



OPEN DOORS:

Unauthorized Entry of Non-Citizens onto New York's Voter Rolls

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Executive Summary

Project CIVICA's review of county voter-registration records has identified significant numbers of records carrying indicators of non-citizenship and raises serious questions about New York's voter-registration, agency-transmission, list-maintenance, and statewide database processes.

Key Findings

- Across **14 counties** (approximately 10% of the state's population), Project CIVICA identified approximately **10,680 records carrying non-citizen indicators**.
- Of these, **88 unique records contain voting history, some as recently as 2024 and 2025**, spread across 12 of the 14 counties.
- The records fall into two primary categories:
 - **Type 1** – County-determined non-citizenship: Approximately **463 records** contain a county status/reason code indicating the individual was determined to be a non-citizen. **34 of these records show voting history**.
 - **Type 2** – Negative citizenship response ("N"): Approximately **10,248 records** contain an "N" in the citizenship field. **57 of these records show voting history**.
 - Some records are **dual-flagged**, carrying both Type 1 and Type 2 indicators.
- The overwhelming majority of the flagged records are now purged, although some remain Active or Inactive.
- In some Type 1 records the "Voter Is Citizen" field still shows "Y." This may reflect that the original answer provided on the registration form was retained and not overwritten when the Board of Elections later determined the person was not a citizen.
- Detailed summary counts are provided in Appendix A.

Dominant Source of the Records

- In the most complete source field examined, **96% of the records originated from DMVI**.
- Across every available source field, **DMV/DMVI transactions dominate** (see Appendix B).
- This is the most significant system finding: thousands of applications that answered "N" (not a citizen) were still transmitted from the DMV into the election system.
- This risk is heightened by the interaction of two separate policies: New York's Green Light Law, which issues standard driver's licenses without requiring proof of citizenship or lawful presence, and the DMV's transmission of voter-registration applications based largely on self-attestation. The Green Light Law itself does not require or authorize the transmission of voter registration applications from non-citizens.

Legal and Process Failures

- Under New York Election Law and regulations (including 9 NYCRR § 6217.5 and Part 6223), an application that answers “N” is incomplete. It should not be transmitted by the DMV or any designated agency, should not receive an SBOEID, and should not become a voter record.
- Despite these clear rules, the data show that large numbers of “N” applications were transmitted, accepted, processed, and in some cases assigned statewide identifiers and allowed to vote.
- When counties later cancelled registrations for non-citizenship, NYSVoter most often recorded the reason as “**Duplicate**” (or other codes like “Death” or “Moved”).
- New York’s regulations contain **no standardized non-citizen reason code** for NYSVoter. (see Appendix D)

Broader Implications

- These patterns raise substantial compliance questions under the Help America Vote Act (HAVA), the National Voter Registration Act (NVRA), and New York Election Law and regulations.
- The problems appear at multiple stages of the registration pipeline: agency transmission, county acceptance and processing, statewide database coding, and preservation of the audit trail.
- The 14 counties represent only a fraction of the state (approximately 10% of the state’s population) . Many other counties do not release the fields necessary for comparable analysis. **The true statewide scale is almost certainly larger.**

Central Questions

- How did thousands of applications that answered “N” (not a citizen) get transmitted by the DMV into the voter registration system?
- How did some of those records receive statewide identifiers and voting history, some as recently as 2024 and 2025?
- Why does NYSVoter systematically record non-citizen cancellations mostly as “Duplicate”? Why isn’t there a non-citizen cancellation code at the state level?
- Can the State produce a complete audit trail for these records?

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1. Introduction

U.S. citizenship is a fundamental requirement for voting under both federal and New York law. Despite this clear legal standard, Project CIVICA's examination of county voter rolls has identified approximately 10,680 records across 14 New York counties that carry indicators of non-citizenship. Of these, 88 unique records show that the individual voted.

These records fall into two primary categories: those in which a County Board of Elections applied a non-citizen reason code (Type 1), and those in which the original registration application answered "N" to the citizenship question (Type 2). A smaller number of records carry both indicators and are referred to in this report as dual-flagged records.

A central finding of this analysis is that the large majority of these records originated through Department of Motor Vehicle (DMV) DMVI or DMV transactions. Under New York law and regulations, applications that answer "N" to the citizenship question are incomplete and should not be transmitted by the Department of Motor Vehicles or other designated agencies. The data show that this safeguard has failed in practice.

This report documents the scope of the problem, examines how these records entered the voter registration system, analyzes coding and data-integrity failures in NYSVoter, and identifies significant compliance concerns under the Help America Vote Act, the National Voter Registration Act, and New York Election Law. The 14 counties examined represent only about 10% of the state's population, indicating that the true statewide scale of the issue is likely substantially larger.

2. Legal Requirement of U.S. Citizenship

U.S. citizenship is required to vote in all federal, state, and local elections in New York. Non-citizens, including permanent residents (green-card holders), visa holders, and undocumented immigrants, are prohibited from voting.

- **Federal law:** 18 U.S.C. § 611 (enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996) makes it a crime for any non-citizen to vote in an election for federal office (President, Vice President, U.S. Senate, or U.S. House of Representatives). Penalties include fines, imprisonment, and immigration consequences, including deportation. Limited exceptions exist for individuals who can prove they reasonably believed they were citizens.
- **New York law:** Article II, § 1 of the State Constitution provides that "Every citizen shall be entitled to vote at every election for all officers elected by the people..." Election Law § 5-102(1) explicitly states that no person is qualified to register or vote at any election unless they are a citizen of the United States. In *Fossella v. Adams* (March 2025), the New York Court of Appeals held that the citizenship clause restricts the franchise to U.S. citizens only and invalidated New York City Local Law 11, which had sought to allow certain long-term non-citizens to vote in municipal elections.

Applicants must attest to citizenship under penalty of perjury. False statements can result in criminal penalties as well as immigration consequences. New York relies entirely on this

attestation, the “honor system.” There is no routine requirement for documentary proof of citizenship, and New York has no Memorandum of Agreement with the federal SAVE system for citizenship verification.

3. Voter Registration Process in New York

To register, a person must meet all of the following requirements:

- Be a United States citizen
- Be at least 18 years old by Election Day (pre-registration is allowed at age 16 or 17)
- Be a resident of New York State and of the county, city, or village for at least 30 days before the election
- Not be currently imprisoned for a felony conviction
- Not have been adjudged mentally incompetent by a court
- Not claim the right to vote in any other place

Registration methods include online through the New York State Board of Elections portal, in person at a County Board of Elections or at designated NVRA agencies (primarily the Department of Motor Vehicles), and by mail.

