



CALM BEFORE --- **THE STORM**

**ARE PALM BEACH COUNTY'S ELECTIONS
PROTECTED AGAINST EMERGING THREATS?**

PUBLIC INTEREST

— LEGAL FOUNDATION —

PUBLICINTERESTLEGAL.ORG

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EXECUTIVE SUMMARY

Decades of mismanagement have left Palm Beach County's voter rolls in disarray and vulnerable to foreign attack.

The 2018 midterm was marred by recount delays and other alarming events, which went on to gain national attention in the days and weeks following election day. Shortly before Governor Ron DeSantis ended Palm Beach County Supervisor of Elections Susan Bucher's tenure in office,¹ the Public Interest Legal Foundation began audits and record collection efforts to identify specific flaws within voter registration files and any systemic glitches creating them.

After three months of county office visits,

records inspections, voter roll audits, and data science best practices,


the Foundation highlighted more than 23,800 registration files for official review and necessary maintenance.

Concerns ranged from apparent clerical errors memorialized in voter records to evidence of dead and double voting. Seemingly unlawful claims of business and government addresses were also found used as residential ones. Some individuals (unwillingly or otherwise) even demonstrated an ability to register multiple times under the same name, address, and date of birth thanks to human or computer system errors between the county elections office and Florida Highway Safety and Motor Vehicles

personnel. Perhaps most alarming of all, apparent noncitizens were documented registering to vote in Palm Beach County—sometimes while admitting their immigration status on the voter applications.

The Palm Beach County research effort helps map the growing number of ways that contemporary Florida election systems can glitch or fail—all leading to a cumulative corruption of the voter registration system from within, all amid reported efforts to perform external attacks on the same assets.

Upon completion of the study, the Foundation submitted all findings to new County Supervisor of Elections Wendy S. Link in May 2019 for a line-by-line review to discern necessary list maintenance efforts according to federal and Florida statutes.



summary *of* findings

**Double voting by the same
registrant in 2016 and/or 2018
across state lines (225)**

**Double registrations across
state lines (20,479)**

**Use of non-residential
addresses as
county residences (68)**

**Deceased voters on the voter
roll (2,203)**

**Records of deceased voters
casting ballots (139)**

**Registrant names appearing
more than once on the county's
voter roll (413)**

**Apparent noncitizens
previously registered to vote
for a total average of seven
years (68)**

KEY FINDINGS



Developed findings submitted to the Palm Beach County Supervisor of Elections Office (SOE) ranged from clearly human clerical mistakes to potential fraud in both registration and voting. All discoveries were traced back to flaws within the County's voter roll or documents officially disclosed during the research period.



INTERSTATE DOUBLE VOTING

*225 registrants
apparently voted twice
in 2016, 2018, or both*

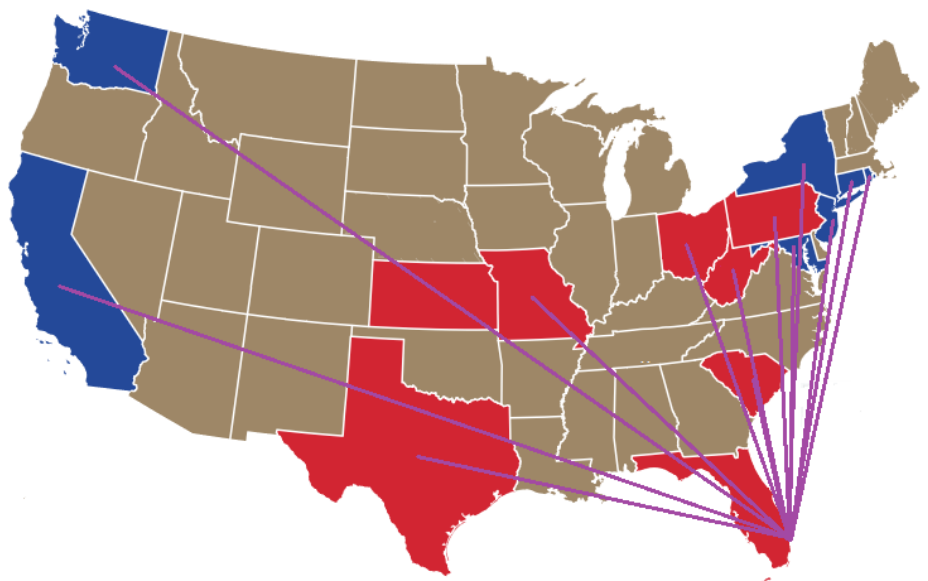
Analysis was designed to identify two types of data: cases of double voting due to duplicate registrations across state lines and concurrent interstate registrations without evidence of double voting to date. It is not illegal to hold two registrations in different states—especially since people have a tendency to move to Florida from elsewhere. Too often, the former election official of permanent residence is left immediately unaware of the relocation and subsequent registration. But when one decides to take advantage and vote twice—that’s a different story.

An analysis of all voters with two active voter registration files revealed 38 instances

of apparent double voting occurring in Palm Beach and in counties located in either New York or Pennsylvania in the November 2018 General Election. Of the 38, 28 voted in both Palm Beach and New York, while 10 voted in both Palm Beach and Pennsylvania.

Research was also done on the 2016 Presidential Election, which expanded beyond matches between Palm

Beach County, New York, and Pennsylvania. The Foundation revealed at least 185 cases where registrants on the Palm Beach voter roll apparently cast votes in Florida and in another state in the same election. The bulk of these occurred in the northeast and along the Eastern Seaboard, however, there are also cases in Texas and California.



While duplicate registrations may be more common than actual double voting, they are still extremely alarming because of how simple it would be for a person to double vote if registered in two different states. Florida faces this challenge regularly—to the point that concern over the “snowbird vote” sits firmly in the mainstream political lexicon. The Foundation’s 2019 research matching against only three states helps to underscore the issue.

Double registrations are also indicative of deficient list maintenance efforts.

DUPLICATE INTERSTATE REGISTRATIONS

When a person moves, there are procedures mandated by federal law that cause the change of address to trigger the removal process or cancellation of the former registration. If, however, a voter is actively maintaining two residences without submitting any type of change of address, then such procedures will fail to cancel a registration.

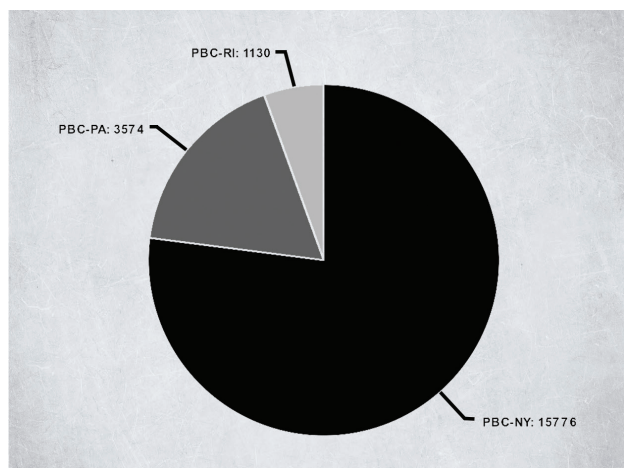
The table gives a breakdown of how the “active” portion of the Palm Beach County voter file matched against the respective entireties of

New York, Pennsylvania, and Rhode Island.

