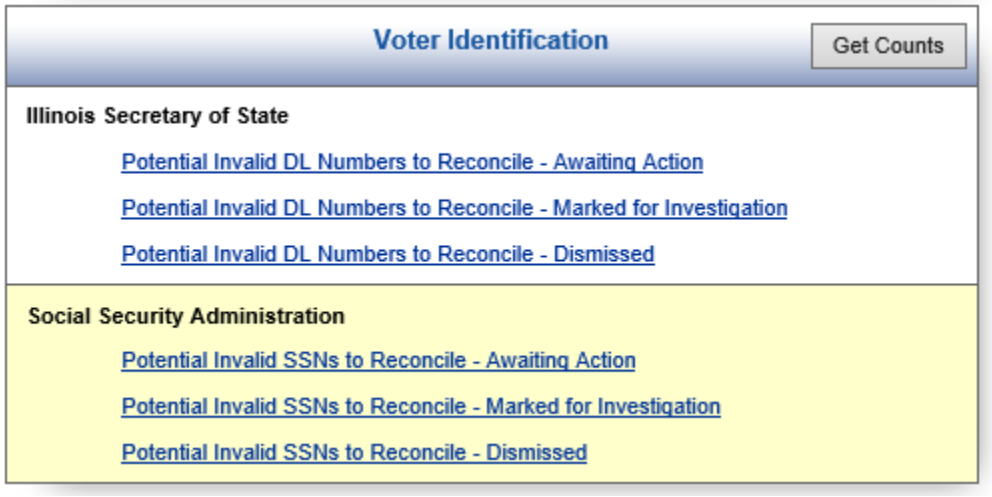
Match County All

Search Clear

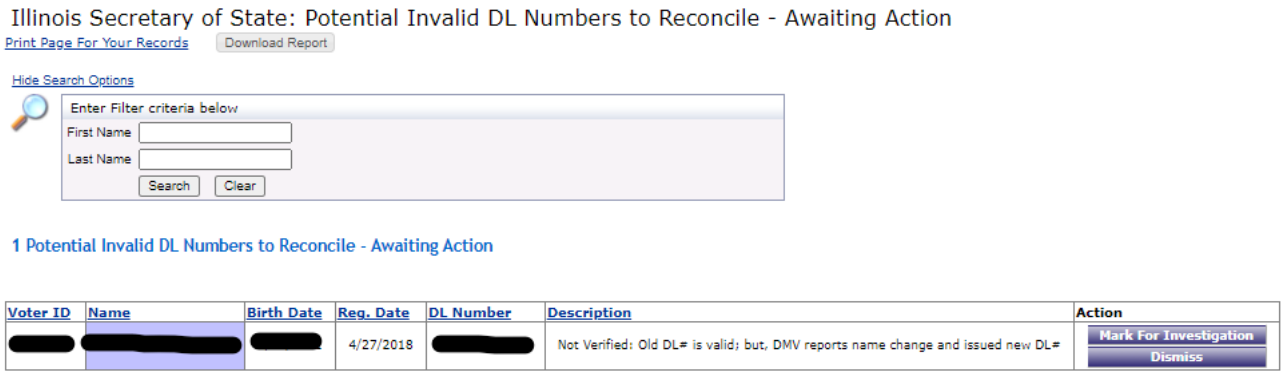
2 Matches found

Current Voter Information :	Voter Information Sent to ERIC :	Match Information according to ERIC :	View Details	Reject Reason
SUID: Name: Registration Date: 2001/07/25 Birth Date: Address: Springfield, IL 62711	SUID Name Registration Date: 2001-07-25 Last Vote Date: 2008-11-04	State/County: MO, 189 Name Registration Date: 2017-07-21 Birth Date: DOB same in both records. SSN: SSN same in both records. Last Vote Date: Match Date: 2019/01/13	Match Entity Type: VOTER Match Score: 7.000 View Details Note: Min score is 5. Max score is 13	Insufficient Information
SUID: Name: Registration Date: 2016/10/22 Birth Date: Address: Springfield, IL 62703	SUID: Name: Registration Date: 2016-10-22 Last Vote Date:	State/County: MO, 189 Name: Registration Date: 2018-11-01 Birth Date: DOB same in both records. SSN: SSN same in both records. Last Vote Date: Match Date: 2019/02/27	Match Entity Type: VOTER Match Score: 7.000 View Details Note: Min score is 5. Max score is 13	Insufficient Information

VOTER IDENTIFICATION

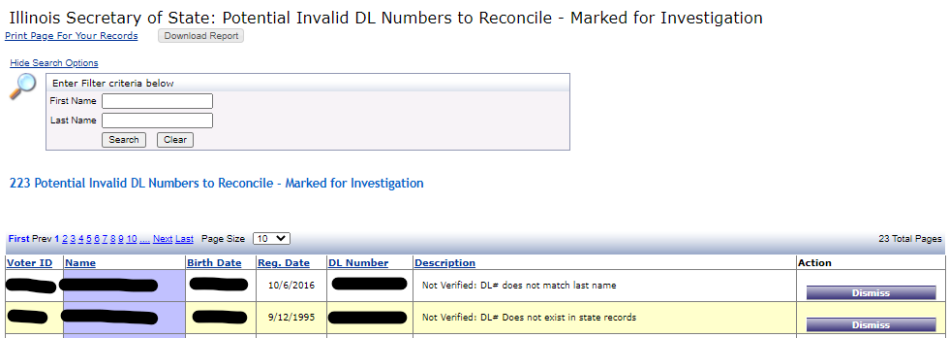


Illinois Secretary of State (SOS) Potential Invalid DL Numbers to Reconcile – Awaiting Action will provide a list of voters whose driver's license number or State ID (DL/ID #) does not match that on the database for the Secretary of State (SOS).

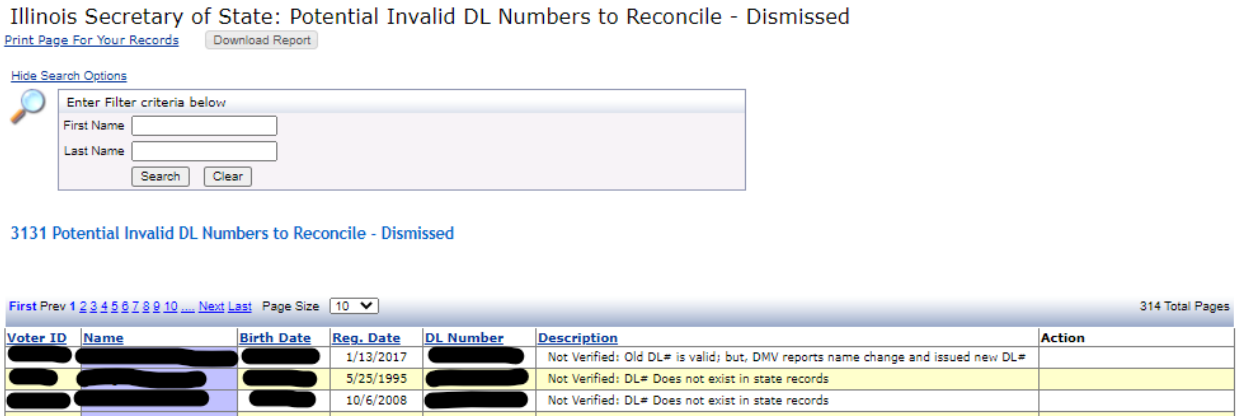


In each case, your option is either to **Mark for Investigation** or **Dismiss**, these actions will move the case into either of the respective, "Marked for Investigation" or "Dismissed" categories. The former is self-explanatory and the latter means that either there is nothing wrong with the record or that it has been fixed. These records are sometimes matched due to a name change, you will need to view your scanned copy of the registration to ensure that the Driver's License number was changed in your local voter registration system.

Potential Invalid DL Numbers to Reconcile – Marked for Investigation these records will provide a list of all the potential voters with driver's license mismatch issues that have been viewed and marked for further investigation. This is accomplished by gathering further information, for instance by sending an R-26 or other notification to the voter. From here you can only **dismiss**.



Potential Invalid DL Numbers to Reconcile – Dismissed these are cases that have been viewed and either judged to be non-issues or corrected. No action can be taken; it is just informational. You have already made the decision that the record is correct or you have already corrected the record in your local voter registration system.



Illinois Secretary of State: Potential Invalid DL Numbers to Reconcile - Dismissed

Print Page For Your Records Download Report

Hide Search Options

Enter Filter criteria below

First Name

Last Name

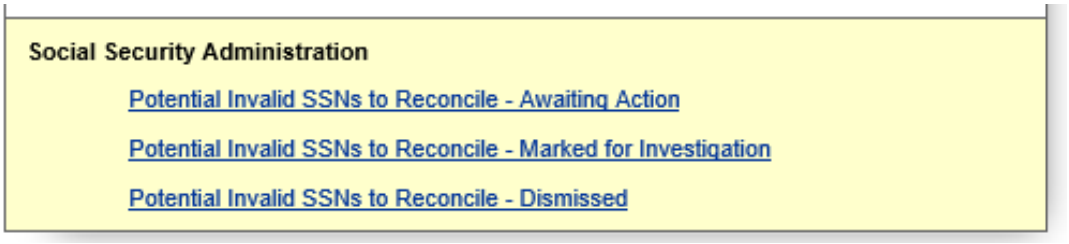
Search Clear

3131 Potential Invalid DL Numbers to Reconcile - Dismissed

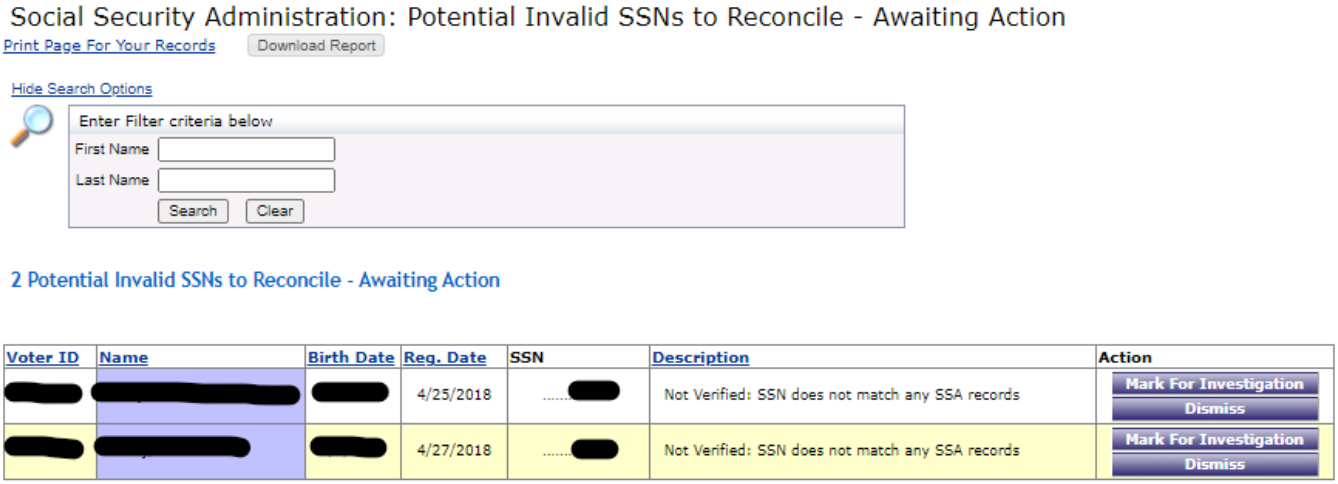
First Prev 1 2 3 4 5 6 7 8 9 10 .... Next Last Page Size 10 314 Total Pages

Voter ID	Name	Birth Date	Reg. Date	DL Number	Description	Action
[redacted]	[redacted]	[redacted]	1/13/2017	[redacted]	Not Verified: Old DL# is valid; but, DMV reports name change and issued new DL#	
[redacted]	[redacted]	[redacted]	5/25/1995	[redacted]	Not Verified: DL# Does not exist in state records	
[redacted]	[redacted]	[redacted]	10/6/2008	[redacted]	Not Verified: DL# Does not exist in state records	

SOCIAL SECURITY ADMINISTRATION

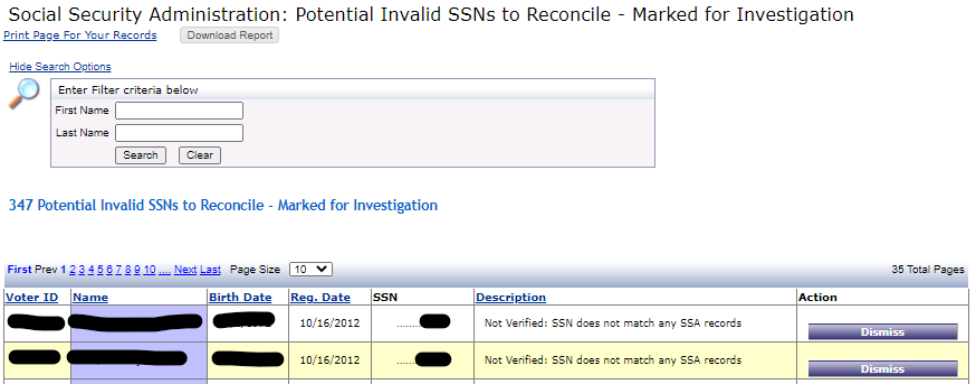


Potential Invalid SSNs to Reconcile – Awaiting Action provides you voter records that have a mismatch of information when compared with Social Security Administration (SSA) data. Name, Date of Birth (DOB), and Last 4 of SSN are the fields reviewed in this section.

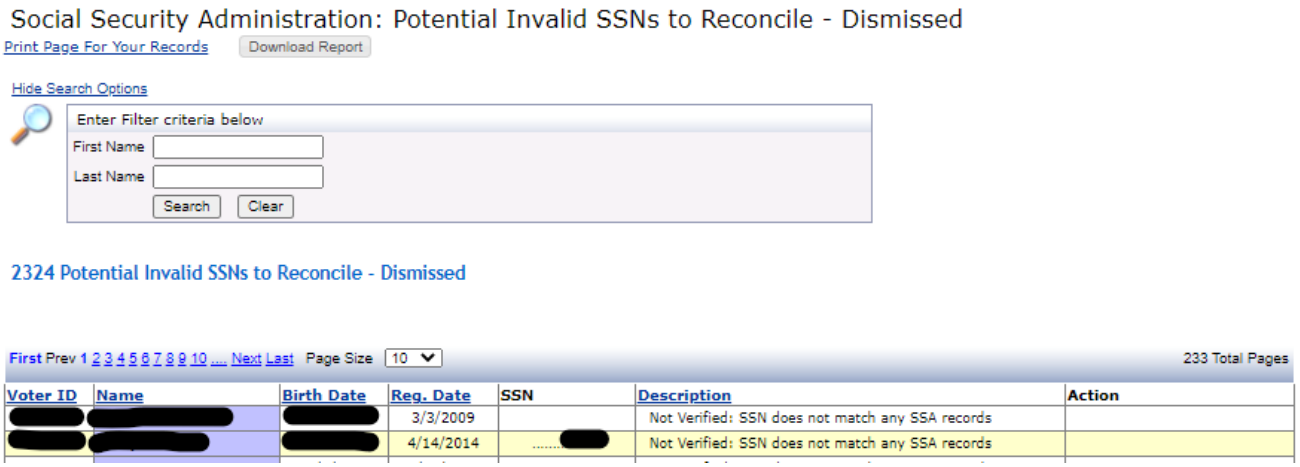


In each case, your option is either to **Mark for Investigation** or **Dismiss**, which will move the case into either of the respective, "Marked for Investigation" or "Dismissed". The former is self-explanatory and the latter means that either there is nothing wrong with the record or that it has been corrected. These records are sometimes matched due to a mismatch on name due to the individual registering with a nickname, you will need to view your scanned copy of the registration to ensure that the Social Security number is correct in your local voter registration system. You can utilize the Validation tab at the top of the screen to check an individual's proper name against the SSA database.

Potential Invalid SSNs to Reconcile – Marked for Investigation provides a list of all the potential voters with Social Security mismatch issues that have been viewed and marked for further investigation. This is done when you need to gather further information on the record, for instance by sending an R-26 or other notification to the voter.

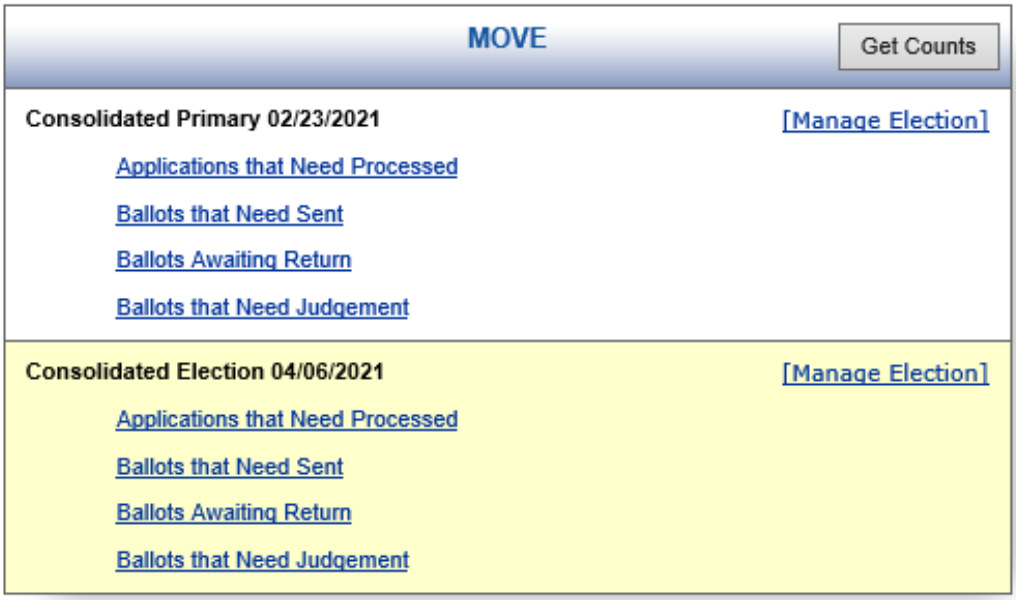


Potential Invalid SSNs to Reconcile – Dismissed these are cases that have been viewed and either judged to be non-issues or corrected. No action can be taken; it is just informational. You have already made the decision that the record is correct or you have already corrected the record in your local voter registration system.



MILITARY AND OVERSEAS VOTER EMPOWERMENT ACT

M.O.V.E.



Illinois residents currently serving in the armed forces and their eligible military dependents stationed either abroad/at sea or at Continental United States military installations or assignments, as well as civilians citizens residing outside the territorial limits of the United States for any reason are eligible to establish an account and use the Illinois State Board Elections MOVE website located at https://move.elections.il.gov.

Ballots for Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) voters may be emailed out to the voter but the ballot must be mailed back in order to be counted. **Ballots cannot be emailed back, under any circumstance.**

Once a voter chooses to establish and activate an online account through MOVE, their request for application of ballot will appear on your IVRS homepage. Please note that in the event a voter would like an application for both a primary and general election, the application for ballot will appear on your screen under both election "buckets". This allows you to easily keep track of the applications for ballot in a calendar year.

Please keep in mind that the UOCAVA voter has the option to choose the method of delivery for his/her vote-by--mail ballot. The options for ballot delivery are mail, fax, email, or through the MOVE system (Web). No matter what method of delivery the voter chooses, all procedures for verifying the application will still be in place. The voter is still required to send an application containing their signature to the election authority. The application may be **faxed, emailed, or mailed. (The application can be sent with the ballot, however the ballot will not be counted unless the signed application is received back with the ballot).** After a copy of the voter registration/vote by mail application has been received by the election authority, you will begin to track the UOCAVA voter in the IVRS system. If the application and ballot are being sent at the same time, instructions are given later in this document.

Once you are logged into the IVRS homepage you will find a bucket labeled "MOVE". This is where you will begin the process of tracking your "MOVE" voters. Located in the "MOVE" category are four buckets.

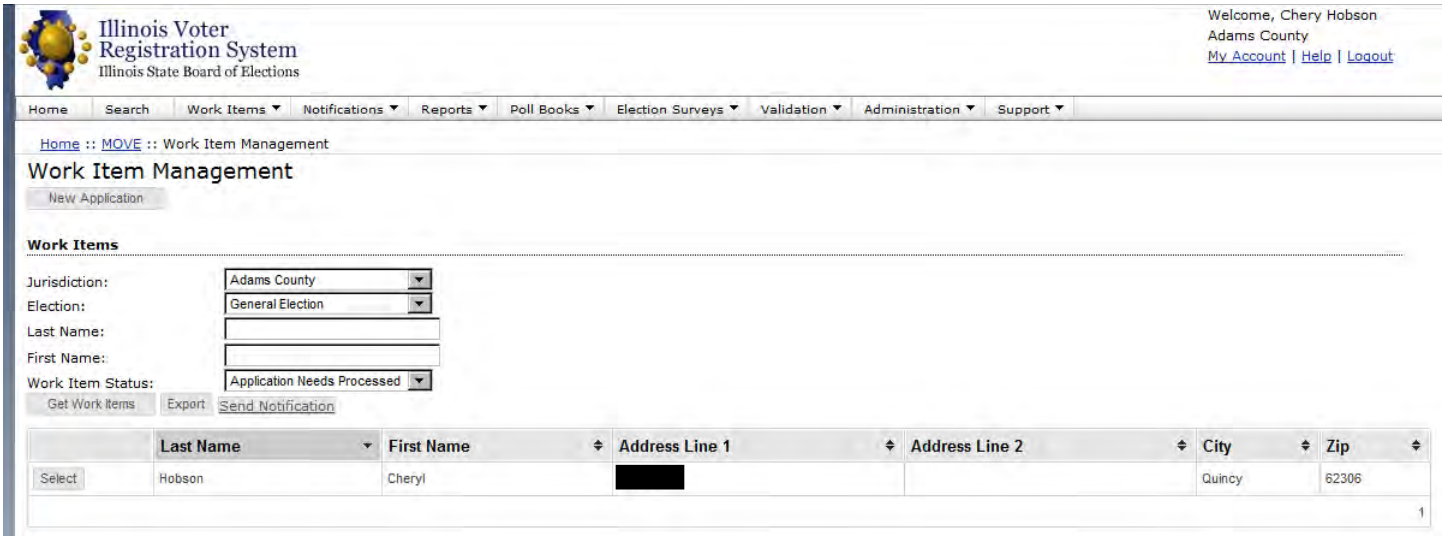
Applications that Need Processed- This bucket will house any UOCAVA voters that have requested a vote by mail ballot through the MOVE system.

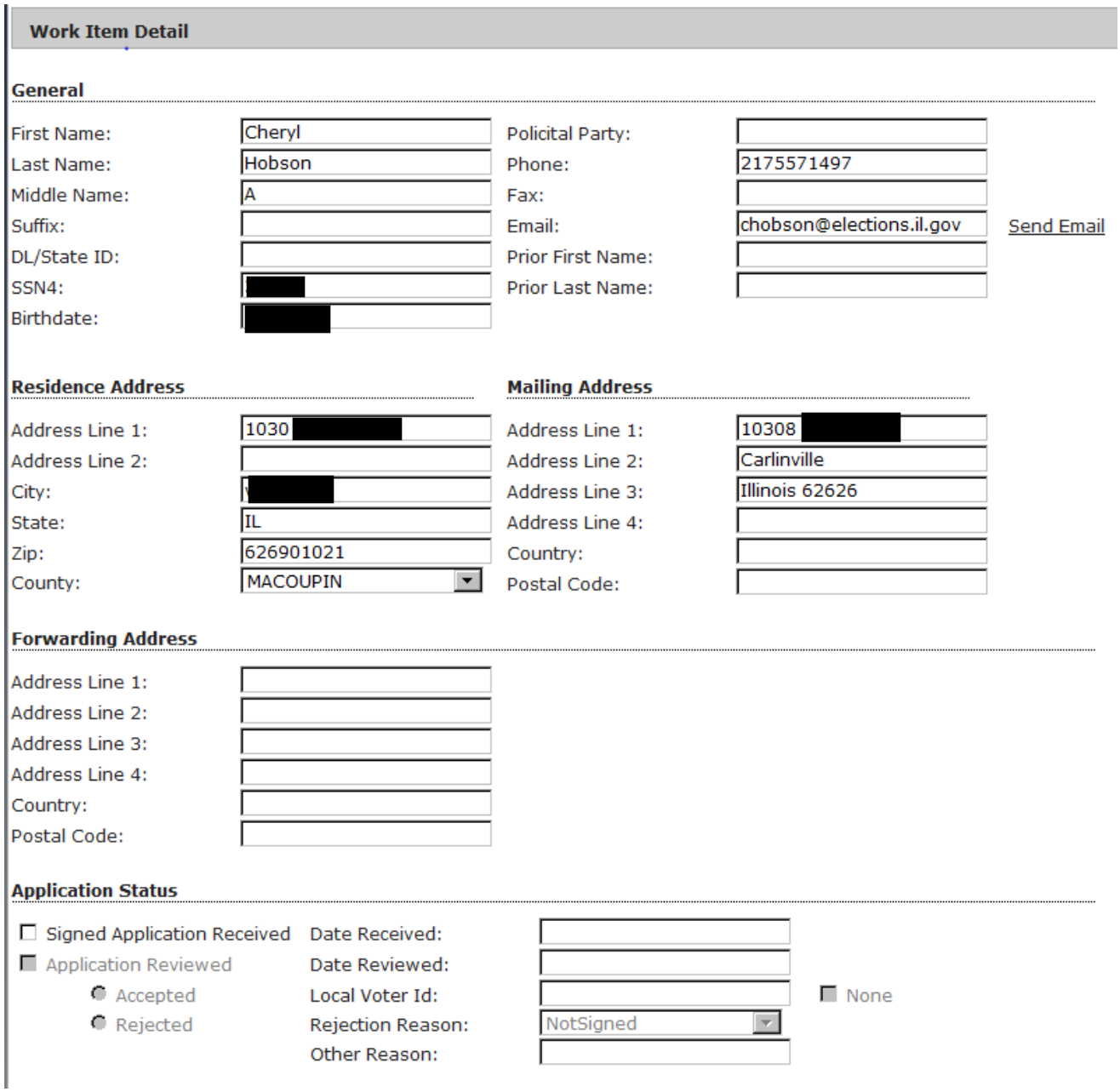
Ballots that Need Sent- This bucket will house any voters waiting for their ballots to be delivered.

Ballots Awaiting Return- This bucket will house the voters who were sent ballots and you are waiting for them to be returned and processed.

Ballots that Need Judgement – This bucket will house the voters who have returned their ballots and are waiting for the completion process**. (SEE EACH BUCKET BROKE DOWN BELOW)**

Applications that Need Processed Clicking on this link will direct you to "Work Item Management". All voters that have created an account or have been created by your jurisdiction will appear. Simply click on the "Select" button next to the voter's name. You also have the ability to search by last name and/or first name. Or click the "Last Name" to order alphabetically. *If the voter already has an account in the system, they are unable to create a new account with the same email address, for security purposes*.

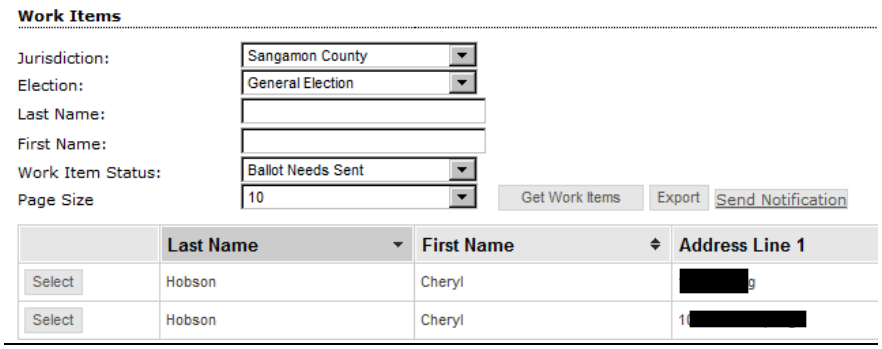




Work Item Detail will load all the information for your UOCAVA voter application from what the voter entered into the system. Once the application has been received and reviewed, you will then check each box accordingly. Check all information in the system against the application. The date will automatically populate to today's date. The date may be edited if necessary. The application status will be updated at the bottom of this screen. Determine whether you will accept or reject the ballot application and mark accordingly. You must "Save" before exiting this screen. A notification will be generated to the voter in order to inform them of the status of his/her ballot application.

Upon acceptance of the application, the application will then be moved to the "Ballots that need Sent" section. Once the application changes have been saved, you will be returned to the "Work Item Management" screen to process your next application.

BALLOTS THAT NEED SENT



After the application for ballot has been accepted, you will move to the next step of sending the ballot to the voter. **The ballot must be delivered by the method selected by the applicant-fax, email, web (through their MOVE account) or regular mail**.

Search for a name by typing the last name or the first name of the voter. You may also look for the name in the listing. You can organize fields by clicking the bar above the data you wish to sort.

Click the select button to the left of the name. Update the Ballot status by checking the box labeled "Ballot Delivered", the date will populate to today's date. You can edit if necessary.

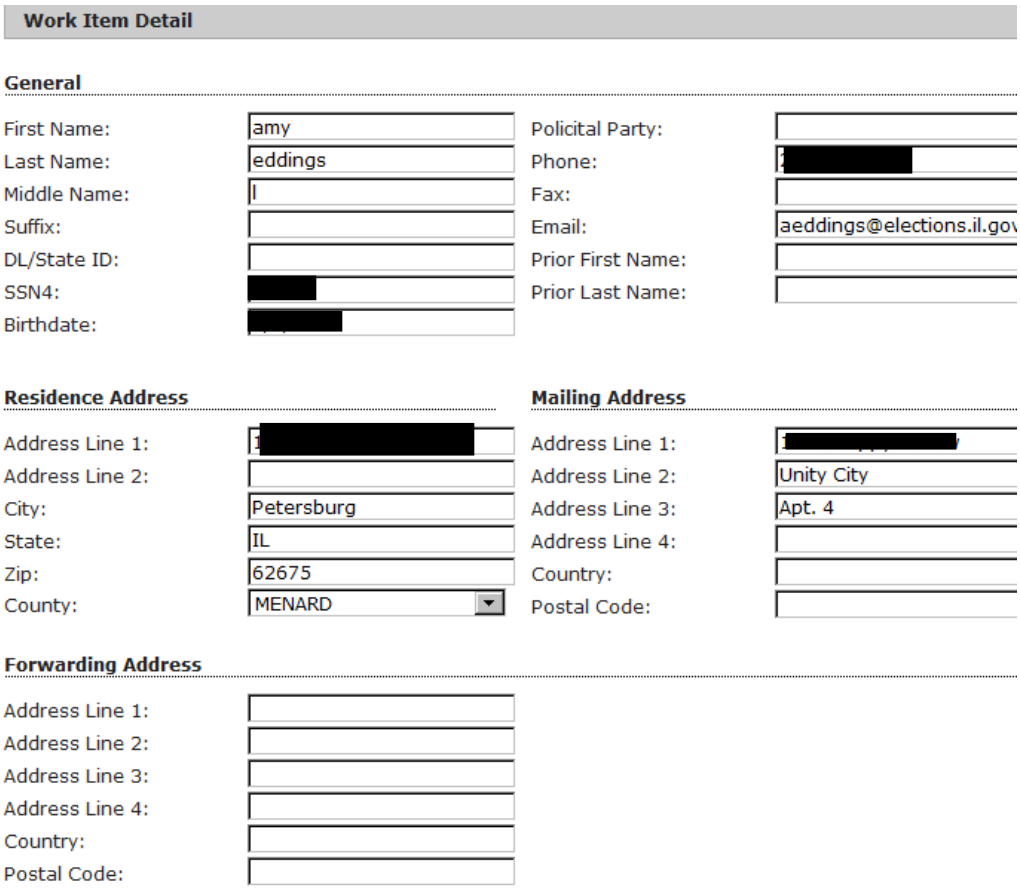


In the "Actual Method" select the method of delivery the voter has chosen from the drop down:

- **Mail** – mail the ballot and all instructions and supplies to the voter.
- **Fax** – fax the ballot and instructions and supplies to the voter at the number given.
- **E-mail** - email the ballot and instructions and supplies to the voter at the email address given.
- **Web** – When the ballots have been uploaded to the site, click the small icon to the right of "Ballot Style". **See instructions for uploading ballots.**

After the delivery date and method have been recorded accordingly, remember to Click Save. Then complete the ballot delivered process by the method selected by the voter.

