

From:

Robert Ramos – Citizen of Kings County, California  
Brian Gogue – Citizen of Kings County, California  
Nick Wagner – Citizen of Kings County, California  
Elizabeth M. Wagner – Citizen of Kings County, California  
Kim Harmon – Citizen of Kings County, California  
Robin Fagundes – Citizen of Kings County, California  
Karen Clancy – Citizen of Kings County, California  
R. W. Brookshier – Citizen of Kings County, California  
Anna M. Brookshier – Citizen of Kings County, California

To:

Chairman Doug Verboon of the BOS District 3 for Kings County.  
Vice Chairman Rusty Robinson of the BOS District 4 for Kings County.  
Supervisor Joe Neves of the BOS District 1 for Kings County.  
Supervisor Richard Valle of the BOS District 2 for Kings County.  
Supervisor Richard Fagundes of the BOS District 5 for Kings County.

RE: California Canvass Report on NCOA and Dual State Registrations

Dear Clerk of the Board,

Attached, please find the California report on National Change of Address (NCOA) and dual state registration issues. This report highlights findings regarding voter registration discrepancies and provides an analysis of the data gathered.

Voter registration and voter roll maintenance are a constant 24/7, 365 days per year activity. Elections are infrequent and specific calendar events. If the voter rolls are not adequately and properly maintained, all downstream activities and results, including elections, could be affected.

**Key findings of the report include:**

- **56,674** voter records flagged as having moved to another state while still having active voter status in California. **(250 voter records for Kings County.)**
- **75,362** active voters identified as having undeliverable mailing addresses according to the NCOA data. **(159 voters for Kings County.)**
- **208,246** voters appeared to be registered in both California and another state, with **7,812** of these having active status in California. **(558 voters for Kings County.)**
- **7,358** voters either cast a ballot in both states or cast a ballot in California after their Change of Address move date to another state. **(17 voters for Kings County.)**

The goal of this report is to bring awareness to these issues and to work collaboratively towards resolving potential discrepancies in the voter rolls. We believe that diligent maintenance of voter registration lists is crucial for upholding the principles of our democratic process.

We encourage you to review the report and CSV (Comma Separated Values) files provided to the Registrar of Voters, Lupe Villa on August 19, 2024, verify our analysis, and address any confirmed discrepancies within the voter rolls. We are available for any further discussions or clarifications that may be needed.

Other Considerations:

The canvassing efforts in Kings County consisted of teams of 2 people through a citizen-led canvass effort that was initiated to determine if these voters had a change in domicile to an out of state address.

Thank you for your attention to this important matter and we look forward to working with you and your office closely to understand the status of this affected class of registered voters.

Best regards,

A handwritten signature in black ink that reads "Anna M. Brookshier". The signature is fluid and cursive, with a large initial 'A' and 'B'.

Anna M. Brookshier  
Kings County Captain  
(559) 362-1957  
anna.m.brookshier@me.com

# CALIFORNIA VOTER ROLLS

## National Change of Address & Dual State Registrations

### Data Analysis Reporting & Multi-County Voter Canvass Results

Prepared August 2024

By

*Patriot Force California*

Note: Significant effort was made to ensure the accuracy of this report. The authors note that findings may include voters that changed their status after 12/2023 or who are UOCAVA voters, (Uniformed and Overseas Citizens Absentee Voting Act).

## EXECUTIVE SUMMARY

*"Houston, we have a problem!"* — Astronaut John "Jack" Swigert during NASA's Apollo 13 mission on April 13, 1970, after an explosion onboard the spacecraft.

California has a problem too and the source of the California explosion was Governor Newsom's [Executive Order N-64-20](#) issued on May 8, 2020 announcing a mandatory universal vote by mail process for the November 2020 Presidential Election. Three years ago, California became [one of eight states](#) to permanently adopt mandatory universal Vote by Mail (VBM) elections. Governor Newsom [signed ten pieces](#) of election legislation on September 27, 2021 in the immediate aftermath of an attempt to recall him from office and during his administration's ongoing government response to COVID-19. [Assembly Bill 37](#) is one of the bills signed that makes mandatory universal VBM elections the law in California.

Five elections have been held using mandatory universal VBM ballots. The Historical Registration and Participation reports on the Secretary of State's website shows that [over 59 million](#) of the mailed ballots (54%) are unaccounted for. The chain of custody for tens of millions of ballots is irrevocably destroyed when ballots are unaccounted for. Presumably, they were tossed into the landfill, but there is no guarantee this is what happened to them.

Next to clean and accurate voter rolls (the foundation) and cast ballots (elections), unaccounted for ballots have the potential of derailing election outcomes by diminished confidence in large voter blocs.

In addition to the cost of printing and mailing millions of ballots that voters did not ask for and that have gone unaccounted for, issues with voter roll maintenance created by mandatory massive ballot mailings is further aggravated by a population on the move.

A lot has been written about California [residents leaving the state in record numbers](#) in recent history. This makes the process of maintaining the voter rolls and verifying eligibility to vote in California more challenging than previous years. California's recent elections code change from in-person precinct voting and optional requested absentee ballots to a mandatory statewide all vote-by-mail (VBM) profile adds urgency to voter roll maintenance in advance of ballots being mailed for any election.

Voter registration rolls are the foundation for all election related activities. Voters do not exist without registration rolls, and elections do not occur without voters. Elections are calendar events and are episodic. The rolls created by voter registrations and the maintenance of that information is a 365-day a year activity. California election officials are duty bound and legally required to uphold the federal and state constitutions and the related California Election Codes by properly, consistently, and with due diligence maintaining voter roll lists of over 22 million registered voters.

There are 26.6 million citizens living in the state who are eligible to vote. However, Californians who are eligible to vote do not automatically become voters. They become voters only after their names are registered on the rolls. Importantly, federal and state law requires that the names of voters who move

permanently to another state be removed from California's voter rolls. Federal and state law allow California election officials to use the United States Postal Service (USPS) and Change of Address (COA) data as a resource for that maintenance. This tool can be used to ensure only qualified residents are included on California's voter rolls.

In a collaborative effort with Cause of America, California voter rolls were compared against National Change of Address (NCOA) data and voter rolls of 31 states. The results include:

- Voter records flagged (56,674) as having moved to another state while still having active voter status on California's rolls.
- Active voter registration statuses with 75,362 undeliverable mailing addresses.
- Apparent dual state registrations for 208,246 voters listed in California and another state.
- Dual state registrants with an active voter status for 7,812 entries which means they will receive VBM ballots in the upcoming election unless corrected.
- Cast ballots for 7,358 dual state registrants who either cast a ballot in both states or the voter cast a ballot in California after the move date to another state was recorded in NCOA data.

Finally, this report includes findings from a multi-county, citizen-led canvass designed to better understand the possible breadth and depth of updates that were missed in the voter roll maintenance for people who have moved out of the state. It is a crushing blow to voter confidence in election outcomes when voter rolls are shown to be inaccurate and to contain voter registrations for people no longer eligible to vote in California elections. The more Californians learn that voter roll maintenance for people who moved out of state uses sophisticated software and costly datasets but misses the goal, the more voters distrust California's election process. The uncertainty and doubt can possibly give way to fear, a feeling of disenfranchisement, and/or voter apathy.

The time to act is now with the election season well underway. The unprecedented political landscape includes a recent assassination attempt on a nominee for President, the murder of an American citizen by the deranged man who attempted the assassination, a preferred candidate recently abandoning their candidacy for the Presidential nomination, and the highly irregular, singular advancement of a replacement candidate who never participated in a democratic Presidential primary election and who, when running for the nomination four years ago, had so little support that the candidate was forced to abandon the campaign before any votes were cast.

