



Secretary of State
State of California
Election Complaint Form

For Help America Vote Act (HAVA) complaints or other election-related complaints.

Important: Please Type or Print the information on this form.

Complainant Information

First Name: Logan

Last Name: Churchwell

Street Address: 107 S West St Ste 700

Apt #:

City: Alexandria

State: VA

Zip Code: 22314

Daytime Phone: (703) 745-5870

Evening:

Fax Number:

Email: lchurchwell@publicinterestlegal.org

Preferred method of correspondence: EMAIL

Person(s) or Organization(s) Against Whom Complaint Is Brought

Name(s): Logan Churchwell

Organization(s): Los Angeles County ROV

Position(s) of person(s) (if applicable):

Statement of Facts

Date(s) and time(s) alleged event(s) occurred: See attachment

Location(s) of alleged event(s): See attachment

Names and phone numbers of witnesses or other victims (if applicable): N/A

Describe Your Complaint (If necessary, attach additional sheets.)

See attachment

Signature I acknowledge that all of the above information is true and accurately reflects the matter in question, to the best of my knowledge.

Signature

Date 10/29/26

If your complaint alleges a violation of Title III of HAVA, a notary public must complete the following certificate of acknowledgement.

Certificate of Acknowledgment
For HAVA Title III complaints

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of

On

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before me,

(date)

(insert name and title of the officer)

personally appeared

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.


(NOTARY PUBLIC SIGNATURE)



NOTARY PUBLIC SEAL

Return this form to: SECRETARY OF STATE'S OFFICE
ELECTIONS DIVISION
1500 11TH STREET, 5TH FLOOR, SACRAMENTO, CA 95814
For more information or assistance filling out this form:
English: 1-800-345-VOTE (8683)
Spanish: 1-800-232-VOTA (8682)
www.sos.ca.gov

COMPLAINT PURSUANT TO THE HELP AMERICA VOTE ACT

The Public Interest Legal Foundation (“Foundation”) files this complaint with the California Secretary of State (“Secretary”), alleging that a violation of Title III of the Help America Vote Act of 2002 (“HAVA”) has occurred, is occurring, and will continue to occur absent relief. Specifically, the Secretary has not complied with the requirement to eliminate duplicate names from the official list of eligible voters. *See* 52 U.S.C. § 21083(a)(2)(B).

HAVA Requires Elimination of Duplicated Registration Records

1. HAVA requires states receiving HAVA grant money to implement “a single, uniform, official, centralized, interactive computerized statewide voter registration list defined, maintained, and administered at the State level that contains the name and registration information of every legally registered voter in the State and assigns a unique identifier to each legally registered voter in the State.” 52 U.S.C. § 21083(a)(1)(A). This serves as “the single system for storing and managing the official list of registered voters throughout the State.” 52 U.S.C. § 21083(a)(1)(A)(i). It also serves as the “official voter registration list for the conduct of all elections for Federal office in the State.” 52 U.S.C. § 21083(a)(1)(A)(viii).

2. Under HAVA, states must ensure that: “(i) the name of each registered voter appears in the computerized list; (ii) only voters who are not registered or who are not eligible to vote are removed from the computerized list; and (iii) duplicate names are *eliminated* from the computerized list.” 52 U.S.C. § 21083(a)(2)(B) (emphasis added).

3. HAVA requires the State to create a state-based administrative complaint procedure to ensure compliance. 52 U.S.C. § 21112(a)(1).

4. As a grant recipient, the Secretary must ensure “voter registration records in the State are accurate and are updated regularly,” 52 U.S.C. § 21083(a)(4), and “make[] a reasonable

effort to remove registrants who are ineligible to vote from the official list of eligible voters,” 52 U.S.C. §§ 21083(a)(4)(A); 21084 (emphasizing that the requirements are a minimum, states may establish stricter election technology and administration requirements).

5. Article 7 of the California Code of Regulations (“the Code”) require the Secretary to provide “a uniform, nondiscriminatory procedure for resolving any complaint alleging a violation of any provision of Title III of the Help America Vote Act of 2002.” 2 Cal. Code Regs. § 20107 (2026).

6. Complaints are sent to the Elections Division or delivered in person to any office of the Secretary within 60 days after the occurrence of the violation, or within 90 days of the Complainant becoming aware of the violation. *Id.*

7. The Code allows Complainants to use form prescribed by the Secretary, or any other writing “containing the information solicited by the prescribed form.” *Id.*

8. The Secretary reviews the record and determines whether Title III was violated. *Id.* The Secretary must explain in a written decision the reason for her determination and selected remedy. *Id.*

9. The Secretary applies the preponderance of evidence standard when determining whether Title III was violated. *Id.*

Deceased Registrants Have Not Been Eliminated in Los Angeles County, Despite Prior Notice

10. The Foundation’s Research Director identified a sample of 9,766 deceased registrants in ACTIVE status. This sample finding is derived from the October 14, 2026, PVRDR voter file, furnished by the California Secretary of State.