Located within the "Work Item Status" drop down menu is the option to recover applications that you may have rejected, ballots accepted, and ballots rejected.



Work Item Detail

General

First Name:	amy	Policital Party:	
Last Name:	eddings	Phone:	[redacted]
Middle Name:	I	Fax:	
Suffix:		Email:	aeddings@elections.il.gov
DL/State ID:		Prior First Name:	
SSN4:	[redacted]	Prior Last Name:	
Birthdate:	[redacted]		

Residence Address

Address Line 1:	[redacted]
Address Line 2:	
City:	Petersburg
State:	IL
Zip:	62675
County:	MENARD

Mailing Address

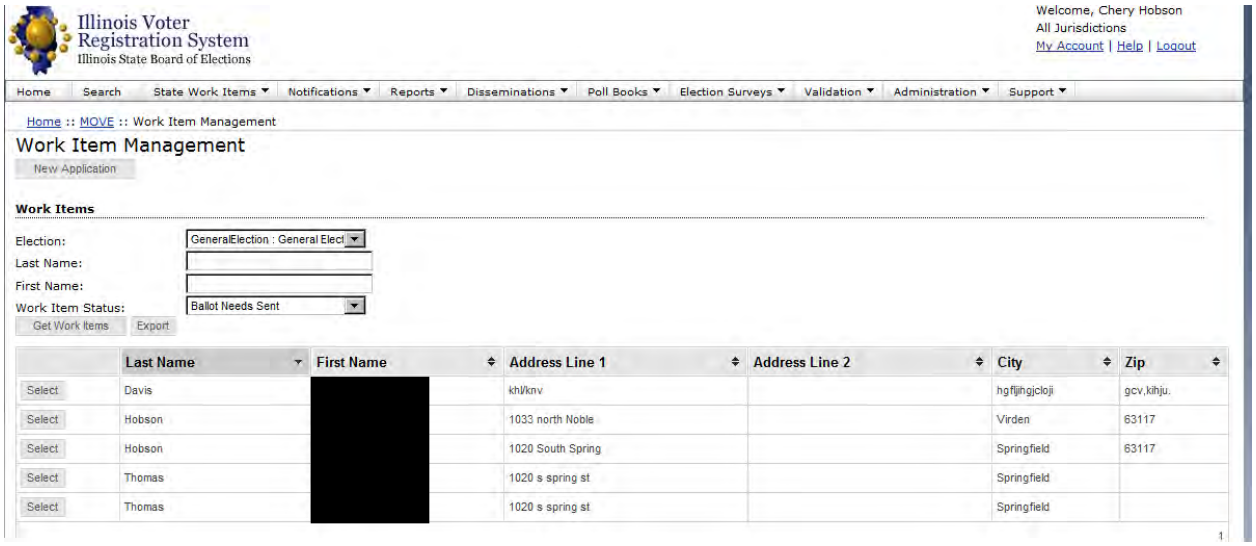
Address Line 1:	[redacted]
Address Line 2:	Unity City
Address Line 3:	Apt. 4
Address Line 4:	
Country:	
Postal Code:	

Forwarding Address

Address Line 1:	
Address Line 2:	
Address Line 3:	
Address Line 4:	
Country:	
Postal Code:	

Before the ballot is mailed, if the voter selected that method to have the ballot delivered, the option to enter a forwarding address is available. Check the application and make sure you have entered the forwarding address if one was provided. An example may be if a voter is in an area where mail service is not readily available or for unforeseen circumstances the voter cannot receive mail at a particular place or time. Once the ballot has been sent, MOVE is complete until the ballot is returned before any other processing will be done.

Applications being processed within the MOVE site will have the information entered directly into the system by the voter and then that information is verified by the election authority when the application is received. **However,** there will be cases where the election authority may choose to manually enter information for a voter who did not use MOVE. To Manually Enter an application you will select the "New Application" button located directly under "Work Item Management".



The same steps will apply once the voter is entered into the MOVE system

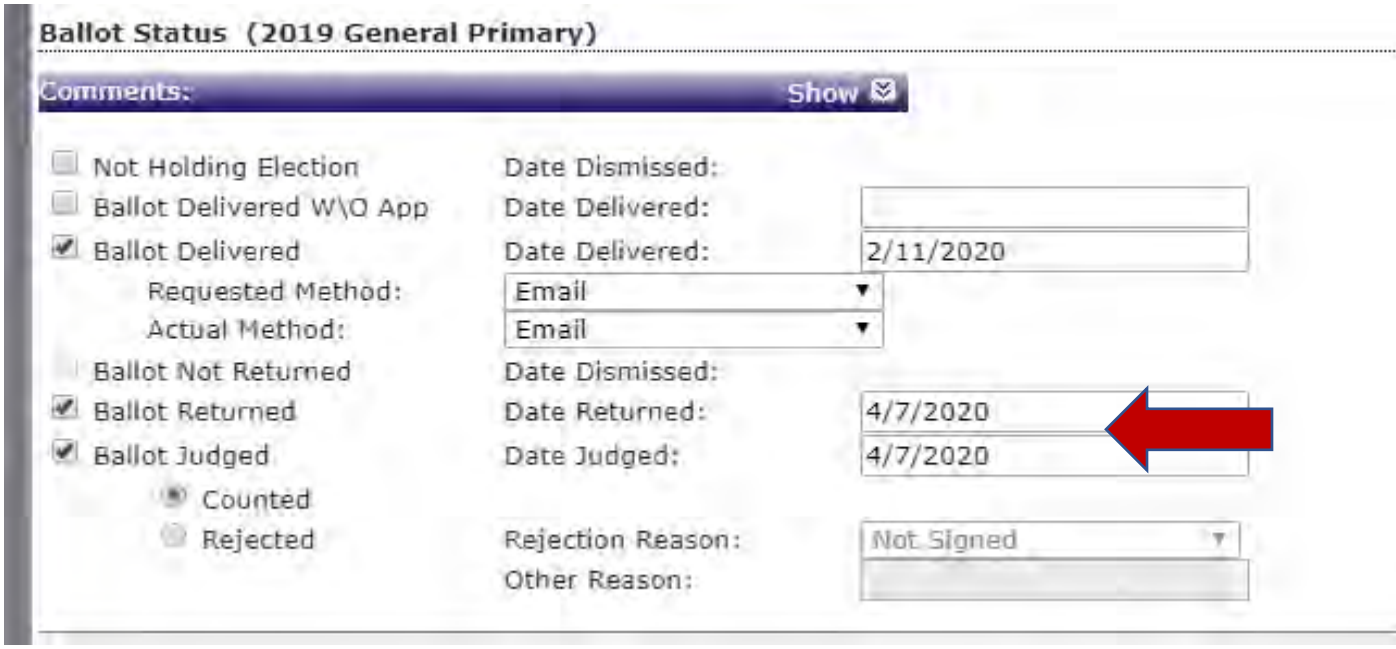
- The "Application Status" will need to be checked indicating you received the application. The date will automatically populate or it can be edited.
- The "Application Reviewed" will need to be checked indicating that you have reviewed the application. This will populate the date it was either accepted or rejected. Please fill in the local ID field.
- With applications that are entered and not sent through the MOVE site, the elections that the voter would like to have a vote by mail sent to them must be marked in the section under elections.
- The delivery method must be chosen along with the party preference, if it is a primary election.
- Once the information is entered correctly, select the save button to store the application in the MOVE system.

REMINDER: If you create an account in MOVE to track voters who contact you directly, emails will be sent to the voter to keep them updated on the delivery of the ballot. If you create an account for the voter, please double check their email address and notify the voter that an account has been set up and that they will need to reset their password when logging in.

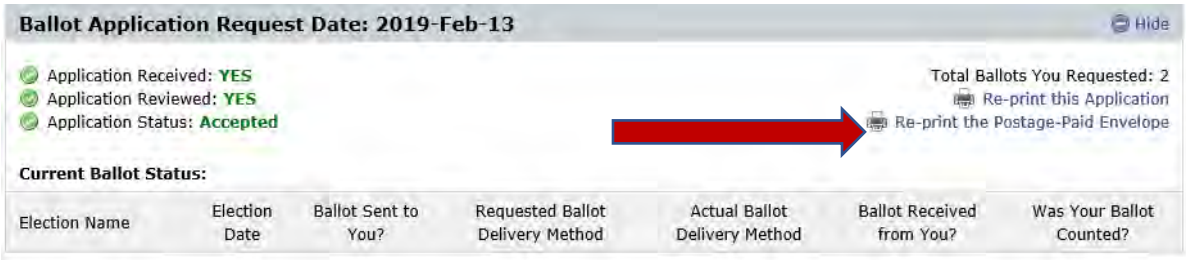
BALLOTS AWAITING RETURN & BALLOTS THAT NEED JUDGED

After the voter has returned the ballot to the election authority, enter the ballot returned date.

After the election, notify the UOCAVA voter if their ballot was counted or rejected. Select the Ballot Judged Box and indicate if the ballot was "counted" or "rejected". If the ballot was rejected, a reason must be selected. This step will send notice to the voter of their ballot status. These two steps can be completed individually or at the same time, depending on your preference.



For UOCAVA voter that have not yet sent in the signed application: The MOVE site has explicit instructions that the applicant is to mail, fax or email their signed application to the election authority. However, sometimes the application is not received in a timely manner to the election authority. Based on the timeframe to deliver the ballot to the UOCAVA voter two options are available; if time permits the election authority may reach out to the applicant via email to request the signed application (the application is always available for reproduction in their MOVE account on the right hand side labeled "re-print" application)



Some UOCAVA voters will not have access to a printer, or the timeline is close and the ballot may need to be sent without the signed application being received by your office. This is where the "Ballot Delivered W/O App" comes into play. **Only UOCAVA voters are able to have a ballot sent without the signed application being received first. However, the signed application must be received in order for the ballot to be counted.**

If this scenario occurs, you will need to select the voters name from the "Applications that Need Processed" bucket in MOVE. Click the "select button" next to the applicants name; scroll down to the "Ballot Status" and click "Ballot Delivered W/O App" this will populate the date then click "Save" at the bottom of the screen.



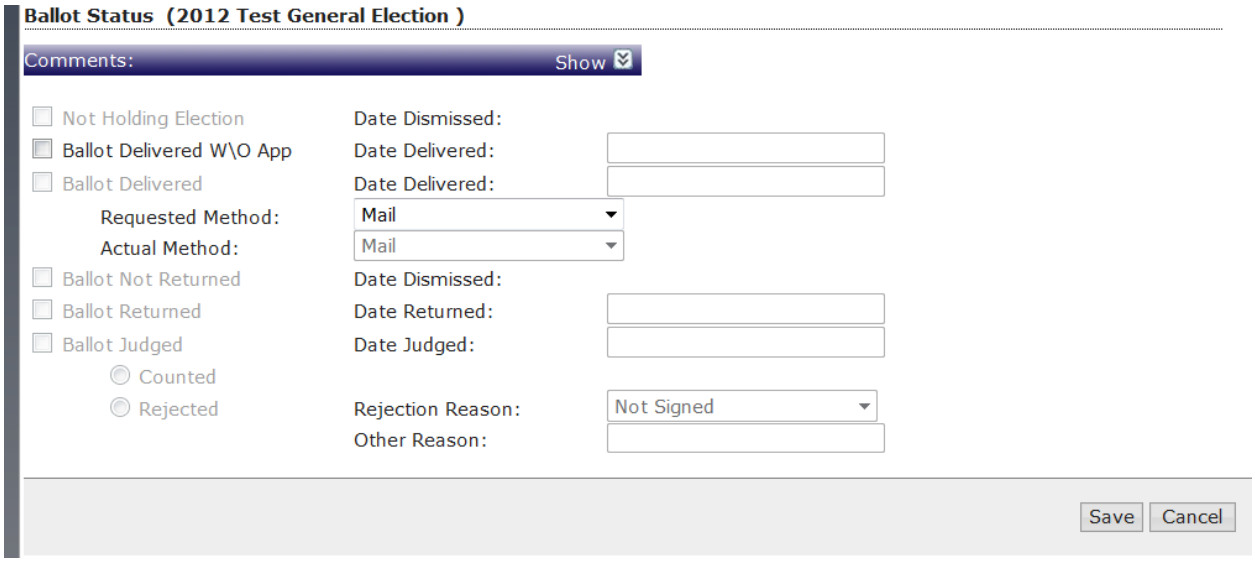
Sending the ballot without the application will leave the application in the "Applications that Need Processed" bucket. Once the ballot and application are received you will need to populate/process the application section in order for the lower sections to stop being greyed out.

Not Holding Elections-If your jurisdiction is not participating in any or all of the Consolidated Primary, Special Primary or Special Election and an application appears in any of these "buckets" a notice will need to be generated to inform the voter. Click on the Applications that Need Processed. This action will open the Work Item Management screen.

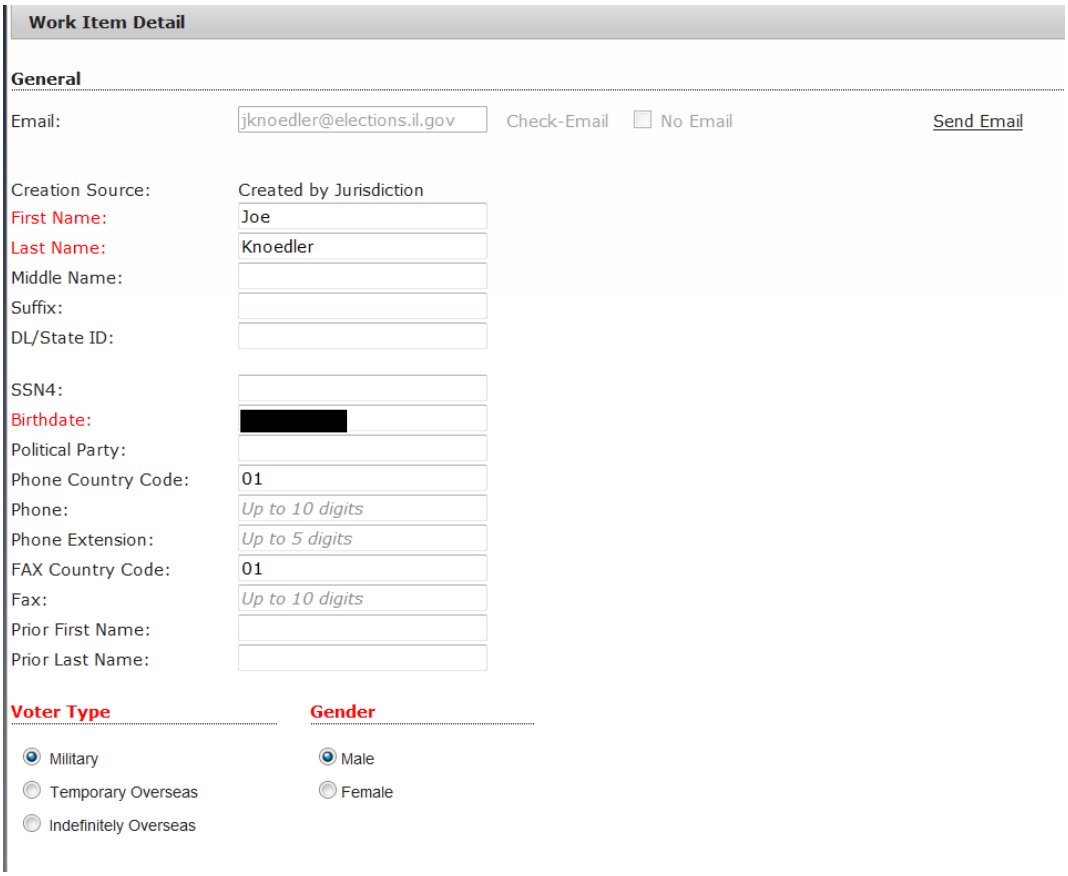
If you have received the signed application. The "Signed Application Received" will be checked, and the date will populate. Check the "Application Reviewed" box and indicate if the application was accepted or rejected. ***This action is necessary in order to maintain the application status in other elections for which the application is associated.***



Move down to "Not Holding Election" and check the box, the date will appear. Once the SAVE button is selected, the voter will receive an email informing them that their jurisdiction will not be holding that election.

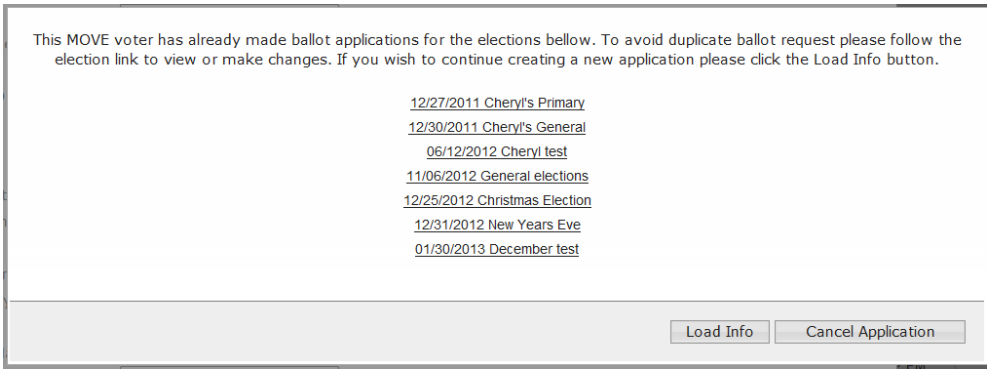


When a jurisdiction user manually enters an FPCA (Federal Post Card Application) to MOVE, by selecting the "New Application" button on the work item management page, the system will search to determine by email address if the application is a duplicate (If the application does not give an email address, the jurisdiction will ignore the email line.) With this added feature, this search should eliminate duplicate applications from being added to the jurisdiction level. The system will also notify the voter of status updates of the application and ballot, to follow the law concerning MOVE.

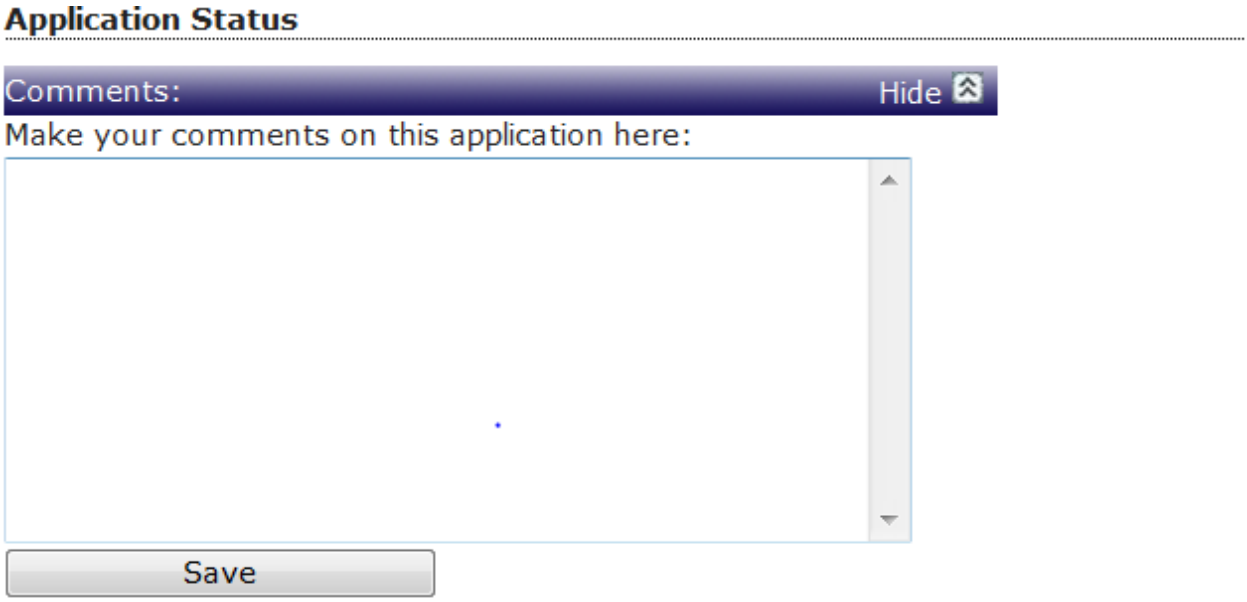


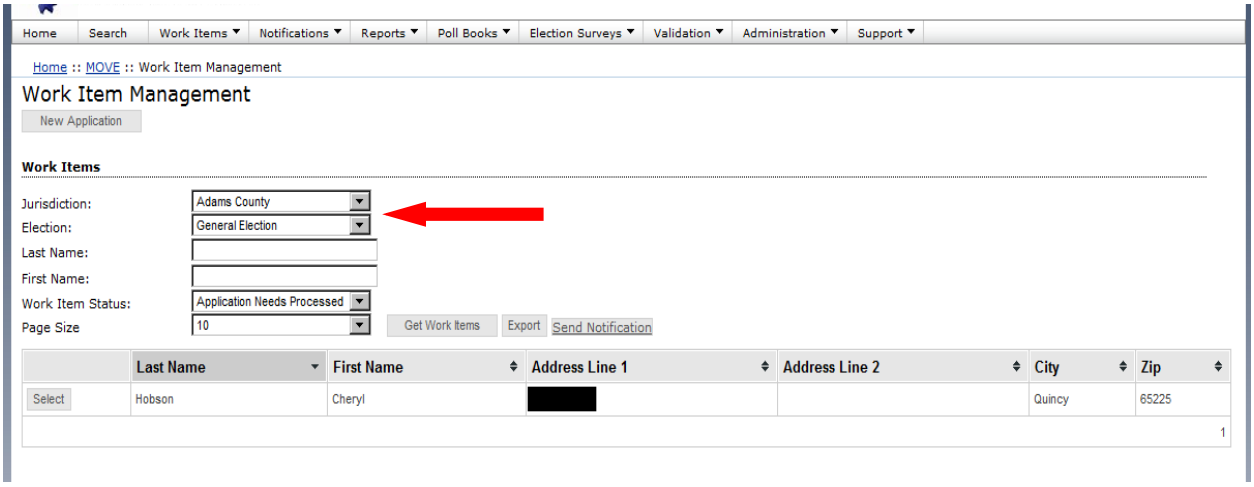
Enter the email address of the voter and select, check email. If a duplicate is found within MOVE, the message pictured below will appear. This will display all elections for which the voter has submitted an application for ballot. You will need to determine if the application you are entering is already in the system. If the application has not been submitted and you wish to add the voter to the system, you will select "***Load Info***". Proceed with processing the application.

If the application has already been entered into the system and is in fact a duplicate application you can follow the election link to view or make changes.



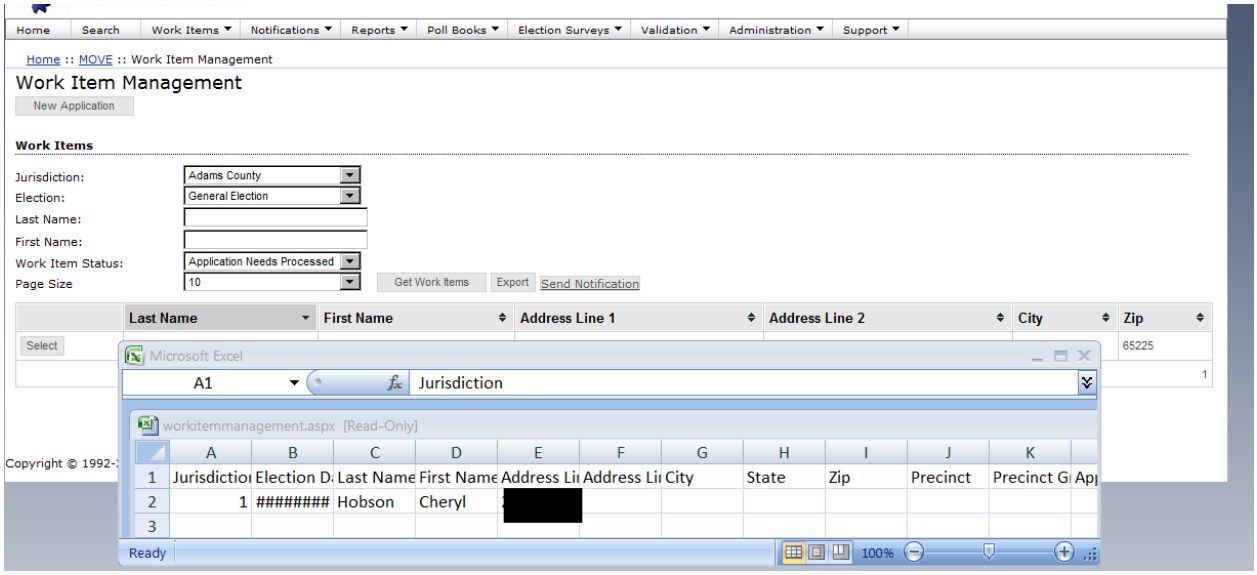
Comments & Ballot Delivered in MOVE the "Comments" box is a free style note page to make notes on what correspondence or action has been taken with the voter. This has been added to both the application and the ballot sections within details of each individual voter.



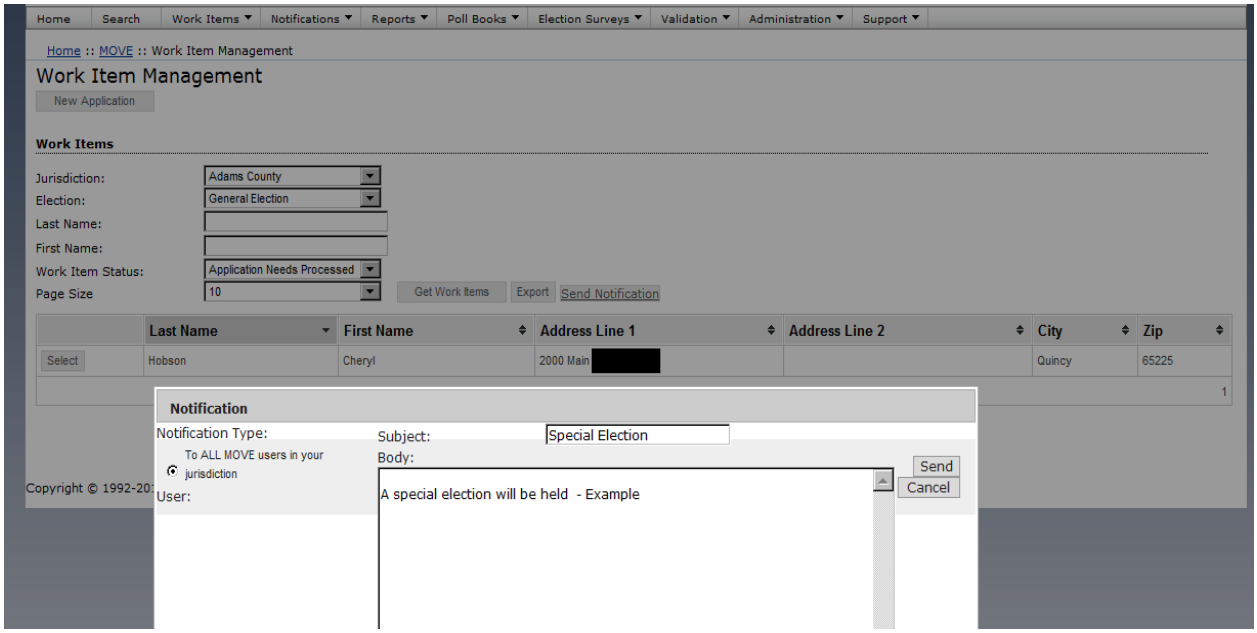


It is extremely important when you are working on any function in the system that you verify the jurisdiction and election are set each time to the current election. This is also important when uploading ballots. Take the time to verify the information on each screen is correct and accurate before moving on to the next phase.

Exporting Information to Excel Spreadsheet - The system also offers an option for the election authority to export the data from IVRS into an excel spreadsheet for tracking purposes. Simply click on the "Export" button and the data will automatically be transferred to an excel document. In this form you can track, manipulate, and create spreadsheets based on the information exported. This function can be used as a tracking tool for your MOVE voters.