The producers of this report recognize that voter roll information is fluid and that this report captures data that may or may not be relevant at the time of this reading. However, because California voter confidence in the election process and outcomes is severely crippled when it is shown voter rolls are not accurate, we urge the reader to review and verify the information and to take all appropriate action. Copies of this report and the data files discussed are being sent to California Secretary of State Shirley Weber and to the Registrars of Voters in the counties that participated in the canvass.

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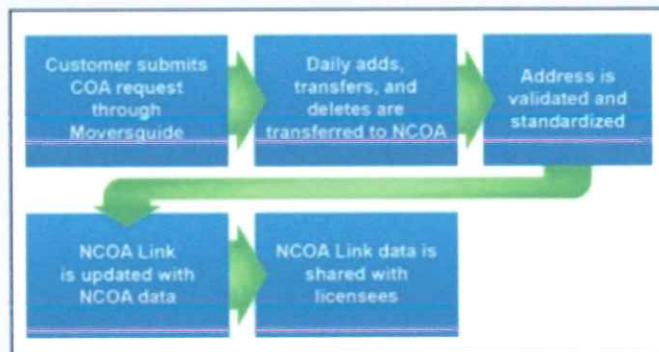
# BACKGROUND

## National Change of Address (NCOA)

“The Postal Service processed nearly 36 million address changes in 2021, with over 20 million submitted online...” (Page 7, USPS-OIG Semiannual 2022 Report)

People submit change of address (COA) orders to the USPS (Figure A) to register moves. Customers submit orders via the website, submit a hard copy through the mail, or at a post office retail counter. Customers indicate whether the move is temporary or permanent, as well as whether the move applies to an individual or the entire household.

### Moversguide and NCOA Online Change of Address Process



Source: U.S. Postal Service Office of Inspector General (OIG) analysis of online change of address process based on the Postal Service COA Controls and Protections dated March 2020.

**OFFICIAL MAIL FORWARDING CHANGE OF ADDRESS ORDER**

Please PRINT items 1-10 in blue or black ink. Your signature is required in item 9.

1. Change of Address for: (Read Attached Instructions) Individual (#5)  Entire Family (#5)  Business (#6)  2. Is This Move Temporary? Yes  No

3. Start Date (ex. 02/27/17) 4. If TEMPORARY move, print date to discontinue forwarding. (ex. 03/27/17)

5a. LAST Name & Jr./Sr./etc. 5b. FIRST Name and MI

6. If BUSINESS Move, Print Business Name

7a. OLD Mailing Address 7b. For Puerto Rico Only: If address is in PR, print urbanization name, if appropriate.

7c. OLD CITY 7d. State 7e. ZIP

8a. NEW Mailing Address 8b. For Puerto Rico Only: If address is in PR, print urbanization name, if appropriate.

8c. NEW CITY 8d. State 8e. ZIP

9. Print and Sign Name (see conditions on reverse) 10. Date Signed: (ex. 01/27/17)

PS FORM 3575 Visit usps.com to change your address online

Figure A. Change of Address Order Form

USPS provides COA information to approved licensees through a database process known as NCOALink (National Change of Address Linkage). NCOALink matches names and addresses of 160+ million records of individual, family, and business moves to licensed customer lists to verify an address of record. The USPS also provides data that can be used for additional address verification.

USPS has a computerized file that contains all delivery point addresses, except general delivery addresses information. Called Data Sequence File, version 2 (DSF<sup>2</sup>), this database contains each of the 145+ million delivery points that USPS delivers to. By combining delivery point addresses DSF<sup>2</sup> with NCOALink COA information customers can significantly improve delivery rates because DSF<sup>2</sup> detects potentially undeliverable addresses for reasons other than Change of Address.

NCOALink provides approximately four years of COA data collected by the USPS. The dataset contains several fields that provide more specific information on a customer’s location status.

**NCOALink Sample Data Fields**

- New Address
- New County
- New Congressional District
- Lat/Long Coordinates of New Address
- Carrier Route Code (aka CRRT)
  - R = Rural Delivery
  - G = General Delivery
  - B = P.O. Box
  - H = Hired Routes
  - C = Carrier Delivery
- Data Service Return Code
- Address Match Code
- Record Type Codes
- Commercial Receiving Agent Code
- Vacant Property Code
- COA Match Flags
  - C = Undeliverable
  - F = Foreign Move
  - G = Box Closed
  - K = No Forwarding Address
- M = Forwardable Move
- P = Error in Primary Address
- S = Apartment or Box Number is missing
- COA Move Date
- COA Move Type
  - B = Business
  - F = Family
  - I = Individual

Our analysis focuses on only a few Service Codes (Figure B) to identify registration records of voters that have potentially moved out of state permanently. If a permanent move out of state is confirmed, these voters are ineligible to vote in California. Their registrations “shall” be canceled, and their names removed from the rolls. When a VBM ballot address is undeliverable by USPS, it is an additional, though different, concern (see page 15). The recent change to mandatory universal VBM ballot mailings makes these categories more critical now than they have been for the last century.

Data Service Return Code	Summary
13	Invalid City.
17	Insufficient data – Missing information within the address.
21	Address did not match an address range in the database.
22	Address matched multiple ranges.
23	New address could not be provided. Addressee has moved or temporarily moved.
27	Recipient moved without providing a forwarding address to the USPS.
33	Address is non-deliverable.
36	Individual move – New address provided.
37	Family move – New address provided.
38	Business move – New address provided.

Figure B. Data Service Return Code Summary



## Who Can Vote in California?

California's Constitution [Article II Section 2](#) plainly states who is qualified to vote: "A United States citizen 18 years of age and a resident in this State may vote." According to [Election Code § 2022](#) "If a person moves to another state with the intention of making it his or her domicile, the voter loses his or her domicile in this state." Domicile has a legal definition used to determine who is a resident. People who indicate a permanent move to another state on the COA form, should be removed from California's voter rolls to ensure ballots are not mailed to the former address of a now ineligible voter.

## National Voter Registration Act (NVRA)

The NVRA of 1993 is also referred to as the "[motor voter law](#)". The following text from the NVRA directs states to create a program to remove names of ineligible voters. The law permits the use of NCOALink to meet this requirement. Once out of state moves have been identified, registrants should be sent postcards to confirm a changed residence. If the card is not returned, the voter must confirm residency prior to casting a ballot. If no vote is cast in two general Federal elections, the registration record shall be canceled. Below are relevant NVRA quotes.