The registration form requires the applicant to answer a citizenship question (typically a yes/no checkbox) and sign an affirmation under penalty of perjury. (Election Law § 5-210)

The form itself states that if the applicant checks “No,” they should not complete the form. Figure 1 shows the New York State Voter Registration forms citizenship question, while Figure 2 highlights the affirmation signed under penalty of perjury.

New York State Voter Registration Form

The image shows a portion of the New York State Voter Registration Form. It is divided into three main sections: "Register to vote", "Verifying your identity", and "Send or deliver this form".

Register to vote: This section explains that the form is used to register to vote in elections in New York State. It lists three bullet points: "change the name or address on your voter registration", "become a member of a political party", and "change your party membership". It also states "pre-register to vote if you are 16 or 17 years of age".

Verifying your identity: This section explains that the form will be used to check the applicant's identity before Election Day. It lists three methods: "DMV number (driver's license number or non-driver ID number)", "last four digits of your Social Security number", and "a valid photo ID, current utility bill, bank statement, paycheck, government check or some other government document that shows your name and address". It also states that if the applicant does not have a DMV number, they must provide the last four digits of their Social Security number. If they have neither, they may provide a valid photo ID, current utility bill, bank statement, paycheck, government check or some other government document that shows their name and address. They must include a copy of one of those types of ID with this form—be sure to tape the sides of the form closed. If they are unable to verify their identity before Election Day, they will be asked for ID when they vote for the first time.

Send or deliver this form: This section explains that the form should be filled out and sent to the county's address on the back of this form, or taken to the office of the County Board of Elections. It states that the form must be received no later than 10 days before the election. The county will notify the applicant that they are registered to vote.

Questions? This section provides contact information for the County Board of Elections, including a phone number (1-800-FOR-VOTE) and a website (www.elections.ny.gov).

To register you must: This section lists four requirements: "be a US citizen", "be 18 years old (you may pre-register at 16 or 17 but cannot vote until you are 18)", "not be in prison for a felony conviction", and "not claim the right to vote elsewhere; not found to be incompetent by a court".

Qualifications: This section contains two questions: "1 Are you a citizen of the U.S.?" and "2 A) Will you be 18 years of age or older on or before Election Day? B) Are you at least 16 years of age and understand that you must be 18 years of age on or before Election Day to vote, and that until you will be eighteen years of age at the time of such election your registration will be marked 'pending' and you will be unable to cast a ballot in any election?". Both questions have "Yes" and "No" checkboxes.

It is a crime to procure a false registration or to furnish false information to the Board of Elections. This statement is printed in blue ink.

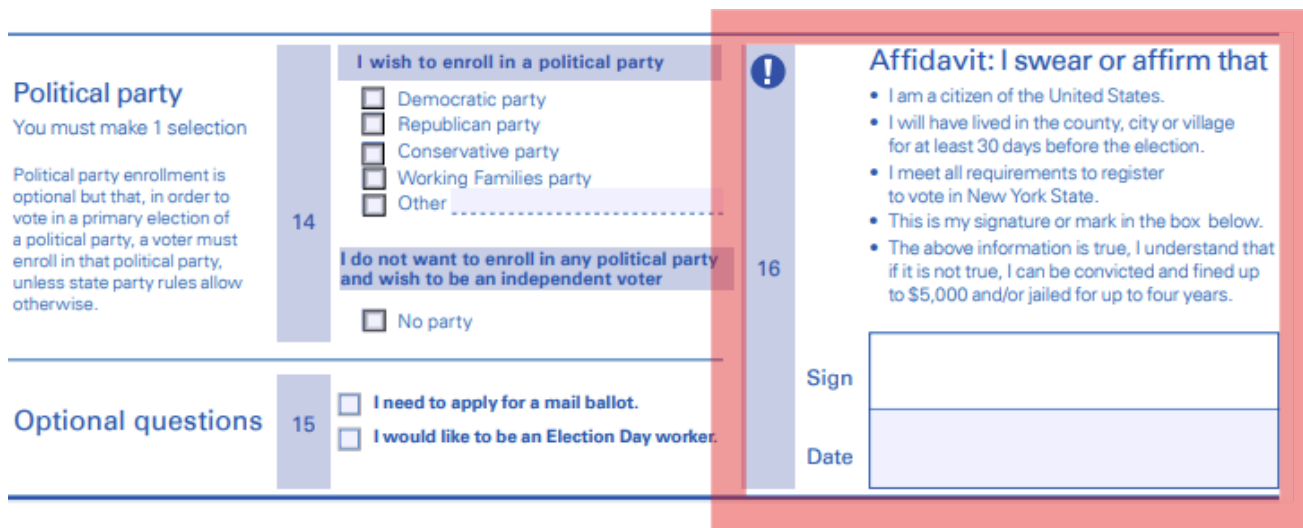
Please print in blue or black ink. This instruction is printed in blue ink.

For board use only This section is for the County Board of Elections to use.

Figure 1: New York State Voter Registration Form registration requirements and citizenship question.

Critical distinction between identity verification and citizenship verification:

- Identity verification occurs after submission. County Boards attempt to match the applicant's information against DMV or Social Security Administration records (the HAVA process known as Help America Vote Verification, or HAVV). HAVV responses address only whether the submitted identifying information matches SSA records (match/no-match, alive/deceased, multiple matches, etc.) and contain no citizenship information.
- Citizenship is established solely by the applicant's sworn attestation. (Figure 2) New York has no routine post-application process that independently verifies citizenship.



The image shows a portion of the New York State Voter Registration Form, specifically the 'Sworn Affidavit' section. It is divided into three main areas: 'Political party', 'Optional questions', and 'Affidavit: I swear or affirm that'. The 'Political party' section (labeled 14) asks the user to select a party from a list: Democratic party, Republican party, Conservative party, Working Families party, and Other. The 'Optional questions' section (labeled 15) has two checkboxes: 'I need to apply for a mail ballot.' and 'I would like to be an Election Day worker.'. The 'Affidavit' section (labeled 16) contains a list of statements the user must affirm, such as being a U.S. citizen and having lived in the county for at least 30 days. Below the affidavit is a 'Sign' line and a 'Date' line. The entire form is highlighted with a red border.