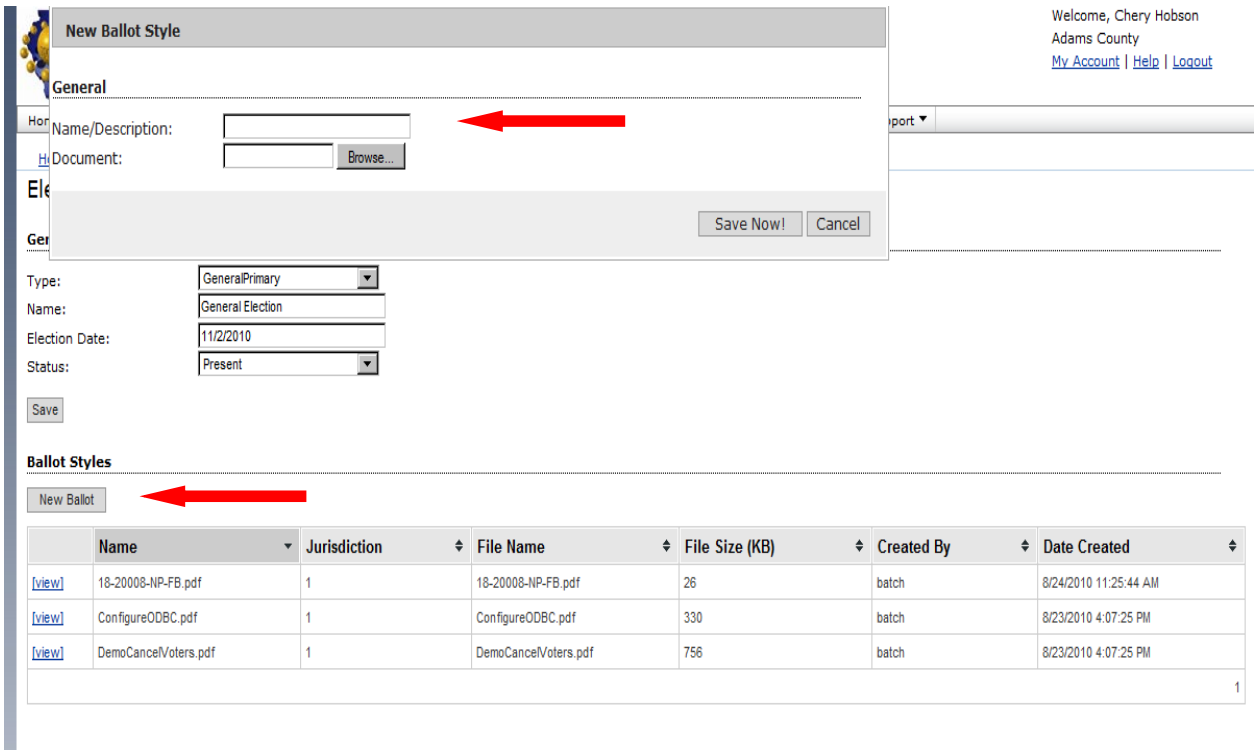


Send Notification Option - This option is available to give the election authority a simple way to contact **all** the MOVE voters in your jurisdiction. Example: If you want to notify **all** your MOVE voters that ballots will be sent on a certain date or a Special Election will be held on a certain date, this feature gives you a quick way to send those notifications.



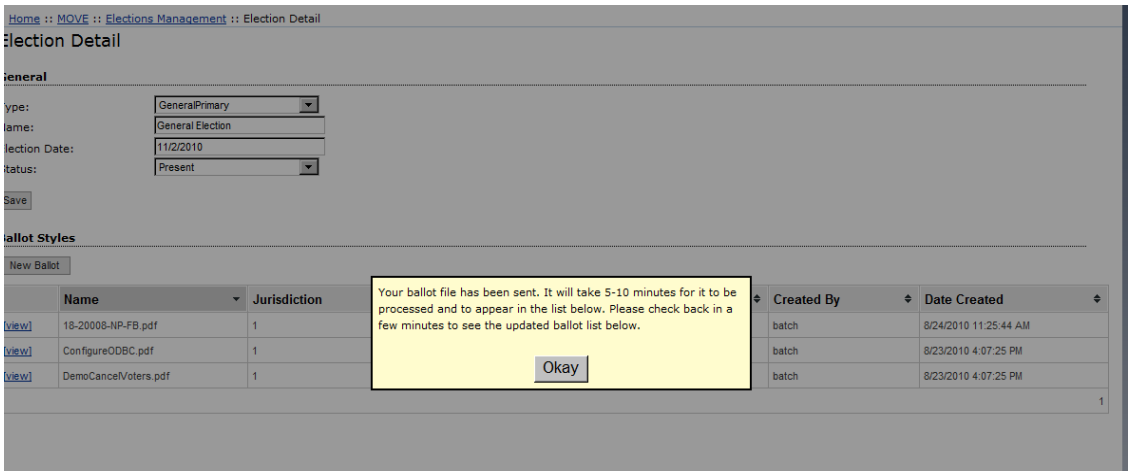
Uploading a ballot into MOVE - Most jurisdictions have their ballots sent to them on a disk/CD from their vendor that contains all the ballot styles for a particular election. These ballot styles can be uploaded directly into MOVE to send the voter their ballot through their MOVE account. You can choose to upload your ballots one at time or you can save them to a compressed zip file and upload several ballots at once.

Upload a single ballot style:



On your IVRS homepage under MOVE you will see “Manage Election”. Click on Manage Election. The Election Detail page will display the Type, Name, Election Date and Status of the current election. Verify this information is correct. When the Election Details are correct, under the Ballot Styles Click “New Ballot”. A box labeled “New Ballot Style” will appear. You should name the Ballot appropriately so you know which ballot style you are saving. Click on the “Browse” button. Simply locate the folder you saved your ballots in, click on the ballot style you want to upload. Click “Save Now”. Your ballot will upload.

You will receive a notice stating that it takes about 5-10 minutes for your ballot to upload-times will vary based on connectivity.



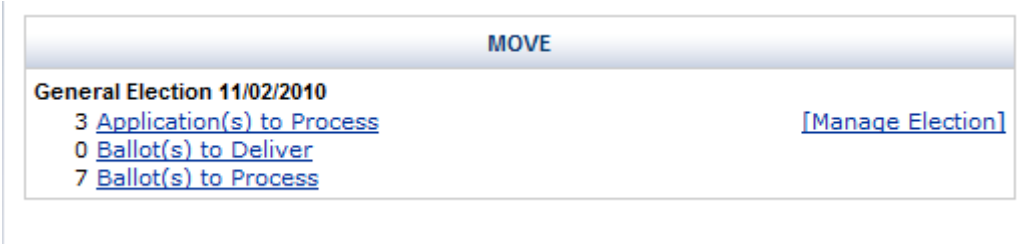
Upload multiple ballot styles:

In order to upload multiple ballot styles to MOVE, you will first need to save the ballot styles to a compressed zip file. Save the ballots you wish to upload to your desktop. Right Click on one of the ballot styles, choose the option “Send to” and select compressed “zip” folder. Click and drag the ballot styles into this folder. Once you have all the ballots saved to your zip file, you will follow the same instructions as a single ballot upload and select the entire folder instead of a single ballot.

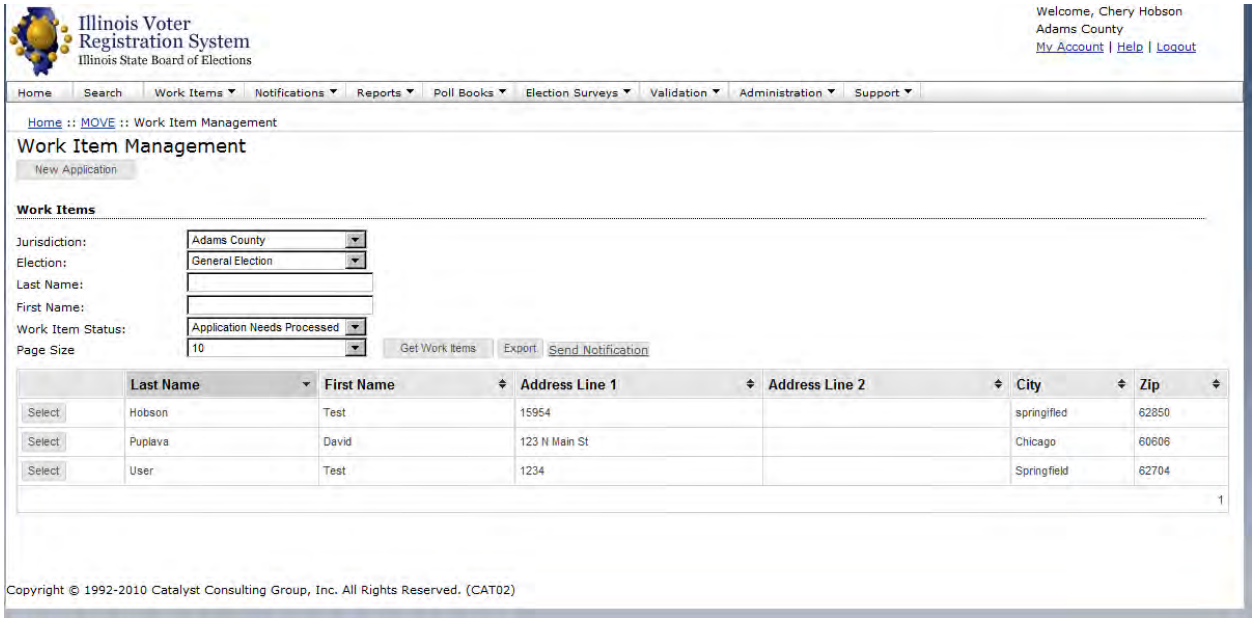
Transfer an Application:

If an application appears in your bucket that belongs in another jurisdiction, it will need to be transferred to the correct jurisdiction. This will mainly occur in areas that have Counties and Board of Election Commissioners. The voter chooses the election jurisdiction and may not understand that these are two separate units.

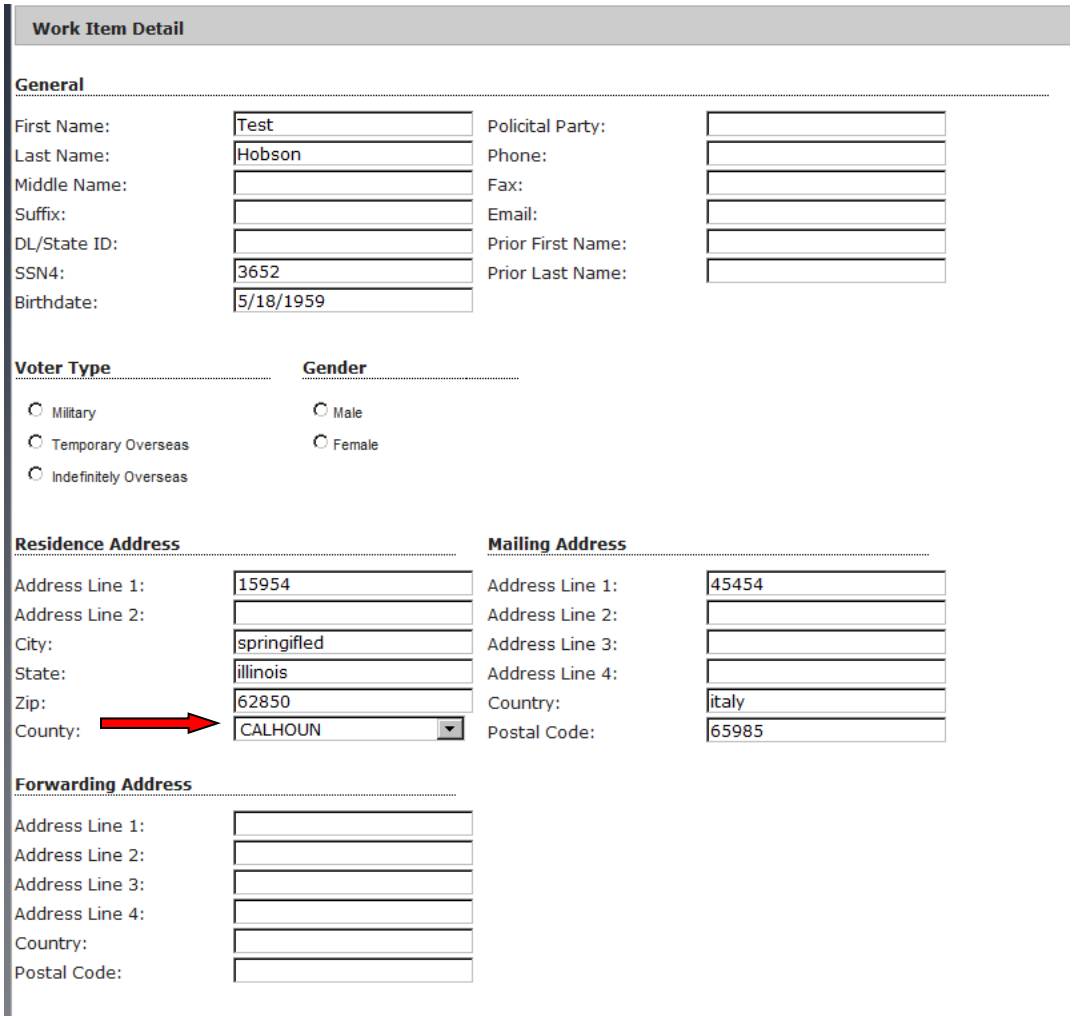
On the home page of IVRS under MOVE you will select the “Application to Process”



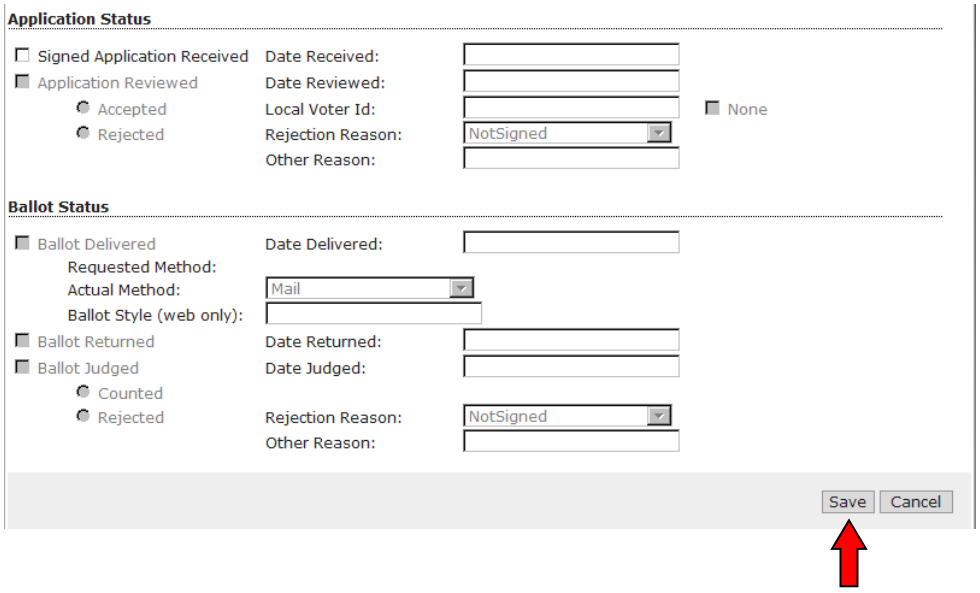
In "Work Item Management" you may find a voter that you need to transfer. Click select to the left of the voter's name.



In "Work Item Detail" in the section "Residence Address" you will see your county name, select the drop-down box, and find the jurisdiction that you want to send the application to. Choose the appropriate Jurisdiction



To do nothing with the application status. Click "save" at the bottom of the page.

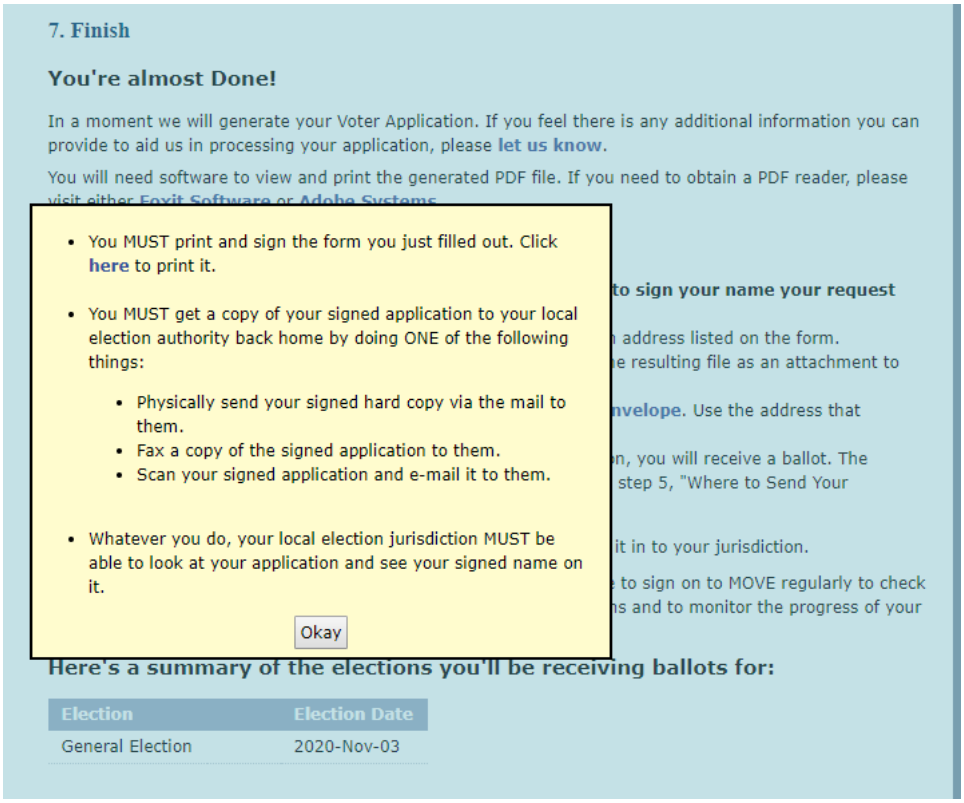


Once the application is saved, the voter's application will automatically be transferred to the correct jurisdiction. When you receive the application by fax, email, or standard mail, you will need to forward it to the correct jurisdiction as done with any other incorrect applications you receive.

Application Dismissal-After the election, any application that was not received by the election authority that is in the MOVE bucket can be dismissed. The box will be unavailable until after the election has passed, this action is necessary in order to maintain the application status in other elections.



The next two screen shots are from the MOVE site that the voter sees when filling out an application and are for informational purposes.



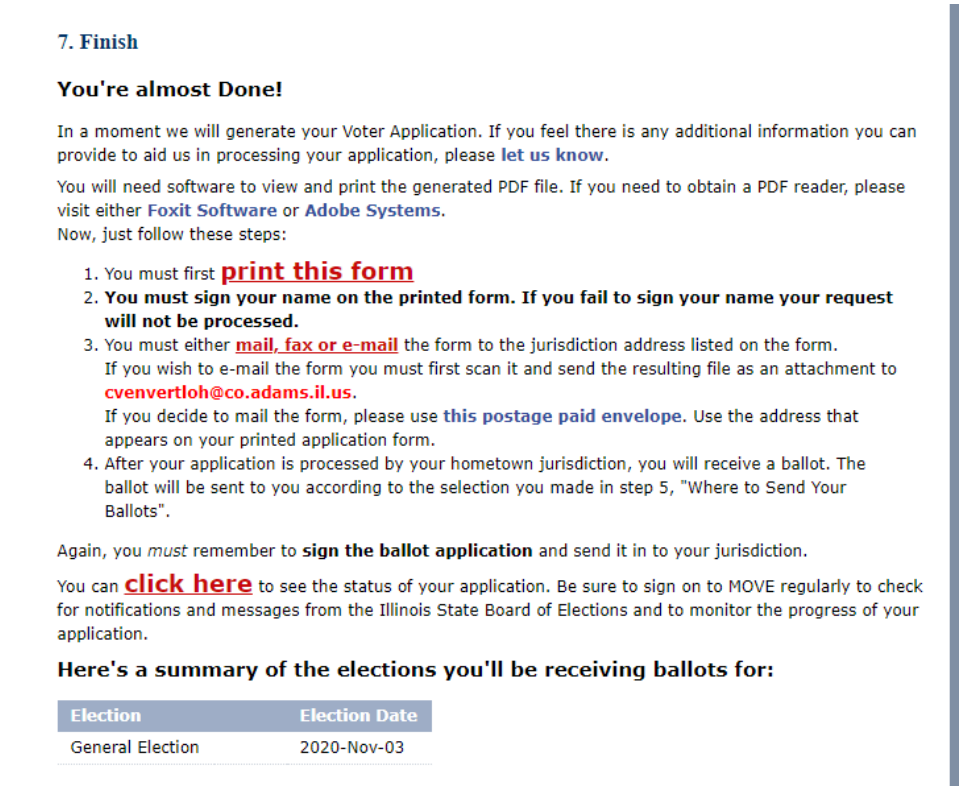


EXHIBIT F

ERIC Agreement and Bylaws Materials

ERIC-related agreement and bylaws materials produced by Illinois.

Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

ELECTRONIC REGISTRATION INFORMATION CENTER, INC.

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BYLAWS

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Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16. 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

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Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

ELECTRONIC REGISTRATION INFORMATION CENTER, INC.

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BYLAWS

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ARTICLE I

Offices

Section 1. Location. The principal office of Electronic Registration Information Center, Inc. (the "Corporation") shall be located within or without the State of Delaware, at such place as the Board of Directors shall from time to time designate. The Corporation may also maintain additional offices at such other places as the Board of Directors may from time to time designate. The Corporation shall have and maintain within the State of Delaware a registered office at such place as may be designated by the Board of Directors.

ARTICLE II

Members

Section 1. Members. The members of the Corporation shall consist solely of state, territorial governmental units, or the District of Columbia. Each member shall be represented by the chief election official or a chief election official's designee to act on the member's behalf for all purposes related to the Corporation, including service on the Board of Directors or as an Officer (the "Member Representative"). A chief election official may designate a new or replacement Member Representative at any time for any reason, at their discretion, upon written or electronic notice to the Executive Director who shall, in turn, notify the Membership.

Section 2. Admission of Members. Any jurisdiction seeking membership shall apply to the Executive Director. The Executive Director shall provide written notice to the Membership of ERIC's intent to admit a new jurisdiction, and members shall have five (5) business days to submit objections to the Executive Director in writing. If there are no objections, the new jurisdiction shall be automatically admitted to Membership effective upon execution of the Membership Agreement and payment of the Membership Fee as required by Article II, Section 4 of these Bylaws. If one or more members object to the admission of the new jurisdiction, then the jurisdiction shall be admitted to Membership upon a majority vote of the entire Board of Directors, effective upon execution of the Membership Agreement and payment of the Membership Fee.

Section 3. Membership Agreement. Each member shall sign a Membership Agreement that sets forth the terms and conditions of membership in the Corporation, which is attached as Exhibit A to these Bylaws.

Section 4. Membership Fee. Upon admission and execution of the Membership Agreement, each member shall pay a one-time, non-refundable Membership Fee of $25,000 to the

Corporation. With respect to individual members, the schedule for payment of the Membership Fee may be modified by the Board of Directors.

Section 5. Dues. Each member shall pay annual Membership Dues. Each year, the Membership shall approve the annual dues (the "Dues Schedule"), which shall form the basis of the Corporation's budget to be set annually by the Board of Directors. The Dues Schedule may be amended, modified, or substituted by a vote of the Membership, however, the schedule for payment of dues by individual members may be modified by the Board of Directors. The Executive Director shall set the schedule for payment of Membership Dues in accordance with section 1 of the Membership Agreement. Any member of the Corporation who is delinquent in the payment of Membership Dues shall be notified of the delinquency and suspended from certain privileges of membership as provided for in the Membership Agreement. If dues are ninety (90) days delinquent, the delinquent member shall forfeit all rights and privileges of membership and be automatically removed from Membership. No dues will be refunded after payment, absent an overpayment or other payment error.

Section 6. Term of Membership; Good Standing. Members shall remain members provided they remain in good standing with the Corporation. Each member shall remain in good standing by complying with all of the terms and conditions of the Membership Agreement and paying annual dues on a timely basis, as described in Section 5 of this Article. A member that is out of compliance with the requirements for good standing may be subject to removal, including automatic removal, as set forth in Section 8 of this Article.

Section 7. Resignation. A member may resign by mailing or delivering written notice to the Executive Director, who shall, in turn, notify the Membership. A member must provide a minimum of 21 days notice before their resignation is effective. Any paid Membership Dues will not be refunded, and a member shall be responsible and liable for any dues assessed prior to notice being received. However, if a member who has resigned reapplies for membership in the same fiscal year, dues previously paid will be credited to their Membership Dues for that fiscal year. If the sole reason for member's resignation is a material breach by ERIC of the Membership Agreement, member may not issue a notice of resignation in accordance with this section unless a) it has provided written notice to ERIC of the alleged breach; and b) within thirty (30) days (or such other time specified in the Membership Agreement) of receiving such notice from member, ERIC is unable to cure the breach or determines the breach cannot be cured.

Section 8. Removal.

(a) Automatic Removal: A member shall be automatically removed from Membership for failure to comply with the "automatic removal" provisions as set forth herein or in the Membership Agreement. Such automatic removal shall be effective upon written notice by the Chair of the Board of Directors and/or the Executive Director to the non-compliant member.

(b) Other Grounds for Removal: Any member may be removed at any time, with or without cause, by a three-fourths vote of the entire Board of Directors. The Board of Directors may vote to remove a member solely for a breach of the provisions of the Membership Agreement (with the exception of those provisions that trigger automatic

removal) only if the breach cannot be cured or, if curable, is not cured by the member within thirty (30) days (or such other time as may be specified in the Membership Agreement) of receiving notice of the breach from the Corporation.

(c) Dues Upon Removal: Any paid dues will not be refunded following removal.

(d) Readmission to Membership: After termination of membership pursuant to this Section, the member may reapply for membership at any time, without penalty, subject to remedying the cause for termination. Any dues assessed to the member upon reapplication shall be credited the amount of dues paid previously for the same fiscal year.

Section 9. Meetings of the Members. An annual meeting of the members shall be held each year at such time and place as shall be fixed by the Board of Directors for the transaction of business as may properly come before the members.

Regular or special meetings of the members may be held at such times as may be fixed by the Board of Directors. The annual meeting of the members shall be open to the public, except as provided by law.

Meetings of the members may be held at such places within or without the State of Delaware as may be fixed by the Board of Directors for annual and regular meetings and in the notice of meeting for special meetings. The Board of Directors may authorize that meetings of the members may be held by means of remote communication in accordance with Section 211(a)(2) of the General Corporation Law of the State of Delaware, and other applicable laws. Minutes of any meeting of the Membership shall be published following the meeting.

Section 10. Notice. Annual and special meetings of the members shall be held upon at least ten (10) days' notice by first-class mail, personal delivery, or by telephone, electronic transmission or other similar means of communication to the members, and, in the case of public meetings, publication by appropriate means. The notice shall be given by or at the direction of the Chair or the Secretary, who shall call a meeting on the request of two or more directors, a majority of the entire Membership, or upon request of the Executive Director. In the case of a meeting at which amendments to the Certificate of Incorporation, bylaws or Membership Agreement will be submitted to the members, the notice of such meeting shall set forth the proposed amendment or a summary of the changes to be effected thereby.

Section 11. Waivers of Notice. Whenever any notice is required to be given to a member, a waiver thereof in writing, signed by the person or persons entitled to such notice, or by electronic transmission, whether before or after the time stated therein, shall be equivalent to the giving of such notice. Such waiver need not specify the purpose or purposes of the meeting.

Section 12. Quorum, Vote, Proxy. A majority of the members of the Corporation, as represented by their respective Member Representatives, shall constitute a quorum at a meeting of members, and the affirmative vote of a majority of such members present at the meeting and entitled to vote on the subject matter shall be the act of the members, except as otherwise provided herein. As permitted by Delaware law, a member entitled to vote on matters reserved to the Membership may do so by identifying a proxy for the Member Representative, who shall be a part

of the Member Representative's staff or department. The Member Representative shall provide written notice to the Executive Director of the proxy within a reasonable period of time in advance of the meeting of the members.

Section 13. Written Consent of Members. Any action required or permitted to be taken at a meeting of the members may be taken without a meeting if the members having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting of the members consent in writing or by electronic transmission to the adoption of a resolution authorizing such action. Each resolution so adopted and the writings or electronic transmissions evidencing such consent by the members shall be filed with the minutes of the proceedings of the members.

ARTICLE III

Board of Directors

Section 1. Power of Board and Qualification of Directors. The business and affairs of the Corporation shall be managed by or under the direction of its Board of Directors.

Section 2. Appointment of Directors. All members of the Corporation have a right to appoint their Member Representative to serve as a director on the Board of Directors. Upon admission to Membership under Article II, Section 2 or in the event of a vacancy, member shall inform the Executive Director in writing whether it wishes to have its Member Representative serve or continue to serve on the Board of Directors. Declining to have a Member Representative serve on the Board of Directors shall have no effect on the Member's other rights under these Bylaws, and such member shall have the right to appoint or reinstate their Member Representative to the Board of Directors at any time by providing written notice to the Executive Director who shall, in turn, notify the Board of Directors.

Section 3. Resignation. Any director may resign from office at any time by delivering a resignation in writing to the Corporation. Such resignation shall take effect at the time specified therein, and unless otherwise specified, acceptance of such resignation shall not be necessary to make it effective.

Section 4. Removal of Directors. Any director may be removed from office at any time, with or without cause, by a vote of three-fourths of the entire Board of Directors.

Section 5. Vacancies. If a Member Representative position on the Board of Directors becomes vacant for any reason including resignation or removal, the chief election official shall appoint a replacement in accordance with Article II, section 1 and shall notify the Executive Director in writing whether it wishes to have its replacement Member Representative serve as a director on the Board of Directors.

Section 6. Meetings of the Board. An annual meeting of the Board of Directors shall be held each year at such time and place as shall be fixed by the Board of Directors, for the election of officers and for the transaction of such other business as may properly come before the meeting.

Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

Regular meetings of the Board of Directors shall be held at such times as may be fixed by the Board of Directors. Special meetings of the Board of Directors may be held at any time whenever called by the Chair of the Board, two or more directors, or the Executive Director. Any Member Representative who is not a director may attend any meeting of the Board of Directors.

Meetings of the Board of Directors may be held at such places within or without the State of Delaware as may be fixed by the Board of Directors for annual and regular meetings and in the notice of meeting for special meetings. Minutes of any meeting of the Board of Directors shall be published following the meeting.

Section 7. Notice. Annual and special meetings of the Board of Directors shall be held upon at least five (5) days' written notice by first-class mail or twenty-four (24) hours' notice given personally or by telephone, electronic transmission or other similar means of communication to all members.

Any such notice shall be addressed or delivered to each member at such member's address as it is upon the records of the Corporation or as may have been given to the Corporation by the member for purposes of notice.

Section 8. Quorum and Voting. Unless a greater proportion is required by law, the Certificate of Incorporation or these Bylaws, a majority of the entire Board of Directors shall constitute a quorum for the transaction of business or of any specified item of business and, except as otherwise provided by law, the Certificate of Incorporation or these Bylaws, the vote of a majority of the directors present at a meeting at the time of the vote, if a quorum is present at such time, shall be the act of the Board of Directors. Directors are not permitted to give a proxy to someone to act on his or her behalf with respect to actions of the Board of Directors.

Section 9. Written Consent of Directors; Meetings by Conference Telephone. Any action required or permitted to be taken by the Board of Directors or any committee thereof may be taken without a meeting if all members of the Board of Directors or such committee consent in writing or by electronic transmission to the adoption of a resolution authorizing such action. Each resolution so adopted and the writings or electronic transmissions evidencing such consent by members of the Board of Directors or such committee shall be filed with the minutes of the proceedings of the Board of Directors or such committee.

Any one or more members of the Board of Directors or of any committee thereof may participate in a meeting of such Board or committee by means of video conferencing, a conference telephone or similar communications equipment allowing all persons participating in the meeting to hear each other at the same time. Participation by such means shall constitute presence in person at a meeting.