### [52 U.S. Code § 20507](#)

*(a) In the administration of voter registration for elections for Federal office, each State shall— (4) 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 — (A) The death of the registrant; or (B) A change in the residence of the registrant, in accordance with subsections (b), (c), and (d);*

*(c)(1) A State may meet the requirement of subsection (a)(4) by establishing a program under which— (A) Change-of-address information supplied by the Postal Service through its licensees is used to identify registrants whose addresses may have changed; and*

*(c)(B) If it appears from information provided by the Postal Service that — (i) A registrant has moved to a different residence address in the same registrar's jurisdiction in which the registrant is currently registered, the registrar changes the registration records to show the new address and sends the registrant a notice of the change by forwardable mail and a postage prepaid pre-addressed return form by which the registrant may verify or correct the address information; or (ii) The registrant has moved to a different residence address not in the same registrar's jurisdiction, the registrar uses the notice procedure described in subsection (d)(2) to confirm the change of address.*

*(d)(2) A notice is described in this paragraph if it is a postage prepaid and pre-addressed return card, sent by forwardable mail, on which the registrant may state his or her current address, together with a notice to the following effect: (2)(A) If the registrant did not change his or her residence, or changed residence but remained in the registrar's jurisdiction, the registrant should return the card not later than the time provided for mail registration*

*under subsection (a)(1)(B). If the card is not returned, affirmation or confirmation of the registrant's address may be required before the registrant is permitted to vote in a Federal election during the period beginning on the date of the notice and ending on the day after the date of the second general election for Federal office that occurs after the date of the notice, and if the registrant does not vote in an election during that period the registrant's name will be removed from the list of eligible voters.*

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## California Election Code (ELEC)

The California Election Code outlines how the state will meet the requirements of removing out of state residents from the voter rolls. Once move notifications are identified through NCOALink, county elections officials are required to send forwardable notices to registrants. Upon mailing the notice, the voter registration status shall be changed from active to inactive.

### CA ELEC § 2225

*(2) If notification received through NCOA or Operation Mail or a returned mailing indicates that a voter has moved and has given no forwarding address or indicates that a voter has moved out of the state, the county elections official shall send a forwardable notice in substantially the same format as the notice set forth in paragraph (2) of subsection (d) of Section 20507 of Title 52 of the United States Code.*

*(c) If postal service change-of-address data received from a nonforwardable mailing indicates that a voter has moved and left no forwarding address or indicates that a voter has moved out of the state, a forwardable notice shall be sent in substantially the same format as the notice set forth in paragraph (2) of subsection (d) of Section 20507 of Title 52 of the United States Code.*

*(e) Upon the mailing of the forwardable address confirmation notice described in subdivision (b) to a voter, the county elections official shall not update the status of the voter's registration to inactive.*

*(f) Upon the mailing of the forwardable address confirmation notice described in subdivision (c) to a voter, the county elections official shall update the status of the voter's registration to inactive.*

---

California Election Code directs county elections officials to cancel registrations with an inactive status due to failure to respond to the forwardable notice when registrants have failed to vote in two general Federal elections. However, if the registrant casts a ballot within this timeframe, the voter's status is restored to active.

**CA ELEC § 2226**

Based on change-of-address information received pursuant to Sections 2220 to 2225, inclusive, or change-of-address information provided directly by the voter, the county elections official shall take the following actions as appropriate:

*(b) The voter registration record of a voter whose status is inactive for failure to respond to an address verification mailing required by subdivision (c) of Section 2225, and who does not offer to vote or vote at any election between the date of the mailing and two federal general elections after the date of that mailing, shall be canceled.*

*(c) A voter who has a registration status of inactive, who offers to vote at any election between the date of the verification mailing required by subdivision (c) of Section 2225 and two federal general elections after the date of that mailing, or who notifies the elections official of a continued residency, shall have the voter's voter registration status updated to active.*

**VoteCal NCOA Processing**

California's VoteCal is the system used to submit domicile and mailing addresses for NCOA processing and comparison. The California Employment Development Department (EDD) is the agency tasked with running the voter roll check monthly. [\(Link here. See page 1.\)](#) Once complete, the EDD returns the file to VoteCal where the system rejects or bypasses NCOA flags based on certain criteria and submits the remaining records to the appropriate county elections officials. (Figure C)

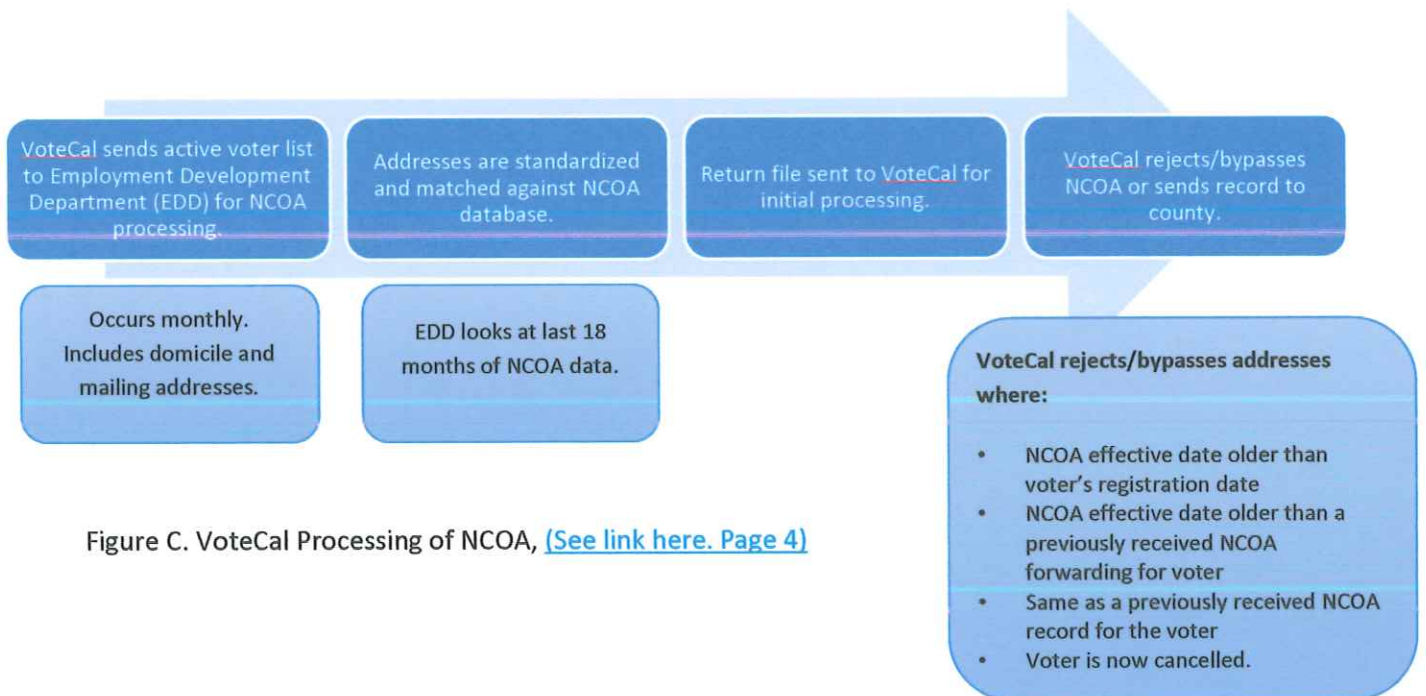


Figure C. VoteCal Processing of NCOA, [\(See link here. Page 4\)](#)

## County NCOA Processing

After the state of California’s VoteCal system submits the NCOA report to each County, there are specific procedures that are followed by each County. The state automatically processes these records in two categories: Figure D shows the Domicile Residence address change and Figure E shows the Mailing address change.

