



VIA EMAIL

September 19, 2025

ATTN: Elections Division
The Hon. Shirley N. Weber, Ph.D.
California Secretary of State
1500 11th Street, 5th Floor
Sacramento, CA 95814
Email: elections@sos.ca.gov

RE: Introduction of Voter Registration Data Findings, Request for Meeting

Dear Secretary Weber:

I am writing with the goal of scheduling a meeting to discuss our recent, sampled review of California's voter registration and voting data. Below are summaries of findings with general explanations on methodologies. These findings are not intended to be exhaustive. We would very much like to provide detailed data and answer any questions you may have at a mutually convenient time.

Deceased Registrants from 'Dormant' Sample Study

A grand total of **94,516** registrants in California are flagged as apparently deceased from a sample of 2 million active registrants. The California voter roll was compared against the Social Security Death Index (SSDI) using full SSNs to arrive at matches. To compensate for the SSDI's prioritizing of recording older recipients, the Foundation separately utilized a skip-tracing process of matching SSNs to published obituary records which cross-reference state death notices.

Deceased Registrants by Methodology	
SSDI	59,905
Obit & State	34,611
TOTAL	94,516

There are a variety of reliable methods to positively identify deceased individuals from voter rolls. The Foundation generally promotes an all-of-the-above approach. Since 2021, our secure database partners have briefed the Foundation about the increasingly noticeable limitations of death coverage from the SSDI. It is not a true master list. In sum, the earlier in life a person dies (relative to receiving Social Security benefits), the longer that passing may be reflected in the SSDI – sometimes measuring in years. Our combined method also helps lead to deaths occurring outside of California, and it guides further confirmation efforts with resources already available to your office.

The statewide sampling parameters which led to roughly 2 million “dormant” registrants were:

- Active registration status;
- Registered at least 10 years; and,
- No recorded votes over the most recent 10 years.

This sampling was also used in a separate study explained later in the letter.

Roughly two-thirds of the combined findings show deaths occurring within California. These locations are drawn upon a cross-referenced collection of credit bureau data and local death notices. These last location indicators only speak to *location*, not necessarily subsequent/duplicate voter registration status.

CA Registrant Deaths Elsewhere	
Arizona	3,747
Texas	3,472
Nevada	2,912
Oregon	2,169
Washington	2,139
Florida	1,448
Colorado	1,065
Georgia	927
Missouri	852
Oklahoma	839

The Foundation wishes to focus this area of conversation with you on tools which may be under-utilized or not yet adopted for California. Thankfully, these are increasingly available to sovereign actors¹, and the Foundation has direct experience in advising other states on options with proven track records.

Statewide Sample: 8% of Birthdates are Incorrect Among ‘Dormant’ Registrants

Using the same “dormant” sample of 2 million active registrants, the Foundation performed a Levenshtein distance analysis of birthdates to determine the percentage of registrants showing incorrect data in the voter roll. The effort revealed that roughly **8 percent of the sample contained at least one false digit** within date of birth fields. Overall, Fresno, San Joaquin, Riverside, Los Angeles, and Merced Counties, respectively, led the state in typographical errors within birthdate fields.

Voter roll dates were compared against Social Security and credit bureau records for the analysis. A simplified example of the scoring system is below.

Name	Voter Roll DOB	Actual DOB	Typo Count
John Doe	1/12/1980	1/13/1980	1
Jane Doe	3/12/1970	3/21/1970	2
John Public	1/1/1900	5/1/1985	3

Typographical errors in birthdate fields can *predict* list maintenance failures, especially if California requires perfect matching to Social Security Death Index or similar resources. Further, the solution to this problem rests with the same data resources utilized to perform the study and are also being tested by the U.S. Election Assistance Commission with promising results.²

¹ KERA; Tarrant County adopts new software to clean voter rolls, stay ahead of registration challenges (July 7, 2025), <https://www.keranews.org/government/2025-07-07/tarrant-county-elections-voter-rolls>

² EAC; Voter List Maintenance Study – The Use of Third-Party Commercial Data for Accurate Voter Lists (August 2025), https://www.eac.gov/sites/default/files/2025-08/Voter_List_Maintenance_Study_508.pdf

For the sake of contrast, the Foundation performed a secondary Levenshtein analysis with a broader sample of the California voter roll. We sampled 1,000 random active registrants (regardless of vote history or duration of registration) from each county. The study found that **five percent** of the statewide sample contained incorrect dates of birth.

Interstate Duplicate Registrants

The Foundation highlights **57,725** California registrants holding matched voter registration files in second states as of August 2025. The study only compared California's roll to Florida, Maine, Michigan, Minnesota, North Carolina, New Jersey, New York, Ohio, Oregon, Pennsylvania, and Washington.