Section 10. Compensation of Directors. Directors shall receive neither compensation nor reimbursement of expenses for their services as such.

Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

ARTICLE IV

Committees

Section 1. Committees of the Board. The Board of Directors, by resolution adopted by a majority of the entire Board, may designate from among its members an Executive Committee and other standing committees, each consisting of two or more directors, and each of which, to the extent provided in the resolution and to the fullest extent of the law, shall have and may exercise all the powers and authority of the Board. No committee may a) take any action expressly reserved under these Bylaws and Membership Agreement to the members for approval; b) amend the certificate of incorporation, these Bylaws, or the Membership Agreement; c) approve or remove members; d) elect or remove officers; e) remove directors; f) elect members of committees; g) hire or discharge an executive director; h) adopt an agreement of merger or consolidation; i) recommend to the Membership the sale, lease or exchange of all or substantially all of the Corporation's property and assets; or j) recommend to the Membership a dissolution of the Corporation or a revocation of a dissolution of the Corporation. The Board of Directors shall have the power at any time to designate a member of such committee as its chair, fill vacancies, change the membership or discharge a committee.

Section 2. Committee Rules. Unless the Board of Directors otherwise provides, each committee designated by the Board may make, alter and repeal rules for the conduct of its business, except with respect to quorum. In the absence of a contrary provision established by the Board of Directors, a majority of the entire authorized number of members of each committee shall constitute a quorum for the transaction of business, the vote of a majority of the members present at a meeting at the time of such vote if a quorum is then present shall be the act of such committee, and each committee shall otherwise conduct its business in the same manner as the Board of Directors conducts its business under Article III of these Bylaws.

Section 3. Service of Committees. Each committee of the Board of Directors shall serve at the pleasure of the Board. The designation of any such committee and the delegation thereto of authority shall not alone relieve any director of his or her duty under law to the Corporation.

Section 4. Records. Minutes shall be kept of each meeting of each committee. Copies of the minutes of each such meeting shall be filed with the corporate records and supplied to each member of the Board of Directors.

Section 5. Advisory Board. The Board of Directors shall create a Privacy and Technology Advisory Board, and may create such other advisory boards and appoint to them such persons as it deems appropriate. Persons serving in such advisory capacity shall not exercise any of the powers granted to the Board of Directors in these Bylaws.

Section 6. Executive Committee.

(a) *Ex Officio* Membership: The Executive Committee shall consist of the Chair, Vice Chair, Immediate Past Chair, Treasurer, and Secretary of the Board of Directors, and the Executive Director shall serve as a non-voting member of the Executive Committee (collectively the "*ex officio* members"). Vacancies in the *ex officio* membership of the Executive Committee shall be addressed in accordance with Article V.

(b) Elected Membership: In addition to the *ex officio* members, until the Membership reaches thirty-four, the Executive Committee shall include two voting members of the Board of Directors elected by the Board of Directors. When the Membership reaches thirty-five, the number of voting members of the Board of Directors serving on the Executive Committee shall increase to four, with the election of the additional members occurring within a reasonable time following the admission of the thirty-fifth member. Such committee members shall serve in this capacity for terms of one year, not to exceed three consecutive one-year terms. In the event of a vacancy among the elected membership of the Executive Committee, in accordance with sub-section d below, the Executive Committee shall take reasonable steps to propose a replacement to fill the unexpired term of his or her predecessor.

(c) Chair of Executive Committee: The Chair of the Board of Directors shall be the Chair of the Executive Committee.

(d) Role and Powers of Executive Committee: Except as set forth in Article IV, Section 1 above, or as otherwise proscribed by the Board of Directors, the Executive Committee shall have the authority to exercise all powers of the Board of Directors between meetings of the Board. In addition, the Executive Committee's responsibilities shall include preparing and proposing to the Board of Directors a slate of candidates for officer positions and elected members of the Executive and Finance Committees, including in the event of a vacancy, and the Executive Director; and, in consultation with the Finance Committee, reviewing the compensation and performance of the Executive Director. The Executive Committee shall hold regular meetings at such times as it shall determine and special meetings as requested by the Chair, the Executive Director, or two or more of its members. Actions of the Executive Committee shall be reported to the Board of Directors.

Section 7. Finance Committee.

(a) *Ex Officio* Membership: The Finance Committee shall consist of the Treasurer and Secretary of the Board of Directors, and the Executive Director shall serve as a non-voting member of the Finance Committee (collectively, the "*ex officio* members"). Vacancies in the *ex officio* membership of the Finance Committee shall be addressed in accordance with Article V.

(b) Elected Membership: The Finance Committee shall include one voting member of the Board of Directors elected by the Board. This committee member shall serve in this capacity for terms of one year, not to exceed three consecutive one-year terms. In the event the voting member position on the Finance Committee becomes vacant, in accordance with sub-

section d below, the Executive Committee shall take reasonable steps to propose a replacement to fill the unexpired term of his or her predecessor.

(c) Chair of Finance Committee: The Treasurer shall be the Chair of the Finance Committee.

(d) Role and Powers of Finance Committee: Except as set forth in Article IV, Section 1 above, or as otherwise proscribed by the Board, the Finance Committee shall have the authority to exercise all powers of the Board of Directors between meetings of the Board. The Finance Committee will assist the Board of Directors with its financial oversight responsibilities including reviewing and recommending approval of the annual operating budget; reviewing periodic financial reports; and overseeing the management of financial assets and audits. The Finance Committee shall hold regular meetings at such times as it shall determine and special meetings as requested by any of its members. Actions of the Finance Committee shall be reported to the Board of Directors.

ARTICLE V

Officers, Agents and Employees

Section 1. General Provisions. The officers of the Corporation shall be a Chair, a Vice Chair, the Immediate Past Chair, a Secretary, a Treasurer, the Executive Director, and may include such other officers as may be deemed necessary.

Section 2. Term of Office, Vacancies and Removal. The officers, other than the Immediate Past Chair and the Executive Director, shall be elected by the Board of Directors from among its membership at the annual meeting of the Board. The Board of Directors may appoint other officers, who shall have such authority and perform such duties as may be prescribed by the Board. Each officer shall hold office for terms of one year, until the next annual meeting of the Board of Directors after his or her appointment and until his or her successor has been appointed and qualified. Any two or more offices may be held by the same person, except the offices of Chair and Secretary and Chair and Treasurer. If an office becomes vacant for any reason, the Board of Directors may fill such vacancy. Any officer so appointed or elected shall serve only until such time as the unexpired term of his or her predecessor shall have expired unless re-elected by the Board of Directors. Any officer may be removed by a vote of the majority of the entire Board of Directors with or without cause. Such removal without cause shall be without prejudice to such person's contract rights, if any, but the appointment of any person as an officer of the Corporation shall not of itself create contract rights.

Section 3. Powers and Duties of Officers.

(a) Chair. The Chair shall preside at all meetings of the Board of Directors. The Chair shall perform all duties customary to that office and shall supervise and control all of the affairs of the Corporation in accordance with the policies and directives approved by the Board of Directors.

(b) Vice Chair: The Vice Chair shall serve as advisor to the Chair and shall substitute for the Chair in his or her absence or inability to serve.

(c) Immediate Past Chair: The Immediate Past Chair shall serve as advisor to the Chair, the Executive Director, and the Board of Directors.

(d) Secretary. The Secretary shall be responsible for the keeping of an accurate record of the proceedings of all meetings of the Board of Directors and members, shall give or cause to be given all notices in accordance with these Bylaws or as required by law, and, in general, shall perform all duties customary to the office of Secretary. The Secretary shall oversee the custody of the corporate seal of the Corporation, if any; and shall have authority to affix or cause to be affixed the same to any instrument requiring it; and, when so affixed, it may be attested by his or her signature. The Board of Directors may give general authority to any officer to affix the seal of the Corporation, if any, and to attest the affixing by his or her signature.

(e) Treasurer. The Treasurer shall be chair of the Finance Committee. The treasurer shall oversee the custody of, and be responsible for, all funds and securities of the Corporation; shall keep or cause to be kept complete and accurate accounts of receipts and disbursements of the Corporation; and shall deposit or cause to be deposited all monies and other valuable property of the Corporation in the name and to the credit of the Corporation in such banks or depositories as the Board of Directors may designate. Whenever required by the Board of Directors, the Treasurer shall render or cause to be provided a statement of accounts. The Treasurer shall at all reasonable times exhibit or cause to be exhibited the books and accounts to any officer or director of the Corporation, and shall perform or cause to be performed all duties incident to the office of Treasurer, subject to the supervision of the Board of Directors, and such other duties as shall from time to time be assigned by the Board. The Treasurer shall, if required by the Board of Directors, give such bond or security for the faithful performance of his or her duties as the Board may require.

Section 4. Executive Director. The Board of Directors shall hire an Executive Director who shall serve as the chief executive officer of the Corporation. The Executive Director shall have day-to-day responsibility for the management of the staff and programs of the Corporation, including carrying out the Corporation's goals and Board-approved policies. The Executive Director shall serve as an ex-officio, non-voting member of the Board of Directors; report on the progress of the Corporation's activities, provide notice to members regarding any changes in their standing with regard to the Corporation, answer questions of Board members and carry out the duties described in the job description. The Board of Directors may designate other duties as necessary. The Executive Director shall report to the Chair of the Corporation.

Section 5. Agents and Employees. The Board of Directors may hire or appoint agents and employees who shall have such authority and perform such duties as may be prescribed by the Board. The Board of Directors may remove any agent or employee at any time with or without cause. The foregoing powers may be delegated to the Executive Director. Removal without cause shall be without prejudice to such person's contract rights, if any, and the appointment of such person shall not itself create contract rights.

Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

Section 6. Compensation of Officers, Agents and Employees. Salaries or other compensation of officers, agents and employees may be fixed from time to time by the Board of Directors, or this power may be delegated to the Executive Director; provided, however, that such salaries and compensation shall not be excessive in amount and shall be for services which are reasonable and necessary for performance of the Corporation's purposes.

ARTICLE VI

Miscellaneous

Section 1. Fiscal Year. The fiscal year of the Corporation shall be determined by resolution of the Board of Directors.

Section 2. Corporate Seal. The seal of the Corporation shall be circular in form and contain the name of the Corporation, the words "Corporate Seal" and "Delaware" and the year the Corporation was formed in the center. The Corporation may use the seal by causing it or a facsimile to be affixed or impressed or reproduced in any manner.

Section 3. Checks, Notes, Contracts. The Board of Directors shall determine who shall be authorized from time to time on the Corporation's behalf to sign checks, notes, drafts, acceptances, bills of exchange and other orders or obligations for the payment of money; to enter into contracts; or to execute and deliver other documents and instruments.

Section 4. Books and Records. The Corporation shall keep in the custody of the Executive Director (1) correct and complete books and records of accounts, (2) minutes of the proceedings of its Board of Directors and members, and any committee of the Corporation, and (3) a current list or record containing the names and addresses of all members, directors and officers of the Corporation. Any of the books, records and minutes of the Corporation may be in written form or in any other form capable of being converted into written form within a reasonable time.

Section 5. Amendments to Certificate, Bylaws and Membership Agreement. The Certificate of Incorporation may be amended in whole or in part by the members. These Bylaws may be amended or repealed, in whole or in part, by a two-thirds vote of the entire Membership. The Membership Agreement may be amended, in whole or in part, by a four-fifths vote of the entire Membership.

Section 6. Privacy. The protection of individual's privacy being of significant importance to the Corporation, the Corporation shall take all reasonable and prudent actions to prevent and/or contest the disclosure of any personal or individual data held within the Corporation's control to anyone other than the members, in accordance with federal law.

Section 7. Indemnification and Insurance. The Corporation may, to the fullest extent permitted by law, indemnify any present or former director, officer, employee or agent or any person who may have served at its request as a director, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise, whether for profit or not for profit, against expenses (including attorneys' fees), judgments, fines and amounts paid in settlement,

actually and reasonably incurred by him or her in connection with any threatened, pending or completed action, suit or proceeding whether civil, criminal, administrative, or investigative, to which he or she may be or is made a party by reason of being or having been such director, officer, employee or agent if he or she acted in good faith and in a manner he or she reasonably believed to be in or not opposed to the best interests of the Corporation and, with respect to any criminal action or proceeding, had no reasonable cause to believe his or her conduct was unlawful. However, there shall be no indemnification in respect of any claim, issue or matter as to which he or she shall have been adjudged to be liable to the Corporation unless and only to the extent that the Court of Chancery or the court in which such action or suit was brought shall determine upon application that, despite the adjudication of liability but in view of all the circumstances of the case, such person is fairly and reasonably entitled to indemnity for such expenses which the Court of Chancery or such other court shall deem proper.

The Corporation shall have the power to purchase and maintain insurance to indemnify the Corporation and its directors and officers to the full extent such indemnification is permitted by law.

The Corporation may pay expenses (including attorneys' fees) incurred by an officer or director in defending any civil, criminal, administrative or investigative action, suit or proceeding in advance of the final disposition of such action, suit or proceeding upon receipt of an undertaking by or on behalf of such officer or director to repay such amount if it shall ultimately be determined that he is not entitled to be indemnified by the Corporation under this Article. Such expenses (including attorneys' fees) incurred by other employees and agents may be paid upon such terms and conditions, if any, as the Board of Directors deems appropriate.

In no case, however, shall the Corporation indemnify, reimburse, or insure any person for any taxes imposed on such individual under chapter 42 of the Internal Revenue Code of 1986, as now in effect or as may hereafter be amended ("the Code"). Further, if at any time the Corporation is deemed to be a private foundation within the meaning of § 509 of the Code then, during such time, no payment shall be made under this Article if such payment would constitute an act of self-dealing or a taxable expenditure, as defined in § 4941(d) or § 4945(d), respectively, of the Code.

If any part of this Article shall be found in any action, suit, or proceeding to be invalid or ineffective, the validity and the effectiveness of the remaining parts shall not be affected.

Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

OFFICER'S CERTIFICATE

I, _____, _____ of the Electronic Registration Information Center, formed and existing under the laws of the State of Delaware, do hereby certify that the foregoing is a true and complete copy of the Bylaws of this not-for-profit corporation as submitted and read to, and adopted by, the Board of Directors on _____, 20__.

_____

Name: _____
Title: _____

Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

EXHIBIT A

ELECTRONIC REGISTRATION INFORMATION CENTER, INC.

MEMBERSHIP AGREEMENT

This membership agreement (this "Agreement") is made and entered into as of the ____ day of _____ 20___ (the "Effective Date"), by and between Electronic Registration Information Center, Inc., a Delaware nonstock corporation ("ERIC") and _____ (the "Member").

WHEREAS, ERIC was formed for charitable and educational purposes to engage in meaningful, evidence-based improvements to voter registration in the United States; and

WHEREAS, ERIC seeks to lessen the burdens of government by facilitating the collaboration of states to conduct research, develop technology, and perform other charitable and educational activities designed to reduce the costs and increase the accuracies and efficiencies associated with their use of voter registration systems; and

WHEREAS, ERIC seeks the direct involvement of states, the District of Columbia, and United States territorial governmental units ("States") in furthering its charitable and educational purposes by such states becoming members of ERIC and furnishing voter registration and other data to help ERIC understand the needs of states with respect to their use of voter registration systems, and assist states in making their voter registration lists and processes more accurate, more complete, and fully compliant with federal, state and local laws; and

WHEREAS, ERIC securely analyzes data from multiple sources to provide its Members with reports, and Members use the reports to improve the accuracy of their voter registration rolls, provide voter registration information to potentially eligible but unregistered individuals, and investigate possible cases of illegal voting.

NOW THEREFORE, in consideration of the foregoing, the terms and conditions hereinafter set forth and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties agree as follows:

1. **Annual Dues.** The Member shall pay annual dues to ERIC as determined by the ERIC Membership, pursuant to Article II, Section 5 of ERIC's Bylaws. The Executive Director shall invoice Members for dues and set a reasonable payment deadline. If the Member fails to pay dues by the payment deadline, ERIC shall not deliver, nor shall the Member receive, any services or data from ERIC until such payment is received. Any Member that fails to pay dues within ninety (90) days of a payment deadline shall be *automatically removed* as a Member in accordance with ERIC's Bylaws (the "Bylaws").

2. **Voter Registration Data and Motor Vehicle Department Data.**

    a. A reasonable time after admission, the Corporation and the Member will agree upon a 'Certification Date' that obligates the Member to the following two sections

herein. The Member shall be notified in writing by the Corporation of the Certification Date.

b. Within sixty (60) days of the Certification Date, and at least every sixty (60) days thereafter, the Member shall transmit the following data to ERIC: (1) all inactive and active voter files (excluding those records that are confidential or protected from disclosure by law), including those fields identified in Exhibit B ("Voter Registration Data"), and (2) all licensing or identification records from motor vehicles departments (excluding those fields unrelated to voter eligibility, such as fields related to an individual's driving record), including those fields identified in Exhibit B ("MVD Data"). Voter Registration Data and MVD Data shall be collectively referred to as "Member Data." Under no circumstances shall the Member transmit an individual's record where the record contains documentation or other information indicating that the individual is a non-citizen of the United States.

c. Should Member fail to transmit Member Data by the 10th day after any sixty (60) day period as provided in sub-section b, Member shall, upon written notice from ERIC, have a thirty (30) day initial extension in which to provide such Member Data. Member may submit written requests to the Executive Director for reasonable additional extensions if Member is unable to upload Member Data because of a technical issue or a problem accessing or receiving the Member Data. Whether or not to grant the extension or to proceed to automatic removal shall be in the sole discretion of the Executive Director. If an extension period expires without a transmission to ERIC of Member Data from the Member, the Member shall be *automatically removed* from membership in accordance with the Bylaws.

3. **Protection of ERIC Reports, Member Data, Third-Party Data, and ERIC Information.**

a. Definitions. The following definitions pertain to this Section and the Agreement as a whole.

i. ERIC Reports: Using Member Data (defined in Section 2 of this Agreement) and, in some cases, data from third-party sources, ERIC makes the reports described below available to its Members. These reports, in whole or in part, shall be collectively referred to in this Agreement as "ERIC Reports."

A. **Cross-State Movers Report**: This report identifies voters who appear to have moved from one ERIC member state to another ERIC member state. This report contains MVD Data and Voter Registration Data.

B. **In-State Movers Report**: This report identifies voters who appear to have moved within the member state or who have updated their contact

information. This report contains MVD Data and Voter Registration Data.

C. **Duplicate Report**: This report identifies voters with duplicate registrations within the member state. This report contains Voter Registration Data. MVD Data is used to help strengthen the matches identified in this report but is not contained in the report.

D. **Deceased Report**: This report identifies voters who may have died. This report is created using Social Security death data known as the Limited Access Death Master File ("LADMF"). This report contains Voter Registration Data that matches the LADMF Data. MVD Data is used to help strengthen the matches identified in this report but is not contained in the report.

The Social Security Administration (SSA) acknowledges the monthly LADMF may include errors or omissions, for example misidentifying an individual as being deceased. The monthly file may include corrections when the SSA previously identified an individual as deceased who is not, in fact, deceased. ERIC automatically shares SSA's corrections with its Members in the **SSA Corrections Update.** This update contains Voter Registration Data data that matches individuals previously misidentified by the SSA as deceased and that were previously included in a Deceased Report.

E. **Eligible but Unregistered Report**: This report identifies individuals who appear to be eligible to register to vote in a member state but who do not appear to be registered. This report contains MVD Data.

F. **Voter Participation Report**: This report identifies voters who appear to have voted (1) more than once in the Member jurisdiction in the same election, (2) in more than one Member jurisdiction in the same election, or (3) on behalf of a deceased voter within the Member jurisdiction. This report contains MVD Data and Voter Registration Data. In addition, this report contains voter history data.

G. **National Change of Address (NCOA) Report ("NCOA Report")**: This report identifies voters who have moved using NCOALink data ERIC licenses from the United States Postal Service ("USPS"). There is no Member Data contained in this report.

ii. Third-Party Data: The LADMF data and the NCOALink data ERIC uses to create the Deceased Report and the NCOA Report, respectively, is collectively referred to herein as "Third-Party Data."

iii. ERIC Information: Information relating to ERIC other than ERIC Reports, Member Data or Third-Party Data is collectively referred to herein as

"ERIC Information." By way of illustration only, ERIC Information includes, but is not limited to, ERIC governing documents, membership dues invoices, communications between the Member and ERIC, ERIC's Information Security Management Plan, and documentation of ERIC's federal tax-exempt status.

iv. Records Request(s): All requests to members for ERIC Reports, Member Data, Third-Party Data or ERIC Information, including but not limited to requests that invoke state public records laws or the National Voter Registration Act ("NVRA"), to which a member believes it has a legal obligation to respond or comply with shall be collectively referred to in the Agreement as "Records Request(s)."

b. Member Representations.

i. Member represents and warrants that the transmission of Member Data to ERIC or ERIC's agents, contractors or subcontractors required under this Agreement and its use of ERIC Reports is and shall continue to be conducted in compliance with applicable federal, state, and local laws, rules, and regulations.

ii. Member shall not use, transmit, sell, or disclose any ERIC Reports, Member Data, Third-Party Data or ERIC Information for any purpose other than the administration of elections under state or federal law, supporting the operations of ERIC, and responding to Records Requests consistent with the terms of this Agreement.

iii. Member shall use its best efforts to prevent the Unauthorized Disclosure (defined in subsection (g)(i) below) of ERIC Reports, Member Data, Third-Party Data, or protected ERIC Information.

c. Confidentiality of ERIC Reports. The Member agrees that the federal statutes and regulations identified below ("Federal Protections") protect and prohibit the disclosure of certain ERIC Reports, Member Data, and Third-Party Data. The Member agrees to prevent disclosure of and otherwise protect the ERIC Reports, Member Data, and Third-Party Data in accordance with the Federal Protections, including when responding to Records Request(s), as more fully set forth below.

i. Driver's Privacy Protection Act ("DPPA"): MVD is protected from disclosure under the DPPA, 18 U.S.C. § 2721 *et seq*, but may be disclosed if a statutory permissible use applies.

ii. LADMF RegulationsLA: DMF data is protected from disclosure under Section 203 of the Bipartisan Budget Act of 2013, 42 U.S.C. § 1306c, and associated regulations administered by the National Technical Information Service, 15 CFR Part 1110 ("LADMF Regulations"), during the three-calendar year period starting from the date of death. The National Technical

Information Service has certified ERIC to receive LADMF data, which ERIC uses to prepare Deceased Reports for Members.

iii. NCOALink Regulations: The NCOALink data used to create the NCOA Report is generally protected from disclosure pursuant to ERIC's license agreement with the USPS. The license agreement is expressly subject to and derived from federal statutory privacy provisions under the Nondisclosure of Lists of Names and Addresses Act, 39 U.S.C. § 412 and the Privacy Act, 5 U.S.C. § 552a ("NCOAlink Regulations").

d. Release of ERIC Reports, Member Data, and Third-Party Data.

i. In accordance with the Federal Protections enumerated above, Member shall not release or disclose the following Reports in whole or in part:

A. **Cross-State Movers, In-State Movers, and Eligible but Unregistered Reports**, but may be disclosed if a DPPA statutory permissible use applies;

B. **NCOA Reports**; or

C. **Voter Participation Reports**, which, in addition to the Federal Protections, and as set forth above are prohibited from release under state law.

ii. In accordance with Federal Protections above, Member is permitted to release the following:

A. **In-State Duplicate Report**;

B. **Deceased Report**, provided that (i) the requestor is a "certified person" as set forth in the LADMF Regulations; or (ii) the data contained in the report sourced from the LADMF is redacted; or (iii) the three-year period of protection for the LADMF data described above has expired; and

C. **SSA Corrections Update**.

e. Process for Managing of Records Requests for ERIC Reports, Member Data, Third-Party Data, and ERIC Information.

i. When a Member receives Records Request(s) for ERIC Reports, Member Data, Third-Party Data or ERIC Information, Member shall notify and confer with the Executive Director before releasing any information in response to the Records Request(s). The purpose of this requirement is to advance the goals of (a) fostering open communication between ERIC and

its Members regarding the disclosure of information relating to ERIC in accordance with this Agreement and the Federal Protections; (b) creating consistency across the Membership with respect to the handling of the release of information relating to ERIC; (c) allowing for the case-by-case assessment of requests, including whether the request is for information that might legally be protected from disclosure on grounds other than those outlined in subsection (c).

ii. Member shall not have an obligation under this Agreement to release an ERIC Report, Member Data, Third Party Data or ERIC Information in response to Records Request(s) even if authorized to do so under the Agreement, including, by way of example and not limitation, if the Member determines that doing so would violate an applicable law in Member's jurisdiction.

f. ERIC Representations.

i. ERIC represents and warrants that it does not and shall not use or transmit any ERIC Reports, Member Data, Third-Party Data or ERIC Information for any purpose other than providing services to its Members. ERIC's services to its members include, but are not limited to, undertaking research projects with the assistance of third-parties to help evaluate and assess ERIC, provided that such research is in accordance with its status as a non-partisan organization exempt from federal taxation under 501(c)(3) of the Internal Revenue Code. Before undertaking any such research project, the Executive Director shall obtain the approval of the Board. ERIC's services may also include responding to requests for information from third-parties.

ii. ERIC represents and warrants that it does and shall use its best efforts to prevent an ERIC Unauthorized Disclosure (defined in subsection (g)(ii)) of ERIC Reports, Member Data, Third-Party Data or protected ERIC Information.

iii. If ERIC receives a request from a third-party for ERIC Reports, Member Data, Third-Party Data or ERIC Information, ERIC will generally refer the requestor to the relevant member(s), understanding that ERIC may provide the requestor with public information such as information relating to its status as a 501(c)(3) public charity. If ERIC otherwise determines it is legally obligated to respond directly to a third-party information request, it will do so in accordance with subsections (c) and (d), after first notifying the Executive Committee.

g. Unauthorized Use or Disclosure of Data.

i. Member: Should there be an unauthorized or impermissible use, access, acquisition, or disclosure or transmission of an ERIC Report, Member Data,

Third-Party Data or protected ERIC Information, regardless of whether it is accidental or intentional (for example, Member intentionally sells, distributes, publishes or uses an ERIC Report for a purpose other than election administration, including a commercial purpose) or by a third party (collectively, "Unauthorized Disclosure"), Member shall, take the following steps:

1. **Notice to ERIC:** shall report to the Executive Director of ERIC immediately upon learning of any Unauthorized Disclosure. ERIC will notify the entire Membership of the Unauthorized Disclosure within a reasonable period of time thereafter, but no less than as required under federal or state law.

2. **Member Legal Management of Unauthorized Disclosure:** Where applicable, Member shall address the Unauthorized Disclosure in accordance with law and keep the Executive Director reasonably apprised of its efforts to do so and its progress.

3. **ERIC Remediation Process:** Within ninety (90) days of ERIC receiving notice of the Unauthorized Disclosure, Member shall (a) explain in writing to ERIC that such Unauthorized Disclosure has been cured and how it was cured or, if the breach is not curable, provide a written explanation to ERIC of what steps it has taken to mitigate the risks to ERIC and its Members resulting from such breach; and (b) provide a written explanation of what processes it has implemented to prevent such Unauthorized Disclosure in the future. Upon written application, the Executive Director, in consultation with the Board Chair, may extend the deadline for Member to comply with this section. At its first meeting (or at a subsequent meeting as determined by the Executive Director, in consultation with the Board Chair), following the Member's compliance with sub-sections (a) and (b) above, the Board will consider the information submitted by the Member and vote on Member's continued membership. Should Member fail to provide any information in response to sub-sections (a) or (b) above, Member shall be *automatically removed.* To the extent permitted under each Member's state law, the Member agrees to indemnify, defend and hold harmless ERIC against any claims or losses related to or stemming from the Unauthorized Disclosure.

ii. Notice of Unauthorized Disclosure of Data/Indemnification-ERIC: Should there be an unauthorized disclosure of Member Data, Third-Party Data, or ERIC Reports by ERIC, whether accidental or intentional or the responsibility of a third party ("ERIC Unauthorized Disclosure"), ERIC shall immediately give notice to Members and take such other steps as required by law, insurance policies, and its incident response plan. ERIC shall keep the membership reasonably apprised of the steps it is taking to

address the ERIC Unauthorized Disclosure. Understanding that ERIC's primary source of funds are fees and dues paid by Members, and subject to consultation and approval by the Board, ERIC agrees to indemnify, defend, and hold harmless state motor vehicle agencies against any claims related to an ERIC Unauthorized Disclosure attributable to a negligent act or omission by ERIC, capped at the limit of any applicable ERIC insurance policy.

h. Miscellaneous. This provision shall not be construed to limit any Member's sovereign immunity, rights, claims, or defenses which arise as a matter of law or pursuant to any other provision of this Agreement. This section shall survive a Member's resignation or removal from ERIC.

4. **Utilizing ERIC Reports to Improve the Accuracy of State Voter Rolls and Increase Access to Voter Registration**

ERIC securely analyzes Member Data and Third-Party Data to provide its Members with the ERIC Reports. Members use the ERIC Reports to improve the accuracy of their voter registration rolls and provide voter registration information to potentially eligible but unregistered individuals. "Member Data" is defined in Section 2 of this Agreement. "Third-Party Data" and "ERIC Reports" are defined in Section 3 of this Agreement.

Well-timed, frequent and effective use of ERIC Reports will result in more accurate and up to date voter rolls at any given time and increase the number of eligible citizens registered to vote.

a. Requesting ERIC Reports

As an organization comprised of and governed by state election officials, ERIC recognizes that Members and their local election officials must conduct elections in compliance with federal and state laws. Members and their local election officials also work year-round to build and maintain public trust in the elections process and outcomes. In recognition of these demanding and complex conditions, Members need flexibility for when they utilize ERIC Reports.

Each Member may request the following ERIC Reports on a schedule deemed appropriate by the Member and upon which ERIC staff can reasonably provide the requested reports:

Cross-State Movers Report
In-State Movers Report
Duplicate Report
Deceased Report
Eligible but Unregistered Report
National Change of Address (NCOA) Report

While each Member retains control over when (or whether) to request any of these ERIC Reports, to further ERIC's mission and maximize the value of their membership, Members are encouraged to utilize these reports as frequently as possible while complying with applicable federal and state laws.

Members may cancel a request for a report listed in this Section up to 90 days from the date the report is provided. Members must submit a cancelation request to ERIC in writing. Canceled reports are not subject to the requirements of this Section.

b. Requirements and deadlines for acting on ERIC Reports

To further ERIC's mission and maximize the value of their membership, Members agree to comply with the following requirements once they receive a requested ERIC Report. In all cases, Members must act on ERIC Reports in compliance with federal and state laws.

i. Cross-State Movers, In-State Movers, Duplicate, and Deceased Reports:

A. Members must use these reports to improve the accuracy of the Member's voter rolls.

B. When a Member receives a **Cross-State Movers** or **In-State Movers Report** the Member must act on the report by, at a minimum, initiating contact with voters identified in the report to correct the inaccuracy or obtain sufficient information to inactivate or update the voter's record.