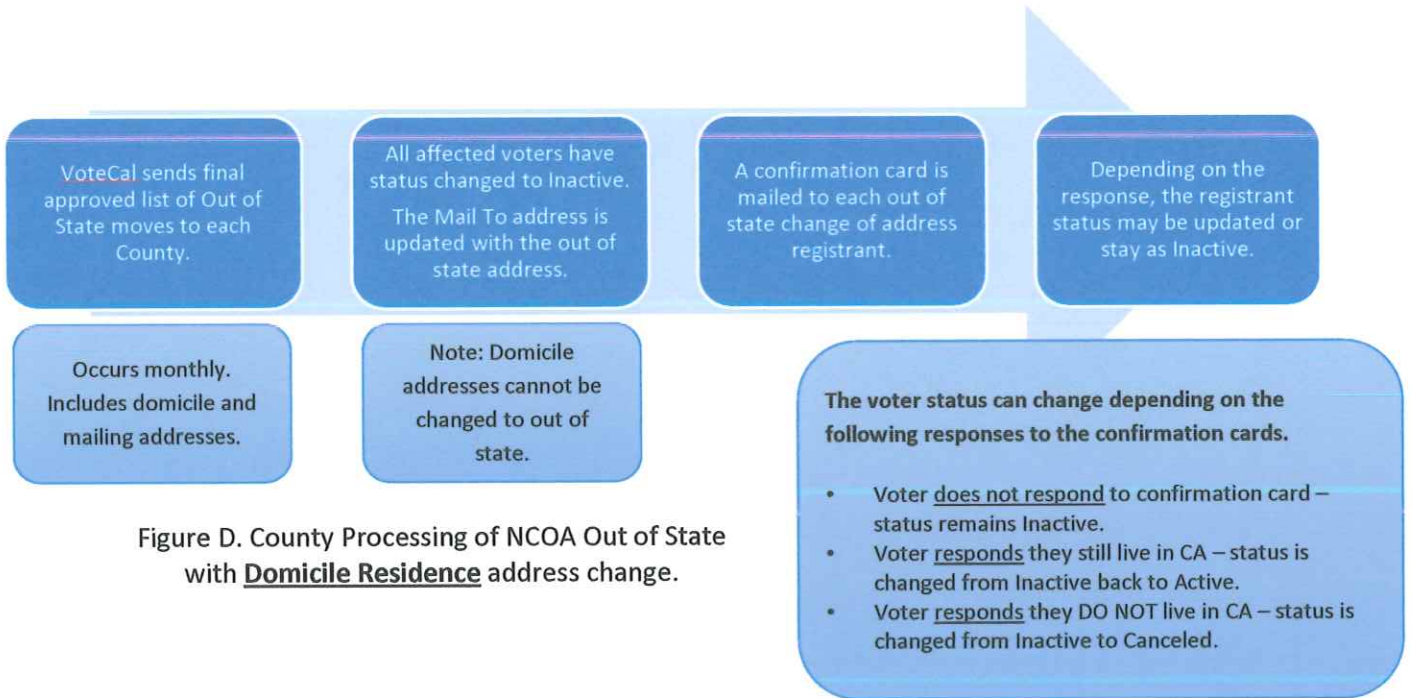


Figure D. County Processing of NCOA Out of State with Domicile Residence address change.

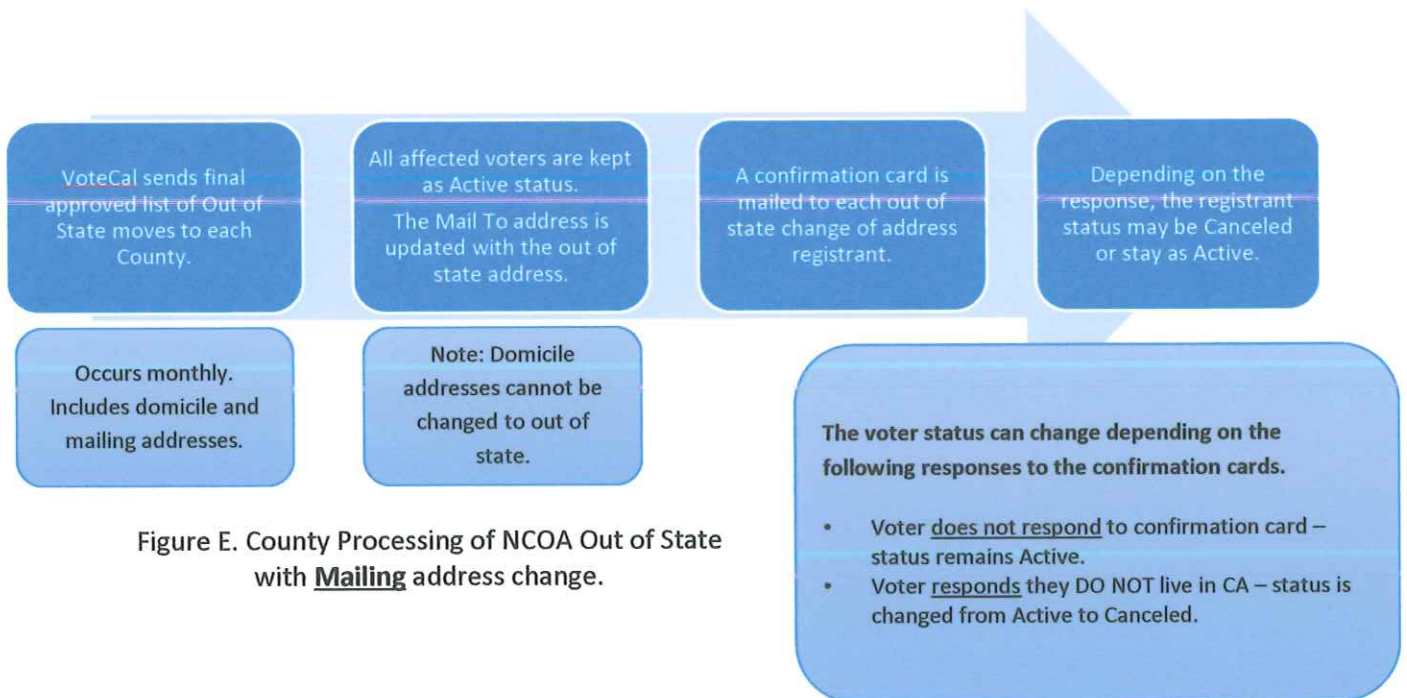


Figure E. County Processing of NCOA Out of State with Mailing address change.

## The California Challenge: Voter Rolls Maintenance & Mandatory VBM Ballot Mailings

Governor Newsom issued [Executive Order N-69-20](#) on May 8, 2020. The order required Vote by Mail (VBM) ballots be mailed to every voter with an active registration for the November 2020 Presidential Election. Three years ago California became [one of eight states](#) to permanently adopt mandatory universal Vote by Mail (VBM) elections. Governor Newsom [signed ten pieces](#) of election legislation on September 27, 2021 in the immediate aftermath of an attempt to recall him from office and during his administration’s ongoing government response to COVID-19. AB 37 made mandatory universal VBM balloting permanent.

Since the laws changed, voter turnout remains unimpressive, tens of millions of ballots are unaccounted for, and election costs continue to rise.

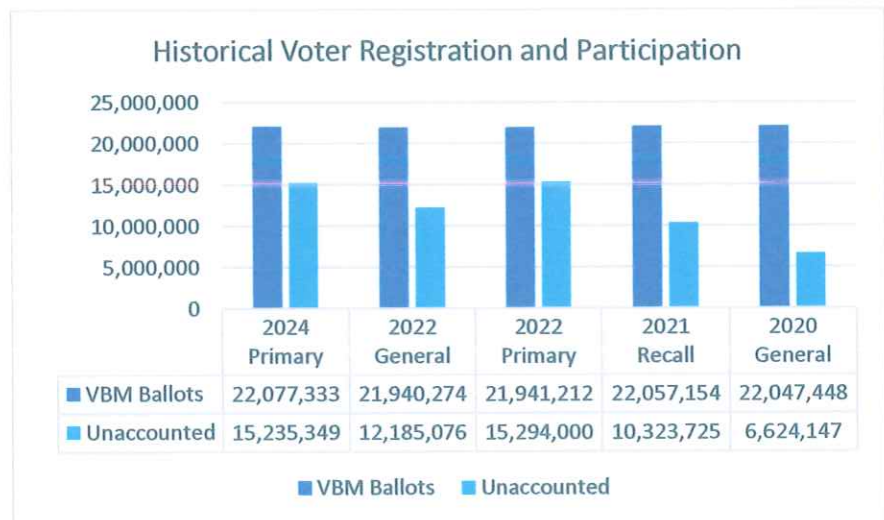
Unaccounted for VBM ballots plague California. (Figure F) Ballots that are cast are tracked, but ballots that are not cast disappear. It is as though they never existed. The only records associated with them are the ballot mailed date recorded in election systems and an invoice from the printer who printed and mailed the ballots!