The second significant concern related to

20,479 ‘active’ registrations were matched as duplicates in NY, PA, RI

duplicative interstate registrations involves the use of the address of the election supervisor’s office as a residential voting address. If a registrant does not have a fixed address in Florida or anywhere else in the United States but wishes to stay registered to vote, they may use the privilege. Common examples include homeless and deployed military personnel. The Foundation demonstrated, however, that some registrants were established at both the SOE address and another elsewhere in the United States concurrently. Fifteen cases were immediately flagged for official review.



POTENTIALLY FRAUDULENT USE OF COMMERCIAL AND GOVERNMENT ADDRESSES

as residences, some registrants found a loophole, regardless of intent. In several cases, it appears that registrants masked their PO Box number by claiming it was an apartment or unit number attached to the

physical street address for a United States Postal Service building. Post offices in Boca Raton, Boynton Beach, Delray Beach, Lake Worth, Lantana, Palm Beach, and West Palm Beach were identified. The SOE was alerted to registrants whose voting histories indicated ballots cast while at these

addresses in both 2018 and 2016. A total of 21 registration records were flagged for review.

During a search of known UPS Store

addresses against the current year Palm Beach County voter registration roll, the Foundation identified at least 36 examples where stores were claimed specifically as residential addresses for voter registration purposes. Of the 36,

Barring few exceptions, Florida law states that when registering to vote, a residential address claimed on a voter registration application is meant literally to be just that. In addition to potential misuses of the 240 S. Military Trail election office address, the Foundation identified three more types of distinct problems with addresses involving post office buildings, UPS stores, and other government buildings.

Although the Florida voter registration application makes clear that post



201 West Ocean Avenue, Lantana, FL
Courtesy: Google Street/Maps

POTENTIALLY FRAUDULENT USE OF COMMERCIAL AND GOVERNMENT ADDRESSES (CONTINUED)

As with the post office address records, most registrants entered their rented box numbers as their apartment or unit numbers at the store's address.

19 hold voter credits for participating in either or both the 2018 or 2016 general elections. Some of the 19 also hold voter credits for elections prior to 2016. UPS Stores were claimed as homes in Lake Worth, Delray Beach, Palm Beach, and West Palm Beach.

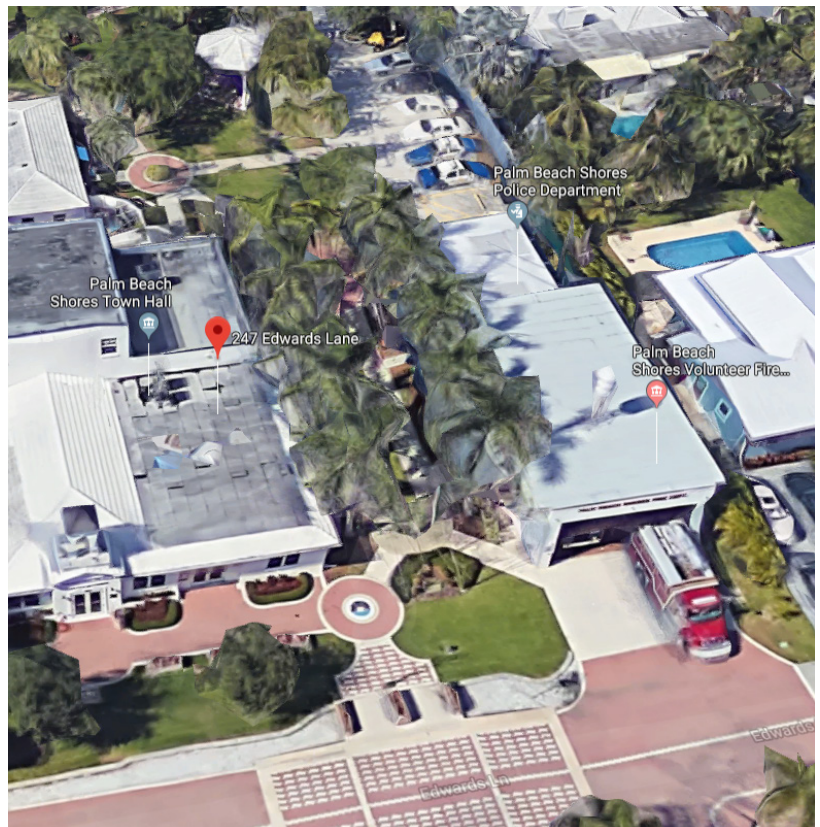
Last, the address analysis found 10 examples where registrants claimed local government buildings, including police stations, fire houses, and/or city halls, as residences in Boca Raton and Palm Beach Shores. Nine of the 10 registrations claim 100 NW 2nd Avenue, a Boca Raton police station, as their home address. One lists 247 Edwards Ln. in Palm Beach Shores.



6586 Hypoluxo Rd, Lake Worth, FL
Courtesy: Google Street/Maps



100 NW 2nd Ave, Boca Raton, FL
Courtesy: Google Street/Maps



247 Edwards Ln, Palm Beach Shores, FL
Courtesy: Google Street/Maps

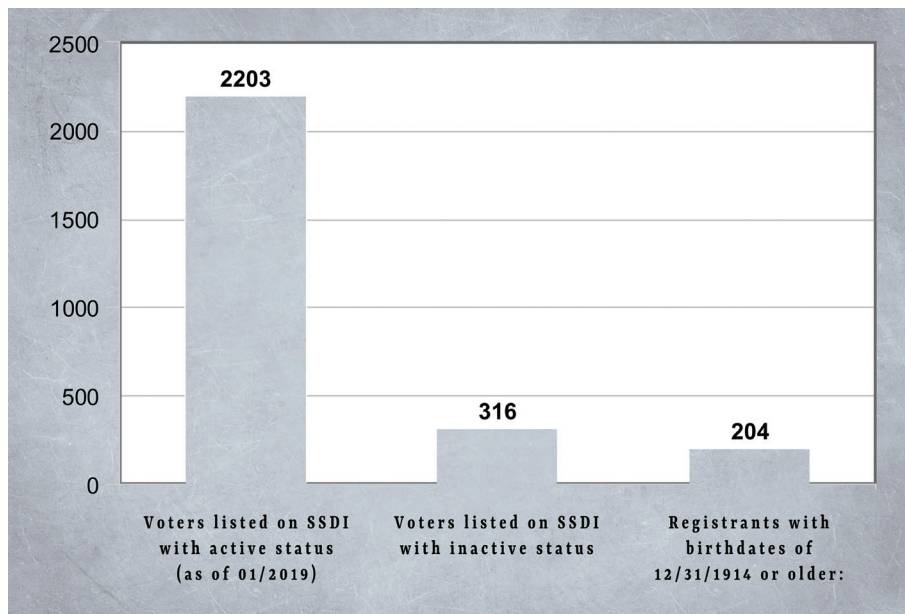
DECEASED REGISTRANTS STILL VOTING IN PALM BEACH COUNTY