ERIC acknowledges State or local election officials may fulfill this requirement in a manner consistent with similar list maintenance activities conducted in the Member jurisdiction pursuant to federal or state law. This requirement does not prevent the Member from taking any other action on a voter record identified in these reports that may be required by federal or state law.

ERIC acknowledges Members may exclude from contact conducted in accordance with this Section any voter identified in these reports where other official federal, state, or local data sources, or records internal to the Member, indicate the voter record is not out of date or inaccurate. Upon the request of the Executive Director, Members must provide to ERIC details on the excluded voter records.

C. When a Member receives a **Duplicate** or **Deceased Report** the Member must act on the report for the purposes of resolving Duplicate Registrations or removing Deceased voters.

ERIC acknowledges State or local election officials may fulfill this requirement in a manner consistent with similar list maintenance activities

conducted in the Member jurisdiction pursuant to federal or state law. This requirement does not prevent the Member from taking any other action on a voter record identified in these reports that may be required by federal or state law.

ERIC acknowledges Members may not act on any voter record identified in these reports where other official federal, state, or local data sources, or records internal to the Member, indicate the voter is not deceased or the record is not a duplicate. Upon the request of the Executive Director, Members must provide to ERIC details on these voter records.

D. Members have ninety (90) days after ERIC provides the report to act on the report in a manner consistent with this subsection.

E. Members must certify compliance with these requirements in accordance with subsection (c) of this Section.

ii. Eligible but Unregistered Report

A. Members must use these reports to provide voter registration information to potentially eligible but not yet registered individuals.

B. When a Member receives an **Eligible but Unregistered Report** the Member must act on the report by, at a minimum, initiating contact with all "individuals identified in the report deemed potentially eligible by the Member" for the purpose of providing voter registration information, including the deadlines and requirements for registering as specified in applicable federal or state law.

For the purposes of this Agreement, "individuals identified in the report deemed potentially eligible by the Member" means the individuals who remain on the Contact List after the Member has used any other official federal, state, or local data sources, or records internal to the Member, to identify and remove from the Eligible but Unregistered Report individuals who are not eligible pursuant to federal or state law. Members are not required to initiate contact with any individual they determine to be ineligible.

For the purposes of this Agreement, "Contact List" refers to the list of potentially eligible but unregistered individuals provided to the entity responsible for preparing or initiating contact (for example, a mailing) with the recipient of the voter registration information.

C. Members may not remove from the Contact List any individual identified in the Eligible but Unregistered Report who otherwise appears to be eligible to register under federal or state law.

D. Members are not required to initiate contact with individuals identified in the Eligible but Unregistered Report deemed potentially eligible by the Member more than once at the same address. Members are not required to contact any individual who has affirmatively confirmed their desire not to be contacted pursuant to this Agreement.

E. Members have ninety (90) days after ERIC provides the report to act on the report in a manner consistent with this subsection.

F. Members must certify compliance with these requirements in accordance with subsection (c) of this Section.

iii. National Change of Address Report

Members of ERIC must act on these reports in compliance with the USPS NCOALink Service Statement, which ERIC will provide to Members in writing.

c. Certifying compliance with ERIC Report requirements.

The goals of certifying compliance with subsection (b) are to 1) ensure Members take seriously their obligations to further ERIC's mission of improving the accuracy of state voter rolls and providing voter registration information to all eligible citizens, 2) hold Members accountable to the public and to other members of the organization, and 3) provide ERIC with information needed to evaluate its effectiveness.

i. The Executive Director will develop Certification Process Requirements, in consultation with the Executive Committee and as approved by the Board. The Certification Process Requirements will, at a minimum, include a deadline and method by which Members must provide written certification to ERIC that the Member has or has not complied with the applicable requirements for acting on the Cross-state Movers, In-State Movers, Duplicates, Deceased, and Eligible but Unregistered Reports.

ii. ERIC acknowledges some Members may be limited in what they can certify due to voter registration system limitations, statutory requirements, technical difficulties, or other circumstances. Members must communicate any such limitations or circumstances to the Executive Director as they arise or 30 days prior to the deadline established in the Certification Process Requirements. The Executive Director will assess the circumstances and work with the Member to determine if there are acceptable alternatives to achieving the goals of the certification requirement. This determination is in the sole discretion of the Executive Director, though the Executive Director may consult with the Executive Committee during the assessment process.

iii. Upon advance written notice from the Member Representative, Member staff other than the designated Member Representative may certify compliance. Written notice must be submitted via email to the Executive Director at least one (1) day prior to the Member submitting the certification. Such designations remain active until the Member Representative revokes or updates the designation.

d. Failure to act on a Cross-state Movers, In-state Movers, Duplicates, Deceased, or Eligible but Unregistered Report.

If a Member submits a certification indicating it is out of compliance with the requirements to act on a report, the Member shall have a 30-day grace period within which to comply with the applicable report requirements. The grace period begins the day the certification of non-compliance is submitted. Within ten (10) business days following the expiration of the grace period, the Member shall provide a written certification to ERIC that the Member has complied or not complied with the applicable report requirements. If a member is still out of compliance, the Member's noncompliance will be included in the annual report required in Section 4(e).

e. Accountability and Transparency.

The Executive Director must cause to be published an annual report of each Member's utilization of the ERIC Reports for the previous calendar year. At a minimum, for each Member, the report must disclose the total number of ERIC Reports requested; the specific ERIC Reports requested; and the frequency by which such ERIC Reports were requested throughout the previous year. In consultation with the Executive Committee, the Executive Director may include other content related to how Members used ERIC Reports in the preceding year.

5. **Voter Participation Reports**.

ERIC recognizes that the appearance of illegal voting, allegations of illegal voting, and actual illegal voting undermines public confidence in the electoral process and election outcomes. ERIC can be a tool to identify potentially illegal votes and refer them to Members for further investigation consistent with each state's laws. For the purposes of this Agreement, "illegal votes" means votes cast by an individual who may have voted more than once in the Member jurisdiction at the same election, voted in more than one Member jurisdiction at the same election, or voted on behalf of a deceased voter within the Member jurisdiction. Upon the written request of a Member Representative, ERIC shall provide the Member with data identifying voters who appear to have cast illegal votes in a preceding Federal General Election.

To receive the Voter Participation Report, Members must submit a written request to ERIC. Members are encouraged to submit the request as soon as practical following each

Federal General Election, but must do so no later than 90 days from the date the Member certifies the applicable Federal General Election pursuant to the Member's state law. In the written request, the Member must: (1) specify the election for which it requests a Voter Participation Report (2) affirm that it will submit to ERIC voting history data for the applicable election in a manner consistent with how it routinely submits Member Data (3) affirm that it will accept the Voter Participation Report from ERIC, (4) affirm that it will complete a reasonable internal investigation of any possible illegal votes before publicly releasing information about the data, and (5) affirm that it can protect the confidentiality of the Voter Participation Report, either by state law or regulation.

A Member who requests a Voter Participation Report must submit to ERIC the required voting history data no later than 90 days from the date the Member certifies the applicable Federal General Election pursuant to the Member's state law. In consultation with the Executive Director, the Member may request a deadline extension to accommodate a recount(s) or other post-election activity required by state law that will prevent the member from providing the voting history data by the 90-day deadline.

A Member who requests a Voter Participation Report must refer all findings of credible cases of illegal voting to the appropriate law enforcement authorities, as designated by the Member's state law, no later than December 31 of the calendar year following the applicable Federal General Election or 180 days after the Member receives its final Voter Participation Report, whichever is later. In consultation with the Executive Director, Members may submit a written request for a reasonable extension to refer all findings of credible cases of illegal voting to the appropriate law enforcement authorities.

6. Single Point of Transfer. The Member shall designate and maintain a single point of transfer of data and a single data source/point of data per data feed.

7. Publicity. The Member shall not make or permit any person connected with it to make any announcement or statement purporting to be on behalf of ERIC, or use any logo, trademark, service mark, or business or trading name of ERIC or any other Member of ERIC without the prior written approval of ERIC or the affected Member, as applicable. Furthermore ERIC shall not make or permit any person connected with it to make any announcement or statement purporting to be on behalf of any Member, or use any logo, trademark, service mark, or business or trading name of any Member of ERIC without the prior written approval of the affected Member.

8. Waiver. No waiver by any party for any breach by the other of any of the provisions of this Agreement shall be deemed a waiver of any preceding or succeeding breach of the same or any other provisions hereof. No such waiver shall be effective unless in writing and then only to the extent expressly set forth in writing.

9. Severability. The provisions of this Agreement are separate and severable, and the invalidity of any of them shall not affect or impair the validity or enforcement of the remaining provisions.

EXHIBIT A

10. Assignment. ERIC may not sell, assign, or otherwise transfer any of its rights or interests or delegate any of its duties or obligations in this Agreement, without a majority vote of the entire Membership. The Member may not sell, assign, or otherwise transfer any of its rights or interests or delegate any of its duties or obligations in this Agreement, without the prior written consent of ERIC. Any sale, assignment, or transfer in violation of this Section is void and without effect.

11. No Partner or Agency. This Agreement does not constitute or create a partnership or joint venture with any Member or among the Members; appoint any Member as an agent for ERIC or any other Member, or appoint ERIC as an agent for any Member; or create any fiduciary obligations among the Members, except as may be expressly set forth in this Agreement.

12. Amendments. Amendments or modifications of this Agreement shall be effective immediately upon approval of such changes by the Membership in accordance with Article VI, Section 5 of the Bylaws.

13. Communications; Notices. All communications and notices that are required to be given by ERIC or a Member pursuant to this Agreement must be in writing and sent to the recipient either by electronic mail, personal delivery, or overnight commercial courier service. Members may request a preferred method of delivery and the Corporation will make all reasonable efforts to oblige such requests. Communications and notices must be sent using the Notice Details set forth on the signature page of this Agreement, unless these details are changed by delivery of a written notice to ERIC, if the change related to a Member, or the Member, if the change relates to ERIC.

14. Counterparts. This Agreement may be executed in two (2) or more counterparts, each of which when fully executed shall be an original, and all of said counterparts taken together shall be deemed to constitute one and the same agreement. This Agreement may be executed using electronic signatures.

15. Complete Agreement. This Agreement is the parties' final and binding expression of their agreement and the complete and exclusive statement of its terms. This Agreement cancels, supersedes and revokes all prior negotiations, representations and agreements between the parties, whether oral or written, relating to the subject matter of this Agreement.

16. Headings and Subsections. Section headings are provided for reference and do not constitute part of this Agreement.

Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

EXHIBIT A

ELECTRONIC REGISTRATION INFORMATION CENTER, INC.

By: _____
Name: _____
Title: _____
Date: _____

Notice Details:
Name:
Title: ERIC Executive Director
Address:
Phone:
Email:

[MEMBER]

By: _____
Name: _____
Title: _____
Date: _____

Notice Details:

Name:
Title:
Address:
Phone:
Email:

With a copy to (optional):

Name:
Title:
Address:
Phone:
Email:

Updates: March 28, 2014; May 21, 2015; October 28, 2015; December 16, 2016; November 30, 2018; February 3, 2020; June 3, 2022; February 19, 2023; March 17, 2023; May 28, 2024; July 21, 2025.

EXHIBIT B

ELECTRONIC REGISTRATION INFORMATION CENTER, INC.

Voter Registration and motor vehicles data fields to be submitted to ERIC by each participating jurisdiction, if collected by the Member State

1. All name fields
2. All address fields
3. Driver's license or state ID number
4. Last four digits of Social Security number
5. Date of birth
6. Activity dates
7. Current record status
8. Phone number
9. E-mail address or other electronic contact method

Docusign Envelope ID: 24796D0B-107B-806A-80ED-F105A5D7942D

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Tuesday, 17 November, 2026 01:36:50 PM
Clerk, U.S. District Court, ILCD

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

LAURA HOIS; ROBERT R. "RUSTY" STEVENS; JIMMY LEE TILLMAN II; JODIE ZITKO; MARY CATHERINE PAUKSTYS; GREGORY STENSTROM; HARRY R. HAURY; and UNITE 4 FREEDOM, INC.,

Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. _____

EXHIBIT G — DECLARATION OF GREGORY STENSTROM

EXHIBIT G — DECLARATION OF GREGORY STENSTROM

I, Gregory Stenstrom, declare as follows:

1. I am a Plaintiff in this action. I am familiar with Unite 4 Freedom, Inc.'s ("U4F") Illinois voter-registration and voter-history analyses, the machine-readable outputs generated from those analyses, and the files described below.

2. U4F generated the Scorecard CSV files by applying repeatable analytical tests and category rules to official Illinois voter-registration and voter-history data. The category names appearing in the first and second fields are U4F analytical classifications. They are not field names, findings, or admissions created or adopted by Illinois.

3. Each CSV row is a flagged condition instance. A registration identifier may appear in more than one row or category. The row totals therefore are not counts of distinct persons and do not, standing alone, establish that any registration or vote is unlawful. The files identify records for which the underlying State records are necessary to confirm, explain, reconcile, or correct the flagged condition.

4. The following file-level controls identify the preserved analytical outputs underlying the totals stated in U4F's August 18, 2026 notice and Appendix A (Exhibit A):

5. 2024_IL_NVRA_ScorecardSection01.csv — 950,368,591 bytes; 4,566,205 data rows; 3,875,145 unique identifiers; SHA-256 77632D842F40CA79CF8FC5591293FF568BA7CD1FB411E90B5C310B37E15EDD0C.

6. 2024_IL_NVRA_ScorecardSection02.csv — 310,989,906 bytes; 1,468,959 data rows; 1,045,659 unique identifiers; SHA-256 534999418B2EF4081A68E601D981522E3DB3AADC1CFC45E088F56DA1422223AD.

7. Both files are headerless; their first lines are data records. Section 01 has a recorded last-modified time of August 19, 2026 at 20:10:20.1628885 UTC. Section 02 has a recorded last-modified time of August 19, 2026 at 20:10:11 UTC.

8. I verified the Section 02 CSV after extraction from the supplied ZIP archive. It contains exactly 1,468,959 rows, each with 34 fields, and 1,045,659 distinct values in the registration-identifier field. Its first-category control totals, using the category labels exactly as they appear in the file, are: 01 Illegal Duplicate Registrations, 725,023; 02 Voted Before Registered, 317,697; 03 Inactive registration that was never active, 273; 04 Questionable inactive status, 28,352; 05 Voted while Inactive, 24,787; 06 Backdated Registrations, 35,557; 07 Modified Date Prior to Registration Date, 2,036; 08 Invalid or Illogical Registration Date, 142,846; 09 Age Discrepant Registrants, 6,071; 10 Registrants with questionable address, 126,304; 11 Registered after 2022 GE yet voted, 60,013. Total: 1,468,959.

9. The category labels quoted in the preceding paragraph are the screening labels U4F's analysis assigned when the files were generated. They are reproduced exactly because altering them would alter the files and their SHA-256 hashes. They are not findings. In particular, "Illegal Duplicate Registrations" identifies potential duplicate or conflicting registration records requiring comparison against Illinois's disposition records, not registrations determined to be illegal; and "Voted Before Registered" identifies records whose recorded registration date falls after a recorded vote, a condition Illinois attributes to differing local definitions of "registration date." See Exhibits A and D.

10. The Section 02 transport archive is named 2024_IL_NVRA_ScorecardSection02.zip. It is 80,923,828 bytes, has SHA-256 B28BCDC50E5BDD0F367E0DEB1D5D78A8DFF973BB962F1E4B014EEA7D47E6A311, and contains only the Section 02 CSV identified above.

11. The two uncompressed CSV files total 1,261,358,497 bytes. Their omission from the docket is based on file size, not on any unwillingness to produce them. The files are preserved and can be made available to the Court and the parties by secure electronic transfer, physical media, discovery production, or another method directed by the Court. The hashes above permit byte-for-byte verification of any produced copy.

12. I will compare the requested definitions, source transmissions, change histories, and dispositions against the preserved Illinois analyses, distinguish explained conditions from verified errors, and present supported issues to the responsible officials before certification. The file controls identify the preserved versions; an August 19 last-modified timestamp alone does not identify the bytes transmitted with the August 18 notice.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on: 11/15/2026

Signed by:
Gregory Stenstrom
D2908023535049E...

Gregory Stenstrom

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

LAURA HOIS,
ROBERT R. "RUSTY" STEVENS,
JIMMY LEE TILLMAN II,
JODIE ZITKO,
MARY CATHERINE PAUKSTYS,
GREGORY STENSTROM,
HARRY R. HAURY, and
UNITE 4 FREEDOM, INC.,

Plaintiffs,

v.

BERNADETTE MATTHEWS, in her official capacity as Executive Director and Chief State Election Official of the Illinois State Board of Elections, and JOHN OLDFIELD, in his official capacity as Director of Voting and Registration Systems,

Defendants.

DECLARATION OF JODIE ZITKO

I, Jodie Zitko, declare as follows:

1. My name is Jodie Zitko. I am an adult United States citizen residing at 3N778 Walt Whitman Rd., St. Charles, IL. 60175 in Kane County, Illinois. I am a registered Illinois voter in Illinois Congressional District 11 (IL-11). I voted in the November 5, 2024 federal general election and intend to vote in the November 3, 2026 federal general election.

2. Since March 2022, I have participated extensively in Illinois election-record review, voter-history analysis, election observation, election-judge training, statewide election-incident coordination, communications with election authorities, and the preservation of election-related records.

3. In February 2022, I learned through review of official Illinois voter-history data that my voter-participation record attributed participation to me in the 2010, 2014, and 2018 general elections even though I did not vote in those elections.

4. My husband, Kenneth Allen Zitko, likewise had participation entries attributed to him for those same three elections even though he also states that he did not vote in those elections.

5. The matching disputed entries in both of our records caused me to conclude that the issue could not responsibly be dismissed as a simple mistake in my memory or as an isolated personal-record anomaly.

6. I preserved and reviewed successive official State-derived voter-file snapshots dated August 28, 2021; June 14, 2022; October 13, 2023; October 15, 2024; January 24, 2025; and May 13, 2026.

7. Across those records, the disputed participation entries attributed to me can be identified and compared over time.

8. I have not received the originating applications, poll-book records, ballot-issuance records, voter-history source transactions, audit logs, correction records, user-activity records, reason codes, or written findings explaining how those entries were created, maintained, changed, or removed.

9. In 2023, my husband and I personally reported the disputed voter-history entries to the Kane County Clerk's office and sought an explanation.

10. I remain without a documented investigation, originating transaction, correction history, audit trail, or written determination explaining the entries.

11. Merely changing or removing a displayed participation entry would not resolve my concern. Without preservation of the source transaction and audit history, I cannot determine how the entry originated, whether the underlying records were corrected, whether similar conditions exist elsewhere, or whether the condition could recur.

12. After discovering participation attributed to my record for elections in which I did not vote, I changed the way I personally cast ballots because I wanted a more visible and documented chain surrounding the ballot issued in my name.

13. Beginning in the spring of 2023, my husband and I registered to receive vote-by-mail ballots. We receive those ballots but do not return them through the mail.

14. Instead, on Election Day, we personally bring each unvoted vote-by-mail ballot and its original envelope to our assigned precinct, inform the election judges that we wish to vote in person, surrender and spoil the vote-by-mail ballot, complete the required written process, and then receive and cast an in-person ballot.

15. We have used this procedure successfully in four election cycles since the spring of 2023 and plan to do so in November 2026.

16. This practice is important to me because it creates a contemporaneous and documentable sequence showing that a vote-by-mail ballot was issued in my name, remained in my possession, was not voted or returned through the mail, was surrendered and spoiled at

the precinct, and was replaced with an in-person ballot issued after check-in and completion of the required process.

17. That process should create records sufficient for later reconstruction and reconciliation, including the vote-by-mail issuance record, surrendered ballot and envelope, affidavit or other written documentation, poll-book or check-in record, in-person ballot-issuance record, and final voter-participation-history entry.

18. I should be able to determine from official records both how participation was attributed to me in elections in which I did not vote and whether elections in which I personally followed the surrender-and-spoil process were recorded accurately.

19. In addition to reviewing my own voter-history records, I sought direct experience with election administration. I attended Kane County election-judge training in September 2022 and later participated extensively in election observation and election-incident coordination.

20. During the November 2022 and spring 2023 election cycles, I coordinated or helped lead six election observation efforts across Illinois. In that role, I worked with poll watchers, election participants, volunteers, county contacts, and others to receive, evaluate, preserve, and escalate election-related incident reports.

21. The reporting process preserved time-stamped reports, county and precinct information, photographs where available, communications, spreadsheets, follow-up notes, and affidavits. My role included substantial responsibility for intake, coordination, follow-up, preservation, and escalation.

22. I also personally participated in poll watching and communications with county election officials and the Kane County State's Attorney's Office concerning election-administration issues that I personally observed or helped document.

23. During the April 4, 2023 Kane County Consolidated Election, our contemporaneous materials also documented election-night reporting figures that changed materially while additional precincts were being reported. At approximately 9:00 p.m., with 40 of 47 precincts reported, the public-facing figures reflected 11,427 ballots and 29,659 votes. By approximately 12:10 a.m., after 47 of 47 precincts were reported, the public-facing figures reflected 8,162 ballots and 20,929 votes.

24. I understood those changing figures to require explanation and reconciliation because the later reported totals were lower despite additional precincts having been reported. Our team preserved the screenshots, figures, calculations, and presentation materials so that the changes could later be reconstructed and reviewed.

25. I do not allege that those figures alone establish unlawful conduct or an incorrect election result. My concern is that material changes in official or public-facing election information should be capable of reconstruction and explanation through preserved underlying records.

26. These experiences have shown me that displayed voter-history records, analytical datasets, public reports, screenshots, summaries, and individual observations are not sufficient by themselves to determine what occurred within an official voter-registration or election record.

27. To responsibly investigate an identified condition, I need the underlying official definitions, voter-history source records, status and reason codes, transaction histories, dates of changes, notices, responsible custodians, audit histories, user-activity records, synchronization information, and documented dispositions.

28. Where a voter-history entry, registration record, ballot status, participation record, or other election record changes or differs across official records, I need sufficient information to determine what the prior record reflected, what changed, when and why it changed, what authority supported the change, and how the matter was ultimately resolved.

29. I have reviewed the requests for records and election-administration information identified in the Plaintiffs' August 2026 notice under the National Voter Registration Act. The records and information sought in that notice are directly relevant to my interests and activities as a registered Illinois voter and as a person who regularly reviews voter-registration and voter-history information, including my ability to investigate and evaluate conditions affecting my own voter record and other voter-registration records I review.

30. I intend to use responsive records to compare official voter-registration information, voter-history entries, transaction histories, status and reason codes, dispositions, audit information, and related official records with the election data and records already available to me; identify which conditions have documented explanations; present verified matters to responsible election officials; pursue lawful individualized correction or reconciliation where appropriate; and document their disposition.

31. I cannot responsibly perform those activities from analytical flags, voter-file snapshots, summary data, screenshots, public reports, or isolated records alone because those materials do not necessarily disclose the originating transaction, official explanation, correction history, change authority, audit trail, synchronization history, or final disposition necessary to determine whether an identified condition has been explained and reconciled.

32. The official information I need is not otherwise available to me through the records I already possess. Those records may identify a condition requiring investigation but do not substitute for the underlying official records necessary to determine what occurred.

33. My interest is not merely a generalized interest in election administration. It arises from my own disputed voter-history record, my personal efforts to obtain an explanation, the change I made to my own voting practices, my direct election-observation and records-

preservation activities, and my continuing need for official records sufficient to investigate and evaluate voter-registration and voter-history conditions.

34. I remain an Illinois voter and continue to participate in election-record analysis, election observation, organizational activity, and review of election administration.

35. I intend to continue receiving a vote-by-mail ballot and personally surrendering and spoiling it at my precinct before voting in person unless I am given a reliable and documented reason to change that practice.

36. I therefore expect to encounter the same voter-history, ballot-issuance, vote-by-mail surrender, ballot-spoilage, poll-book, affidavit, ballot-accounting, preservation, reconciliation, and related voter-registration systems in future federal elections.

37. Access to responsive records would allow me to compare official records with conditions I have personally encountered, determine whether identified conditions have documented explanations, seek lawful individualized correction or reconciliation where appropriate, and determine whether changes to my own voter-history record have been properly documented.

38. My need for those records does not end on Election Day. Official voter-registration, voter-history, participation, ballot-accounting, audit, and related records remain relevant during post-election review, reconciliation, canvass, preservation, and certification.

39. If material voter-registration, voter-history, participation, or related record conditions remain unresolved after voting, I intend to use preserved official records, where appropriate, to determine whether those conditions can be reconstructed, explained, corrected, and reconciled before final certification.

40. I am not asserting in this declaration that any presently identified voter-history discrepancy, changed record, reporting discrepancy, unavailable record, or other condition necessarily proves an unlawful registration, unlawful vote, or incorrect election outcome.

41. I am stating that material voter-registration and election-record conditions should be capable of investigation through preserved official records and, where appropriate, reconstruction and reconciliation.

42. The facts concerning my residence, voter registration, voting history, records review, voting practices, election-observation activities, election-incident coordination, communications with election officials, intended use of official records, and personal activities stated in this declaration are based upon my personal knowledge, except where I expressly identify information learned from official records, preserved datasets, written communications, or records created by other witnesses.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on: October 20, 2026

At: Kane County, Illinois

Jodie Zitko

Jodie Zitko

Sworn to and subscribed before me this 20th **day of** October, **2026.**

Cynthia A. Colar-DeJohnette

Notary Public

My commission Expires: 03/11/2027

CYNTHIA A COLAR-DEJOHNETTE
Official Seal
Notary Public - State of Illinois
My Commission Expires Mar 11, 2027

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

LAURA HOIS,
ROBERT R. "RUSTY" STEVENS,
JIMMY LEE TILLMAN II,
JODIE ZITKO,
MARY CATHERINE PAUKSTYS,
GREGORY STENSTROM,
HARRY R. HAURY, and
UNITE 4 FREEDOM, INC.,

Plaintiffs,

v.

BERNADETTE MATTHEWS, in her official capacity as Executive Director and Chief State Election Official of the Illinois State Board of Elections, and JOHN OLDFIELD, in his official capacity as Director of Voting and Registration Systems,

Defendants.

DECLARATION OF MARY CATHERINE PAUKSTYS

I, Mary Catherine Paukstys, declare as follows:

1. My name is Mary Catherine Paukstys. I am an adult United States citizen residing at 5244 S. Newcastle Avenue, Chicago, IL 60638 in Cook County, Illinois. I am a registered Illinois voter in Illinois District 6 (IL- 06).. I voted in the November 5, 2024 federal general election and intend to vote in the November 3, 2026 federal general election.

2. I am a long-serving Chicago election judge who has served for more than three decades and continues to train and serve in current elections. My preserved Chicago Board of Election Commissioners records document repeated service as a Republican election judge beginning no later than 1994 and continuing through 2026.

3. My continuing service as both an Illinois voter and election judge places me directly within the voter-registration, voter-history, ballot-issuance, signature-verification, closing, chain-of-custody, reporting, reconciliation, preservation, and certification processes used in Illinois elections.

4. I preserved official Chicago Board assignment letters or credentials for multiple elections, including records dated September 6, 1994; March 19, 1996; February 26,

2019; April 2, 2019; March 17, 2020; November 3, 2020; November 5, 2024; and March 17, 2026.

5. Those records consistently identify me as a Republican election judge except for the November 3, 2020 general-election assignment, which identified me as a Democratic judge. I did not serve under that November 2020 assignment.

6. I did not request a change in party designation and had served as a Republican election judge for more than thirty-five years before the November 2020 assignment.

7. My official Illinois voter-participation data separately records a Democratic ballot in the March 17, 2020 primary, although I requested and cast a Republican ballot.

8. The matching Democratic designations appearing in my March 2020 voter history and November 2020 election-judge assignment remain unexplained by any correction record, source transaction, audit history, or written determination available to me.

9. In the summer of 2020, I contacted the Chicago Board of Election Commissioners to renew my election-judge application for the two-year term beginning with the November 3, 2020 general election. I requested to continue serving as a Republican judge at Ward 13, Precinct 1, where I had served for decades.

10. A Chicago Board representative told me that no Republican judge positions remained available at that location and offered an available Democratic judge position. I did not request a change in party designation, did not represent that I was a Democrat, and agreed to the offered position only because I wished to preserve my decades-long continuity of election-judge service at that polling place.

11. The resulting November 3, 2020 assignment credential identified me as a Democratic judge, although I ultimately withdrew and did not serve in that election.

12. The underlying assignment, party-designation, application-history, roster-change, source-record, and audit-history information is relevant to determining how and why my election-judge designation and voter-history records were recorded as they were.

13. I preserved election-judge training materials, quizzes, handbooks, written instructions, and precinct records. Those materials include differing instructions concerning the ballot to be issued when a registered voter's signature does not appear in the electronic poll book.

14. One set of preserved instructions directs issuance of a provisional ballot, while later 2026 Chicago training materials direct judges to issue a regular ballot without requesting identification.

15. I seek authoritative, preserved, and reconcilable procedures sufficient to determine which instruction governs and how voters and ballots handled under those circumstances are recorded and reviewed.

16. I have also observed recurring deficiencies or inconsistencies in election-judge training concerning closing procedures, signature verification, ballot issuance, and chain of custody.

17. In my experience, instructors have emphasized completing closing procedures quickly rather than carefully checking each assigned duty, and training has at times moved quickly over signature-verification responsibilities.

18. I have also observed instructors dictate answers to quiz questions rather than requiring election judges to independently demonstrate their understanding of governing procedures.

19. During 2026 election-judge training, a participant asked whether, when identification was required, a voter could satisfy that requirement by displaying an electronic image of identification on an iPhone. The instructor answered yes. I provide this statement to report the specific question and answer I personally heard.

20. During the same 2026 training, the instructor stated that it was false that two people were required to return election materials after the polls closed and said that one person could return the materials. That instruction differed from my prior understanding and training concerning bipartisan participation and the secure return and chain of custody of election materials.

21. In both returning-election-judge training classes I attended for the 2026 Primary Election and the 2026 Midterm Election, the Chicago Board of Elections instructor told attendees that initialing or signing across envelope flaps was not required.

22. That instruction conflicted with the written 2026 Chicago Board of Elections Election Judge/Election Coordinator handbook materials I reviewed. Pages 81 and 82 state that Envelope S for spoiled ballots, Envelope D for damaged ballots, Envelope W for write-in ballots and write-in tape, Envelope 71E containing specified results records, and Envelope 72E containing specified results records must be signed by judges across the sealed flaps.

23. I also reviewed 10 ILCS 5/24B-10, which contains a requirement that election judges sign across folds at which an envelope could be opened if unfastened. The purpose and practical effect of signing across the sealed flap, as I understand it from the written procedure, is to make later opening of the envelope observable through disturbance of the signatures. The difference between the oral training I personally received and the written requirements is important to me because these envelopes contain election materials relevant to ballot accounting, results, preservation, chain of custody, and later reconstruction.