Political party
You must make 1 selection

Political party enrollment is optional but that, in order to vote in a primary election of a political party, a voter must enroll in that political party, unless state party rules allow otherwise.

I wish to enroll in a political party

- ☐ Democratic party
- ☐ Republican party
- ☐ Conservative party
- ☐ Working Families party
- ☐ Other

I do not want to enroll in any political party and wish to be an independent voter

- ☐ No party

Optional questions

- ☐ I need to apply for a mail ballot.
- ☐ I would like to be an Election Day worker.

Affidavit: I swear or affirm that

- I am a citizen of the United States.
- I will have lived in the county, city or village for at least 30 days before the election.
- I meet all requirements to register to vote in New York State.
- This is my signature or mark in the box below.
- The above information is true, I understand that if it is not true, I can be convicted and fined up to \$5,000 and/or jailed for up to four years.

Sign

Date

Figure 2: New York State Voter Registration Form Sworn Affidavit.

How the process is supposed to work under federal and state law when the answer is “No”:

Under the National Voter Registration Act (NVRA) and New York Election Law, the citizenship question is intended to function as a gatekeeper. The form must contain the citizenship question and the explicit instruction not to complete the form if the answer is “No.” At DMV and other designated agencies, if an applicant indicates they are not a U.S. citizen, the voter-registration portion of the transaction should not proceed, and no application data should be transmitted to election officials as a completed registration. An application that answers “No” (or leaves the citizenship question unanswered) is incomplete and should be rejected by the County Board of Elections. No registration record should be created in the state registration system, and no SBOEID should be assigned. The incomplete record can be maintained by the county system. (9 NYCRR § 6217.5(a)(1)(2))

Applications processed as part of a normal DMV license or ID transaction are generally treated as identity-verified because documents are required at the front end. Other agency-based registrations undergo the standard identity-matching process. New York does not require photo identification when voting. Identity at the polls or for mail ballots is confirmed by signature comparison against the registration record (Election Law §§ 8-304,

8-302, 8-303 and related regulations). Mail ballots undergo bipartisan signature review, with mismatches eligible for cure within seven days.

4. Statewide and County Voter Registration Systems (NYSVoter)

HAVA requires every state to maintain a single, uniform, official, centralized, interactive computerized statewide voter registration list that assigns each registered voter a unique identifier and is regularly maintained for accuracy.

New York's system is NYSVoter:

- The State Board of Elections maintains the overall infrastructure and compiles the official statewide list.
- County Boards of Elections have sole authority under Election Law § 5-614 and 9 NYCRR Part 6217 to add, change, cancel, or remove individual voter records.
- Counties maintain their own voter registration systems, which synchronize electronically with NYSVoter (required at least every 24 hours; many operate near real-time).
- NYSVoter assigns a unique statewide identifier (SBOEID) that is intended to remain with the voter for life. Counties also assign their own unique identifier (county ID).
- NYSVoter returns electronic confirmation of each transaction and is required to maintain a complete transaction history for every record (what changed, the reason, date and time stamp, and the identity of the county operator/system that made the update).

5. Project CIVICA Research Methodology

Project CIVICA conducts a longitudinal study of New York voter-roll compliance with federal and state law. The team obtains monthly snapshots of the statewide NYSVoter database.

Separately, beginning in Spring 2026, the team began systematically collecting county-level voter rolls through Freedom of Information Law (FOIL) requests. The project is requesting rolls from every county in the state. When non-citizen indicators were identified in the 2026 county files, the team also reviewed earlier county rolls that had been obtained in 2024.

When calculating the number of unique records with voting history (88), dual-flagged records (those carrying both Type 1 and Type 2 indicators) were counted only once.

Comparisons of how those same records appear in NYSVoter (particularly purge reason codes) were performed by matching the county records against the independent monthly NYSVoter snapshots.

Where available, the team also examined registration-source fields; different counties provided different source fields, so three separate source variables were analyzed.

Data availability limitations:

- Some counties did not provide a “Voter Is Citizen” (or equivalent) column.
- Some counties either do not maintain a distinct non-citizen purge reason code or redact it from the data they release.
- As a result, the approximately 10,680 flagged records come only from the 14 counties that released usable indicators. The true number of potentially affected records statewide may be higher.

The underlying county voter roll files used in this analysis were obtained through Freedom of Information Law (FOIL) requests. Individual-level records are not published in this report in order to protect personal privacy. Qualified researchers, journalists, or government officials may contact Project CIVICA to request access to the anonymized datasets or the original FOIL responses, subject to applicable legal restrictions.

6. Findings – Two Types of Records Flagged in Connection with Non-Citizenship

Across the 14 counties that released usable non-citizen indicators, approximately 10,680 records were identified. 88 unique records show voting history (see Appendix A for detailed breakdowns).

Overall status of the flagged records:

- Purged: 10,518
- Inactive: 90
- Active: 72

Type 1 – County determination of non-citizenship

These are records in which the County Board of Elections determined the registrant was not a U.S. citizen and cancelled the registration, using a local reason code such as “NOTCITIZEN,” “N-CITIZEN,” “NONCIT,” or similar. (See Figure 3). Status is typically set to Purged (P), or occasionally Inactive (I). From the Voter Status Reason column (the primary source of Type 1 records), 463 records were identified. Of these, 34 show voting history.

When these Type 1 records were compared against NYSVoter, the statewide system, NYSVoter most often listed the purge reason as “Duplicate.” A smaller number were coded with other reasons such as “Death” or “Moved.”

P	Q	R	S	T	U	V	W	X
Original Reg Source	Party	Voter Status	Voter Status Reason	Voter Is Citizen	Voter Status Date	Last Voted Date	Voting Method	SBOEID
	IND	P	MOVED	N	7/8/2008 0:00	11/11/2000 0:00	IN PERSON	NY000000000020
	NOP	P	NOTCITIZEN					
AGENCIES	NOP	P	NOTCITIZEN					
AGENCIES		P	NOTCITIZEN					
AGENCIES	DEM	P	NOTCITIZEN					
AGENCIES	IND	P	NOTCITIZEN					
AGENCIES	DEM	P	NOTCITIZEN					
DUNKIRK-MV	REP	P	NOTCITIZEN					
DUNKIRK-MV	NOP	P	NOTCITIZEN					
SCHOOL	NOP	P	NOTCITIZEN					
SCHOOL	DEM	P	NOTCITIZEN					
AGENCIES	NOP	P	NOTCITIZEN					
AGENCIES	NOP	P	NOTCITIZEN					
AGENCIES	NOP	P	NOTCITIZEN					
AGENCIES	NOP	P	NOTCITIZEN					
AGENCIES	NOP	P	NOTCITIZEN					
AGENCIES	NOP	P	NOTCITIZEN					
AGENCIES	NOP	P	NOTCITIZEN					
	NOP	P	NOTCITIZEN					
	REP	P	NOTCITIZEN					
	REP	P	INCOMPLETE	N				
	BLK	P	DECEASED	N		11/03/2015	IN PERSON	NY000000000053
		P	INCOMPLETE	N				