Analysis revealed that there are deceased registrants on the roll, as well as many implausibly old registered voters, as noted below:

from more than a decade ago, which means that if the death is either not reported to the county or is not acted upon

2,203 registrants flagged for official review

With a cursory glance, it may seem that performing list maintenance designed to remove deceased voters from the roll is not a priority maintenance task because the deceased person is not going to be voting. However, our analysis revealed that more than 100 deceased registrants actually cast ballots in recent elections in Palm Beach County after their dates of death.



These findings appear to indicate that the procedure for receiving and processing death information needs improvement. Many Social Security Death Index (SSDI) matches reveal dates of death

when received, there is no review process in place to systematically check the voter roll for deceased voters. If a death goes unnoticed in 1999, officials are not positioned to catch the mistake in 2019.

Data revealed that 156 voter “credits” belong to registrants whose name and other identifying information, such as a Social Security number, appeared on the SSDI list prior to the date that

DECEASED REGISTRANTS STILL VOTING IN PALM BEACH COUNTY (CONTINUED)

the ballot was cast. The Foundation accounted for and removed any matches where votes were cast during an early voting period for the election at hand if the death occurred in the same period. The table outlines the credits issued per election for current registered voters, whose status is “active” and matched against the SSDI.

Ballots cast by a registered voter who has died indicates two problems. The first is that the voter roll is not “accurate and current” as required by Florida law² and federal law.³ The second problem is that identification of voters,

either at the polls or in analyzing the signatures of mail-in ballots, is not catching that the ballot is being cast by someone other than the deceased

Election	Credits
2012 General	19
2008 General	17
2010 General	12
2008 PPP	10
2016 General	8
2006 General	8
2018 General	7
2010 Primary	6
2016 PPP	5
2016 Primary	5
2014 General	5
2011 Other	5
2018 Primary	4
2012 Primary	4
2008 Primary	4
2012 PPP	3
2006 Primary	3
2008 Other	3
2009 Other	3
2009 Primary	3
2014 Primary	2
2013 Other	2

voter. Obviously, it is much easier for this to happen with a mail-in ballot because a mail-in ballot is counted so long as 1) the name appears on the voter roll, and 2) there is a signature on it that essentially “matches” a signature in the voter’s registration file.⁴

The use of mail-in ballots to fraudulently vote is of particular concern because, under Florida law, a registered voter can call or write the Supervisor’s office and request a mail-in ballot for any reason.⁵ The caller need only provide a name, address and date of birth in order to receive a

DECEASED REGISTRANTS STILL VOTING IN PALM BEACH COUNTY (CONTINUED)

ballot by mail. This type of information is readily available to family, friends, others acquainted with the deceased voter and, frankly, anyone reading an obituary. And, although the address provided for the ballot must match the address of the deceased registrant, that is not the case when someone else requests the ballot on behalf of the registrant. At that point, the requestor's address will suffice as long as the request is in writing.⁶ Notably, once a request is made, the registrant continues to automatically receive mail-in ballots through several elections,

according to Florida law.

For this reason, it is imperative that deceased voters be timely removed from the voter roll so that illegal votes are not cast through an abuse of the mail-in ballot system. Florida law requires that each county remove the deceased registrant from the roll within 7 days of receipt of the death notice from the Department of State.⁷ This has obviously not been happening consistently.

Setting aside the deceased voters who

actually cast ballots, there remains 2,203 “active” registrants on the Palm Beach County voter roll who are also on the SSDI death list. Their status as “active” indicates a failure of list maintenance to remove their names through one of the required list maintenance programs identified in Florida law.⁸



1301 S Dixie Hwy, West Palm Beach, FL
Courtesy: Google Street/Maps



*413 sets of duplicate registrations
flagged for official review*

IN-COUNTY DUPLICATE REGISTRATIONS

It is not complicated to become registered multiple times under your own name, address, birthday, and Social Security number in Palm Beach County. It also is not particularly unlawful to do so. Finding duplicate registrations can be a good barometer for a variety of related issues, such as: quality assurance protocols in handling new/updated registration requests; data transfer quality within the Motor Voter system; data handling procedures involving third-party voter drives; and even a basic understanding of how to spot duplicates within a supervisor's own voter registry.

The most common example found was of a single person registering twice at the same address with an exact or substantially similar full name and date of birth. In an

abundance of caution, the Foundation shed potential duplicates with similar data fields that could not be verified as living in single-family dwellings or specific units in multi-family housing complexes, according to local property tax appraisal district files. This process of elimination still yielded over 413 duplicate registration sets. Of those, some voters were confirmed to have voted twice in the same election. Here are some examples of apparent duplicate registrations:

VOID	126281505	VOID	115704708
Last Name	HANVIVATPONG	Last Name	HANVIVATPONG
First Name	AMANDA	First Name	AMANDA
Middle Name	A	Middle Name	A
Address 1 & 2	9701 W LAKE CT	Address 1 & 2	9701 W LAKE CT
Birth Date	1/5/1990	Birth Date	1/5/1990
Party	DEM	Party	DEM
Status	ACT	Status	ACT

A duplicate set with neatly matching data fields at a single-family residence

VOID	123901414	VOID	112050424
Last Name	RIVERA	Last Name	RIVERA
First Name	CHRISTINE	First Name	CHRISTINE
Middle Name	MEGHAN	Middle Name	MEGHAN
Address 1 & 2	130 ELYSIUM DR	Address 1 & 2	130 ELYSIUM DR
Birth Date	12/19/1984	Birth Date	12/19/1984
Party	NPA	Party	DEM
Status	ACT	Status	ACT

A duplicate set with a typographical error in the last name field at a single-family residence

VOID	112508371	VOID	112506596
Last Name	MAWALI	Last Name	MAWALI
First Name	JERRY	First Name	JERRY
Middle Name	DANORRIS	Middle Name	LANORRIS
Address 1 & 2	17467 FOX TRAIL LN	Address 1 & 2	17467 FOX TRAIL LN
Birth Date	7/26/1976	Birth Date	7/26/1976
Party	NPA	Party	NPA
Status	ACT	Status	ACT

A duplicate set with a typographical error in the middle name field at a single-family residence

IN-COUNTY DUPLICATE REGISTRATIONS (CONTINUED)