Interstate Duplicate Counts	
CA-Washington	15,064
CA-Florida	13,534
CA-Oregon	8,956
CA-New York	5,191
CA-North Carolina	4,383
CA-Michigan	2,793
CA-Pennsylvania	2,427
CA-Ohio	2,099
CA-New Jersey	1,636
CA-Minnesota	1,230
CA-Maine	412

The Foundation's relational database was designed to house voter registration rolls from every state to run comparative analytics. Like the Electronic Registration Information Center (ERIC) system, the Foundation can detect apparent interstate duplicate registrations using several methodologies but only focuses on one in California today. The method utilizes the secondary or mailing address data kept by California to follow the local registrant to that second state address to check if there is a matching registration. This process is then reversed by checking other states' mailing address data, which lead to addresses in California. A registrant is flagged if names and birthdates perfectly match.

Same-Address Duplicate Registrants

The Foundation highlights **3,104 instances of duplicated registrants** where variations in name spelling or nicknames have generated duplications at same residential addresses. Within the finding, we see that 81 percent of these duplicate sets are Active-Active. The Foundation studies same-address duplicates using the following common patterns of duplication, assuming perfectly matched DOBs:

- Perfect matches potentially due to missing Social Security data (John Doe vs. John Doe);
- Hyphenated/married name confusion (Jane Doe vs. Jane Doe-Surname);
- Typographical errors in last name fields (John Smith vs. John Smiht); and,
- Typographical errors in first name fields (John Smith vs. Jon Smith).

The California finding demonstrates a common duplication scenario where a person initially registers with a Hispanic-style first name which later changes to an Anglicized one (e.g. Eduardo vs. Edward, Jorge vs. George, Pablo vs. Paul, etc.). Another troubling pattern is the apparent ease in which single keystrokes can spawn a duplicate (e.g. O'Connor vs. O Conner, Don Juan vs. DonJuan, Minh-Tam vs. MinhTam, etc.).

The 3,104 figure is not the problem. Rather, it's how those 3,104 duplicates demonstrate proven text combinations to confuse the California voter registration system and its processes into recording duplicate records – which must be serviced with automatic mail ballots.³ The Foundation believes that interventions can be discussed to adjust the underlying software for the voter registration database to better prevent these entries from being created.

Placeholder/Fictitious Dates of Birth

Lastly, the Foundation's latest count shows at least **7,677 registrants** in California are flagged for having placeholder or fictitious dates of birth in the public record, with Los Angeles County representing 26 percent of the total. Forty-eight (48) of the 58 counties' voter rolls contain these fictional dates.

As you know, holding fictitious dates of birth risks complicating future voter registration list maintenance efforts when you cannot match these dates to resources like the Social Security Death Index (SSDI) and others. And, while it is understandable that some longstanding registration files dating back decades may naturally miss certain critical information, the Foundation is pleased to report on an effective solution to backfill these data.

The placeholder dates generally follow a few formats, such as 1/1/1900, 1850-01-01, and a collection of specific months and dates with years showing 1900 or sometime in the 1800s. They are not hard to find and, with the right tools, are easy to resolve.

While reviewing placeholder records, the Foundation took a random sample of 10 active registrants – some of which were credited for voting in the November 2024 Presidential Election – and backfilled the missing birthdates with full Social Security number validation to ensure quality control. Unfortunately, the backfill process of the limited random sample revealed additional list maintenance problems. Half were already deceased, with dates ranging as far back as 2008.

Placeholder/fictitious dates risk obscuring additional maintenance needs, and the sample gives two clear examples. First, one deceased registrant with a voter roll birthdate of "1850-01-01" with an actual birthdate of September 15, 1922, also showed a misspelled first name in their voting record. This combination of bad data likely confused existing deceased removal protocols when they passed in 2011, according to State of California death records. In a separate example, one of the backfilled birthdates belongs to a living person, who was revealed to hold two registrations in Los Angeles and Dallas, Texas. If California were to correct errors such as these, perhaps your state's voter data may be more helpful with interstate list maintenance cooperatives like ERIC.

The Foundation would be pleased to advise California further on its methodology and experiences using credit bureau and other federal resources to complete or correct these records.

Request for Meeting

³ California Elections Code § 3000.5.

PILF representatives would like to discuss these findings further at a mutually convenient time in your offices. Please contact me to arrange for the secure transmission of the findings and discuss scheduling. Thank you for your attention to these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Logan Churchwell", with a stylized, cursive script.

Logan Churchwell
Research Director, Public Interest Legal Foundation

CC: The Hon. Harmeet K. Dhillon
U.S. Assistant Attorney General for the Civil Rights Division
U.S. Department of Justice
4 Constitution Square, Room 8.923
150 M Street, NE
Washington, D.C. 20530
voting.section@usdoj.gov