Figure 3: Cross section of a county voter roll showing Type 1 non-citizenship indicators, see the Voter Status column (R), Voter Status Reason column (S), Original Registration Source column (P)

Type 2 – Application answered “N”

These records contain a county-level field (commonly labeled “Voter Is Citizen”) with the value “N.” This column apparently records the applicant’s answer to the citizenship question. (see Figure 4) Under New York regulations (9 NYCRR § 6217.5), a complete/registered record requires a mark affirming the applicant is a citizen of the United States. Applications marked “N” should be rejected and should never become active registrations or receive an SBOEID.

From the Citizen Status column, 10,248 records were identified. Of these, 57 show voting history.

A substantial majority of the Type 2 records (and some Type 1 records) originated from DMV/DMVI or other agency transactions. This is a central finding: applications on which the registrant indicated they were not a citizen were nevertheless transmitted to County Boards of Elections and entered into the voter registration system. This pattern parallels the 2023–2024 New Jersey Motor Vehicle Commission software error in which applicants who answered “No” to the citizenship question were still transmitted for registration. (See columns P, T V, W)

P	Q	R	S	T	U	V	W	X
Original Reg Source	Party	Voter Status	Voter Status Reason	Voter Is Citizen	Voter Status Date	Last Voted Date	Voting Method	SBOEID
DMVI	REP	P	MOVED	N	5/23/2023 0:00			NY0000000000062
DMVI		P	DUPLICATE	N	9/25/2020 0:00			
DMVI	NOP	P	DUPLICATE	N	9/28/2020 0:00			
DMVI		P	DECEASED	N	7/16/2021 0:00			
DMVI		P	DUPLICATE	N	10/2/2020 0:00			
DMV	NOP	P	DUPLICATE	N	12/3/2020 0:00			NY0000000000060
DMVI	NOP	P	DECEASED	N	11/2/2020 0:00			
DMVI		P	DUPLICATE	N	11/3/2020 0:00			
DMVI		P	DUPLICATE	N	11/3/2020 0:00			
DMVI		P	DUPLICATE	N	11/3/2020 0:00			
DMVI		P	DUPLICATE	N	12/3/2020 0:00			
DMVI	REP	P	MOVED	N	1/4/2023 0:00	11/8/2022 0:00	EARLY IN PERSON	NY0000000000062
DMVI		P	DUPLICATE	N	10/18/2020 0:00			
DMVI	NOP	P	DUPLICATE	N	2/8/2024 0:00			NY0000000000062
DMVI	NOP	P	DUPLICATE	N	10/27/2020 0:00			
DMVI		P	DECEASED	N	11/26/2021 0:00			
DMVI	NOP	P	DUPLICATE	N	2/6/2024 0:00			NY0000000000062
DMVI		P	DECEASED	N	11/27/2021 0:00			
DMVI	NOP	A		N	11/17/2022 0:00	11/5/2024 0:00	IN PERSON	NY0000000000054
DMVI	NOP	P	DUPLICATE	N	8/31/2021 0:00			NY0000000000060
DMVI	NOP	P	DUPLICATE	N	4/19/2021 0:00			
DMVI	REP	P	DUPLICATE	N	10/2/2023 0:00	11/8/2022 0:00	AFFIDAVIT	NY0000000000057
DMVI	DEM	A	WEBCORRECT	N	3/6/2023 0:00	3/18/2025 0:00	IN PERSON	NY0000000000022
DMVI	NOP	P	DECEASED	N	4/23/2021 0:00			
DMVI	REP	I	MAIL CHECK	N	5/8/2024 0:00			NY0000000000062
DMVI		P	DECEASED	N	5/2/2022 0:00			
MAIL	NOP	P	DUPLICATE	N	10/13/2023 0:00			NY0000000000062
DMVI	NOP	P	DECEASED	N	5/21/2021 0:00			NY0000000000062
DMVI	LBT	A	REREG	N	10/5/2022 0:00			NY0000000000062
DMVI	NOP	P	DUPLICATE	N	6/21/2021 0:00			
DMVI	NOP	P	DUPLICATE	N	6/24/2021 0:00			
DMVI	NOP	A		N	11/17/2022 0:00	11/5/2024 0:00	IN PERSON	NY0000000000062
DMVI	REP	A	ACTIVE	N	9/12/2022 0:00	11/5/2024 0:00	IN PERSON	NY0000000000023
DMVI	NOP	P	DECEASED	N	12/27/2022 0:00			NY0000000000062
DMVI	NOP	P	DUPLICATE	N	7/6/2021 0:00			
DMVI	NOP	P	DUPLICATE	N	2/8/2024 0:00			NY0000000000062
DMVI	CON	P	MOVED	N	9/10/2024 0:00	11/8/2022 0:00	ABSENTEE	NY0000000000056
DMVI	REP	A	REREG	N	9/20/2022 0:00			NY0000000000062
DMVI	NOP	P	DECEASED	N	10/24/2022 0:00			NY0000000000062

Figure 4: Cross section of a county voter roll showing Type 2 non-citizenship indicators, see Voter Is Citizen column (T), Original Registration Source column (P). Note the Last Voted Date column (V); Voting Method column (W), State Board of Elections Identification (SBOEID) number column (X).

Dual-Flagged Records

Several of the 14 counties contain records that carry both Type 1 and Type 2 indicators (see Figure 5, columns S and T). These dual-flagged records appear when a county later determined the registrant was not a citizen (Type 1) even though the original registration form had answered “N” in the citizenship field (Type 2), or vice versa.

In some Type 1 records the “Voter Is Citizen” field still shows “Y.” We believe this occurs because the original answer provided by the registrant on the registration form is retained and is not overwritten when the Board of Elections later determines the person is not a citizen and cancels the registration (or conversely is a citizen or becomes a citizen). Note also the Last Voted Date and Voting Method columns (V and W) in Figures 4 and 5, as well as the SBOEID numbers in column X.