VOID	100575541	VOID	111872067
Last Name	CARRILLO	Last Name	ORRCARRILLO
First Name	JUSTIN	First Name	JUSTIN
Middle Name	A	Middle Name	ANDRES
Address 1 & 2	8910 SONOMA LAKE BLVD	Address 1 & 2	8910 SONOMA LAKE BLVD
Birth Date	11/27/1981	Birth Date	11/27/1981
Party	DEM	Party	DEM
Status	ACT	Status	ACT

A duplicate set with last name confusion and initial confusion in middle name at a single-family residence

VOID	119562975	VOID	122252980
Last Name	CRANSTON	Last Name	EDWARDS
First Name	FRANK	First Name	FRANK
Middle Name	EDWARD	Middle Name	[BLANK]
Address 1 & 2	11 SW 6TH ST	Address 1 & 2	11 SW 6TH ST
Birth Date	3/24/1965	Birth Date	3/24/1965
Party	DEM	Party	DEM
Status	ACT	Status	ACT

A male duplicate set with last and middle name confusion at a single-family residence

VOID	115898287	VOID	125903578
Last Name	FELDMAN	Last Name	SCHOSHHEIM
First Name	ALI	First Name	ALI
Middle Name	MICHELE	Middle Name	MICHELE
Address 1 & 2	19312 SKYRIDGE CIR	Address 1 & 2	19312 SKYRIDGE CIR
Birth Date	12/1/1983	Birth Date	12/1/1983
Party	DEM	Party	NPA
Status	ACT	Status	ACT

A female duplicate set with married name confusion at a single-family residence

VOID	126040849	VOID	111754852
Last Name	STRAKA	Last Name	STRAKA
First Name	BRADLEY	First Name	BRADLEY
Middle Name	J.	Middle Name	James
Address 1 & 2	18284 104TH TER S	Address 1 & 2	18284 104TH TER S
Birth Date	9/7/1969	Birth Date	9/7/1979
Party	DEM	Party	DEM
Status	ACT	Status	ACT

A duplicate set with substantially similar full names but an apparent single-digit typographical error in the year of birth at a single-family residence

IN-COUNTY DUPLICATE REGISTRATIONS (CONTINUED)

VOID	115941193	VOID	123876603
Last Name	LACOMBE	Last Name	LACOMBE
First Name	ANGELO	First Name	ANGELO
Middle Name	FRITZNER	Middle Name	FRITZNER
Address 1 & 2	200 SW 14TH AVE	Address 1 & 2	200 SW 14TH AVE
Birth Date	5/13/1973	Birth Date	6/13/1973
Party	DEM	Party	DEM
Status	ACT	Status	ACT

A duplicate set with substantially similar full names but an apparent single-digit typographical error in the month of birth at a single-family residence

VOID	119263445	VOID	123523417
Last Name	HO	Last Name	HO MISIASZEK
First Name	KIMBERLY	First Name	KIMBERLY
Middle Name	S.	Middle Name	SABRINA
Address 1 & 2	1855 OAK BERRY CIR	Address 1 & 2	1855 OAK BERRY CIR
Birth Date	10/13/1988	Birth Date	10/13/1988
Party	REP	Party	REP
Status	ACT	Status	ACT

A duplicate set with apparent married surname confusion and middle name confusion at a single-family residence

VOID	126179588	VOID	124357241
Last Name	DE LA CRUZ	Last Name	DELACRUZ
First Name	ANGEL	First Name	ANGEL
Middle Name	[BLANK]	Middle Name	[BLANK]
Address 1 & 2	3028 NW 28TH TER	Address 1 & 2	3028 NW 28TH TER
Birth Date	11/10/1968	Birth Date	11/9/1968
Party	NPA	Party	NPA
Status	ACT	Status	ACT

A duplicate set with apparent spacing issues in the surname and a typographical error in the date of birth at a single-family residence

VOID	112099638	VOID	124052575
Last Name	NEFZGER	Last Name	NEFZGET
First Name	WILMA	First Name	WILMA
Middle Name	L.	Middle Name	[BLANK]
Address 1 & 2	5162 MICHAEL DR	Address 1 & 2	5162 MICHAEL DR
Birth Date	10/5/1928	Birth Date	10/5/1927
Party	DEM	Party	DEM
Status	ACT	Status	ACT

A duplicate set with a misspelled surname in the VOID record ending 575 and a typographical error in the year of birth at a single-family residence

The examples indicate that duplicate registrations are likely generated by both human error and potential faults within the voter registration system itself. Regardless, the registration system should catch such errors but it is not doing so.

Regardless of where fault ultimately lies in any given case, voter duplication is occurring and some are even taking advantage of the extra ballot in their name by apparently voting twice.

68 cancelled voter registrants later admitted their immigration status in recent years

APPARENT NONCITIZENS ON THE VOTER ROLL

Over the course of document inspection and disclosures, the SOE disclosed records related to 68 cases of cancellations where citizenship eligibility was the primary factor for removal.⁹

Regardless of voter participation

history or their means of registration, noncitizens usually become aware of their voter status during an immigration procedure. Prospective naturalized citizens are often confronted with their pre-existing voter registration records, causing great alarm and a rush to quickly cancel their registration. The Foundation's research works to determine how much blame to place upon the apparently ineligible registrant versus the local voter registration office or even the state's compliance measures related to the federal Motor Voter law. Research often confirms that the typical

Florida Voter Registration Application Part 2 - Form (06-DE 439, R18-2.040, F.A.C. (vfr. 01/2012))				The downloadable/printable online form is available at: http://election.dos.state.fl.us/pdf/webappform.pdf			
This is: <input checked="" type="checkbox"/> New Registration <input type="checkbox"/> Record Update/Change (e.g., Address, Party Affiliation, Name, Signature) <input type="checkbox"/> Request to Replace Voter Information Card							
A Are you a citizen of the United States of America? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				OFFICIAL USE ONLY			
B <input checked="" type="checkbox"/> I affirm that I am not a convicted felon, or if I am, my right to vote has been restored.				81112 BL			
C <input checked="" type="checkbox"/> I affirm that I have not been adjudicated mentally incapacitated with respect to voting or, if I have, my right to vote has been restored.							
D Date of Birth (Enter in format MM-DD-YYYY) 06-05-1949				FVRS No: [REDACTED]			
E Florida Driver's License (FL DL) or Florida Identification (FL ID) Card Number [REDACTED]				If no FL DL or FL ID, then provide Last 4 digits of Social Security Number [REDACTED] <input type="checkbox"/> I have NONE of these numbers.			
F Last Name [REDACTED]		First Name NOEL		Middle Name or Initial [REDACTED]		Name Suffix (Jr., Sr., I, II, etc.):	
G Where You Live (legal residence-no P.O. Box) 6600 [REDACTED] PLACE		Apt/Lot/Unit		City BOCA RATON		County PALM BEACH	
Mailing Address (if different from above address)		Apt/Lot/Unit		City		State or Country	
Address Where You Were Last Registered to Vote		Apt/Lot/Unit		City		State	
Former Name (if name is changed)		Gender <input checked="" type="checkbox"/> M <input type="checkbox"/> F		State or Country of Birth [REDACTED]		Telephone No. (optional)	
Party Affiliation (Check only one. If left blank, you will be registered without party affiliation) <input type="checkbox"/> Florida Democratic Party <input checked="" type="checkbox"/> Republican Party of Florida <input type="checkbox"/> No party affiliation <input type="checkbox"/> Minor political party (print name):		Race/Ethnicity (Check only one) <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black, not of Hispanic Origin <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> White, not of Hispanic Origin <input type="checkbox"/> Other: <input type="checkbox"/> Multi-racial		Active Uniformed Services, Merchant Overseas U.S. Citizen (Check only one if applicable) <input type="checkbox"/> Active duty uniformed services/merchant marine <input type="checkbox"/> Family member of active duty uniformed services or merchant marine member <input type="checkbox"/> U.S. Citizen Residing Outside [REDACTED]		<input type="checkbox"/> I will need assistance with voting. <input type="checkbox"/> I am interested in becoming a poll worker.	
H Oath: I do solemnly swear (or affirm) that I will protect and defend the Constitution of the United States and the Constitution of the State of Florida, that I am qualified to register as an elector under the Constitution and laws of the State of Florida, and that all information provided in this application is true.				SIGN/ MARK HERE [REDACTED]		Date 07/30/2012	

