

6/11/25

To: Mr. Art Tinoco, Riverside County Registrar

cc: Riverside County Supervisors

Mr. Jeff Van Wagenen, County Executive Officer

Mr. Juan C. Perez, Chief Operating Officer

Breg Langworthy, REIT

From: Jim Niederecker, REIT

Subject: Registrar of Voting Department Staffing for fiscal year 2025/2026

#### Purpose of Memo

Riverside Election Integrity Team, REIT, recommends additional staffing required to update and maintain the county voter rolls.

#### Executive Summary

The Riverside voter rolls are inaccurate and in violation of the National Voter Registration Act, (NVRA), Section 8(a)(4) which mandates the state and county to conduct a general program that makes a reasonable effort to remove ineligible voters. Additionally, the Help America Vote Act (HAVA), requires every state to have a centralized statewide voter registration database that is regularly maintained and updated. The design of the voter rolls is based on a Structured Query Language, SQL, database. To identify, correct, and maintain the database requires programmers skilled in the SQL language and the ability to write and execute queries accessing other databases, e.g. property tax database, immigration and naturalization database, National Change of Address database, and resources such as SAVE, the Systematic Alien Verification for Entitlements program. Without programmers with these skill sets, the errors in the database cannot be identified and remedied. The proposed budget for the Registrar does not include this needed headcount. REIT is recommending the budget be revised to add two computer programming engineers to address this very important staffing need.

#### Details of Voter Rolls

The ROV used the Experian Credit agency to validate registrant addresses prior to the 2024 General Election. A total of 1.34 million records were analyzed. The results included:

- Approximately 64,500 in county moves
- Approximately 32,500 out of county moves
- Approximately 25,000 out of state moves
- 1,400 registrants identified as no best address
- 1,580 address verifications required

2. United Sovereign Americans, USA<sup>1</sup>, a 501 c4 non-profit election integrity organization purchased and analyzed the California 2022 and 2024 voter rolls. Riverside represents 6% of the California totals based on the number of registrants. Note: REIT is working with USA to obtain current data for Riverside based on the 2024 General Election. The results included:

#### California Scorecard – 2022 Election

Eligible or Uncertain Registration Types	Calif Score	Riverside Estimate
Multiple Voter IDs	45,401	2,724
Age Discrepant Registrants	8,791	527
Invalid Names	7,565	454
Invalid Addresses	459,264	27,556
Invalid Registration Dates	14,670	880
Birthplace altered	132,317	7,939
Changing Registrant ID	108,738	6,524
voter Does Not Exist	624,211	37,423

#### California 2024 GE Validity Scorecard – Preliminary Data

Registrations with material errors and omissions whose votes were counted	Number of Instances	Riverside Estimate
Legal duplicate registrations	66,460	3,988
Registered while inactive	204	12
Unrequested registration	2,341,572	140,494
Age discrepant registrants	3,125	187 <sup>4</sup>

3. The National Voter Registration Act, Section 8(a)(4), requires states to “conduct a general program that makes a reasonable effort to remove” from the official voter rolls “the names of ineligible voters” who have died or changed residence. The law requires registrations to be cancelled when voters fail to respond to address confirmation notices and then fail to vote in the next two general federal elections. The U.S. Election Assistance Commission (EAC) requires states to report election metrics as part of a biennial survey<sup>2</sup> which includes Confirmation Notices and Reason for Removal of Registrants. A Judicial Watch lawsuit<sup>3</sup> points out 16 California counties including Riverside, could not even tell how many registrations were removed pursuant to the NVRA requirement and the EAC survey.

1. See the USA website for details on the organization and their voter roll analysis methods: <https://unite4freedom.com>

2. <https://www.judicialwatch.org/california-clean-up-voting-rolls/>

3. <https://www.eac.gov/research-and-data/studies-and-reports> See questions A8 and A9.

4. Analysis of the 2024 Voter Detail List identified 175 age discrepant registrants

4. A California study<sup>5</sup> evaluated the number of naturalizations compared to the number of new registrants and found up to 3.8 million records in California's voter rolls are non-citizens. This estimate was determined by comparing individuals registered in the voter rolls that were born outside the US with the number of Californians who legitimately gained US citizenship. Given Riverside registrants represent 6% of the state's registrants, there are up to 228,000 non-citizens on the Riverside voter rolls. The cause of this difference is in California individuals who apply for driver's licenses are automatically added to the voter rolls (Motor Voter). Many of these individuals are not US citizens.

5. A simple analysis of the Voter Detail List for the 2024 General Election which lists the voters that voted revealed:

- Registrants between 100 and 121 years of age equals 138
- Registrants born between 1800 and 1886 equals 37
- Most of these registrants are potentially deceased.