N	O	P	Q	R	S	T	U	V	W	X
Voter Registration Source Code	Last Saved Reg Source	Original Reg Source	Party	Voter Status	Voter Status Reason	Voter Is Citizen	Voter Status Date	Last Voted Date	Voting Method	SBOEID
BOE			NOP	P	NOTCITIZEN	Y	09/02/2003			
BOE			NOP	P	NOTCITIZEN	Y	02/07/2001			
BOE			NOP	P	NOTCITIZEN	Y	08/21/2001			
BOE			NOP	P	NOTCITIZEN	Y	02/01/2002			
BOE			DEM	P	NOTCITIZEN	Y	08/30/2005	09/10/2002	IN PERSON	
BOE			REP	P	NOTCITIZEN	Y	01/30/2004			
BOE			IND	P	NOTCITIZEN	Y	10/12/2005			
BOE			NOP	P	NOTCITIZEN	N	10/14/2005			
BOE			NOP	P	NOTCITIZEN	Y	06/27/2007			NY000000000023
BOE			IND	P	NOTCITIZEN	Y	09/29/2006			
BOE			DEM	P	NOTCITIZEN	Y	01/26/2009	11/07/2006	IN PERSON	
BOE			NOP	P	NOTCITIZEN	Y	04/14/2010			NY000000000053
BOE			NOP	P	NOTCITIZEN	Y	08/06/2012			NY000000000053
BOE			IND	P	NOTCITIZEN	N	06/24/2011			NY000000000051
BOE			NOP	P	NOTCITIZEN	Y	12/02/2010			
NEWCITIZEN			NOP	P	NOTCITIZEN	Y	10/21/2016			NY000000000052
BOE			CON	P	NOTCITIZEN	Y	12/14/2011			NY000000000052
BOE			DEM	P	NOTCITIZEN	N	02/14/2023	11/04/2014	IN PERSON	NY000000000052
BOE			NOP	P	NOTCITIZEN	Y	02/16/2012			NY000000000052
BOE			NOP	P	NOTCITIZEN	Y	05/14/2012			NY000000000052
BOE			WOR	P	NOTCITIZEN	Y	08/31/2012			NY000000000053
BOE			NOP	P	NOTCITIZEN	N	01/22/2014			NY000000000054
BOE			NOP	P	NOTCITIZEN	Y	04/04/2014			
BOE			NOP	P	NOTCITIZEN	Y	04/09/2015			NY000000000054
NEWCITIZEN			DEM	P	NOTCITIZEN	Y	10/24/2017	11/07/2017	IN PERSON	NY000000000054
BOE			DEM	P	NOTCITIZEN	Y	08/15/2017			NY000000000055
CANCEL			DEM	P	NOTCITIZEN	Y	08/02/2018	11/08/2016	IN PERSON	NY000000000055
BOE			NOP	P	NOTCITIZEN	Y	03/23/2018			NY000000000055
CALL			DEM	P	NOTCITIZEN	Y	09/16/2019			NY000000000057
BOE			OTH	P	NOTCITIZEN	N	08/08/2023			NY000000000063
BOE			NOP	P	NOTCITIZEN	Y	06/02/2021			
BOE			DEM	P	NOTCITIZEN	Y	02/14/2022			NY000000000061
BOE			REP	P	NOTCITIZEN	Y	08/16/2022			NY000000000061
BOE			REP	P	NOTCITIZEN	Y	02/10/2005	11/07/2000	ABSENTEE	
BOE			CON	P	NOTCITIZEN	Y	02/12/2019	09/25/2001	IN PERSON	NY000000000023
BOE			DEM	P	NOTCITIZEN	Y	10/05/2009	11/04/2008	IN PERSON	NY000000000023

Figure 5: Cross section of a county voter roll showing Dual-Flagged records in columns (S) and (T).

7. Registration Source of the Flagged Records

A central finding of this analysis is the origin of the records that carry non-citizen indicators. Different counties provided different registration-source fields, so Project CIVICA examined all three available fields across the dataset.

The registration source fields in the county voter rolls use abbreviated codes to indicate how or where the registration originated. The most common codes appearing in the data are:

- DMVI – Department of Motor Vehicles – Internet / online transaction
- DMV – Department of Motor Vehicles – in-person or non-internet transaction
- BOE – Board of Elections
- CBOE – County Board of Elections
- Agency / Agencies – Other designated NVRA agencies
- Mail – Mail-in voter registration application
- SchoolReg – School-based registration
- AM / Central – Administrative or central processing codes (exact meaning can vary by county system)

These codes appear across the three source fields examined in this analysis: Voter Registration Source Code, Original Registration Source, and Last Saved Registration Source. Full counts and percentages for each source field are provided in Appendix B.

In the most complete field (“Voter Registration Source Code,” covering approximately 9,600 records), 96% of the records were coded as originating from DMVI. Figure 6 shows the Voter Registration Source Code field (n = 9,616).

VOTER REGISTRATION SOURCE CODE
(n = 9,616)

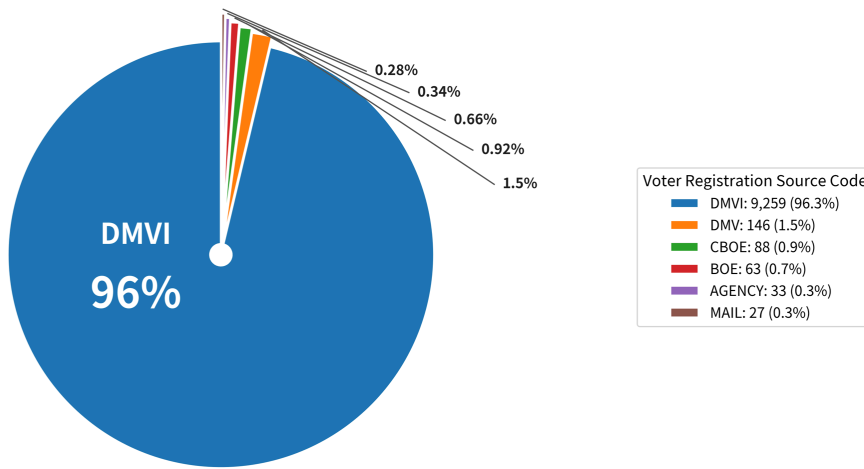


Figure 6: Voter Registration Source Code Field Distribution

In the “Original Registration Source” field (approximately 580 records), DMVI accounted for 76%. Figure 7 shows the distribution of the Original Registration Source field (n = 580).