APPARENT NONCITIZENS ON THE VOTER ROLL

(CONTINUED)

canceled registrant for citizenship registered to vote without intending to do so, usually as a result of third-party registration drives. Even in cases where noncitizens became registered in driver's license offices, they were sometimes handed voter registration applications printed only in English, whereas their driver paperwork was offered in their primary language.

An inspection of the SOE's voter registration system manual leaves the Foundation to believe that certain official procedures and systems actually make matters worse. For example, the voter registration database includes a setting that checks "YES" to the citizenship eligibility box by default, requiring the staff person doing the inputting to uncheck the box during the processing of each application if, in fact, the box is unchecked on the actual application before them. With default settings designed to require more effort from staff, as opposed to less, it is no wonder that the voter roll contains input errors traced to human data entry. Default settings should never be used in voter application input, especially when concerning such a foundational

requirement as citizenship.

Automation in voter registration too often generates more error to only be suffered by the noncitizen at a later date.

This is a very significant defect in the software that undermines the citizenship checkbox required by Congress in the NVRA. There should be no default choice because the actual form contains no default—by design. The applicant is tasked with making a choice on the citizenship question, not the election officials or the computers the officials use. This is the single most important step to ensuring that alien residents do not vote in American elections in Florida.

Despite numerous noncitizen applicants clearly checking the "NO" box as to U.S. Citizenship, applications were still processed and accepted—some even voted as a result. This came to light after the Foundation requested the complete cancellation file for each noncitizen whose registration was canceled. These files included copies of the original applications submitted. Some are highlighted below.

APPARENT NONCITIZENS ON THE VOTER ROLL (CONTINUED)

Case Studies / Noel

04-26-2019
14:38:19

PALM BEACH COUNTY Supervisor of Elections VOTING HISTORY REPORT

NOEL [REDACTED]

Registered Address : 8184 [REDACTED] LN
BOCA RATON FL 33496

FVRS Voter-ID: [REDACTED]

Registered: 07-31-2012 Status: Canceled Total Items: 5

0282 Polls	11/08/2016	2016 General Election
0281 Polls	08/30/2016	2016 Primary Election
0218 Polls	11/04/2014	2014 General Election
0217 AB	08/26/2014	2014 Primary Election
9547 Early	11/06/2012	2012 General Election

Noel immigrated to the United States from Venezuela but did not register to vote until well into his adult years. Twice he came into contact with the voter registration system and, twice, he admitted to not being a citizen on the applications. These incidents occurred in 2012 and 2016. He went on to vote early, by mail, and in-person in primary and general federal elections until 2017. The disclosed registration applications show a mix of printed and handwritten field inputs, suggesting these transactions were likely part of Motor Voter activities.

APPARENT NONCITIZENS ON THE VOTER ROLL (CONTINUED)

Case Studies / Noel

Florida Voter Registration Application Part 2 - Form (DS-DE #39, R18-2.040, F.A.C. (01/01/2012))				The downloadable/printable online form is available at: http://election.dos.state.fl.us/pdf/webappform.pdf			
This is: <input checked="" type="checkbox"/> New Registration <input type="checkbox"/> Record Update/Change (e.g., Address, Party Affiliation, Name, Signature) <input type="checkbox"/> Request to Replace Voter Information Card				OFFICIAL USE ONLY			
A Are you a citizen of the United States of America? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				81112 BL			
B <input checked="" type="checkbox"/> I affirm that I am not a convicted felon, or if I am, my right to vote has been restored.							
C <input checked="" type="checkbox"/> I affirm that I have not been adjudicated mentally incapacitated with respect to voting or, if I have, my right to vote has been restored.							
D Date of Birth (Enter in format MM-DD-YYYY) 0 6 - 0 5 - 1 9 4 9				FVRS No: [REDACTED]			
E Florida Driver's License (FL DL) or Florida Identification (FL ID) Card Number [REDACTED]				If no FL DL or FL ID, then provide [REDACTED]		Last 4 digits of Social Security Number [REDACTED] <input type="checkbox"/> I have NONE of these numbers.	
F Last Name [REDACTED]		First Name NOEL		Middle Name or Initial [REDACTED]		Name Suffix (Jr., Sr., I, II, etc.):	
G Where You Live (legal residence-no P.O. Box) 6800 [REDACTED] PLACE		Apt/Lot/Unit		City BOCA RATON		County PALM BEACH	
Mailing Address (if different from above address)		Apt/Lot/Unit		City		State or Country	
Address Where You Were Last Registered to Vote		Apt/Lot/Unit		City		State	
Former Name (if name is changed)		Gender <input checked="" type="checkbox"/> M <input type="checkbox"/> F		State or Country of Birth		Telephone No. (optional) [REDACTED]	
Party Affiliation (Check only one. If left blank, you will be registered without party affiliation) <input type="checkbox"/> Florida Democratic Party <input type="checkbox"/> Republican Party of Florida <input checked="" type="checkbox"/> No party affiliation <input type="checkbox"/> Minor political party (print name):		Race/Ethnicity (Check only one) <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black, not of Hispanic Origin <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> White, not of Hispanic Origin <input type="checkbox"/> Other: <input type="checkbox"/> Multi-racial		Active Uniformed Services, Merchant Overseas U.S. Citizen (Check only one if applicable) <input type="checkbox"/> Active duty uniformed services/merchant marine <input type="checkbox"/> Family member of active duty uniformed services or merchant marine member <input type="checkbox"/> U.S. Citizen Residing Outside [REDACTED]		<input type="checkbox"/> I will need assistance with voting. <input type="checkbox"/> I am interested in becoming a poll worker.	
H Oath: I do solemnly swear (or affirm) that I will protect and defend the Constitution of the United States and the Constitution of the State of Florida, that I am qualified to register as an elector under the Constitution and laws of the State of Florida, and that all information provided in this application is true.		SIGN/ MARK HERE [REDACTED]		JUL 31 2012		Date 07/30/2012	