11. In September 2025, the Foundation alerted the California Secretary of State’s office to voter registration data errors across the state, including 94,516 deceased registrants from

a sample study. *See* 2025 California Voter Roll Study, Pub. Interest Legal Found. (Sept. 19, 2025), <https://publicinterestlegal.org/research/2025-california-voter-roll-study/>. The Secretary's office took digital delivery of the data shortly thereafter. The sample population for the deceased study focused on ACTIVE registered voters who, for the last decade of their registration period, had not cast a single ballot. At the time of the 2025 finding, Los Angeles County showed 14,834 deceased registrants. *See* Exhibit 1 attached.

Duplicated Records Have Not Been Eliminated in Los Angeles County

12. Despite HAVA's requirements, Los Angeles County has failed to eliminate duplicate voter registration records.

13. By analyzing the PVRDR export received from the Secretary on October 14, 2026, the Foundation identified 1,279 apparent duplicated voter registration record sets on Los Angeles County's official voter registration list. *See* Exhibit 1 attached.

14. The Foundation's Research Director identified these duplicated records by implementing the following six different queries: (1) identification of all records that share the exact same address information, and also have the exact same last name, first name, and date of birth; (2) identification of all records that share the exact same address information and also have the exact same first name and date of birth and have the last name of one record fully incorporated into the last name of the other record; (3) identification of all records that share the exact same address information and also have the exact same first name and date of birth and have the last name of one record be 2 characters or fewer different than the last name of the other record; (4) all records that share the exact same address information and also have the exact same last name and date of birth and have the first name of one record be 2 characters or fewer different than the first name of the other record; (5) all records that share the exact same address

information, date of birth, and last names but have common nickname, diminutive, phonetic, or punctuation conflicts in name fields (e.g., William versus Bill, Jacqueline versus Jackie, Bedingfield versus Bedingfiled, O'Donnell versus Odonnell, respectively); and, (6) all records that share matching names and address fields, yet contain apparent typographical errors in birthdate fields demonstrating year-shift errors (e.g. 1991 versus 1992) or date transpositions (e.g. 1/12/2000 versus 1/21/2000).

15. California has not eliminated duplicate voter registration records as HAVA requires. 52 U.S.C. § 21083(a)(2)(B)(iii).

Supplemental Findings During Duplicates Study

16. The Foundation's Research Director encountered instances of potential duplicate sets based on full name and address matches but could not be completed because at least one registration contained what appeared to be placeholder or fictitious dates of birth, often styled as "1/1/1900" and "1850-01-01." Out of an abundance of caution, those potential duplicate sets are not provided in the HAVA complaint duplicate count. Instead, a listing of all 1,340 registrants bearing what appear to be placeholders or fictitious dates of birth in their record supplement the exhibit.

17. Another supplemental finding is provided apart from the HAVA complaint, regarding suspiciously old dates of birth. The Foundation's Research Director isolated 704 ACTIVE Los Angeles County registrants who, if their dates of birth are accurate, are at least 110 years of age.

18. Finally, the Foundation raises evidence of PO Box addresses being spoofed to appear as apartment addresses. The Research Director identified 54 United States Postal Service

locations across Los Angeles County which are claimed as residential addresses, with box numbers formatted to appear as apartment units.

19. Absent relief, Los Angeles County's November 3, 2026, General Election will be conducted using an inaccurate voter registration list.

20. This complaint is filed against the California Secretary of State pursuant to HAVA and California's HAVA complaint procedure.

21. The Foundation requests a hearing.

Prayer for Relief

22. The Foundation respectfully requests an order:

- A. Declaring that Los Angeles County is violating Title III of HAVA by not merging duplicate names from the official list of eligible voters;
- B. Ordering the Secretary to review the data submitted with this Complaint and take all corrective action consistent with HAVA as is necessary to merge duplicate names from the official list of eligible voters;
- C. Ordering the Secretary to develop and implement a remedial plan to bring Los Angeles County into compliance with HAVA now and in the future, including, but not limited to, a procedure for verifying correct registration data when a registrant with duplicated registration records appears to vote in person.
- D. Granting the Foundation all further relief deemed just and proper.

October 29, 2026

Respectfully Submitted,

/s/ Jewel Lightfoot
Jewel Lightfoot

PUBLIC INTEREST LEGAL FOUNDATION
107 S. West Street, Suite 700
Alexandria, VA 22314
Tel: (703) 745 5870
jlightfoot@publicinterestlegal.org