ORIGINAL REGISTRATION SOURCE
(n = 580)

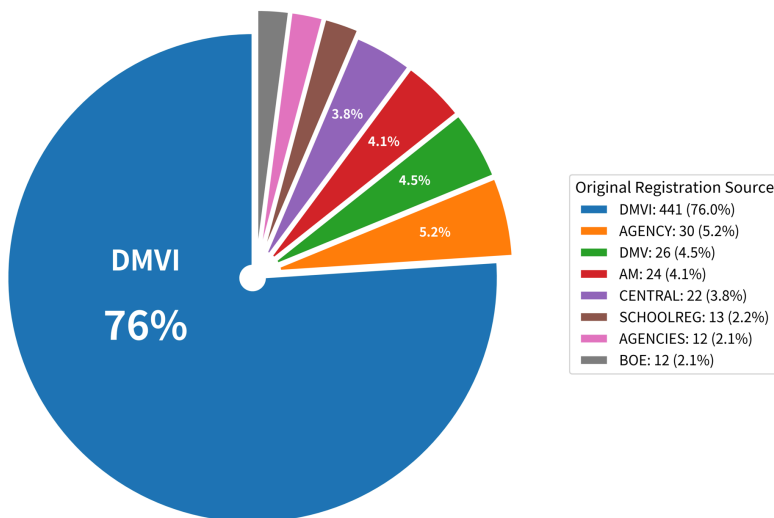


Figure 7: Original Registration Source Code Distribution

Figure 8 shows the Last Saved Registration Source field (n = 7,538). Even in this field, DMVI remained the largest single source at nearly 60%, with the County Board of Elections accounting for most of the remainder.

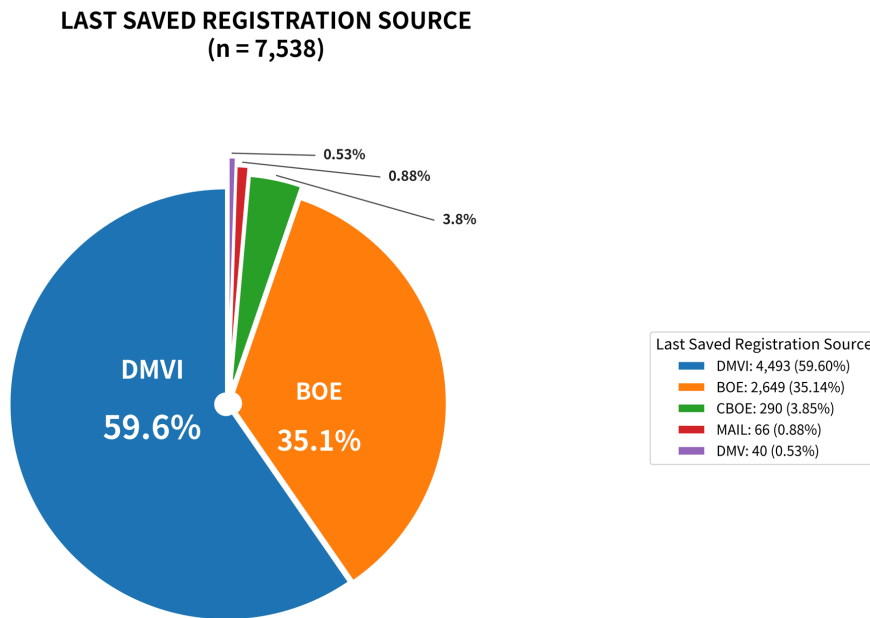


Figure 8: Last Saved Registration Source Code Distribution

Across every available source field, DMV/DMVI transactions dominate. The heavy concentration of records coded as DMVI is particularly significant. These are online / internet-based transactions. The dataset indicates that the electronic interface used for DMV online transactions has been transmitting applications that answered “N” to the citizenship question, contrary to the statutory and regulatory prohibition on forwarding incomplete applications.

All other sources combined, other agencies, mail, school registration, and in-person registration at a Board of Elections, account for only a small fraction of the flagged records.

This pattern is significant under both federal and state law. The National Voter Registration Act requires states to offer voter registration opportunities at motor-vehicle offices, but it does not require (or permit) the transmission of applications from individuals who are ineligible. New York Election Law § 5-900 and the implementing regulations (9 NYCRR Part 6223) go further: designated agencies, including the Department of Motor Vehicles, shall not transmit voter registration information for any person who indicates on the integrated application that they do not meet the eligibility requirements, including U.S. citizenship.

The official combined DMV/designated agency forms reinforce this rule. They contain a prominent warning that non-citizens must not complete the form and provide a clear opt-out

box stating: “I decline use of this form for voter registration and pre-registration purposes. Do not forward my information to the Board of Elections.” (New York Election Law § 5-900(10))

Despite these explicit statutory, regulatory, and form-based safeguards, the dataset shows that the large majority of applications that answered “N” to the citizenship question were still transmitted electronically from the DMV to County Boards of Elections and entered into the voter registration system. This indicates a breakdown at the front-end transmission stage rather than solely at the county level.

New York’s Green Light Law allows individuals to obtain a standard driver’s license or learner permit regardless of citizenship or immigration status, without requiring a Social Security number or proof of lawful presence. Separately, the state operates an agency-based voter-registration system through the Department of Motor Vehicles that relies almost entirely on the applicant’s self-attestation of citizenship. The Green Light Law itself does not require or authorize the transmission of voter-registration applications from non-citizens. Under Election Law § 5-900 and 9 NYCRR Part 6223, designated agencies are prohibited from transmitting applications when the applicant indicates they do not meet the eligibility requirements, including U.S. citizenship.

The dataset shows that this safeguard has failed in practice: the large majority of applications that answered “N” to the citizenship question were still transmitted from the DMV into the voter-registration system. Some of those records received statewide identifiers and appear to have voted. The combination of a licensing pathway that does not verify citizenship with the electronic transmission of incomplete voter applications has allowed ineligible records to reach County Boards of Elections, enter the voter rolls, and in some cases produce voting history.

The dominance of DMVI as the source of these records is therefore not merely a descriptive statistic. It points to a systemic failure in the agency-based registration process that the existing legal framework was designed to prevent.

8. Required Process When Non-Citizenship Is Identified

Figure 9 shows a county which marked some of the records as incomplete in the voter status reason columns (S) when the citizenship answer was “N”. New York state details the process as follows.