6. There are estimated 245,528 registrants whose listed birthplace is blank, or a foreign country, e.g. Mexico, India, etc. Many of these registrants are likely not born in the USA or not naturalized and therefore cannot legally vote.

The breadth of apparent errors in the California voter rolls is significant. Standards published by the U.S. Computer Emergency Readiness Team (US-CERT) reflect the impact level of information security events where data has been compromised. The data compromised in the California Voter Rolls could be classified as an "Information Impact – Critical Systems Data breach". The material errors and omissions create an open legal question as to the validity of the records.

7. The report acknowledges the source of most of the voter roll errors is the responsibility of the Secretary of State. A majority of the discrepant entries were included when the registrant was added or modified in the rolls. California law requires the voter rolls be secure. Regardless, the State is responsible to ensure the voter rolls are accurate.

5. <https://joehoft.com/breaking-exclusive-potentially-24-of-the-votes-in-the-2024-election-in-riverside-were-from-non-citizens/>

### Early Hire Requirements

Programmers with SQL query experience are required to identify and remedy suspect registrant information. For example:

- Invalid addresses may be an address that does not exist or an address that is not a legal residence. A query comparing the voter roll database to the property tax database can identify the suspect properties.
- Voter roll registrants with no birthplace listed or a birthplace outside the U.S. may be compared to the DMV database, the Social Security database, the Immigration and Naturalization database, or the Systematic Alien Verification for Entitlements program, SAVE, to confirm the registrant is naturalized or an actual US citizen.
- Age discrepant registrants may be identified via analysis of the voter rolls themselves, i.e. identify voters over 100 years of age, and by comparison to the Deceased Persons database.
- A query to identify back dated registrations and analysis of the voter roll's change logs is needed to remedy suspect registration dates.
- A query to identify voters who voted while inactive is needed to understand how they were able to vote, and provide this information to the District Attorney as appropriate.

There are many other queries that must be executed to ensure voter rolls are accurate prior to an election. Bad actors manipulate voter rolls to cheat. For example, in Arizona, thousands of voters addresses were changed prior to the 2022 election. These VBM ballots were used to impact the election. After the election, the addresses were changed back. In another case, voters were changed from inactive to active before the election, voted, and then their status was changed back to inactive. Voter roll manipulation especially occurs prior to elections and in the last 30 days leading up to election day. The ROV is forced to monitor voter rolls frequently prior to elections to address fraudulent inputs. The routine maintenance done via the California Automated Voter Registration System (CAAVRS) is not sufficient to address the unique issues listed.

Primary role of the new staff is to work with the Secretary of State's Elections Division to identify and correct inaccurate registrations loaded into the voter rolls.

The following is a list of recommended voter roll analysis techniques. Many of these tasks are required since voter roll creation and maintenance at the state level is not trustworthy.

- Voter registration rolls should be recorded, by date, at least monthly. Every new voter roll version should be compared with the previous version to identify new records that may be discrepant (e.g. invalid address, invalid birthplace). This is required since the root cause of many discrepant records has not be identified and corrected.
- Voter registration rolls should be reconciled, every 30 days, with county personal property tax rolls ensuring every address at which a registered voter resides is valid.

Every voter address should be scanned by an artificial intelligence (AI) engine to take the same address, if presented in multiple ways, to bring it into a uniform address type.

3. Beginning 45 days before early voting, begin daily snapshots of the voter rolls. These comparisons identify new voters added after deadlines, zip code changes or other changes that inject uncertainty and doubt into election outcomes.

4. Analyze every name to identify duplicates, e.g. two names with subtle differences, but include the same address.

5. Identify voters who may be deceased based on birthdate.

6. Identify voters ineligible based on birthplace or birthdate.

7. Identify voters who have not voted in the last two federal elections that should be removed from the rolls

8. Identify voter records with more than one unique identifier

9. Identify voters registered in a college dorm and they have resided there for more than 5 years

10. Verify the addresses of every ballot returned undeliverable in the last 3 elections have been flagged as illegitimate addresses not to be used

11. Compare the voter roll database to the Felony database on a periodic basis.

12. During early voting, daily updates of who voted (electronic poll book) should be produced and compared with all previous day's data insuring voter information is not modified after the voter has voted.

#### Conclusion

ROV has identified numerous voter roll errors that may only be identified and corrected with programmers skilled in the SQL database language. The chief source of the voter roll discrepancies lies within the system itself triggering the need for these unique resources. The 2025/2026 budget should reflect the added headcount. Without these resources, the ROV cannot ensure the voter rolls are accurate per state and federal requirements.

ROV is ready to assist the ROV as needed to develop and strategy to identify and maintain accurate voter rolls.