APPARENT NONCITIZENS ON THE VOTER ROLL (CONTINUED)

Case Studies / Noel

Florida Voter Registration Application Part 2 - Form (DS-DE #39, R1S-2.040, F.A.C.) (eff. 10/2013)				The downloadable/printable online form is available at: dos.myflorida.com/elections/for-voters/voter-registration			
This is: <input type="checkbox"/> New Registration <input checked="" type="checkbox"/> Record Update/Change (e.g., Address, Party Affiliation, Name, Signature) <input type="checkbox"/> Request to Replace Voter Information Card							
1	Are you a citizen of the United States of America? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			OFFICIAL USE ONLY			
2	<input checked="" type="checkbox"/> I affirm that I am not a convicted felon, or if I am, my right to vote has been restored.			ALC 7/11/16 m2			
3	<input checked="" type="checkbox"/> I affirm that I have not been adjudicated mentally incapacitated with respect to voting or, if I have, my right to vote has been restored.						
4	Date of Birth (MM-DD-YYYY)	06 - 05 - 1949		FVRS No:	[REDACTED]		
5	Florida Driver License (FL DL) or Florida Identification (FL ID) Card Number			If no FL DL or FL ID, then provide	Last 4 digits of Social Security Number	<input type="checkbox"/> I have NONE of these numbers.	
6	[REDACTED]			First Name	Middle Name	Name Suffix (Jr., Sr., II, etc.):	
7	8184 [REDACTED]	P.O. Box)	Apt/Lot/Unit	City	County	Zip Code	
8	Mailing [REDACTED]	ss)	Apt/Lot/Unit	City	State or Country	Zip Code	
9	Address Where You Were Last Registered to Vote			Apt/Lot/Unit	City	State	Zip Code
10	Former Name (if name is changed)			Gender	State or Country of Birth	[REDACTED]	
				<input checked="" type="checkbox"/> M <input type="checkbox"/> F	VENEZUELA		
11	<input type="checkbox"/> Email me SAMPLE BALLOTS if option is available in my county. (See Public Record Notice above) My email address is:						
Party Affiliation (Check only one. If left blank, you will be registered without party affiliation)		Race/Ethnicity (Check only one)		(Check only one if applicable)		<input type="checkbox"/> I will need assistance with voting.	
<input type="checkbox"/> Florida Democratic Party		<input type="checkbox"/> American Indian/Alaskan Native		<input type="checkbox"/> I am an active duty Uniformed Services or Merchant Marine member		<input type="checkbox"/> I am interested in becoming a poll worker.	
<input type="checkbox"/> Republican Party of Florida		<input type="checkbox"/> Asian/Pacific Islander		<input type="checkbox"/> I am a spouse or a dependent of an active duty uniformed services or merchant marine member			
<input checked="" type="checkbox"/> No party affiliation		<input checked="" type="checkbox"/> Black, not of Hispanic Origin		<input type="checkbox"/> I am a U.S. citizen residing outside the U.S.			
<input type="checkbox"/> Minor party (print party name):		<input type="checkbox"/> Hispanic					
		<input type="checkbox"/> White, not of Hispanic Origin					
		<input type="checkbox"/> Multi-racial					
		<input type="checkbox"/> Other:					
12	Oath: I do solemnly swear (or affirm) that I will protect and defend the Constitution of the United States and the Constitution of the State of Florida, that I am qualified to register as an elector under the Constitution and laws of the State of Florida, and that all information provided in this application is true.			SIGN/ MARK HERE		Date 6/27/16	

APPARENT NONCITIZENS ON THE VOTER ROLL (CONTINUED)

Case Studies / Carmen

Canceled Voter Profile	
Full Name	Carmen
Date of Birth	May 5, 1993
Date of Registration	December 17, 2015
# of Voter Credits	1
Date of Cancellation	October 25, 2016
Political Party	DEM
Citizenship Attestation	NO

Carmen eventually came to reside in Florida after moving from Guatemala. She registered to vote in her early twenties in 2015, despite admitting noncitizenship at the outset. With her voter registration ID in hand, she participated in the 2016 Presidential Preference Primary, likely in the Democratic contest since she identified herself as a Democrat on the application. Her record was canceled shortly before the 2016 General Election.

04-26-2019
14:11:59

PALM BEACH COUNTY Supervisor of Elections VOTING HISTORY REPORT

CARMEN [REDACTED]

Registered Address : 801 [REDACTED] CT
JUPITER FL 33458

FVRS Voter-ID: 123051762

Registered: 12-17-2015 Status: Canceled Total Items: 1

0448 Polls

03/15/2016 2016 Pres Preference Prim

APPARENT NONCITIZENS ON THE VOTER ROLL (CONTINUED)

Case Studies / Carmen

Florida Voter Registration Application Part 2 - Form IDS-DE #39, R1S-2,040, F.A.C. (eff. 10/2013)				The downloadable/printable online form is available at: dos.myflorida.com/elections/for-voters/voter-registration			
This is: <input checked="" type="checkbox"/> New Registration <input type="checkbox"/> Record Update/Change (e.g., Address, Party Affiliation, Name, Signature) <input type="checkbox"/> Request to Replace Voter Information Card							
1	Are you a citizen of the United States of America?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		OFFICIAL USE ONLY	
2	<input checked="" type="checkbox"/> I affirm that I am not a convicted felon, or if I am, my right to vote has been restored.			12-28-15			
3	<input checked="" type="checkbox"/> I affirm that I have not been adjudicated mentally incapacitated with respect to voting or, if I have, my right to vote has been restored.			CSC			
4	Date of Birth (MM-DD-YYYY)			05-05-1993		FVRS No:	
5	Florida Driver License (FL DL) or Florida identification (FL ID) Card Number			If no FL DL or FL ID, then provide		Security Number	
6	Last Name			First Name		Middle Name	
7	Address Where You Live (legal residence-no P.O. Box)			City		County	
8	Mailing Address (if different from above address)			City		State or Country	
9	Address Where You Were Last Registered to Vote			City		State	
10	Former Name (if name is changed)			Gender		State or Country of Birth	
11	<input type="checkbox"/> Email me SAMPLE BALLOTS if option is available in my county. (See Public Record Notice above) My email address is:			<input type="checkbox"/> M <input checked="" type="checkbox"/> F		Telephone No. (optional)	
Party Affiliation (Check only one. If left blank, you will be registered without party affiliation)		Race/Ethnicity (Check only one)		(Check only one if applicable)		I will need assistance with voting.	
<input checked="" type="checkbox"/> Florida Democratic Party		<input type="checkbox"/> American Indian/Alaskan Native		<input type="checkbox"/> I am an active duty Uniformed Services or Merchant Marine member		<input type="checkbox"/> I am interested in becoming a poll worker.	
<input type="checkbox"/> Republican Party of Florida		<input type="checkbox"/> Asian/Pacific Islander		<input type="checkbox"/> I am a spouse or a dependent of an active duty uniformed services or merchant marine member			
<input type="checkbox"/> No party affiliation		<input type="checkbox"/> Black, not of Hispanic Origin		<input type="checkbox"/> I am a U.S. citizen residing outside the U.S.			
<input type="checkbox"/> Minor party (print party name):		<input checked="" type="checkbox"/> Hispanic					
		<input type="checkbox"/> White, not of Hispanic Origin					
		<input type="checkbox"/> Multi-racial					
		<input type="checkbox"/> Other:					
Oath: I do solemnly swear (or affirm) that I will protect and defend the Constitution of the United States and the Constitution of the State of Florida, that I am qualified to register as an elector under the Constitution and laws of the State of Florida, and that all information provided in this application is true.			SIGN/ MARK HERE		DEC 17 2015		Date
							12/9/15