- 9 NYCRR § 6217.5(a)(1) lists the information required for a complete/registered record. One of the mandatory elements is:
“(iv) a mark in the checkbox affirming the applicant is a citizen of the United States”
- Subsection (a)(2) then states:
“Incomplete. A voter registration application is incomplete if it does not contain the required information in paragraph (a)(1) of this section; and incomplete voter records are not uploaded to the NYSVoter database, but may be maintained within the county election management system.”
- An application marked “N” should be rejected outright; no registration record should be created in NYSVoter and no SBOEID should be assigned.

M	N	Q	R	S	T	V
Registration Date	Voter Registration Source Code	Party	Voter Status	Voter Status Reason	Voter Is Citizen	Last Voted Date
08/31/2020	DMVI		P	INCOMPLETE	N	
08/31/2020	DMVI		P	INCOMPLETE	N	
09/01/2020	DMVI		P	INCOMPLETE	N	
09/02/2020	DMVI		P	INCOMPLETE	N	
09/04/2020	DMVI		P	INCOMPLETE	N	
08/20/2020	DMVI		P	INCOMPLETE	N	
08/20/2020	DMVI		P	INCOMPLETE	N	
08/31/2020	DMVI		P	INCOMPLETE	N	
09/01/2020	CBOE	REP	I	SIGNATURE	N	
09/01/2020	DMVI		P	INCOMPLETE	N	
09/02/2020	DMVI		P	INCOMPLETE	N	
09/02/2020	DMVI		P	INCOMPLETE	N	
08/17/2020	CBOE		P	DUPLICATE	N	
08/20/2020	DMVI		P	INCOMPLETE	N	
09/03/2020	CBOE	BLK	I	SIGNATURE	N	
09/03/2020	DMVI		P	INCOMPLETE	N	
09/03/2020	DMVI		P	INCOMPLETE	N	
09/03/2020	DMVI		P	INCOMPLETE	N	
09/04/2020	DMVI		P	INCOMPLETE	N	
09/04/2020	DMVI		P	INCOMPLETE	N	
09/04/2020	DMVI		P	INCOMPLETE	N	
08/28/2020	DMVI		P	INCOMPLETE	N	
08/24/2020	DMVI		P	INCOMPLETE	N	
08/19/2020	DMVI		P	INCOMPLETE	N	
08/17/2020	DMVI		P	INCOMPLETE	N	
08/17/2020	DMVI		P	INCOMPLETE	N	
08/18/2020	DMVI		P	INCOMPLETE	N	
08/18/2020	DMVI		P	INCOMPLETE	N	
08/18/2020	CBOE	BLK	A		N	
08/19/2020	DMVI		P	INCOMPLETE	N	
08/23/2020	DMVI		P	INCOMPLETE	N	
08/24/2020	DMVI		P	INCOMPLETE	N	
08/25/2020	DMVI		P	INCOMPLETE	N	
08/28/2020	DMVI		P	INCOMPLETE	N	
08/28/2020	DMVI		P	INCOMPLETE	N	
08/25/2020	DMVI		P	INCOMPLETE	N	
08/26/2020	DMVI		P		N	
08/26/2020	DMVI		P	INCOMPLETE	N	
08/27/2020	DMVI		P	INCOMPLETE	N	
08/28/2020	DMVI		P	INCOMPLETE	N	

Figure 9: Cross section of a county voter roll showing incomplete status in the Voter Status reason column (S) in response to Voter is Citizen Column (T) answered “N”.

- If a person is already registered and the county later has reason to believe the person is not a citizen, Election Law § 5-402 generally requires written notice by first-class forwardable mail and a 14-day opportunity to respond before cancellation (with limited exceptions for death, personal written request, or completion of the statutory inactive-status waiting period).

9. Observed Data-Integrity and Coding Problems

Several recurring problems appear in the data:

- **Inaccurate reason codes:** Non-citizen determinations by counties are frequently recorded in NYSVoter (and sometimes at the county level) as “Duplicate” or other codes such as “Death” or “Moved.” These codes do not accurately reflect a citizenship-based cancellation and obscure the true basis for removal.
- **Regulatory gap on reason codes:** 9 NYCRR § 6217.9 lists the standard purged reason codes used by NYSVoter (see Appendix D). “Non-citizen” is not among the standardized codes. When counties use a local non-citizen code, NYSVoter most often maps it to “Duplicate,” systematically obscuring the actual reason for removal.

- **Missing or never-assigned SBOEIDs:** Some records exist without the unique statewide identifier required by HAVA and New York regulations. Two different conclusions are possible, depending on the record type:
 - For Type 2 records (applications that answered “N”), the absence of an SBOEID may reflect correct handling. Under 9 NYCRR § 6217.5, an application that does not contain a mark affirming U.S. citizenship is incomplete and is not to be uploaded to NYSVoter. Incomplete records may be retained only in the county election management system; no statewide identifier should be assigned.
 - For other records, a missing SBOEID (or an SBOEID that was later removed or blanked as a duplicate) may indicate an incomplete or altered audit trail, which raises separate questions about compliance with HAVA’s unique-identifier requirement and the legal obligation to maintain a recoverable transaction history.
- **Split sources of error:** Some inaccurate coding originates with the County Board of Elections. Other inaccuracies arise when NYSVoter maps local non-citizen codes into its limited standardized list (see Appendix D).
- **Inconsistent field availability:** The inability of some counties to provide (or their decision not to release) a citizenship indicator or non-citizen reason code means the analysis is incomplete and the full scope of the issue remains unknown.

These problems undermine the accuracy and auditability of the official statewide list. NYSVoter is required to maintain a complete transaction history for each record. Missing or later-removed SBOEIDs and re-coded reasons make it difficult to reconstruct a reliable audit trail of how and why these records entered and left the rolls.

10. Legal Implications

These patterns raise compliance questions under multiple frameworks:

- **HAVA (52 U.S.C. § 21083)** requires a single, accurate statewide list that assigns each voter a unique identifier and ensures that only ineligible voters are removed. Mislabeling non-citizen cancellations and missing SBOEIDs conflict with these mandates. HAVA does not impose a detailed statutory transaction-history requirement, but the Election Assistance Commission recommends systems be capable of recording who made each change.
- **NVRA (52 U.S.C. § 20507)** requires states to make a reasonable effort to remove the names of ineligible voters (including those who were improperly registered in the first instance) and to conduct list maintenance that is uniform and nondiscriminatory. It also requires states to maintain for at least two years, and make available for public inspection, all records concerning programs and activities conducted to ensure the accuracy and currency of the official lists of eligible voters. Inaccurate reason coding reduces transparency.