24. I do not allege that any one training statement or instruction, standing alone, proves that votes were altered or that an election result was incorrect. My concern is that inaccurate, inconsistent, or conflicting instructions can produce different administration of voter-

identification, signature-verification, ballot-issuance, closing, transport, sealing, chain-of-custody, and record-preservation procedures.

25. During the November 5, 2024 federal general election, an assigned election coordinator told me at approximately 6:00 p.m. that coordinators had been trained to begin closing procedures before the statutory 7:00 p.m. closing time.

26. I objected while voters remained present. The coordinator contacted Chicago election headquarters, and a Board representative directed that no closing operations begin until 7:00 p.m. and until all voters had left.

27. During the March 17, 2026 primary, a different coordinator again asked me at approximately 6:00 p.m. to begin pre-initialing closing envelopes and paperwork while the polls remained open.

28. I preserved the 2026 Chicago election-judge handbook and the separately distributed "What's New" instructions stating that, when no known signature is available or the stored signature cannot be adequately examined, judges should accept the questioned signature and issue a regular ballot.

29. During the March 17, 2026 primary, I recorded materially different registered-voter totals for Ward 23, Precinct 2. A February 21, 2026 printed precinct register reflected 1,003 registered voters; three same-day registrations were processed; the electronic poll book displayed 1,071 registered voters at approximately 5:30 p.m. on Election Day; and the Chicago Board's public reporting reflected 996 registered voters the following day.

30. I do not allege that those numerical differences alone establish unlawful conduct. The available records do not identify the timing, source, reason, authority, or audit history necessary to reconcile the differing official counts.

31. These experiences have shown me that voter-history records, training materials, poll-book information, public reports, and individual observations alone do not always provide enough information to determine what occurred within the official election record.

32. To responsibly investigate and evaluate an identified condition, I need the underlying official definitions, voter-history source records, status or reason codes, transaction histories, notices, dates of changes, responsible custodians, audit histories, training records, synchronization information, and documented dispositions.

33. Where a voter-history entry, party designation, registered-voter total, ballot status, or other election record differs among official records or changes over time, I need sufficient information to determine what the prior record reflected, what changed, when and why it changed, what authority supported the change, and how the matter was ultimately resolved.

34. I have reviewed the requests for records and election-administration information identified in the Plaintiffs' August 2026 notice under the National Voter Registration Act.

The records and information sought in that notice are relevant to my interests and activities as a registered Illinois voter and a long-serving election judge, including my ability to review, investigate, and evaluate voter-registration and election-administration matters that I personally encounter.

35. I intend to use responsive records to compare official voter-registration information, voter-history entries, transaction histories, status codes, dispositions, audit information, and related records with the election records and materials already available to me; identify which conditions have documented explanations; present verified matters to responsible election officials; pursue lawful individualized correction or reconciliation where appropriate; and document their disposition.

36. I cannot responsibly perform those activities from isolated voter-history records, public reports, training materials, or summary information alone because those sources do not necessarily disclose the originating transaction, official explanation, correction history, change authority, audit trail, synchronization history, or final disposition necessary to determine whether an identified condition has been explained and reconciled.

37. The information I need is not otherwise available to me through the election-judge materials, precinct records, public reports, or isolated records I possess. Those materials may reveal a condition requiring investigation but do not substitute for the underlying official records necessary to determine what occurred.

38. My interest is not merely a generalized interest in election administration. It arises from my own voter-history record, my own election-judge assignments and training, the official records and instructions I have personally received, the discrepancies and conflicting instructions I have personally encountered, and my continuing participation in Illinois elections as both a voter and election judge.

39. I have served as a Chicago election judge during approximately forty-two of my forty-six years of adulthood. I began serving at approximately nineteen years of age and served in Ward 13 through the March 17, 2020 primary. After a temporary hiatus, I resumed service in Ward 23 for the November 5, 2024 federal general election and the March 17, 2026 federal primary.

40. Because I remain an active Illinois voter and election judge, I expect to encounter the same voter-history, party-designation, judge-assignment, training, signature-verification, ballot-issuance, sealing, chain-of-custody, closing, reporting, and reconciliation systems in future federal elections.

41. Access to responsive records would allow me to compare official records with conditions I have personally encountered, determine whether identified conditions have documented explanations, seek lawful correction or reconciliation where appropriate, and better understand the election procedures I am required to administer.

42. My need for those records does not end on Election Day. Official voter-registration and election records remain relevant during post-election review, reconciliation, canvass, preservation, and certification.

43. If material voter-registration, voter-history, ballot-issuance, signature-verification, closing, sealing, chain-of-custody, or related record conditions remain unresolved after voting, I intend to use preserved official records, where appropriate, to determine whether those conditions can be reconstructed, explained, corrected, and reconciled before final certification.

44. I am not asserting in this declaration that any presently identified voter-history discrepancy, differing voter total, training inconsistency, unavailable record, or other condition necessarily proves an unlawful vote, unlawful registration, or incorrect election outcome.

45. I am stating that material voter-registration and election-administration conditions should be capable of investigation through preserved official records and, where appropriate, reconstruction and reconciliation.

46. The facts concerning my residence, voter registration, voting history, election-judge service, assignment records, training, election procedures, precinct records, intended use of official records, and personal activities stated in this declaration are based upon my personal knowledge, except where I expressly identify information learned from records.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on: October 21, 2026

At: Peoples Bank

Mary Catherine Paukstys

Mary Catherine Paukstys

Sworn to and subscribed before me this 21 **day of** October, **2026.**

Vanessa Aguinaga

Notary Public

OFFICIAL SEAL
VANESSA AGUINAGA
NOTARY PUBLIC, STATE OF ILLINOIS
Commission No. 1035373
My Commission Expires July 17, 2030

My commission Expires: 7/17/2030

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

LAURA HOIS,
ROBERT R. "RUSTY" STEVENS,
JIMMY LEE TILLMAN II,
JODIE ZITKO,
MARY CATHERINE PAUKSTYS,
GREGORY STENSTROM,
HARRY R. HAURY, and
UNITE 4 FREEDOM, INC.,

Plaintiffs,

v.

BERNADETTE MATTHEWS, in her official capacity as Executive Director and Chief State Election Official of the Illinois State Board of Elections, and JOHN OLDFIELD, in his official capacity as Director of Voting and Registration Systems,

Defendants.

DECLARATION OF LAURA HOIS

I, Laura Hois, declare as follows:

1. My name is Laura Hois. I am an adult United States citizen residing at 4405 Oakwood Ave. Downers Grove, IL. 60515, in DuPage County, Illinois. I am a registered Illinois voter in Illinois Congressional District 6 (IL-06). I voted in the November 5, 2024 federal general election and have voted early in the November 3, 2026 federal general election. I am also an elected Republican committeeperson in Downers Grove Township Precinct 007 and the Republican candidate for Illinois State Representative in District 81 in the November 3, 2026 general election. I previously ran for Illinois House District 81 in 2020 and for DuPage County Board District 2 in 2024.

2. I am presently campaigning for the November 3, 2026 election, raising and spending campaign resources, communicating with voters, organizing volunteers, reviewing election records, and preparing for an election in which my name will appear on the same ballot as federal contests.

3. My race will be administered through voter-registration, vote-by-mail, early-voting, polling-place, reporting, canvassing, reconciliation, preservation, and certification processes that are interconnected with the administration of federal elections in Illinois.

4. Because I am a current candidate whose election has not yet occurred, my interest in the records and election-administration practices described here is not limited to a past grievance. These matters presently affect my campaign, my preparation for the November 2026 election, and my ability to evaluate whether records affecting the election in which I am participating are preserved, complete, auditable, and capable of reconciliation.

5. During 2026, I personally sought and reviewed election records relating to voter registration, vote-by-mail administration, FPCA and UOCAVA records, ballot transmission and delivery, election-mail handling, chain of custody, election vendors, audit information, and related election-administration records in DuPage County.

6. I also authorized members of my campaign, including Lisa Forst, to obtain and review official DuPage County voter-registration, vote-by-mail, early-voting, FPCA, and UOCAVA records on behalf of my campaign.

7. On January 30, 2026, I submitted a written Freedom of Information Act request to the DuPage County Clerk Election Division concerning the retrieval, handling, transportation, security, and chain of custody of incoming election mail, including vote-by-mail ballots addressed to the Election Division's post-office box in Wheaton.

8. My request sought written policies, procedures, manuals, instructions, checklists, forms, labels, security logs, training materials, meeting materials, memoranda, emails, schedules, calendars, written notations, and logs identifying the frequency, personnel, and transportation methods used to retrieve and move election mail from the post-office box to the Election Division.

9. On February 6, 2026, the Election Division responded that it had no records responsive to those requests.

10. That response left me unable to determine from official records who retrieved election mail, when and how frequently it was retrieved, how it was transported, what security or bipartisan controls governed the transfer, how many ballots or pieces of election mail were moved, who received them, and what contemporaneous chain-of-custody documentation existed.

11. During the March 17, 2026 primary-election cycle, my campaign also reviewed official records concerning FPCA registrants and related ballot-administration records.

12. The Election Division identified 108 FPCA registrants whose disclosed forms, according to its July 28, 2026 response, lacked a completed "Mail To" or current mailing address in Section 3.

13. My campaign sought existing records showing how and where associated ballots were transmitted, delivered, returned, processed, accepted, rejected, and reconciled.

14. My campaign's original FPCA-related request was dated June 17, 2026. I personally followed up with the Election Division on June 24, 2026. After the Election Division treated the request as voluminous, I reviewed the response and participated in efforts to narrow the request while preserving the core records needed to trace the ballots.

15. On July 7, 2026, the request was narrowed to a sample of 45 registrants and five defined categories of existing records, including original FPCA and registration records; ballot mailing, delivery, USPS tracking, email-transmission and fax records; proof of delivery or return; rejection flags, audit entries, notes or comments; and existing reports or spreadsheets identifying requested and actual transmission methods and destinations.

16. On July 28, 2026, the Election Division produced redacted FPCA forms but stated that it had no records responsive to requests for ballot mailing and delivery logs, USPS tracking, email-transmission or fax records, proof of delivery or return, or notes, comments, rejection flags, and audit-trail entries associated with processing the forms.

17. I do not contend that an incomplete form, blank field, changed record, unavailable record, or analytical discrepancy by itself proves that a voter was ineligible, that a ballot was unlawfully issued or counted, or that an election result was incorrect.

18. My concern is that the available records were insufficient to trace and reconcile the complete chain from registration or application through ballot transmission, destination, delivery, return, acceptance or rejection, participation history, county reporting, synchronization into the statewide system, canvassing, and certification.

19. I have also reviewed records and communications concerning DuPage County's use of outside election vendors for ballot-printing and mailing services and have sought information sufficient to determine the governing scope, status, authorization, performance, and reconciliation of those services.

20. These experiences have shown me that analytical flags, isolated datasets, summary reports, and partial county records are not sufficient by themselves to determine what occurred in an individual voter-registration or election record.

21. To responsibly investigate and resolve an identified condition, I need the underlying official definitions, status codes, transaction histories, source records, dates of changes, notices, responsible custodians, audit histories, synchronization information, and documented dispositions.

22. Where a record changes, is removed, is added, reflects inconsistent participation information, or differs between local and statewide systems, I need sufficient official information to determine what the prior value was, what the subsequent value was, when and why the change occurred, what authority supported it, and whether the change was correctly reflected across the relevant election systems.

23. I have reviewed the requests for records and election-administration information identified in the Plaintiffs' August 2026 notice under the National Voter Registration Act.

The records and information sought in that notice are relevant to my interests and activities as a registered Illinois voter and as a current candidate appearing on the November 3, 2026 ballot, including my ability to review, investigate, and evaluate voter-registration and election-administration matters affecting the election in which I am participating.

24. I intend to use responsive records to compare official definitions, voter-registration dispositions, transaction histories, audit information, and other official records with the election data already available to me; identify which conditions have documented explanations; present verified matters to responsible election officials; pursue lawful individualized correction or reconciliation where appropriate; and document the disposition of those matters.

25. I cannot responsibly perform those activities from analytical flags or summary information alone because those materials do not necessarily disclose the official explanation, underlying transaction history, change authority, audit trail, synchronization history, notice, disposition, or other information necessary to determine whether an identified condition has been lawfully explained and reconciled.

26. The withheld or unavailable information is not otherwise available to me through public summary reports, campaign records, analytical datasets, or isolated county records. Those sources may reveal a condition requiring investigation but do not substitute for the official underlying records necessary to determine what actually occurred.

27. I have personally devoted time, and my campaign has devoted time and resources, to reviewing election records, preparing and narrowing records requests, communicating with election officials, consulting knowledgeable persons, and attempting to understand and reconstruct voter-registration and election-administration processes relevant to the election in which I am participating.

28. Those activities have required time and attention that otherwise could have been devoted to ordinary campaign activities, including voter contact, volunteer organization, fundraising, campaign communications, and policy development.

29. My interest is therefore not merely a generalized interest in election administration. It arises from my status as a registered Illinois voter, my intended participation in the November 3, 2026 federal election, my current candidacy, my personal records requests and review, and my continuing need for official records sufficient to investigate and evaluate voter-registration and election-administration matters affecting the election in which I am participating.

30. The relief sought in this action would have practical value to me before the November 3, 2026 election. Access to responsive records would allow me to personally review identified conditions, determine whether they have documented explanations, seek lawful correction or reconciliation where appropriate, and evaluate the administration of the election in which I am presently participating.

31. My need for those records does not end on Election Day. The official records will also remain important during reconciliation, canvass, preservation, and certification.

32. If material voter-registration or election-record conditions remain unresolved after voting, I intend to use the preserved underlying records to determine whether those conditions can be reconstructed, explained, corrected where appropriate, and reconciled before final certification.

33. Because my race appears on the same November 3, 2026 ballot as federal contests and depends upon interconnected voter-registration, participation-history, reporting, synchronization, reconciliation, canvassing, preservation, and certification processes, the availability and integrity of those records directly affects my ability to evaluate the administration of my own election.

34. I am not asserting in this declaration that any presently identified discrepancy necessarily changes an election outcome. I am stating that the official records necessary to investigate and reconcile material discrepancies should exist, be preserved, and be available for lawful review.

35. If unresolved record conditions persist through the election and into canvass or certification, my interest as a candidate will become even more immediate because I will need the preserved official records to evaluate whether the election record affecting my contest can be reconstructed and reconciled and whether material discrepancies have been resolved before certification.

36. The facts concerning my residence, voter registration, voting history, candidacy, records requests, communications, campaign activities, intended use of records, and personal activities stated in this declaration are based upon my personal knowledge, except where I expressly identify information learned from official records, written communications, or records obtained, or requests for records prepared by an authorized campaign representative.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on: October 20, 2026

At: Downers Grove, DuPage County, Illinois

Laura Hois Laura Hois

State of IL

County of DuPage

This instrument was acknowledged before me on 10/20/2026 (date) by Laura Hois (name of person acknowledged)

Miguel Angel Espinoza Ramirez

(Signature of Notary Public)

"OFFICIAL SEAL"
MIGUEL ANGEL ESPINOZA RAMIREZ
Notary Public, State Of Illinois
Commission No. 1030329
My Commission Expires April 22, 2030

(Seal)

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

LAURA HOIS,
ROBERT R. "RUSTY" STEVENS,
JIMMY LEE TILLMAN II,
JODIE ZITKO,
MARY CATHERINE PAUKSTYS,
GREGORY STENSTROM,
HARRY R. HAURY, and
UNITE 4 FREEDOM, INC.,

Plaintiffs,

v.

BERNADETTE MATTHEWS, in her official capacity as Executive Director and Chief State Election Official of the Illinois State Board of Elections, and JOHN OLDFIELD, in his official capacity as Director of Voting and Registration Systems,

Defendants.

DECLARATION OF ROBERT R. "RUSTY" STEVENS

I, Robert R. "Rusty" Stevens, declare as follows:

1. My name is Robert R. "Rusty" Stevens. I am an adult United States citizen residing at 700 S. Monterey Villa Park, IL. 60181, in DuPage County, Illinois. I am a registered Illinois voter in Illinois Congressional District 6 (IL-06). I voted in the November 5, 2024 federal general election and intend to vote in the November 3, 2026 federal general election. I am presently a candidate for DuPage County Board District 2 in the November 3, 2026 general election.

2. I have previously participated in campaigns and election-observation activities. Because I am currently on the November 2026 ballot, the matters described in this declaration are current and affect an election in which I am personally participating.

3. My present race is administered through voter-registration, voter-address, vote-by-mail, signature-verification, cure, reporting, synchronization, canvassing, preservation, reconciliation, and certification processes interconnected with the administration of federal elections in Illinois.

4. During my 2022 and 2024 campaign activity, I used voter-address information made available for campaign purposes to send individualized first-class mail with address-correction service.

5. I selected address-correction service so that returned mail would contain postal information indicating whether an address was vacant, undeliverable, associated with a person who had moved, or otherwise could not be used to complete the campaign communication.

6. I preserved hundreds of returned pieces of campaign mail and their associated postal markings. My prior records reflect approximately 354 returned pieces, although the precise number should be verified from the preserved originals before I sign this declaration.

7. The returned pieces include markings reflecting conditions such as moved, vacant, no such number, unable to forward, unknown, and other delivery failures. I continue to possess, or have caused to be preserved, the original returned mail and related campaign records.

8. I do not contend that every returned mail piece identifies an ineligible voter, that every address discrepancy reflects an unlawful registration, or that every delivery failure affected a ballot.

9. My concern is that these preserved address and delivery conditions should be traceable to official registration-address records, address-change histories, vote-by-mail issuance and delivery records, undeliverable-ballot records, list-maintenance records, cure records, participation histories, and other records necessary to determine how the condition was addressed.

10. I have not received or identified a complete set of official records sufficient to determine whether the address conditions reflected in the returned campaign mail were identified, investigated, corrected, preserved, or reconciled within the official election records.

11. Removing an address from a private campaign list does not tell me what occurred in the official voter-registration record. To determine that, I need the official source, timing, reason, transaction history, notices, and disposition associated with relevant address changes.

12. Following the 2022 election, I also participated in vote-by-mail cure or verification activities for another candidate and personally traveled to, or participated in outreach to, addresses associated with voters whose vote-by-mail ballots required follow-up, verification, or cure.

13. During that work, I encountered circumstances in which the voter-address information and information obtained through follow-up did not permit me to determine from the records available to me how the corresponding registration, ballot, cure, and final ballot-status records were ultimately resolved.

14. I do not contend from those contacts alone that any voter was ineligible, any ballot was unlawful, or any ballot was improperly counted. Those experiences demonstrated why the official record should permit the registration address, ballot destination, delivery information, cure notice, voter response, signature-review decision, acceptance or rejection decision, participation history, and final ballot status to be reconstructed and reconciled where appropriate.

15. I have also personally observed DuPage County vote-by-mail signature-verification activity.

16. When I first observed the process, observers were positioned approximately twenty to thirty feet from personnel conducting signature review. At that distance, I could not meaningfully observe the signatures, comparison records, screen details, notes, flags, or reasons supporting individual decisions.

17. Observers were later permitted to move closer, to approximately five feet, which materially changed what could be seen.

18. I do not contend that every signature-verification decision was incorrect. My concern is that meaningful review requires adequate observation and preservation of records sufficient to determine how standards were applied.

19. Relevant records may include observer instructions, access information, signature-review standards, training materials, workflow records, acceptance and rejection codes, cure notices, reviewer identities, timestamps, audit entries, and final reconciliation records.

20. These experiences have shown me that returned mail, campaign records, isolated voter-file information, summary reports, and observations alone are insufficient to determine what occurred in an official voter-registration or election record.

21. To responsibly investigate an identified condition, I need the underlying official definitions, address-change histories, status codes, transaction histories, notices, source records, dates of changes, audit histories, responsible custodians, synchronization information, and documented dispositions.

22. Where an address changes, a voter record is updated, a ballot is returned as undeliverable, a cure process occurs, or related information differs among records or systems, I need sufficient official information to determine what changed, when and why it changed, what official action followed, and how the matter was ultimately resolved.

23. I have reviewed the requests for records and election-administration information identified in the Plaintiffs' August 2026 notice under the National Voter Registration Act. The records and information sought in that notice are relevant to my interests and activities as a registered Illinois voter and as a current candidate for DuPage County Board District 2 appearing on the November 3, 2026 ballot, including my ability to review, investigate, and evaluate voter-registration and election-administration matters affecting the election in which I am participating.

24. I intend to use responsive records to compare official voter-registration and address information, transaction histories, status codes, dispositions, audit information, and related records with the physical evidence and election information already available to me; identify which conditions have documented explanations; present verified matters to responsible election officials; pursue lawful individualized correction or reconciliation where appropriate; and document their disposition.

25. I cannot responsibly perform those activities from returned mail, analytical flags, summary data, isolated voter-file information, or campaign records alone because those materials do not necessarily disclose the official explanation, underlying transaction history, change authority, audit trail, notice, synchronization history, final disposition, or other information necessary to determine whether an identified condition has been explained and reconciled.

26. I have personally devoted time, and my campaigns have devoted time and resources, to reviewing returned mail, researching addresses, attempting voter follow-up, reviewing election records, participating in cure activities, observing signature-verification procedures, and attempting to understand and reconstruct voter-registration and election-administration processes.

27. Those activities required time and resources that otherwise could have been devoted to ordinary campaign activities, including voter contact, volunteer organization, fundraising, campaign communications, policy development, and other activities associated with my current campaign for DuPage County Board District 2.

28. My interest is therefore not merely a generalized interest in election administration. It arises from my status as a registered Illinois voter, my intended participation in the November 3, 2026 federal election, my current candidacy, the physical evidence I have preserved, the election processes I personally observed, the resources I have devoted to these matters, and my continuing need for official records sufficient to evaluate matters affecting the election in which I am participating.

29. Access to responsive records would allow me to compare official records with evidence and conditions I have personally encountered, determine whether identified conditions have documented explanations, seek lawful correction or reconciliation where appropriate, and evaluate the administration of the election in which I am presently participating.

30. My need for those records does not end on Election Day. They will remain relevant during post-election reconciliation, canvass, preservation, and certification.

31. If material voter-registration, address, vote-by-mail, cure, verification, or related record conditions remain unresolved after voting, I intend to use preserved official records to determine whether those conditions can be reconstructed, explained, corrected where appropriate, and reconciled before final certification.

32. My DuPage County Board District 2 race appears on the same November 3, 2026 general-election ballot as federal contests and is administered through election processes interconnected with the statewide voter-registration, reporting, reconciliation, canvassing, preservation, and certification framework.

33. I am not asserting that any presently identified address discrepancy, returned mail piece, cure condition, signature-review issue, or unavailable record necessarily proves an unlawful registration, unlawful ballot, or incorrect election outcome. I am stating that material conditions affecting voter-registration and related election records should be capable of investigation through preserved official records and, where appropriate, reconstruction and reconciliation.

34. If unresolved record conditions persist through the election and into canvass or certification, my interest as a candidate for DuPage County Board District 2 will become even more immediate because I will need those preserved records to evaluate whether conditions affecting my own contest have been documented and reconciled before certification.

35. The facts concerning my residence, voter registration, voting history, candidacy, campaign activities, preserved returned mail, voter-address follow-up, election observation, intended use of records, and personal activities stated in this declaration are based upon my personal knowledge, except where I expressly identify information learned from official records, postal records, campaign records, or written communications.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on: 10-19-26

At: 700 S. Monterey Villa Park IL 60181

Robert R. "Rusty" Stevens

Signature witnessed: October 19, 2026

Carolyn R. Carrillo

CAROLYN R. CARRILLO

OFFICIAL SEAL
CAROLYN R CARRILLO
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES: 01/09/2027

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

LAURA HOIS,
ROBERT R. "RUSTY" STEVENS,
JIMMY LEE TILLMAN II,
JODIE ZITKO,
MARY CATHERINE PAUKSTYS,
GREGORY STENSTROM,
HARRY R. HAURY, and
UNITE 4 FREEDOM, INC.,

Plaintiffs,

v.

BERNADETTE MATTHEWS, in her official capacity as Executive Director and Chief State Election Official of the Illinois State Board of Elections, and JOHN OLDFIELD, in his official capacity as Director of Voting and Registration Systems,

Defendants.

DECLARATION OF JIMMY LEE TILLMAN II

I, Jimmy Lee Tillman II, declare as follows:

1. My name is Jimmy Lee Tillman, II. I am an adult United States citizen residing at 7732 S. Calumet, Chicago, Illinois, 60619, in Cook County, Illinois. I am a registered Illinois voter in Illinois Congressional District 1 (IL-01). I voted in the November 5, 2024 federal general election and intend to vote in the November 3, 2026 federal general election.

2. I was a candidate for the United States Senate from Illinois during the 2022 and 2026 federal election cycles. In the March 17, 2026 Republican primary election, I was a candidate for the Republican nomination for the United States Senate but did not advance from the primary.

3. On July 29, 2026, I executed a signed written Statement of Intent, which was notarized, stating my intention to seek public office again in the future. My interest in Illinois election administration is therefore not limited to a completed campaign or past election.

4. As a former statewide federal candidate, a registered Illinois voter, and a person who has formally stated his intention to seek office again, I have a personal interest in the

preservation, accuracy, transparency, reconciliation, canvass, and certification of the election records and systems through which Illinois administers federal elections.

5. During the 2026 United States Senate primary, I experienced an unusual incident involving the public display of purported election results while early voting and campaigning were still underway.

6. On March 9, 2026, approximately eight days before the March 17 primary election, WGN-TV publicly broadcast an election-results ticker during its 4:00 p.m. news program displaying purported results for actual Illinois primary contests, including my pending Republican United States Senate race.

7. The display identified me and another candidate by name and showed specific vote totals and percentages. It displayed me at 49% with 432,330 votes and Don Tracy at 22% with 194,689 votes and represented that 100% of the vote was reporting.

8. Those figures were not actual certified or unofficial election returns. Election Day had not yet occurred, early voting and campaigning were still underway, and no lawful final result existed.

9. I later reviewed sworn affidavits filed by WGN representatives in the prior federal litigation stating that WGN characterized those figures as mock or test data used during technical testing of its Chyron ticker system. Those materials stated that the test display appeared live on air twice.

10. I do not contend that the Illinois State Board of Elections created, supplied, approved, or transmitted those figures. My concern is that purported results for my actual pending federal race were publicly displayed before Election Day and that the incident required preservation, review, clarification, and a documented response.

11. Shortly after the display appeared, voters, supporters, and other members of the public contacted me or persons associated with my campaign. Screenshots circulated, people asked whether the figures were real, and people expressed confusion about how vote totals could be shown before Election Day.

12. I personally received, reviewed, or was provided copies of social-media posts, emails, messages, screenshots, and related communications concerning the display. I preserved or caused those records to be preserved.

13. Those communications documented public exposure and confusion concerning purported election information relating specifically to my federal race.

14. The incident required me and persons assisting me to devote substantial time and resources to answering questions, correcting confusion, preserving evidence, preparing submissions, and pursuing administrative and judicial review.

NOTICE OF VIOLATIONS OF THE NATIONAL VOTER REGISTRATION ACT

Pursuant to 52 U.S.C. § 20510(b)

October 25, 2026

Via Certified Mail, Return Receipt Requested, and Electronic Mail

Bernadette M. Matthews
Executive Director and Chief State Election Official
Illinois State Board of Elections
2329 S. MacArthur Blvd.
Springfield, IL 62704

cc: The Honorable Kwame Raoul, Attorney General of Illinois, 500 South Second Street, Springfield, IL 62701
Marni M. Malowitz, General Counsel, Illinois State Board of Elections

Re: Notice of violations of 52 U.S.C. § 20507 concerning the documentation, uniformity, and verification of changes to registration and voter-participation records in the Illinois Voter Registration System

Dear Ms. Matthews:

I. Purpose of This Notice

This letter gives written notice under 52 U.S.C. § 20510(b)(1) of continuing violations of the National Voter Registration Act (NVRA) in the process by which Illinois changes, documents, and verifies registration and maintains and edits voter-participation records in the Illinois Voter Registration System (IVRS).

This notice concerns process. It does not challenge the result of any election. It does not allege that any individual voter is ineligible, and it does not ask the State to remove any voter, to conduct any systematic removal during the period protected by 52 U.S.C. § 20507(c)(2)(A), or to change State process as to how any ballot is legally supposed to be cast or counted under current state and federal law.

Individual statutory inspection demand. Each undersigned person, individually and on that person's own behalf, hereby demands inspection under 52 U.S.C. § 20507(i) of the existing records identified in Annex B, including IVRS data dictionaries, change histories, transmission reports, work-item dispositions, cancellation reports, and confirmation-notice records. The Board shall promptly provide an inspection appointment or a rolling access schedule and identify, by category, the specific legal basis for any withholding.

This Notice itself constitutes each undersigned person's written request for inspection under § 20507(i), as well as notice of violations under § 20510(b). Annex A states the proposed testing protocol; Annex B specifies the requested records. The August 18 notice, its appendices, and previously served electronic evidence are expressly incorporated without withdrawal, waiver, or supersession. Any additional electronic materials, if served, shall be identified in a separate media manifest.

This notice identifies violations of the State's statutory duties under state and federal law and the corrective action requested to cure them.

II. Persons Giving Notice

This notice is given by each of the following persons, each of whom is aggrieved by the violations described below:

- Unite 4 Freedom, Inc., through its authorized President, Harry R. Haury;
- Harry R. Haury;
- Gregory Stenstrom;
- Laura Hois, a registered voter in Illinois;
- Robert R. Stevens, a registered voter in Illinois;
- Jimmy Lee Tillman II, a registered voter in Illinois;
- Jodie Zitko, a registered voter in Illinois; and
- Mary Catherine Paukstys, a registered voter in Illinois.

Each person gives this notice individually and adopts every part of it.

III. Background

On August 18, 2026, Unite 4 Freedom, Harry Haury, and Gregory Stenstrom served the Board with a notice and two machine-readable data files identifying registration and voter-participation records. The Board's response of September 14, 2026 stated that the files lacked headers, that one column could not be interpreted, and that duplicate entries lacked the matching record. The undersigned do not agree that the files were deficient as sent. In any event, those issues did not prevent the Board from identifying the requested categories of existing implementation records.

The undersigned preserve the earlier service. The State's September 14 response identifies interpretive questions concerning field headers, matching identifiers, and registration-date definitions. The undersigned request access to the existing State data dictionaries, source snapshots, field definitions, matching rules, and transaction histories necessary to resolve those questions. Supplementary files, if transmitted, will be identified by an authenticated manifest distinguishing the original transmitted materials from subsequent derivatives. The State is requested to identify any remaining interpretive difficulty with the previously served files. Any subsequently transmitted files, header keys, paired identifiers, and SHA-256 values will be separately documented in a media manifest specifying their provenance, version, creation date, and relationship to the files previously served.