Nearly half the ballots mailed for the 2022 General Election are unaccounted for. And turnout for the election is below the average for the last 10 General Elections. It was a paltry 50.80% compared to the 63.12% average. There were 15,235,349 unaccounted VMB ballots for the March 2024 Election. Voter turnout was 34.96% which is lower than the 37.58% average for the past 10 Primary Election cycles.

All active-status voters on the rolls are mailed ballots. Millions of these mailed ballots are unaccounted for. Since the November 2020 General Election when all California active-status voters were mailed ballots, over 59 million mailed ballots (54%) have gone missing. Presumably they were tossed into the landfill, but there is no guarantee this is what happened to tens of millions of ballots. So, not only does mandatory universal VBM ballots challenge the taxpayers’ pocketbook, but it also leaves open the possibility that ballots could be misused by someone other than the intended voter.

Figure F. Five elections have been held using mandatory universal VBM ballots.

[Primary](#)      [General](#)



## Californians on the Move

Census data shows that in 2022, [more than 817,000 people left California](#). This trend has been consistent in the recent past and appears it will continue in the foreseeable future as the cost of living as well as [other factors](#) affect the quality of life for Californians. Over half the total moves related to California, [61%](#), are of people leaving the state. The top states that California residents move to are: Arizona, Florida, Oregon, Nevada, Texas, and Washington. [\(Figure G\)](#)

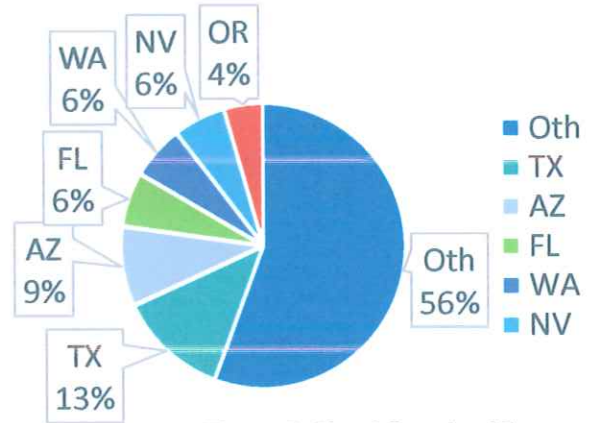


Figure G. Top 6 Popular Move Destinations for Californians

Voter rolls analysis reveals that California has over 97,000 registrants with out of state mailing addresses. This analysis shows similar population destinations as the U.S. Census data does. It is essential that voting citizens of California are confident the 97,000 registrants are qualified to vote in the state in accordance with California Constitution Article II Section 2 and ELEC 2022. [\(Figure H\)](#)

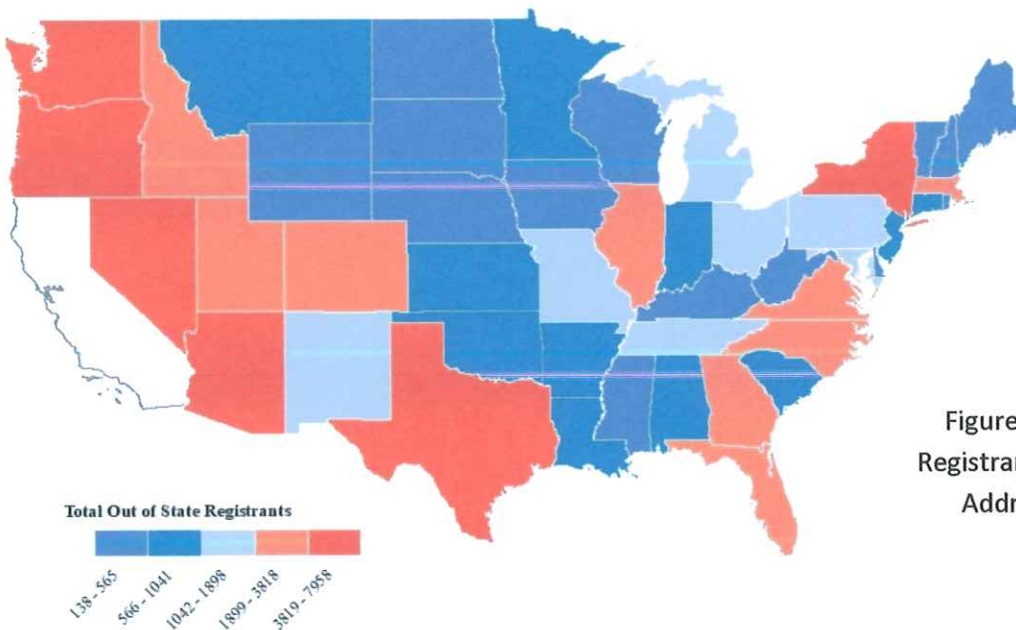


Figure H. Heat Map of California Registrants with Out of State Mailing Addresses by State (12/2023)

## NCOA Project Scope and the Multi-County, Citizen-Led Canvass

In December 2023, voter rolls were analyzed for NCOA matches statewide. Following the 2024 Primary Election, a citizen-led canvass survey began in 16 of California's 58 counties. Records canvassed were active voters that moved out of state with a Data Service Return Code of 36, 37 and 38. (See Figure B, page 6.) Results of this citizen-led canvass survey are discussed in this report. Also included is an

analysis of possible undeliverable mailing addresses of active voters and a cross-state analysis of dual registrations. The project goal is to explore whether California’s voter rolls are being maintained in accordance with the California Constitution Article II Section 2, 52 U.S. Code § 20507, and relevant state Election Codes. This analysis should be reviewed by election officials so appropriate actions on the rolls can be taken.

## MOVED OUT OF STATE

### Overview

A dataset of active voters that NCOA flagged as confirmed moves to an out of state address was compiled using December 2023 data. There are 56,674 total records with the following NCOA Data Service Return Codes: 36, 37, and 38. (Figure I. See Figure B, page 6 for code descriptions.)

A multi-county, citizen-led canvass survey effort was initiated to determine if the voter dataset had a change in domicile to an out of state address. Participating counties included: Alameda, Fresno, Kern, Kings, Los Angeles, Marin, Merced, Orange, Placer, San Bernardino, San Diego, Shasta, Sonoma, Sutter, Ventura, and Yuba. Canvassers knocked on doors for 4,345 records and were able to complete the survey for 2,335 records. A total of 2,097 voter registration discrepancies were confirmed (90% of the records surveyed).