APPARENT NONCITIZENS ON THE VOTER ROLL (CONTINUED)

Case Studies / Beverly

Canceled Voter Profile	
Full Name	Beverly
Date of Birth	December 14, 1944
Date of Registration	September 24, 2016
# of Voter Credits	1
Date of Cancelation	September 25, 2017
Political Party	DEM
Citizenship Attestation	BLANK

Beverly’s country of origin is unknown due to the markings on her original registration application, but that is not the most concerning feature of the document. When asked about citizenship eligibility, she apparently skipped the answer—serving as another reason why Florida’s voter registration system software should not automatically assume eligibility at the outset. She remained on the Palm Beach voter roll for almost a year, casting a ballot in the 2016 Election.

Every effort should be taken to educate staff that eligibility questions should be reviewed as carefully as other questions. When these systems fail, it is the immigrant—not the data entry staff member—who suffers potential criminal and deportation consequences.

APPARENT NONCITIZENS ON THE VOTER ROLL (CONTINUED)

Case Studies / Beverly

Florida Voter Registration Application				The downloadable/printable online form is available at: http://elections.state.fl.us/pdf/wet/appform.pdf			
Part 2 - Form (DS-DE #39, R15-2,040, F.A.C.) (eff. 10/20/13)							
This is: <input checked="" type="checkbox"/> New Registration <input type="checkbox"/> Record Update/Change (e.g., Address, Party Affiliation, Name, Signature) <input type="checkbox"/> Request to Replace Voter Information Card							
1	Are you a citizen of the United States of America?			<input type="checkbox"/> YES <input type="checkbox"/> NO		OFFICIAL USE ONLY	
2	<input checked="" type="checkbox"/> I affirm that I am not a convicted felon, or if I am, my right to vote has been restored.					Beverly 09-29-16	
3	<input checked="" type="checkbox"/> I affirm that I have not been adjudicated mentally incapacitated with respect to voting or, if I have, my right to vote has been restored.						
4	Date of Birth (MM-DD-YYYY)			12 - 14 - 1944		FVRS No:	
5	Florida Driver License (FL DL) or Florida Identification (FL ID) Card Number			If no FL DL or FL ID, then provide		Last 4 digits of Social Security Number	
6	Last Name			First Name		Middle Name	
7	Address Where (no P.O. Box)			Apt/Lot/Unit		City	
8	Mailing Address (if different from above address)			Apt/Lot/Unit		City	
9	Address Where You Were Last Registered to Vote			Apt/Lot/Unit		City	
10	Former Name (if name is changed)			Gender		State or Country of Birth	
11	<input type="checkbox"/> Email me SAMPLE BALLOTS if option is available in my county. (See Public Record Notice above) My email address is:			<input type="checkbox"/> M <input checked="" type="checkbox"/> F		SEP 24 2015	
Party Affiliation (Check only one. If left blank, you will be registered without party affiliation)		Race/Ethnicity (Check only one)		(Check only one if applicable)		<input type="checkbox"/> I will need assistance with voting.	
<input checked="" type="checkbox"/> Florida Democratic Party		<input type="checkbox"/> American Indian/Alaskan Native		<input type="checkbox"/> I am an active duty Uniformed Services or Merchant Marine member		<input type="checkbox"/> I am interested in becoming a poll worker.	
<input type="checkbox"/> Republican Party of Florida		<input type="checkbox"/> Asian/Pacific Islander		<input type="checkbox"/> I am a spouse or a dependent of an active duty uniformed services or merchant marine member			
<input type="checkbox"/> No party affiliation		<input checked="" type="checkbox"/> Black, not of Hispanic Origin		<input type="checkbox"/> I am a U.S. citizen residing outside the U.S.			
<input type="checkbox"/> Minor party (print party name):		<input type="checkbox"/> Hispanic					
		<input type="checkbox"/> White, not of Hispanic Origin					
		<input type="checkbox"/> Multi-racial					
		<input type="checkbox"/> Other:					
12	Oath: I do solemnly swear (or affirm) that I will protect and defend the Constitution of the United States and the Constitution of the State of Florida, that I am qualified to register as an elector under the Constitution and laws of the State of Florida, and that all information provided in this application is true.			SIGN/MARK HERE		Date	

PRESENTATION OF FINDINGS TO PALM BEACH COUNTY

After performing records research and audits throughout the first quarter of 2019, the Foundation presented the new supervisor of elections with data, as well as suggested changes to internal processes. The data was also personally presented to Florida Secretary of State, Laurel Lee. Since then, there have been several meetings and other communications with Supervisor Link and her staff, all of whom have committed to reviewing the findings and correcting the voter roll in accordance with state and federal law as soon as possible.

INTERSTATE REGISTRATIONS, DOUBLE VOTING, DUPLICATE IN-COUNTY REGISTRATIONS

A core factor in revealing these data flaws relies on a county official's ability to review voter registration records in bulk. Too often, these files are handled or seen one at a time in isolation, effectively preventing staff from spotting any troubling trends, such as duplicate registrations. The Foundation suggested that if contemporary voter database(s) do not allow for county-level staff to engage in a bulk review of their data, they should either work with the software vendor to allow it or request federal HAVA funds to improve their system or engage a consultant for scheduled reviews of the data.

NON-RESIDENTIAL ADDRESS CLAIMS FOR VOTER REGISTRATION

The SOE was encouraged to take the Foundation's audit results and meet with local GIS staff responsible for coordinating the existing address blacklist. There, they could be more mindful of the need to cull government addresses, in addition to purely commercial ones.