The Board's September 14 letter and the accompanying high-level overview state that:

- local election authorities record whether each voter voted and transfer that information to IVRS, and the Board's data on voter participation "is provided to it by the election authority" (Sept. 14 letter at 6);
- local election authorities "do not report to SBE the reason for each determination" (id. at 7);
- corrections to records of who voted in a particular election are "not a common occurrence" (id. at 6–7 n.3);
- registration dates are recorded differently by the 108 election authorities, which may use the original registration date, the last voter-initiated date, or the date of the last change to the record (id. at 6 n.2);

- a registration is cancelled for change of address when the voter fails to respond to a confirmation notice and does not vote in two consecutive general federal elections (id. at 5); and
- the Board provides "oversight of unresolved work items" and "post-election data validation" (High-Level Overview at 2).

None of these statements shows that the Board examined, responded to, or cured the violations identified in the August 18 notice.

Prior Notices and Requests Incorporated

This notice incorporates by reference, and does not withdraw or supersede, the following earlier communications:

1. **The August 18, 2026 Notice of Violations and Demand for Corrective Action**, with its Appendix A (Election Validity Scorecard), Appendix B (post-certification voter-history change analysis), and Electronic Exhibit 1 (machine-readable data), received by the Board on August 24, 2026. The record categories requested in Section V.B of that notice and Section IV of its Appendix B, including database transaction logs, change-history records, import, export, synchronization, and replication logs, system event logs, archival snapshots, exception, reconciliation, and quality-control reports, and automated workflow logs, remain outstanding to the extent they are held at the State level, and are restated in Annex B.
2. **The September 2, 2026 Notice of Evidence Preservation Obligations**, received by the Board on September 3, 2026. The preservation obligations it invoked remain in effect, and the undersigned specifically ask that every record identified in Annexes A and B be preserved in native form, including records that would otherwise be overwritten, rotated, or disposed of under a routine retention schedule.

The Board acknowledged both communications by email on September 4, 2026, and responded on September 14, 2026. The violations identified in the August 18 notice concerning the State's list-maintenance program under § 20507(a)(4) remain uncorrected and are restated, with additional facts, in Section IV.

IV. Violations

Violation 1. Failure to maintain records documenting changes to registration and voter-participation records (52 U.S.C. § 20507(i)(1))

Duty. Section 20507(i)(1) requires the State to maintain for at least two years, and to make available for public inspection, all records concerning the implementation of programs and activities conducted to ensure the accuracy and currency of official lists of eligible voters. Because a registrant's participation record determines whether the registrant may be removed under § 20507(d), changes to participation records are activities of that kind, and the records documenting them are records concerning their implementation.

Facts. Successive official statewide voter files show 254,027 changes to 2024 general-election participation records between the January 24, 2025 and May 13, 2026 files: 109,976 changes from "voted" to "did not vote," 15,119 changes from "did not vote" to "voted," 111,268 deletions, and 17,664 additions. Comparable changes appear for the 2022 and 2020 general elections. The Board states that local authorities do not report to it the reason for their determinations.

The response does not establish whether IVRS itself retains the source and basis of each change; that question requires inspection of existing logs and disposition records. The undersigned request Board-held and Board-controlled records and identification of the appropriate local custodians for records held exclusively by local election authorities, without conceding any disputed question about the State's statutory responsibilities. The comparison identifies changes to historical participation fields in files produced after certification. Those changes are not, by themselves, proof that ballots were altered or that certified contest totals changed. They require inspection of the existing transaction histories, source transmissions, prior and new field values, authorizations, and disposition records to determine when, how, and why the recorded participation history changed.

Corrective action requested. Record, for every change to a registration or participation record in IVRS, the source of the change (local transmission, identified automated process, or identified user), its date, its stated basis, and the supporting document; retain those records, together with IVRS audit trails and the Client Transmission, Site Activity, and Automatic Processing records, for at least the period § 20507(i) requires; and make them available for inspection subject to lawful redaction. If the State contends that it already maintains these records, it may demonstrate that by making them available for the registrations selected under the protocol described in Annex A.

Violation 2. Non-uniform process for changing participation records after the canvass (52 U.S.C. § 20507(b)(1))

Duty. Every program and activity to protect the accuracy and currency of the voter list must be uniform and nondiscriminatory. 52 U.S.C. § 20507(b)(1).

Facts. The Board has not supplied a written statewide procedure that governs who may change a participation record after the canvass, on what proof, and with what documentation. Changes reach IVRS through 108 local systems and through State-level processes, each applying its own practice.

Corrective action requested. Adopt and publish a written, uniform statewide procedure governing changes to participation records after the canvass, specifying who may make them, the proof required, and the documentation to be recorded. This process should require review, edit authorities, authorization and complete before and after logs.

Violation 3. Non-uniform registration-date data (52 U.S.C. § 20507(b)(1))

Duty. As stated under Violation 2.

Facts. The Board acknowledges that the 108 election authorities record "registration date" under different definitions. Registration dates are used to determine whether a registration was timely and which of two matching records is current. A field recorded under different definitions in different jurisdictions cannot support uniform list maintenance.

Corrective action requested. Adopt a uniform statewide definition of each registration-date field, require each election authority to report under it, and maintain a published mapping of the definitions currently in use. Ensure that the single required state database is fully synchronized with local ones after each election and before certification.

Violation 4. Use of changed participation records in the removal process without safeguards (52 U.S.C. § 20507(b)(2) and (d))

Duty. A registrant may not be removed for failure to vote except as § 20507(c) and (d) allow. 52 U.S.C. § 20507(b)(2). Under § 20507(d), a registrant who fails to respond to a confirmation notice may be removed for change of residence only if the registrant also does not vote or appear to vote through the second following general election for federal office.

Facts. The Board confirms that Illinois cancels registrations under this two-election rule. A change from "voted" to "did not vote" can cause an eligible voter to appear not to have voted and lead to that voter's removal. A change from "did not vote" to "voted" can keep on the list a registration that should be removed under § 20507(a)(4). The Board has not supplied a procedure that identifies participation records changed after the canvass, verifies the basis for each change, or notifies the voter before a changed record counts toward removal.

Corrective action requested. Before any participation record changed after the canvass is used to support a cancellation under § 20507(d), verify the basis for the change and give the registrant notice and an opportunity to respond; restore accurate participation records for any registrant whose record the State cannot show was changed on a documented basis; and cancel no registration on the basis of such a record.

Violation 5. Failure to conduct a reasonable program as to State-generated matches (52 U.S.C. § 20507(a)(4))

Duty. The State must conduct a general program that makes a reasonable effort to remove the names of ineligible voters by reason of death or change of residence. 52 U.S.C. § 20507(a)(4). Further, it is clear that the system assumes an entry of a registration in the first place is accurate. The number and nature of the analytical flags warrant inspection of how the State implements and documents its statutory death- and change-of-residence maintenance program.

Facts. The Board generates and distributes potential matches for deceased registrants, duplicate registrations, and change of address, and states that it oversees unresolved work items. The U4F Scorecard identifies analytical conditions requiring investigation, not adjudicated ineligible registrants. The State should make available the existing death- and change-of-residence matching records, work-item dispositions, and implementation procedures that permit those conditions to be tested against the statutory program.

Corrective action requested. Produce the existing implementation procedures, match criteria, work-item records, and disposition histories for death and change-of-residence programs. As a proposed corrective measure, conduct a statistically valid independent review of identified categories using databases the State may lawfully access. Establish and publish time limits for resolving State-generated matches, track each match to disposition, and report unresolved matches by jurisdiction and age.

Violation 6. Failure to make list-maintenance records available for public inspection (52 U.S.C. § 20507(i)(1))

Duty. Section 20507(i)(1) requires the State to "make available for public inspection and, where available, photocopying at a reasonable cost, all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters." This duty is separate from the duty to maintain those records

described in Violation 1. It is violated when existing records are not made available, whether or not the underlying list-maintenance activity was lawful.

Facts. The August 18, 2026 notice, received by the Board on August 24, 2026, asked to inspect the record categories listed in its Section V.B and in Section IV of its Appendix B, including database transaction logs, change-history records, import, export, synchronization, and replication logs, system event logs, archival snapshots, exception, reconciliation, and quality-control reports, and automated workflow logs. The Board acknowledged that request on September 4, 2026 and responded on September 14, 2026, but has not made those records available for inspection. They remain outstanding and are restated in Annex B.

Corrective action requested. Make the records described in the August 18 notice and in Annex B available for inspection and copying, in native electronic form and subject to lawful redaction, on a schedule agreed during the cure period. For any category the Board contends it does not maintain, say so and identify the applicable retention schedule and disposition date. To the extent the August 18 notice gave notice of this violation, the period for correcting it runs from the Board's receipt of that notice on August 24, 2026.

V. Verification Measures Requested

The violations above concern a process that does not document its own operation. Without records of where changes come from and on what basis, neither the State nor the public can determine whether the list is maintained accurately, uniformly, and without error to eligible voters. As part of the cure for Violations 1 through 5, the undersigned request that the State:

1. after each general election for federal office, prepare a reconciliation, by election jurisdiction, of voter-participation credit against ballots cast as shown in the canvass, explain any difference, and make the reconciliation available for inspection; and
2. after each general election for federal office, commission an independent, statistically valid random-sample audit of registration and participation records, conducted under a published, mutually acceptable protocol meeting the requirements of Annex A, with a sample size adequate to determine accurately the rates of undocumented changes, unsupported participation credit, registrations not maintained in accordance with § 20507, and registrations whose residential address or United States citizenship cannot be confirmed against federal and state databases, and publish aggregate results; any individual correction must follow the notice, verification, and removal protections prescribed by law.

VI. Cure Period

The violations described in this notice are continuing. Under 52 U.S.C. § 20510(b),

(2) If the violation is not corrected within 90 days after receipt of a notice under paragraph (1), or within 20 days after receipt of the notice if the violation occurred within 120 days before the date of an election for Federal office, the aggrieved person may bring a civil action in an appropriate district court for declaratory or injunctive relief with respect to the violation.

(3) If the violation occurred within 30 days before the date of an election for Federal office, the aggrieved person need not provide notice to the chief election official of the State under paragraph (1) before bringing a civil action under paragraph (2).

Evidentiary clarification. The reported 56,164 difference compares certified turnout with participation-history entries in a later statewide file; it is not a finding of 56,164 unlawful votes. References to deletions and additions concern voter-history records, not physical ballots. The historically titled "Vote Tampering Report" is cited as a post-certification voter-history change analysis, without an inference of intentional alteration. The September 2 preservation letter is incorporated as historical notice of preservation demands; this Notice does not assert independent claims under other election statutes. Original exhibits remain unaltered. Any historical date, filename, or category-label discrepancy must be resolved through the source records and a signed technical declaration before being represented as corrected.

VII. What This Notice Does Not Allege

The record-level files identify conditions requiring documentation. They are not counts of unlawful registrations or votes, and many identified conditions may have lawful explanations, such as corrections, merged duplicate registrations, cancellations, transfers, and reinstatements. The violations alleged here are that Illinois does not document, standardize, or verify the process by which those changes are made. This notice makes no allegation about the outcome of any election.

VIII. Response and Contact

The undersigned request a written response stating, for each violation, whether the State disputes the duty, disputes the facts, or will take the corrective action requested, and on what schedule. The undersigned are available to confer at any time during the cure period. Please direct electronic correspondence and inspection scheduling to Harry R. Haury, coordinating requester, at harryhaury@protonmail.com. Written responses may also be sent to the return address shown on the certified-mail envelope.

Respectfully submitted,

Harry R. Haury, President and authorized representative
Unite 4 Freedom, Inc.
Signature: Signed by: C77A4429665E4DE...
Date: 10/25/2026

Harry R. Haury, individually
Signature: Signed by: C77A4429665E4DE...
Date: 10/25/2026

Gregory Stenstrom
Signature: Signed by: Gregory Stenstrom D2968023535049E...
Date: 10/26/2026

Laura Hois
Signature: DocuSigned by: Laura Hois 99DAA805478A425...
Date: 10/26/2026

Robert Stevens
Signature: DocuSigned by: Robert Stevens 47D1F8AE54F54EC...
Date: 10/26/2026

Jimmy Lee Tillman II
Signature: Signed by: Dr. Jimmy Lee Tillman II 7DC3DE7857C4422...
Date: 10/26/2026

Jodie Zitko
Signature: Signed by: Jodie Zitko E8FC0010CB534E7...
Date: 10/26/2026

Mary Catherine Paukstys
Signature: Signed by: Mary Catherine Paukstys A73E3203BEE342C...
Date: 10/25/2026

Enclosures and incorporated materials:

1. Previously served August 18, 2026 electronic evidence (incorporated by reference, not enclosed again). Any new electronic media will have a separately verified manifest specifying filenames, byte sizes, SHA-256 hashes, source/version relationships, and transmission dates.
2. Annex A, Testing Protocol
3. Annex B, State-Level Election Records Requested
4. August 18, 2026 notice, with Appendices A and B
5. September 2, 2026 preservation letter
6. Board's September 4, 2026 email and September 14, 2026 response and high-level overview

Annex A. Testing Protocol

A.1 Purpose

The purpose of testing is to measure the accuracy of the Illinois voter list. The NVRA exists to "ensure that accurate and current voter registration rolls are maintained," 52 U.S.C. § 20501(b)(4); the list it governs is the "official list[] of eligible voters," id. § 20507(i)(1); every State program to maintain "an accurate and current voter registration roll" must be uniform and nondiscriminatory, id. § 20507(b)(1); and the registration form the Act prescribes requires each applicant to attest to every eligibility requirement, "including citizenship," id. § 20508(b)(2). Under article III, section 1 of the Illinois Constitution and 10 ILCS 5/3-1, an eligible voter is a United States citizen who has resided in Illinois and in the election precinct for at least 30 days before the election. A list of eligible voters is accurate only to the extent that the persons on it meet those qualifications at the addresses recorded.

Testing will therefore establish a baseline: a measurement, with a known and adequate degree of accuracy, of how accurate or inaccurate the Illinois registration rolls are. It will determine the rate at which registrations on the 2024 roll, and the registrations of persons credited with voting in 2024, can be confirmed against federal and state databases as belonging to a living, identifiable person who is a United States citizen residing at a lawful residential address in the election jurisdiction. The baseline gives the State, the undersigned, and the public a common, objective starting point against which later corrective action can be measured. Testing also gives the State a defined means to show whether it maintains the records described in Violation 1 for the selected registrations, and ensures that the State and the undersigned examine the same records.

A.2 A Mutually Acceptable Protocol

The undersigned propose that the State and the undersigned agree on a written testing protocol before any record is selected. The undersigned will confer with the State on its terms during the cure period and will consider in good faith any protocol the State proposes. The protocol should meet the following requirements:

1. **Two samples.** Two random samples are drawn. Sample 1 is drawn from every registration on the official statewide voter roll for the November 5, 2024 general election. Sample 2 is drawn from every registrant credited with voting in that election, including registrants whose registrations were later cancelled. Each population is identified by reference to a specific official file and its hash value.
2. **Random selection.** Registrations are selected at random from each population by a method that is fixed before selection and that either party can independently reproduce.
3. **Adequate sample size.** Each sample is large enough to determine, accurately and at a confidence level and margin of error agreed in advance, the rate at which each qualification tested cannot be confirmed.
4. **Identity and life status.** Each selected registration is checked to confirm that it belongs to a living, identifiable person, using Social Security Administration records through the Help America Vote Verification (HAVV) system (name, date of birth, and last four digits of the Social Security number); SSA death records, including the full death file available to State agencies; Secretary of State driver's license and identification-card records; and Illinois Department of Public Health death records and other databases that are available to the state.

5. **Address verification.** Each selected registration is checked to determine whether the registered address was a lawful residential address for the registrant in the election jurisdiction on the date of the election, using United States Postal Service data, including National Change of Address records and address-validation data identifying whether an address is a deliverable residential address; Secretary of State driver's license and identification-card records; property and assessment records; and reports received through the Electronic Registration Information Center to the extent they may lawfully be used.
6. **Citizenship verification.** Each selected registration is checked against federal and state records of citizenship or immigration status, including the Department of Homeland Security's Systematic Alien Verification for Entitlements (SAVE) program, with its queries based on Social Security numbers and its use of SSA citizenship data where available; SSA records; Secretary of State records of documents presented for a driver's license or identification card, including records of temporary visitor driver's licenses; and any notices from federal or state courts of persons excused from jury service for lack of citizenship.
7. **Other federal sources.** The protocol may include any other federal or state database that records identity, death, residence, or citizenship and that the State is lawfully permitted to use for voter-list accuracy. The databases used, and the reasons any proposed database was not used, are stated in the protocol.
8. Who runs the checks. Checks against databases whose use is limited by law to government agencies are run by the State, or by an agency or designee authorized to use them, under the governing terms of use. The query criteria, match rules, and results are disclosed to the undersigned. The undersigned propose an independent, appropriately qualified and bonded contractor selected through a mutually acceptable process, subject to lawful procurement, access, and privacy restrictions.
9. **Defined review.** The rules for classifying each selected registration are fixed in writing before any results are reviewed. For each qualification, a registration is classified as confirmed, not confirmed but explained by a documented lawful reason, or not confirmed and unresolved. The same sources and rules apply to both samples.
10. **Full transparency.** The protocol, selection method, selected registrations, databases and match rules used, classification rules, calculations, and results are available to both parties, and any departure from the protocol is documented and disclosed.

A.3 Records for Selected Registrations

For each selected registration, the undersigned request the existing records within the Board's possession, custody, or control, including records held on its behalf by vendors or contractors, that show the registration's status history; the source, date, and basis of each change to the registration and its participation history; any work items, matches, or confirmation notices and their dispositions; and any verification of the registrant's identity, address, or citizenship previously performed. The undersigned additionally identify relevant records held by local election authorities. For records outside the Board's possession, custody, or control, they request identification of the local custodian and location, while reserving their position regarding statewide statutory responsibility. The undersigned do not request the creation of new records or explanations. Where a record does not exist, the undersigned ask only that the State say so.

A.4 Results

Results will be reported for each sample, and separately for identity and life status, address, and citizenship, as the estimated rate at which each was confirmed, not confirmed but explained, and not confirmed and unresolved, each with its confidence interval. For each sample, the rate at which every qualification tested was confirmed, with its confidence interval, is the baseline measure of the accuracy of the rolls. A failure to confirm a qualification through a database is not a finding that any registrant is ineligible; database records can be incomplete or outdated. Results and calculations will be provided to the State before any public release, with an opportunity to identify registrations it contends were misclassified.

A.5 Privacy and Use

- The undersigned accept redaction of Social Security numbers, driver's license numbers, protected addresses, and any other information whose disclosure federal law prohibits.
- Database checks will be performed only by persons lawfully authorized to use each database, and only in accordance with its terms of use and with applicable law, including the Driver's Privacy Protection Act.
- Records and results produced under the protocol will be used only to evaluate compliance with the NVRA and the State's maintenance of accurate voter lists.
- No individual voter's information will be publicly released. Published results will be in aggregate.
- Testing measures the accuracy of the list as a whole. It does not seek the cancellation of any registration or any action against any registrant, and no conclusion will be drawn about any individual registrant from it.

Annex B. State-Level Election Records Requested

B.1 Scope

This Annex lists every category of existing record held at the State level that bears on the matters in this notice, together with the local records described in category 2. It covers records within the possession, custody, or control of the State Board of Elections, including records held on its behalf by vendors or contractors and records the Board receives from other State agencies or from the Electronic Registration Information Center (ERIC). Except for the local records described in category 2, it does not request records held only by local election authorities, and it does not request ballots, ballot images, cast-vote records, or tabulation-equipment records.

Period. January 1, 2020 to the present, to the extent the records still exist, and in all cases the full two-year period for which 52 U.S.C. § 20507(i) requires records to be maintained.

Legal basis. Records concerning the implementation of programs and activities conducted to ensure the accuracy and currency of the voter list are requested under 52 U.S.C. § 20507(i). Records marked † concern election results and administration more generally; they are requested as public records under the Illinois Freedom of Information Act, 5 ILCS 140, and under § 20507(i) to the extent they concern list maintenance, including the posting and reconciliation of voter-participation records.

Form. Native electronic form where the records are kept electronically, with redaction of Social Security numbers, driver's license numbers, protected addresses, and other information whose disclosure federal law prohibits. Supervised inspection is acceptable where the Board contends that production is not feasible.

Where a record does not exist. The undersigned do not request the creation of new records. For any category the Board does not maintain, the undersigned ask only that the Board say so and identify any applicable retention schedule and disposition date.

B.2 Categories

1. Statewide voter file and voter history

- Each statewide voter file, extract, or snapshot produced or retained since November 1, 2024, including files sold or provided to requesters, with the date each was generated.
- Daily Voter Snapshot reports for the same period.
- The data dictionary, file layouts, field definitions, status codes, reason codes, cancellation codes, and voter-history codes for the registration and voter-history data.
- Rules and specifications governing how participation credit is posted to IVRS, including timing and source.
- Any record of the definitions each election authority uses for registration-date fields, and any mapping of those definitions.

2. Change, transaction, and system records

- IVRS transaction, audit, and change-history logs for registration and voter-history records, showing for each change the field, prior and new values, date and time, and the user or process responsible.
- IVRS Client Transmission reports and batch summaries for every transmission from a local system.

- Import, export, synchronization, and replication logs for IVRS.
- Automatic Processing Report Details for every automated process that changes registration or participation records.
- Site Activity Reports for Board-level users.
- Records held by local election authorities, or transmitted by them to the Board, that document the source, date, and basis of each change identified in the previously noticed 2024 participation-record change analysis and any supplementary change file actually supplied. For records not held or controlled by the Board, the undersigned request identification of the responsible local election authority and record location; they reserve their position on the State's statutory responsibilities.
- IVRS exception, error, and quality-control reports.
- System event logs for IVRS bearing on changes to registration or participation records.
- An inventory of archival snapshots and backups of IVRS data, with their dates and retention periods, sufficient to show whether prior states of the data can be reconstructed.

3. List-maintenance programs

- Work Item Summary histories and dispositions for every category of work item, including potential duplicates, deceased registrants, incarcerated registrants, transfers and reinstatements, Social Security and driver's license verification, automatic address updates, interstate matches, invalid identifying information, and confirmation notices.
- Cancelled Voters reports.
- Outputs of the Board's daily duplicate-matching process and their dispositions.
- Death-matching files and results from Illinois Department of Public Health and Social Security Administration data.
- Incarceration-matching files and results from Illinois Department of Corrections data.
- Results of Social Security and driver's license verification through the Help America Vote Verification system and the Secretary of State.
- National Change of Address processing records and resulting address updates.
- ERIC records: dates and contents of data submissions, ERIC reports received that may be released under the ERIC agreement, ERIC compliance and utilization reports, and correspondence with ERIC concerning the release of reports.
- Records of registrations received through automatic voter registration and the online application system, including transfers from the Secretary of State and other agencies.
- Any statewide records of confirmation notices sent and responses received.

4. Election administration and results†

- County abstracts of votes and other canvass returns filed with the Board for the 2020, 2022, and 2024 general elections.
- The State canvass records and proclamations for those elections.
- Precinct-level and jurisdiction-level reports filed with the Board under 10 ILCS 5/22-15 and 22-15.1.
- Turnout and ballots-cast reports by jurisdiction and voting method, including early, mail, provisional, and election-day voting.
- Records of the Board's post-election data validation.
- Any reconciliation, at any level, of voter-participation records against ballots cast.

5. Procedures, guidance, and oversight

- Written procedures governing IVRS and list maintenance, including every version of the IVRS manual in effect since January 1, 2020.
- Guidance, directives, memoranda, and training materials issued to election authorities on posting and correcting voter history, list maintenance, duplicate resolution, and registration dates.
- Records of the Board's oversight of unresolved work items, including reports by jurisdiction and age.
- Records of the Board's monitoring of ERIC compliance.

6. Federal and statutory reporting†

- Illinois's submissions to the Election Administration and Voting Survey for 2020, 2022, and 2024.
- Reports concerning NVRA compliance and the State's list-maintenance program.
- Correspondence with the U.S. Department of Justice concerning voter-list maintenance or voter-registration records.

7. System administration and retention

- Policies identifying which roles at the State level can create, change, or delete registration or voter-history records, and the approval required. The undersigned do not request passwords, security configurations, or other information whose disclosure would compromise system security.
- Contracts and statements of work with any vendor that develops, hosts, or maintains IVRS.
- Reports of any incident affecting the integrity of registration or voter-history records.
- The retention schedules that apply to each category in this Annex.

8. Records responsive to the prior notices

- Every record within the categories requested in Section V.B of the August 18, 2026 notice and Section IV of its Appendix B, to the extent held at the State level and not already listed above.

EXHIBIT N - RECORD AND SOURCE INVENTORY

Historical notices and State records

Exhibits A–F contain the August notice and Illinois analyses, acknowledgments and correspondence, preservation demand, September response and overview, IVRS manual, and ERIC materials. The original exhibit labels and Bates references are retained.

Witness declarations

Exhibits G–L and O contain the executed declarations of Gregory Stenstrom, Jodie Zitko, Mary Catherine Paukstys, Laura Hois, Robert R. Stevens, Jimmy Lee Tillman II, and Harry R. Haury. The testimony, visible signatures, and actual execution dates are reproduced from the supplied executed copies.

Second notice

Exhibit M contains the fourteen-page second NVRA notice, including Annexes A and B and the original signatories.

Machine-readable source records

Exhibit G identifies the preserved analytical CSV files, transport archive, byte sizes, and SHA-256 controls. Those native files are not attached to the complaint because of their size. Their identification and proposed production arrangements are stated in the declaration.

Evidence summary

Exhibit P organizes the existing official-file comparisons, personal record disputes, requests, and requested reconciliation by reference to Exhibits A–O. It is an exhibit summary rather than additional witness testimony.

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

LAURA HOIS; ROBERT R. "RUSTY" STEVENS; JIMMY LEE TILLMAN II; JODIE ZITKO; MARY CATHERINE PAUKSTYS; GREGORY STENSTROM; HARRY R. HAURY; and UNITE 4 FREEDOM, INC.,

Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. _____

EXHIBIT O — DECLARATION OF HARRY R. HAURY

EXHIBIT O — DECLARATION OF HARRY R HA RY

I, Harry R. Haury, declare as follows:

1. I am a Plaintiff, a Missouri resident, and Chair and President of Unite 4 Freedom, Inc. ("U4F"). I am authorized to speak for its Illinois records-inspection project. U4F analyzes official voter files, requests implementation records, publishes findings, and presents supported issues for lawful correction.

2. I signed the August 18, 2026 Illinois NVRA communication for U4F and myself. U4F, Gregory Stenstrom, and I are requesters identified in that communication. It identifies the Illinois analyses, alleged failures, requested records, and corrective action. Exhibit A reproduces the supplied communication and materials.

3. The Board received the August notice August 24. Its September 4 email acknowledged both that notice and the September preservation demand and stated that the twenty-day cure period for the August notice expired September 14. Exhibit B contains the acknowledgment communications; Exhibit C contains the preservation demand.

4. The September 14 response provided general materials and promised another letter on the § 20507(i) request. As of November 4, 2026 I have received no promised supplement, inspection appointment for the remaining categories, custodian index, or completion schedule. Exhibit D is the supplied response and overview.

5. I joined the Second Notice dated October 25 and transmitted October 26, 2026. As of November 4 I have received no response making the remaining requested implementation records available. Actual transmission and receipt dates are established by the underlying communications and service records, not by this declaration's date alone.

6. U4F's Illinois analysis and inspection work preceded this lawsuit. We need definitions, source change histories, matching work items, notices, responses, synchronization information, and dispositions to test the existing analyses, separate explained conditions from verified errors, and submit supported jurisdiction-specific issues. Stenstrom will assist the comparisons; I will direct inspection and evaluate the resulting dispositions.

7. General descriptions and purchasable voter-file snapshots do not provide those operational records. Continued nonproduction prevents completion of the specified work during the open canvass. I request prompt preservation, inspection, and independent examination before certification under the proposed protocol.

8. I describe my own acts, receipt of communications, and intended work from personal knowledge and the organization's records. I have reviewed the historical communications identified above. The numerical and file-control statements in Exhibit G require Stenstrom's own confirmation; this declaration does not independently verify missing native files.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on: 11/15/2026

Signed by:
C77A4429665E4DE...

Harry R. Haury

EXHIBIT P CONTINUING CONDITIONS AND REQUESTED RECONCILIATION

Evidence roadmap prepared from Exhibits A–O. This exhibit organizes existing evidence; it is not an additional witness declaration or a completed audit. References below use the exhibit's own internal pages or section, avoiding shifting combined-PDF pagination.

Official-file comparison through 2026

Exs. A and M, Violation 1: January 24, 2025 to May 13, 2026; 254,027 changes to 2024 participation fields, including 109,976 voted-to-not-voted, 15,119 reverse changes, 111,268 deletions, and 17,664 additions.

Requested reconciliation: Trace the selected identifiers across versions, source transmissions, prior/new values, authority, and disposition; determine current status and whether the change was explained. Historical field changes are not themselves changes to certified totals.

Personal histories still disputed

Exs. H–I: Zitko disputes 2010/2014/2018 participation; Paukstys disputes the March 2020 party-ballot entry. Their renewed requests and intended inspection continue in 2026.

Requested reconciliation: Obtain the source event, correction history, relevant local/state transmission, and written disposition. Identify what persists in the latest available version and whether it affects present maintenance.

2026 requests connected to a current candidate

Ex. J: January 30 election-mail request; February 6 no-record response; later FPCA request narrowed to forty-five registrants and five categories; July 28 production with missing operational categories reported.

Requested reconciliation: Trace existing State-controlled and properly obtained local transmission, receipt, processing, and disposition records. Relate findings to the candidate's stated examination work; identify the responsible local custodian where needed.

Address conditions requiring lawful follow-through

Exs. A, K: analytical address flags and approximately 354 preserved pieces of returned campaign mail.

Requested reconciliation: Match source identifiers securely; examine address history, notice, response, disposition, and current status. Returned campaign mail alone is not a determination of ineligibility.

State-held means of reconciliation

Ex. D, response at 6 n.2 and 7–8 and overview at 1–2; Ex. E, named IVRS reports and work-item histories. Different local registration-date meanings and State synchronization/matching functions are described.

Requested reconciliation: Produce existing definitions, mappings, Client Transmission, Site Activity, Automatic Processing, cancellation, snapshot, and work-item records within possession, custody, or control; state actual coverage and gaps.

Notice and continuing nonproduction

Exs. A–D, M, O: August notice, August 24 receipt, September preservation acknowledgment, September 14 response and promised supplement, October renewed notice, and declared nonproduction as of November 4.

Requested reconciliation: Order a named compliance official, rolling inspection, sworn category accounting, fixed deadlines, and recurring status reports. Missing documents require a specific search/gap explanation, not an assumed admission of misconduct.