**Moved out of State (Active Voters by County, \*Counties that participated in the canvass.)**

County	Total	County	Total	County	Total	County	Total
ALAMEDA*	2,618	KINGS*	250	PLACER*	738	SIERRA	-
ALPINE	9	LAKE	55	PLUMAS	156	SISKIYOU	159
AMADOR	68	LASSEN	73	RIVERSIDE	3,873	SOLANO	1,106
BUTTE	413	LOS ANGELES*	16,153	SACRAMENTO	1,283	SONOMA*	669
CALAVERAS	61	MADERA	93	SAN BENITO	57	STANISLAUS	434
COLUSA	12	MARIN*	337	SAN BERNARDINO*	3,223	SUTTER*	56
CONTRA COSTA	1,713	MARIPOSA	44	SAN DIEGO*	5,228	TEHAMA	135
DEL NORTE	36	MENDOCINO	105	SAN FRANCISCO	1,939	TRINITY	5
EL DORADO	515	MERCED*	211	SAN JOAQUIN	635	TULARE	262
FRESNO*	551	MODOC	11	SAN LUIS OBISPO	461	TUOLUMNE	68
GLENN	9	MONO	16	SAN MATEO	943	VENTURA*	1,324
HUMBOLDT	276	MONTEREY	456	SANTA BARBARA	497	YOLO	267
IMPERIAL	117	NAPA	199	SANTA CLARA	2,988	YUBA*	101
INYO	70	NEVADA	196	SANTA CRUZ	542	<i>Grand Total</i>	<i>56,674</i>
KERN*	1,225	ORANGE*	3,241	SHASTA*	392		

Figure I. County Breakdown of Moved Out of State Records

## Canvass Results

Canvassers were able to conduct the survey for 53.8% of the records attempted. Figure J breaks down the result of the contacts made during the canvass and the answers given to the questions. In most cases when surveys were not completed, the current resident did not answer the door. There also are instances of canvassers unable to access the property, locate the address, or who reported a vacant residence.

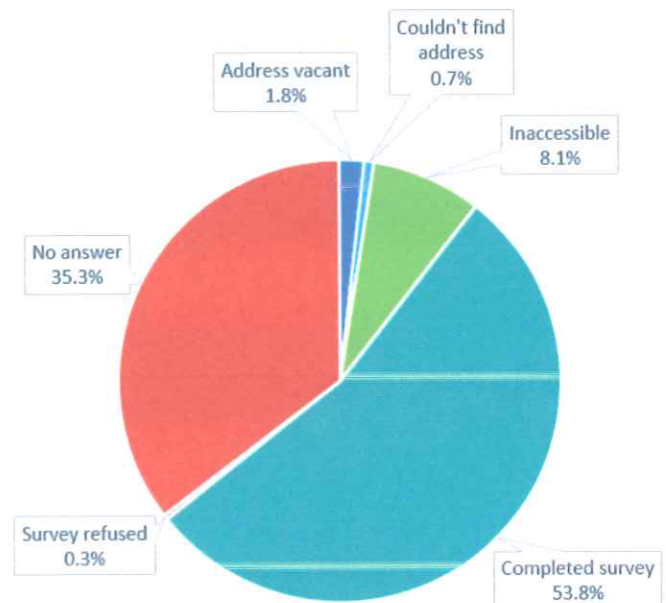


Figure J. Canvass Result of Contact

Canvassers confirmed a majority (2,251) of registered voters were not living at the residence on record. Over half of the respondents said the voter was unknown to them (1,193). There are 1,217 residents who confirmed the reported NCOA out of state move was permanent. In 595 exchanges residents confirmed the new state of record where the voter moved to, according to NCOA data. (Figure K)

## Canvass Responses

Survey Question	Total
Does the voter currently reside? Response: <b>No</b>	2,251
Does the voter currently reside? Response: <b>Yes</b>	157
Does the voter currently reside? Response: <b>Unknown</b>	4
Is the voter known to current resident? Response: <b>No</b>	1,193
Is the voter known to current resident? Response: <b>Yes</b>	1,053
Is the voter known to current resident? Response: <b>Unknown</b>	5
Was the move temporary or permanent? Response: <b>Temporary</b>	54
Was the move temporary or permanent? Response: <b>Permanent</b>	1,217
Was the move temporary or permanent? Response: <b>Unknown</b>	177
Can the current resident confirm new state? Response: <b>No</b>	679
Can the current resident confirm new state? Response: <b>Yes</b>	595
Can the current resident confirm new state? Response: <b>Unknown</b>	2

Figure K. Responses to Survey Questions



## NCOA Move Date Results

According to NCOALink data, 47% of the records in this analysis show that voters moved out of state in 2023 (Figure L). The remaining records list moves between 2019 to 2022. Voters may have moved out of state before 2019. NCOALink is limited to approximately 4 years of change of address history.

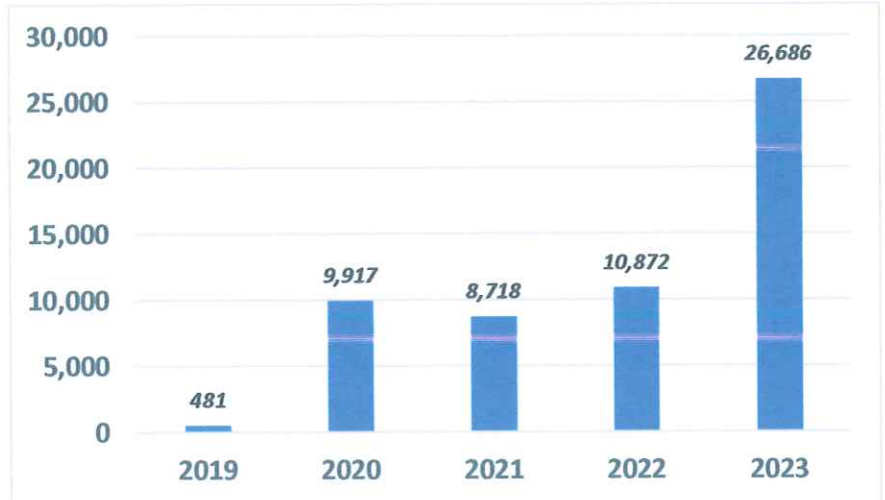


Figure L. NCOA – Year Voter Moved Out of State

## Recap and Next Steps: MOVED OUT OF STATE

- There are 56,674 records flagged for review in the NCOA data.
- Canvassers knocked on doors for 4,345 records.
- The people completing the survey number 2,335.
- For 90% of the survey records canvassers confirmed the voter did not live at the address.
- In 52% of the cases, canvassers confirmed the voter had permanently moved out of state.
- The NCOALink dataset showed more than half had moved out of state over a year ago.

The last bullet point may be the most immediately relevant one on this page. If 90% of the NCOALink dataset contains inaccurate information (51,007) and if 52% of these voters (26,524) moved out of state permanently but potentially received and/or voted ballots, then it is worth noting there are dozens of state and congressional races in which second-place candidates were decided with fewer than 5,000 votes. The margin of victory for some local races in the state is likely smaller.

Details of the records referred to in our findings will be shared with Secretary of State Shirley Weber and with the County Registrars of Voters for counties that participated in the canvass. Our goal is that responsible elections officials will further verify our results and swiftly act on all relevant records.

## UNDELIVERABLE MAILING ADDRESSES

### Overview

This project also reports on a dataset of flagged NCOALink records of voters with an active status but with undeliverable mailing addresses when compared to DSF<sup>2</sup> files. The goal was to determine how many VBM ballot mailings USPS might not be able to deliver so it includes both in and out of state DSF<sup>2</sup> mailing address comparisons.