DECEASED REGISTRANTS

The Foundation offered a five-point listing of suggestions to adopt where necessary.

1. Determine whether the State is sending monthly death reports to the SOE. If so, calendar processing from 7 days of receipt. Assign one staff person to do this task.
2. If the State is not regularly sending a death list, assign one person to submit a standing request for monthly death information from the county coroner's office and/or the SSDI. The SOE has the authority to remove deceased voters based on death certificates they receive.¹⁰ The SOE also has authority to remove deceased voters upon receipt of information from other sources that the voter is deceased.¹¹ Further, state and local government agencies are required to provide records relating to deceased people free of charge at your request.¹² Although the State is supposed to be getting a monthly list of deaths from the Department of Health,¹³ and then use that to notify the counties, it may not be doing so.
3. Confirm that once the voter is "removed" for death, the software management will not automatically send out any remaining mail-in ballots put into place by an earlier request for them.
4. Crosscheck the list of requested mail-in ballot voters to the list of deceased voters.
5. If there is not a procedure in place for regular, systematic bulk review of implausibly old or young birthdates, implement one. Such a review would flag both potentially deceased voters as well as birthdates that may be transposed when entered. For example, when a simple query for birthdates listed as before 01/01/1905 is run, any names that are retrieved can then be searched in the SSDI database ad hoc.

FUTURE NONCITIZEN REGISTRANTS

Without a statewide system to verify claims of citizenship eligibility, the SOE is left with two primary options going forward. First and foremost, improved training for staff data entry tasks is a must. Registering applicants admitting to noncitizenship on the application itself should never happen. Curtailing the cases where noncitizens profess to being U.S. citizens will require more public communication and outreach from the SOE, Tallahassee, and interest groups of all kinds. Newly arrived immigrants can always use a reminder that just because someone offers them voter registration, they should not assume that the offer is legitimately extended under the law in any circumstance. At the very least, share messages to the effect that self-reporting an accidental registration before engaging with the U.S. naturalization process is the best means of clearing the record to avoid further jeopardy.

Unfortunately, federal officials do not make federal citizenship data easily available to state and local election officials so that they can find and remove ineligible registrations. The U.S. Department of Homeland Security should open new information-sharing channels between agencies to include CBP, ICE, USCIS and HSI with state and local election officials to more easily identify noncitizens coming into contact with the federal immigration system.

PROCESS AND METHODOLOGY

The Foundation accessed the current year 2019 qualified voter file for use as the foundation of all research. Various queries and audit strategies leveraged access to the Social Security Death Index and, for higher quality matching purposes, commercially available databases containing living Social Security data. These data allowed the Foundation to assert that the two John Smiths appearing in Palm Beach County and Pittsburgh with matching names and dates of birth also had matching SSNs. These are adopted best practices from similar efforts like the Kansas Crosscheck system and the Electronic Registration Information Center (ERIC).¹⁴

CONCLUSION

As the audit shows, the county's voter roll needs to be made current and accurate. The issues found indicate that efforts at list maintenance over the years have either been lax, inconsistent, ignored or ineffective. Built-in procedures were not properly designed to retroactively find and correct errors; rather, they appear to be aimed at assisting in a one-time data entry exercise rather than maintenance or even quality control of what is entered. Other documented procedures passed down from previous administrations contained loopholes that allowed deceased voters to remain, allowed duplicate registrations to go undetected, allowed noncitizens to register, and allowed double voting to occur both within the county and outside the state.

Having an inaccurate voter roll also makes the county vulnerable to hackers who could manipulate or delete data without the inconsistencies or changes being noticed. The worst-case scenario would be a jurisdiction where officials had difficulty discerning between fresh sabotage and pre-existing defects. During a May 2019 U.S. House Committee on Administration field hearing in Fort Lauderdale, it was openly theorized by Members of Congress that Russian hackers allegedly attempted to infiltrate Broward County's read/write capabilities over voter data¹⁵. For this reason, we recommend implementing ways to view the county's data in bulk, in the same way that a cyber attacker would, as described in recent media coverage and comments given by United States Senator Marco Rubio¹⁶.

Reasonable and proper voter list maintenance requires ownership of, and sweating the small details. Each weakness baked into the voter registry is now an election security threat.

END NOTES

1 South Florida Sun-Sentinel; Gov. DeSantis replaces Palm Beach elections
chief after 2018 election woes (January 18, 2019), [https://www.sun-sentinel.com/
news/politics/fl-ne-ron-desantis-suspends-susan-bucher-20190118-story.html](https://www.sun-sentinel.com/news/politics/fl-ne-ron-desantis-suspends-susan-bucher-20190118-story.html)

2 F.S. 98.075(1).

3 NVRA, 52 USC § 20501(b)(4).

4 F.S. 101.68(1).

5 See Florida Department of State/Division of Elections Voter Guide, Rev. 05-
2018, Ques. 9 “Can I vote by mail?”

6 F.S. 101.62(b).

7 F.S. 98.075(3)(a)(2).

8 F.S. 98.065(1)-(6).

9 This figure is not intended to be exhaustive, as the SOE no longer main-
tained records dating back 10 years or more. Local record storage procedures like-
ly caused additional cancellation files to be categorized differently over various
points in time.

10 F.S. 98.075(3)(b).

11 F.S. 98.075(6).

12 F.S. 98.093(2).

13 F.S. 98.093(2)(a).

14 Shortly after the Foundation presented its own interstate crosscheck find-
ings to the SOE and the Secretary of State, Florida officially joined the ERIC pro-
gram.

15 U.S. House Committee on House Administration (May 6, 2019), [https://you-
tu.be/TnaRaeGgZEc?t=10324](https://youtu.be/TnaRaeGgZEc?t=10324)

16 The New York Times; Hackers Were ‘In a Position’ to Alter Florida Voter
Rolls, Rubio Confirms (April 26, 2019), [https://www.nytimes.com/2019/04/26/us/
florida-russia-hacking-election.html](https://www.nytimes.com/2019/04/26/us/florida-russia-hacking-election.html)

PUBLIC INTEREST

LEGAL FOUNDATION

*The Public Interest Legal Foundation, a 501(c)(3) non-profit organization, relies on contributions to conduct the research and develop findings like those contained in this report., relies on contributions to conduct the research and develop findings like those contained in this report. PILF is the only organization performing this level of work with respect to voter registration system integrity in America. Time, travel, and technology help deliver new insights into our election systems to better educate citizens and policymakers alike. We also bring litigation to pry this public information from government officials when necessary. None of this would be possible without your support. Please help us expand our efforts by visiting **publicinterestlegal.org/donate** to offer your fully tax-deductible gift today.*

Public Interest Legal Foundation
32 East Washington Street, Suite 1675
Indianapolis, Indiana 46204

publicinterestlegal.org
317.203.5599