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Clerk, U.S. District Court, ILCD

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

FILED
11/17/2026
CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

HARRY R. HAURY; LAURA HOIS; ROBERT R. "RUSTY" STEVENS; JIMMY LEE TILLMAN II; JODIE ZITKO; MARY CATHERINE PAUKSTYS; and GREGORY STENSTROM,

Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. 26-cv-3397

EMERGENCY MOTION FOR RELIEF BEFORE CERTIFICATION

Plaintiffs move under 52 U.S.C. § 20510(b), Rules 65 and 26(d)(1), and Civil Local Rule 7.1 for preservation, prompt inspection, sworn compliance reporting, and expert examination before certification. They affirmatively seek a short restraint on specified certification acts where the noticed evidence establishes necessity, proper officials, concrete irreparable injury, and a fixed endpoint. Set a response within two business days and a noticed hearing within five calendar days, earlier if the relevant act is imminent. Decide each remedy separately and address the constitutional grounds identified below if necessary. Oral argument is requested.

1. Why action is needed now The Board acknowledged the August request, supplied general materials September 14, promised more, and has not provided the remaining operational records or an inspection date. Exs. A–F, O. The Second Notice renewed the requests. Ex. M. Zitko and Paukstys need the records to trace disputed entries in their own histories; Hois and Stevens need them during the canvass of their races. Exs. H–K.

Later access cannot restore this opportunity.

2. Immediate relief Preserve existing responsive records without interrupting election operations. Within two business days, require a knowledgeable custodian to identify the responsible offices, preservation measures, known gaps, and known dates and responsible bodies for the relevant certification proceedings. Set the expedited response and hearing. Proposed Order 10 provides the specific terms.

3. Expedited discovery and defined expert examination Order rolling inspection within three business days and sworn category accounting within five. Under Rule 26(d)(1), authorize expedited production and a limited custodian deposition so Plaintiffs' retained expert can trace up to fifty selected histories across preserved and available 2026 versions. Require a named compliance official and reports every three business days. Approve a bounded Phase Two validation design on sworn feasibility evidence, with a staged alternative if the full sample cannot be completed before the relevant certification. Ex. P; Proposed Orders 11–12; protocol § 5.

4. Limited certification relief and meaningful adjudication Plaintiffs ask the Court to grant or refuse a short, specified certification restraint at the noticed hearing. The concern is that officials control evidence needed to test the pleaded violations while continued nonproduction consumes the practical opportunity for redress. Consider the preserved baseline, May 2026 comparison, personal disputed histories, and current access denial together. Determine the affected Plaintiff and race, likely federal violation, imminent certification act, responsible official, endpoint, and why access or other alternatives are insufficient. Resolve access and expedited

examination even if the restraint is refused; no indefinite statewide condition of complete reconciliation is requested. Plaintiffs expressly invoke the due-process and access-to-courts grounds in complaint ¶¶35A–35B and memorandum §IX. They ask whether delayed statutory access can be treated as adequate when that delay defeats the identified time-sensitive use and whether certification forecloses an already asserted examination claim. Resolve the statutory issues first where adequate; if constitutional grounds are reached or rejected, state the reason. Under Rule 52(a)(2), provide findings and conclusions supporting each interlocutory injunction disposition.

5. Notice and security This is a noticed application. Plaintiffs request no ex parte order. They ask that Rule 65(c) security be fixed at $100, subject to a concrete showing of compensable risk. Actual notice and separate Rule 4 service must be established by a separate certificate completed after performance.

6. Pro se status and submitting plaintiff All seven individual Plaintiffs proceed solely on their own behalf. Gregory Stenstrom submits the jointly signed application. U4F is not a current plaintiff. Historical organizational references in the exhibits remain evidence of the original requests and events, not an appearance by the organization. Plaintiffs intend to seek addition of U4F through licensed counsel by proper amendment and joinder when counsel appears.

PRO SE SIGNATURES AND CONTACT INFORMATION

EMERGENCY MOTION FOR RELIEF BEFORE CERTIFICATION

Each individual signs only for himself or herself. Gregory Stenstrom submits the documents as a co-plaintiff and does not appear as counsel for any other person or organization.

s/Harry R. Haury

Harry R. Haury, Pro Se

c/o Unite 4 Freedom, Inc., 167 Lamp & Lantern Village, Suite 194, Chesterfield, MO 63017

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s/Mary Catherine Paukstys

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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

HARRY R. HAURY; LAURA HOIS; ROBERT R. "RUSTY" STEVENS; JIMMY LEE TILLMAN II; JODIE ZITKO; MARY CATHERINE PAUKSTYS; and GREGORY STENSTROM,

Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. 26-cv-3397

MEMORANDUM SUPPORTING RELIEF BEFORE CERTIFICATION

I. The order requested Plaintiffs request examination of a continuing record-maintenance and reconciliation problem before certification. The record includes a comparison reaching May 13, 2026, unresolved individual histories, and 2026 requests and responses. The earlier election fields supply the baseline for testing what persisted, changed, or was corrected in the processes used today. Immediate inspection and targeted longitudinal tracing should proceed now; statewide probability sampling and any limited certification restraint should receive prompt decisions on the supporting evidence. Exhibit P supplies the evidence-to-relief map. The substantive claims remain important. A reasonable and uniform maintenance program requires actual implementation. The documented questions concern inconsistent field meanings, changes to participation histories, and follow-through on noticed residence-related conditions. The requested examination tests those claims while the canvass remains open.

II. Governing standard Plaintiffs must show likely success, likely irreparable harm, a favorable balance of equities, and consistency with the public interest. Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20, 24 (2008). The Seventh Circuit requires a strong showing of likely success that explains how the claim will be proved. Illinois Republican Party v. Pritzker, 973 F.3d 760, 763 (7th Cir. 2020). The proof here begins with the written requests, acknowledgments, partial response, identified reports, and sworn accounts of continuing nonproduction and concrete intended uses. Rule 65 requires notice and specific terms. The

proposed orders state categories, custodians, and deadlines. Rule 26(d)(1) permits court-authorized discovery before the Rule 26(f) conference. Civil Local Rule 7.1 ordinarily allows fourteen days to respond; Plaintiffs request a shortened schedule by court order and oral argument under Rule 7.1(A)(2).

III. The inspection claim has a concrete factual and legal foundation Section 20507(i) covers existing implementation records concerning accurate and current lists. Public Interest Legal Foundation, Inc. v. Matthews, 589 F. Supp. 3d 932 (C.D. Ill. 2022), No. 20-cv-3190, ECF No. 37 at 24–27, held the Illinois statewide list disclosable and conflicting State duplication restrictions preempted. Project Vote/Voting for America, Inc. v. Long, 682 F.3d 331, 339–40 (4th Cir. 2012), explains how disclosure enables public accountability. Public Interest Legal Foundation, Inc. v. Bellows, 92 F.4th 36 (1st Cir. 2024), supports statewide-file disclosure. The reports and histories identified here must be evaluated by their actual function, not merely labeled technical data. These authorities support access; the additional injunction requires the separate equitable showing. The Board's response and overview describe its matching, synchronization, and work-item functions. The manual names transmission reports, activity reports, automatic-processing details, snapshots, cancellations, and dispositions. Exs. D–E. Plaintiffs seek those existing records, with lawful redaction, in the categories already requested. A general description of safeguards cannot replace the records showing what happened in the disputed processes. The compliance accounting makes access enforceable:

identify the custodian and search, available records, specific withholding basis, actual gaps and disposition dates, and completion date. Preservation protects existing evidence. No independent retention count rests merely on inability to obtain an old source record; a newly supported retention violation would require identification of the record, duty, period, and loss.

IV. Each requested remedy addresses an identified injury Zitko disputes three participation entries in her own history; Paukstys disputes the party-ballot entry in hers. Both need source and disposition records to investigate and seek supported correction. Hois and Stevens describe particular records and follow-up work connected to the shared processes used in their November races. The individual analysts Stenstrom and Haury need the records to complete their existing Illinois comparisons and submit verified issues to responsible officials. Exs. G–L, O. A statutorily denied information right must have concrete consequences. Federal Election Commission v. Akins, 524 U.S. 11, 21 (1998); TransUnion LLC v. Ramirez, 594 U.S. 413, 442 (2021). Those consequences are specified here: inability to trace personal entries, test identified conditions, and present supported issues during the current canvass. Access and examination supply the information needed to perform that work. Bost v. Illinois State Board of Elections, 607 U.S. ___, No. 24-568, slip op. at 3–10 & n.7 (Jan. 14, 2026), concerns candidate standing to challenge vote-counting rules and expressly reserves other categories. Its candidate-process reasoning supports an analogy here, not a controlling holding on every maintenance claim. Hois and Stevens also plead concrete denial of

information needed for work concerning their own races. Tillman relies on his own records request and intended uses, not a claim that he advanced from the primary. The candidates' actual results and ongoing interests must be accurately presented; a win or loss alone does not decide every asserted injury. Casillas v. Madison Avenue Associates, Inc., 926 F.3d 329, 334–35 (7th Cir. 2019), distinguishes a bare informational omission from one that frustrates an intended use and causes harm. Here the declarations identify actual uses: tracing personal histories, testing preserved record changes, and presenting supported issues during the canvass. Zitko also describes her repeated ballot-request and surrender practice after discovering her disputed history. The Court should evaluate the factual burden and causal connection rather than assume every precaution establishes injury. Ex. H ¶¶2–8. Paukstys identifies her own disputed history and March 2026 election-judge records work. Ex. I.

V. Notice is supported by the actual written chronology Stenstrom and Haury, together with nonparty U4F, submitted the August writing identifying alleged violations and records. The Board received it August 24, acknowledged it September 4, identified September 14 as the cure deadline for that notice, and responded September 14 with partial production and a promised supplement. Exs. A–D, O. The continued nonproduction supports their § 20510(b)(2) position. The Board's argument that a separate request should have preceded the notice requires a ruling; its partial response and promise bear on that issue but are not treated as an automatic waiver of statutory prerequisites. All Plaintiffs also

invoke § 20510(b)(3) for challenged failures occurring within thirty days before the federal election. Exhibit M supplies the renewed requests and substantive notice. If the Court requires an additional cure period for a Second Notice claim, the period runs from established receipt; receipt October 26 yields November 15 as the twentieth day. Plaintiffs request supplementation under Rule 15(d) when appropriate and separate determination of the matured August claims.

VI. The substantive duties justify focused examination Section 20507(a)(4)(B) requires a reasonable residence-related program, and § 20507(b)(1) requires uniform maintenance. Section 20509 assigns coordination responsibility. The complaint identifies a factual basis for testing implementation: different local meanings of a statewide field, extensive historical participation changes, personal disputed histories, and preserved address evidence. Exs. A, D, H–K. The examination follows the records across time: the preserved historical baseline, the May 2026 statewide version, later authenticated 2026 versions, and current registration/participation where available. For shared identifiers, trace the recorded change, source, legal basis, disposition, and effect on current status. This tests continuity rather than treating each election as an isolated event. Historical and current-election error estimates require separately defined populations; a longitudinal link can establish persistence without treating a historical total as a current unlawful-ballot count. Ex. P; proposed protocol. The proposed examiner is a party-retained independent professional, subject to qualifications and conflicts disclosures, lawful access, and

discovery limits. Plaintiffs request no delegation of judicial decision-making or compulsory special-master appointment by label. Any later Rule 53 appointment requires its own findings and terms. The examiner must authenticate source versions, disclose the sampling frame and code, distinguish flags from verified violations, preserve ballot secrecy, and testify to methodology, cost, and completion time before Phase Two is ordered. Husted v. A. Philip Randolph Institute, 584 U.S. 756 (2018), upholds the notice-and-waiting process Congress authorized; Plaintiffs seek documented implementation subject to those safeguards. Historical participation credit can affect that process in either direction when actually used. The examination must determine whether inconsistent fields or unexplained changes caused different maintenance treatment; differing definitions or returned campaign mail alone do not establish that conclusion. Counts II–III seek adjudication of the pleaded implementation failures, with additional evidence obtained through the requested discovery.

VII. Delay causes a loss that later production cannot repair The current canvass is a finite opportunity to examine official records and present supported issues before certification. The declarations identify the comparisons Plaintiffs intend to perform now. Continued withholding consumes that opportunity. A later response cannot recover the elapsed time or permit a timely submission in the completed canvass. Preservation addresses a separate risk. Some records created during the 2024 election and canvass approach the two-year minimum; the acknowledged hold has not been confirmed. Plaintiffs assert no known scheduled

destruction date. A tailored hold preserves the evidence while allowing live database operations and the canvass to continue. The balance favors a bounded examination of existing administrative data, with secure access and staged reporting. Phase One begins with selected histories; Phase Two proceeds only on an approved frame and sworn feasibility evidence. A proposed 99-percent confidence and five- percentage-point precision target would require 664 usable observations in a large-population simple-random design at maximum variance, before any finite-population correction or adjustment for stratification, clustering, or missing evidence. It is a planning baseline, not a conclusion about errors or an approved final sample.

VIII. Keep the examination tied to certification and actual authority The Court should set its return hearing before the relevant certification. The Board's published agenda lists proclamation of the November election results for December 4, 2026 at 10:00 a.m. The county-abstract period for specified offices ends November 24 under 10 ILCS 5/22-1; the State canvass period ends December 4 and permits earlier action under § 22-7. Those outer limits do not establish the actual local proceedings. Require identification of those dates immediately and complete the focused examination before the applicable event. Illinois State Board of Elections, Board Agenda, https://www.elections.il.gov/abouttheboard/agenda.aspx (reviewed Nov. 4, 2026). Rules 65(d)(2), 19, and 21 govern who is bound and any necessary joinder. An order against these Defendants should reach the records and functions they control. If evidence warrants

relief requiring a local custodian or canvassing official, Plaintiffs should promptly bring the appropriate official before the Court with notice and process. A certification restraint requires findings under Winter and Rule 65. Evaluate the continuing violation using the full chronology, including the official-file comparison through May 2026 and current disputes and denied access. Historical evidence remains relevant to persistence, notice, and the necessity of examination. For a short restraint affecting specified races, identify the concrete present injury, imminent act, responsible official, necessity, and duration. Join any official needed to implement it. The examination should proceed on its independently supported grounds while the Court decides the additional restraint.

IX. Meaningful adjudication and the constitutional grounds raised

Plaintiffs expressly raise the First and Fourteenth Amendment access-to-courts principles and Fourteenth Amendment procedural due process in support of timely adjudication and prospective relief. They identify a concrete sequence: pre-election requests for records needed to test specified statutory conditions; official control of that evidence; continuing nonproduction; and an advancing canvass. A decision that access will eventually be supplied does not by itself decide whether the lost time-sensitive use is adequately remedied. The Court should determine that injury and the necessity of relief under Winter rather than equate certification with an automatic end to examination. Logan v. Zimmerman Brush Co., 455 U.S. 422, 428–37 (1982), rejected extinction of a protected statutory cause of action through official procedural failure without a meaningful opportunity to be heard. It

concerned an adjudicatory deadline in an employment-discrimination scheme, not election certification. Plaintiffs invoke its due-process principle by analogy: if a timing or finality rule is asserted to defeat effective adjudication here, determine the protected interest, actual procedural opportunity, governmental justification, and available adequate alternative before treating the pleaded claims as foreclosed. Christopher v. Harbury, 536 U.S. 403, 413–16 (2002), requires an arguable underlying claim and actual obstruction for an access theory. The underlying statutory claims and their factual bases appear in Counts I–III; Plaintiffs seek to remove the claimed evidentiary obstacle through access, expedited discovery, and a prompt judicial determination in this action. They do not allege an already lost separate election contest or seek damages for one. The constitutional grounds do not supply a general right to government information or dispense with standing, notice, proof, or the Rule 65 factors. If effective statutory relief resolves the controversy, no unnecessary constitutional decision is requested. The present record does not establish purposeful partisan discrimination, a similarly situated comparator class, or arbitrary ballot treatment sufficient for an independent equal-protection count. The statutory uniformity claim remains affirmative; it must be tested against actual treatment. Additional constitutional claims require supporting facts and proper amendment, not a blanket reservation. No constitutional defect in an identified State statute is pleaded merely because prospective relief may affect an official act. Purcell v. Gonzalez, 549 U.S. 1, 4–5 (2006), requires attention to election

disruption and competing harms. Voting has occurred; this request does not change voter instructions or ballot eligibility rules. Certification relief still affects finality and must be justified on the actual record. Plaintiffs seek a short, specified restraint only if immediate access and a bounded examination cannot otherwise protect the identified injury; the public's interest in timely finality must be weighed alongside Congress's disclosure and accuracy objectives. A right to investigate is not proof that a result is wrong. Plaintiffs request express decisions on: (1) whether the identified IVRS records are covered and the statutory notice sufficient; (2) whether continuing withholding causes a concrete loss of useful examination during this canvass; (3) whether expedited access and expert discovery can adequately address it before the relevant act; (4) whether a short restraint is necessary and lawful as to identified officials and races; and (5) if effective statutory relief is unavailable, whether the asserted procedural foreclosure is consistent with the constitutional grounds above. These questions concern the pending requested relief, not an advisory declaration about hypothetical future litigation. Rule 52(a)(2) requires findings and conclusions when an interlocutory injunction is granted or refused. Plaintiffs request separate disposition of preservation, mandatory access, and certification restraint, with reasons for any narrower alternative or refusal. They request a prompt ruling before the identified certification act so that available review remains practical. They do not ask the Court to decide in advance that every order is appealable or that certification automatically moots or preserves every claim.

Requested disposition Enter immediate preservation and scheduling relief after notice. At the first hearing, decide independent examination, rolling access, sworn reporting, and the process for promptly finalizing the statewide sample. Also hear the evidence and joinder needs for a short, specified certification restraint. Set an early return before the relevant certification for findings and any necessary final adjustment. Grant each independently supported obligation even if the broader request requires additional evidence.

X. Individual Plaintiffs and prospective organizational joinder Each current Plaintiff proceeds pro se and asserts his or her own claims. U4F is not a current plaintiff. Its participation in the notices and historical analysis remains relevant evidence; the current requested relief rests on the individual Plaintiffs' pleaded interests. Plaintiffs intend to seek addition of U4F when licensed counsel enters for it, subject to Rules 15, 20, and 21 and any required court permission. An appearance alone will not add the organization, and the current complaint does not purport to preserve a filing date for any later organizational claim.

PRO SE SIGNATURES AND CONTACT INFORMATION

MEMORANDUM SUPPORTING RELIEF BEFORE CERTIFICATION

Each individual signs only for himself or herself. Gregory Stenstrom submits the documents as a co-plaintiff and does not appear as counsel for any other person or organization.

s/Harry R. Haury

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Tuesday, 17 November, 2026 04:16:33 PM
Clerk, U.S. District Court, ILCD

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

HARRY R. HAURY; LAURA HOIS; ROBERT R. “RUSTY” STEVENS; JIMMY LEE TILLMAN II; JODIE ZITKO; MARY CATHERINE PAUKSTYS; and GREGORY STENSTROM,

Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. 26-cv-3397

PROPOSED PRESERVATION ORDER AND EXPEDITED HEARING

After notice and consideration of the complaint and executed declarations and supporting declarations, the Court finds for temporary purposes that the identified covered-record inspection claim has a sufficient likelihood of success; preserving the existing responsive evidence is necessary to protect useful adjudication; and the tailored restraint below favors the balance of harms and public interest. Mandatory inspection and further examination will be determined at the noticed hearing.

It is ordered

1. Defendants and persons bound under Rule 65(d)(2) with actual notice shall preserve existing records within Defendants' possession, custody, or control concerning the noticed registration and participation conditions: IVRS field definitions and mappings; source and client transmissions; change histories with available prior/new values, dates, and user/process identifiers; activity and audit logs; automatic-processing details; snapshots; matching work items; cancellations; confirmation notices, responses, and dispositions; and existing synchronization and participation-reconciliation records.

2. Suspend deletion, overwriting, rotation, or expiration as needed to preserve those records. Preservation may use ordinary copies, exports, snapshots, and litigation holds. Lawful registration activity, live systems, and canvassing may continue.

3. Within two business days, file a knowledgeable custodian's declaration identifying responsible offices and systems, preservation measures, known gaps, and known scheduled certification proceedings and responsible bodies, with the source of that information. State expressly if a date is unknown.

4. Defendants shall respond by _____ at _____. The Court will hear the requests for inspection, accounting, and focused examination on _____ at _____ by _____. The Clerk shall provide prompt notice.

5. At the hearing, identify available priority records, searches performed, specific withholding grounds, exclusively external custodians, and

concrete retrieval burdens or alternatives. The Court reserves mandatory production and additional examination until that hearing.

6. Security is $100, subject to a particularized showing. The preservation restraint expires at _____ on _____, no later than fourteen days after entry unless lawfully extended or replaced. Scheduling remains subject to further order.

7. Plaintiffs shall promptly provide actual notice and file proof. This order binds only persons within Rule 65(d)(2). The Court retains authority to enforce its terms and decide further supported relief before certification.

Entered: _____, 2026, at _____

_____

UNITED STATES DISTRICT JUDGE

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Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. 26-cv-3397

PROPOSED INSPECTION INJUNCTION AND EXAMINATION SCHEDULE

After notice and hearing, the Court finds likely success on the covered-record inspection claim, a concrete loss of useful access during the ongoing canvass absent timely relief, no adequate damages remedy for that loss, and that the balance of harms and public interest favor the tailored obligations below.

It is ordered

1. Defendants and persons bound under Rule 65(d)(2) with actual notice shall preserve existing responsive IVRS definitions and mappings; source/client transmissions; available prior/new values, dates, and process/user identifiers; change, activity, and audit histories; snapshots; automatic-processing details; matching work items; notices, responses, cancellations, and dispositions; and existing synchronization and participation-reconciliation records within Defendants' possession, custody, or control. Suspend routine loss as necessary while permitting lawful operations.

2. Within three business days, begin rolling electronic production or supervised inspection of covered records in these priority categories: definitions and mappings; selected source/change histories; corresponding work items and dispositions; applicable confirmation notices and responses; and existing synchronization and participation-reconciliation records. State lawful redaction or withholding grounds and produce segregable material.

3. Within five business days, file a custodian declaration identifying, for each ordered category, the systems and custodians searched, searches performed, records produced or made inspectable, specific withholding basis, known gaps and disposition dates, external custodians, and the completion date. Name one official responsible for coordinating compliance. File status reports every three business days until production is complete or further order. Report an obstacle promptly with a proposed narrower means of compliance; the undisputed production schedule remains effective unless modified by the Court.

4. Under Rule 26(d)(1), subject to approval of qualifications, conflicts, lawful access, security, and cost, permit Plaintiffs' retained independent expert to trace up to fifty selected histories across jurisdictions. Include affected Plaintiffs and changed/address-related records; trace baseline through available 2026 versions and current registration or participation. Report source, prior/new values, notices, disposition, and gaps. No judicial decision-making authority is delegated. Targeted results are not statewide statistical estimates.

5. Under Rule 26(d)(1), authorize requests for existing records within paragraphs 2–4, responses within five business days, and one remote Rule 30(b)(6) deposition up to three hours about systems, searches, mappings, source histories, and dispositions on three business days' notice. Raise concrete objections promptly; undisputed duties continue.

6. Within three business days of usable access, submit the final proposed Phase Two frame, randomization, precision/confidence assumptions, missing-data treatment, cost, and feasible reporting date. The Court will promptly decide statewide sampling on that sworn showing and any response. File initial traced-record findings within seven business days, or sooner as needed for the relevant certification. Seek an immediate conference if certification is earlier or access prevents completion.

7. The return hearing is _____ at _____. Hear the request for Phase Two statewide examination and any supported limited certification restraint at the first noticed opportunity. Any restraint must be separately entered with specific findings, proper parties, affected offices/acts, and a fixed endpoint. This inspection order does not itself restrain certification, exclude ballots, or remove voters.

8. Use secure identifier exchange and public redactions under Rule 5.2 and Local Rule 5.11. Preserve ballot secrecy. Security is $100, subject to adjustment on a particularized showing. The injunction continues until further order; the Court retains jurisdiction to enforce its specific terms.

Entered: _____, 2026 _____

UNITED STATES DISTRICT JUDGE

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Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. 26-cv-3397

PROPOSED EXPEDITED HEARING ON INDEPENDENT EXAMINATION AND LIMITED CERTIFICATION RELIEF

Upon notice of Plaintiffs' affirmative request for independent examination and a hearing on limited certification relief, the Court ORDERS:

1. At the hearing on _____ at _____, decide Plaintiffs' requests for expedited access and expert tracing, the proposed bounded validation design, and a short restraint on specified certification acts. Plaintiffs shall identify the affected official, race, jurisdiction, imminent act, and proposed expiration; no unjoined official is assumed bound.

2. Plaintiffs shall submit by _____: the proposed examiner's signed qualifications/conflicts and feasibility declaration; the actual frame, sampling, cost, and staffing proposal; and any current-election evidence supporting a limited restraint. Defendants shall respond by _____.

3. Determine standing, statutory notice, likely merits, concrete irreparable injury, balance of harms, public interest, authority, narrower alternatives,

and the scope and duration of any restraint. Address the due-process and access-to-courts grounds in complaint ¶¶35A–35B and memorandum §IX if necessary to the disposition. State findings and conclusions under Rule 52(a)(2) for each interlocutory injunction granted or refused.

4. No certification restraint is imposed by this scheduling order. The inspection and preservation duties independently entered remain effective. The Court will decide supported relief promptly enough to address the identified imminent event where practicable.

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Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. 26-cv-3397

PROPOSED INDEPENDENT EXAMINATION PROTOCOL

1. Scope and two distinct populations Request independent examination of the maintenance processes pleaded in the complaint. Phase One traces up to fifty selected histories across selected jurisdictions, including the affected Plaintiffs’ records. Phase Two uses a probability sample from an identified statewide frame of registration records linked to recorded participation in the November 3, 2026 election. Historical participation-change records are a separate population with separate findings. Do not infer a current-election error rate from the historical population.

2. Examiner and authority Before approval, submit the examiner’s identity, relevant qualifications, CV, conflicts and financial-interest disclosures, compensation, staffing, secure-access arrangements, method, and feasible completion date in a signed declaration. The examiner is a retained professional working under the access/discovery order; legal determinations remain with the Court. Any special- master role requires a

separate Rule 53 process.

3. Frame and version control Use an identified official export and timestamp; disclose which jurisdictions and participation statuses it contains and any omissions. Define eligibility/participation dates and field meanings before selection. Preserve source bytes and hashes. Treat later additions, corrections, and pending participation as a disclosed supplemental frame or wave, with a method preventing duplicate selection. Describe coverage limits and weighting before presenting any statewide estimate.

4. Phase One targeted tracing Securely designate source/version, identifier, condition, and requested category. Trace shared identifiers from the preserved historical baseline through available 2026 versions and current registration/participation. Record source transmissions, prior/new values, timestamps, user/process identifiers, matching work items, notices/responses, dispositions, and synchronization. Identify persistence, correction, recurrence, and any effect on current status separately. Classify each result as explained with support, supported error, disputed, or unresolved for specified missing evidence. Targeted findings are not a statistical estimate.

5. Phase Two proposed statistical design The initial proposal uses 99-percent confidence and a five-point margin for a proportion: 664 usable observations for a large-population simple-random design at maximum variance. As a bounded alternative, propose 1,000 records, expandable only by approval to 2,000, with an interim batch of 300 where feasible before the relevant certification. Use a separate historical- change frame and a 2026 registration/participation frame, defined in advance. The

examiner must justify the actual design, cost, and reporting dates; these counts are proposals, not commitments or completed findings. Use mutually exclusive strata or disclosed methods for overlapping anomaly categories, an unflagged comparison stratum, known inclusion probabilities, and appropriate weights. Disclose frame dates, seed, code, missing-record rules, and any design effects before selection. Report missing evidence separately from a demonstrated legal failure. An interim batch drawn or stopped selectively cannot support a statewide estimate without a valid design. Statewide estimates do not establish any particular race's error rate; separately design any race-level examination.

6. Questions tested For selected records determine whether the recorded maintenance action has a traceable source, consistent field meaning, applicable notice/response, disposition, and synchronization. Where qualification is at issue, identify the legal requirement, relevant date, evidence, and official determination. Separately identify participation credit and any lawfully available issuance, return, acceptance/rejection, and reconciliation evidence. An unconfirmed field or missing record is reported as such, not converted into ineligibility or an unlawful counted ballot.

7. Access and protection Use records within the bound Defendants' possession, custody, or control and separately authorized discovery. Obtain solely local material by agreement, subpoena, or appropriate joinder. Use secure identifiers, public redactions, access logs, and preservation of originals. Do not link voter identities to ballot selections. Identify concrete retrieval burdens and narrower alternatives promptly; undisputed duties continue.

8. Timetable and reporting Within three business days of usable access, submit the final design and sworn cost/timing statement for judicial approval. Supply Phase One preliminary findings within seven business days, accelerated if necessary for certification. Propose an actual Phase Two completion date with staffing assumptions. Report resolved conditions, supported errors, disputes, missing evidence, coverage limits, and confidence intervals only when justified. Request an immediate conference for an imminent certification or access obstacle.

9. Certification relief hearing At the first noticed opportunity, identify the November 2026 condition, injured Plaintiff/race, responsible official, imminent certification act, irreparable injury, alternatives, and proposed fixed endpoint supporting any limited restraint. A restraint is a separate judicial decision; this protocol is not an automatic prerequisite to all certification or a finding that current results are incorrect.

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Plaintiffs,

v.

BERNADETTE MATTHEWS and JOHN OLDFIELD, each in his or her official capacity,

Defendants.

Case No. _____

NOTICE OF LEAD PLAINTIFF, PRO SE STATUS, AND SUBMITTING PLAINTIFF

Harry R. Haury is the first-listed (lead) individual Plaintiff. Gregory Stenstrom is a named individual Plaintiff proceeding pro se. He is the submitting plaintiff for administrative transmission of the jointly signed filings. Each other individual Plaintiff also proceeds pro se and signs on his or her own behalf. Gregory Stenstrom does not appear as counsel or agent for litigation of another person’s claims. Each Plaintiff remains responsible for that person’s own filings, notices, address updates, and court obligations.

No appearance by Perry Abbasi is submitted with this initial filing. Unite 4 Freedom, Inc. is not a current plaintiff. Its participation in original notices and historical activities is preserved as evidence. Plaintiffs intend to seek its addition by amended complaint when licensed counsel authorized to practice before this Court appears for it, subject to the applicable rules and any required leave.

Plaintiffs request that the Clerk record each Plaintiff’s available individual contact information. Gregory Stenstrom requests that case-opening communications be directed to his listed email and telephone. This request does not dispense with notice or service owed to the other parties.

PRO SE SIGNATURES AND CONTACT INFORMATION

NOTICE OF LEAD PLAINTIFF, PRO SE STATUS, AND SUBMITTING PLAINTIFF

Each individual signs only for himself or herself. Gregory Stenstrom submits the documents as a co-plaintiff and does not appear as counsel for any other person or organization.

s/Harry R. Haury

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