## NCOA Mail Return Service Codes Results

There are 75,362 records with NCOA Data Service Codes (DSC) 13, 17, 21, 22, 27, and 33 (Figure M). The most common issue is addresses that did not match a USPS address range, code 21. Figure N is a breakdown of the numbers by county.

### 75,362 Data Service Return Codes (DSC) and Description

Result	Code	Description
6	13	Invalid City.
2,555	17	Insufficient data – Missing information within the address.
72,767	21	Address did not match an address range in the database.
30	22	Address matched multiple ranges.
4	27	Recipient moved without providing a forwarding address to the USPS.
-	33	Address is non-deliverable.

Figure M. Definitions of NCOA Codes

### Undeliverable Addresses (Active Voters by County, \*Counties that participated in the canvass.)

County	Total	County	Total	County	Total	County	Total
ALAMEDA*	197	HUMBOLDT	5,952	MENDOCINO	5,239	SOLANO	298
ALPINE	288	IMPERIAL	3,628	MERCED*	438	SONOMA*	3,817
AMADOR	933	INYO	773	MODOC	1,142	STANISLAUS	976
BUTTE	880	KERN*	2,809	MONO	369	SUTTER*	213
CALAVERAS	2,333	KINGS*	159	MONTEREY	3,634	TEHAMA	1,509
COLUSA	774	LAKE	4,872	NAPA	175	TRINITY	4,907
CONTRA COSTA	1,305	LASSEN	2,078	PLACER*	4,233	TULARE	3,235
DEL NORTE	421	LOS ANGELES*	1,240	SAN LUIS OBISPO	948	TUOLUMNE	1,121
EL DORADO	1,976	MADERA	427	SANTA CLARA	481	YOLO	2,006
FRESNO*	1,058	MARIN*	2,866	SANTA CRUZ	1,772	YUBA*	972
GLENN	290	MARIPOSA	590	SHASTA*	2,028	<i>Grand Total</i>	<i>75,362</i>

Figure N. County Breakdown of Undeliverable Addresses

### **DSC and Delivery Point Validation (DPV) Footnotes Results**

USPS estimates that only [66.9% of mail is deliverable as addressed. \(FAQ number 21.\)](#) It considers the remaining addresses to be deficient which could affect deliverability. Delivery Point Validation (DPV) is a service that uses the DSF<sup>2</sup> file. This process does not catch all issues, but it is considered a reliable indicator to the customer that the address should be investigated further. The total undeliverable addresses estimate in this report is conservative. There are additional Data Service Return Codes that were excluded in this report but should be included in future analysis. All DPV Footnotes were removed except for two: A1 (Zip+4 did not match) and AAM3 (Zip+4 matched but address not confirmed) (Figure O).

#### **75,362 Delivery Point Validation (DPV) Footnotes**

Figure O. Footnote Codes included in the report.

Result	Footnote	Description
75,358	A1	Zip+4 did not match.
4	AAM3	Zip+4 matched but address not confirmed.

### **Recap and Next Steps: UNDELIVERABLE MAILING ADDRESSES**

- Data reviewed for this report shows that 75,362 addresses were flagged as deficient and may be undeliverable as addressed.
- A conservative estimate for all deficient addresses in California based on the data used for this report is 30%. This includes all Delivery Service Codes and Delivery Point Validation footnotes.
- Not all undeliverable VBM ballot mailings are due to a COA.

Address errors must be corrected to ensure voters will receive their VBM ballots and to prevent a VBM ballot in transit from being misused, discarded, or otherwise unaccounted for. It is also important that election officials review the report's dataset to prevent additional fiscal and environmental waste. Further, since voter rolls are foundational to the election process, it is critical to repeat what was written in the Executive Summary: *Over 59 million ballots related to five elections are unaccounted for.* This number will continue to grow until the unaccounted for VBM ballot problem is resolved.

A file containing the records with NCOA flags discussed in this section will be sent to Secretary of State Shirley Webber and to the County Registrar of Voters' Offices for those counties that participated in the canvass.

# DUAL STATE REGISTRATIONS

## Overview

This project also included a comparison analysis between 31 states of active and inactive California voters that left the state. There are 208,246 voters that were found to be registered in California and in another state (Figure P).

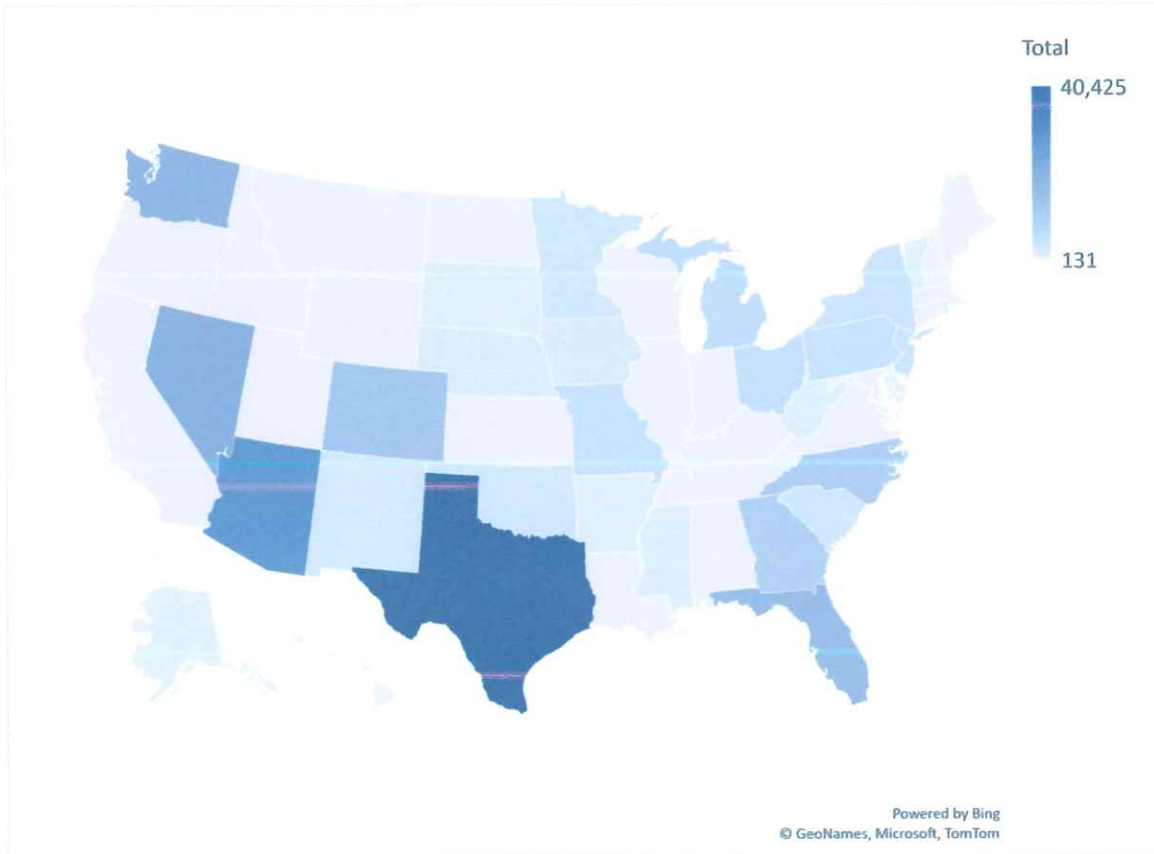


Figure P. Heat Map-Dual State Registrations

According to NCOA data, most of these registrants moved from California in 2021 and 2022 (Figure Q).

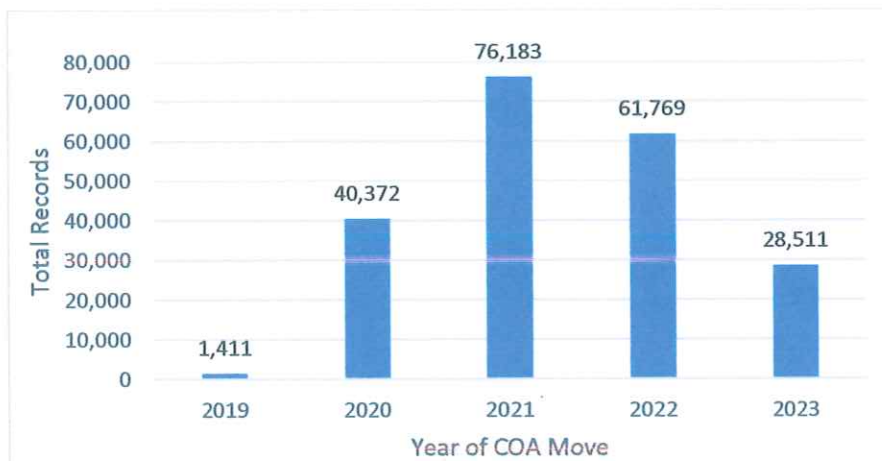


Figure Q. Number of Records by COA Move Year

Figure R shows the breakdown of this data by county. There were 7,812 active voters and 200,434 inactive voters that were registered in California and another state.

**Voter Status-Dual State Registrations (\*Counties that participated in the canvass.)**

<i>County</i>	<i>Active</i>	<i>Inactive</i>	<i>Total</i>	<i>County</i>	<i>Active</i>	<i>Inactive</i>	<i>Total</i>
ALAMEDA*	399	14,258	14,657	ORANGE*	283	14,351	14,634
ALPINE	1	10	11	PLACER*	78	2,831	2,909
AMADOR	4	30	34	PLUMAS	38	103	141
BUTTE	56	904	960	RIVERSIDE	445	19,203	19,648
CALAVERAS	5	269	274	SACRAMENTO	84	7,157	7,241
COLUSA	1	12	13	SAN BENITO	6	160	166
CONTRA COSTA	195	7,832	8,027	SAN BERNARDINO*	442	8,765	9,207
DEL NORTE	8	179	187	SAN DIEGO*	659	19,177	19,836
EL DORADO	35	1,591	1,626	SAN FRANCISCO	187	5,320	5,507
FRESNO*	66	2,351	2,417	SAN JOAQUIN	70	3,206	3,276
GLENN	1	40	41	SAN LUIS OBISPO	42	1,596	1,638
HUMBOLDT	25	637	662	SAN MATEO	109	3,975	4,084
IMPERIAL	25	439	464	SANTA BARBARA	51	1,638	1,689
INYO	3	6	9	SANTA CLARA	573	14,100	14,673
KERN*	74	3,583	3,657	SANTA CRUZ	51	2,328	2,379
KINGS*	53	505	558	SHASTA*	23	1,283	1,306
LAKE	1	227	228	SISKIYOU	39	173	212
LASSEN	8	157	165	SOLANO	257	2,650	2,907
LOS ANGELES*	2,828	42,098	44,926	SONOMA*	76	2,512	2,588
MADERA	5	296	301	STANISLAUS	89	2,291	2,380
MARIN	22	1,394	1,416	SUTTER*	3	320	323
MARIPOSA	7	60	67	TEHAMA	20	252	272
MENDOCINO	18	497	515	TRINITY	1	5	6
MERCED*	11	84	95	TULARE	23	703	726
MODOC	1	5	6	TUOLUMNE	6	69	75
MONO		38	38	VENTURA*	159	5,197	5,356
MONTEREY	34	531	565	YOLO	45	829	874
NAPA	13	618	631	YUBA*	3	362	365
NEVADA	51	1,227	1,278				
<b>Grand Total</b>					<b>7,812</b>	<b>200,434</b>	<b>208,246</b>

Figure R. Breakdown of Voter Status and Dual State Registrations

When the comparison analysis was performed, a similarity score was assigned to each record based on the quality of the match between the California data and the out of state data. A score of 1 indicated a strong data match based on name, date of birth, etc. This number “1” score appears for 98% of the records. Figure S.

**Dual State Data Match Score**

Similarity Score	Total
0.4	806
0.5	997
0.6	406
0.7	247
0.8	1,099
0.9	331
1	204,360
<b>Total</b>	<b>208,246</b>

Figure S. Similarity Scores of Dual State Registrations

**Votes Cast by Dual State Registrants**

The data reviewed shows that 7,196 voters cast their California ballot after moving to another state. Of these, 756 voters are still listed as active on the California rolls. There were 162 voters casting ballots in two states in the same election. Of these, 14 were listed as active on the California rolls. (Figure T)

**Summary of Votes**

Description	Active	Inactive	Total
Voted after moved	756	6,440	7,196
Double voted	14	148	162
<b>Grand Total</b>	<b>770</b>	<b>6,588</b>	<b>7,358</b>

Figure T. Voters Voting After Move and Double Votes

**Recap and Next Steps: DUAL STATE REGISTRATIONS**

- There are 7,812 active voters with dual state registrations who will receive VBM ballots in upcoming elections unless their statuses change. (Figure Q).
- There remain 200,434 inactive, but eligible dual state voters on the rolls who will be allowed to vote if they appear at a vote center.

The California Constitution, Article II Section 2, clearly establishes voting rights for citizen residents of California. Dual state registrations must be addressed to prevent non-California citizens from casting illegal votes. Double votes in Federal elections are deeply concerning and further analysis should be done to understand why these occur so this problem can be solved before current and future elections. A file containing the dual state registration records will be sent to the Secretary of State and County Registrar of Voters’ Offices with the intent to work towards resolving potential issues.

## CONCLUSION

Maintaining voter rolls is not rocket science but... *California, we do have a problem.*

- Too many voters voted in two states.
- Too many registrants have deficient mailing addresses.
- Too many out of state residents are on California's voter rolls.
- Too many California registrants are registered in another state.

This report highlights an urgent need before the 2024 elections for elections officials throughout the state to address the NCOA-related issues associated with California's voter rolls. Hundreds of voter volunteer hours have been spent analyzing the raw data, canvassing fellow California residents to verify the information, and consolidating and reporting on the facts so that actions can be taken.

Whether a voter agrees with mandatory universal VBM ballots or not, current California statutes require mandatory universal VBM ballots be issued with no choice or process available to opt-out. There are [over 26 million](#) men and women eligible to vote in California; of those, 85% are registered voters who will be mailed ballots in early October 2024. In a state with over 22 million registered voters representing nearly [14% of all registered voters](#) in the United States, it is vital that tools such as NCOALink be used to ensure only eligible California residents are on the voter rolls and that only they will be mailed VBM ballots. In addition, the 75,362 Undeliverable addresses flagged by the USPS should be reviewed and, corrected where applicable.

Using this report and other tools available to elections officials has the potential of helping thwart ballot theft, reduce fiscal waste, and minimize the number of ballots tossed into landfills. The integrity of our elections systems must be a collaborative effort between the citizenry and the people that manage the systems.

Finally, the authors of this report are experienced, nonpartisan professionals and concerned Californians who have spent countless hours collecting facts, analyzing data, and drawing reasonable, common-sense conclusions.

Respectfully, We the People submit our work to you.