The dominance of DMVI/DMV as the source of applications that answered “N” raises additional compliance questions under the NVRA’s agency-registration provisions and under New York Election Law § 5-900 and 9 NYCRR Part 6223. These provisions prohibit designated agencies, including the Department of Motor Vehicles, from

transmitting voter registration information for any person who indicates they do not meet the eligibility requirements, including U.S. citizenship.

- **New York Election Law and regulations** assign counties sole authority over changes, require appropriate reason codes, mandate notice before most cancellations (§ 5-402), and require preservation of transaction history. Accepting applications marked “N” (which under 9 NYCRR § 6217.5 are incomplete and should never be uploaded to NYSVoter or receive an SBOEID), entering incorrect reason codes, and the improper creation or handling of records that answered “N” deviate from these rules.
- **Voting Rights Act:** List-maintenance practices must be nondiscriminatory. Pure accuracy or coding defects do not by themselves establish a VRA violation.

11. Outstanding Issues and Process Gaps

The findings raise several unresolved process and compliance questions that require further examination.

A primary concern is how applications that explicitly answered “N” to the citizenship question ever entered the registration system at all, especially given that a large majority of these records originated from DMVI/DMV transactions, despite clear statutory and regulatory prohibitions on transmitting such applications. Under both the National Voter Registration Act and New York Election Law and regulations, such applications should have been rejected as incomplete and should never have received an SBOEID or appeared as purged records.

Equally significant is the systematic mismatch in reason coding. When counties determine that a registrant is not a U.S. citizen and cancel the registration under a local non-citizen code, NYSVoter most often records the cancellation as “Duplicate,” and occasionally with other codes such as “Death” or “Moved.” These standardized codes do not accurately describe a citizenship-based ineligibility determination and obscure the true basis for removal.

Additional questions concern the handling of unique statewide identifiers. Some records appear without an SBOEID at all. While the absence of an SBOEID on Type 2 records may reflect correct non-transmission into NYSVoter under 9 NYCRR § 6217.5, the existence of other records without the required unique identifier, or with identifiers that appear to have been later removed or blanked, raises questions about whether a complete and recoverable transaction history is being maintained as required.

It is also unclear whether the mandatory 14-day written notice required by Election Law § 5-402 is consistently provided before citizenship-based cancellations. The relative contribution of county-level data-entry practices versus NYSVoter’s mapping and display rules to the observed inaccuracies remains to be determined. Finally, the decision by some counties to omit the citizenship-indicator field or to redact non-citizen reason codes in FOIL responses limits transparency and makes a full statewide assessment more difficult.

Together, these gaps undermine the accuracy, transparency, and auditability of the official statewide voter registration list.

12. Records with Voting History

Across the 14 counties that released usable non-citizen indicators, a total of 88 records show that the individual voted at least once - 34 from Type 1 records and 57 from Type 2 records (see Table A2 in Appendix A). The combined total is less than 34 + 57 because some records appear in both categories.

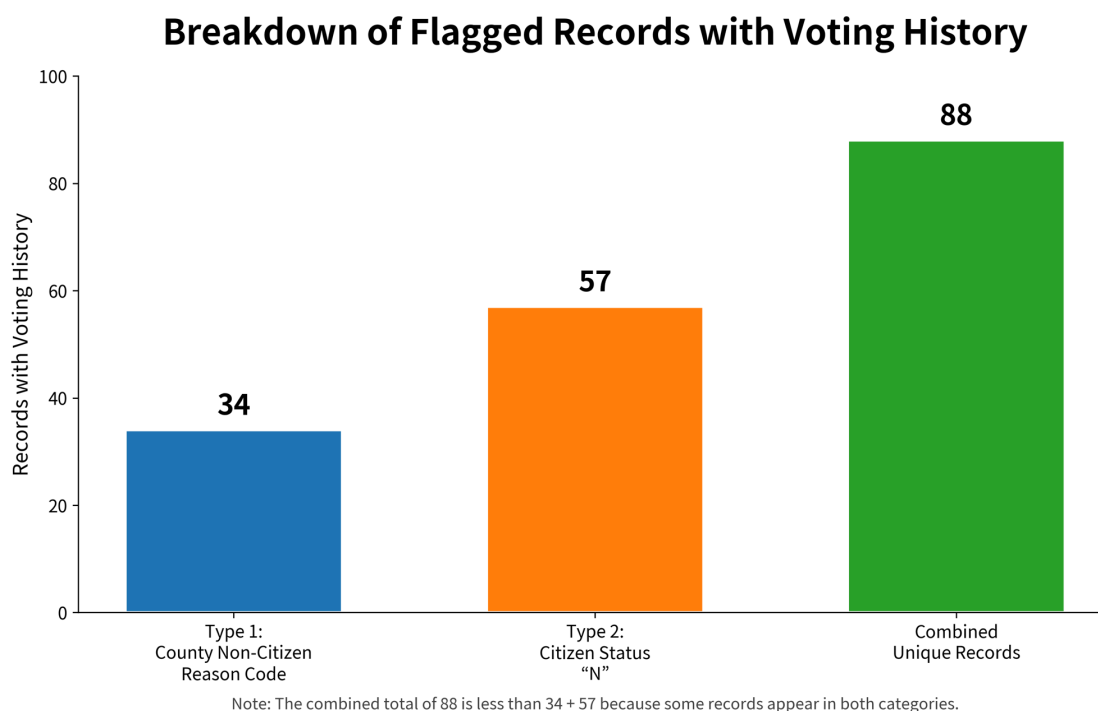


Figure 10. Breakdown of Flagged Records with Voting History

These 88 records are spread across 12 of the 14 counties.

The most recent election dates appearing in these records range from the late 1990s through 2025–2026. A number of the votes occurred in the 2022, 2024, and even 2025 election cycles.

Of the 88 records with voting history:

- The large majority are currently listed as Purged.
- A smaller number remain Active or Inactive.

This demonstrates that some individuals whose records carry non-citizen indicators were able to cast ballots before (or in a few cases after) the county applied a non-citizen or incomplete status.

13. Statewide Scope and Extrapolation

New York State has 62 counties.

Project CIVICA has so far identified non-citizen indicators in 14 counties (approximately 23% of all counties). Twelve of those 14 counties contain records of individuals who voted.

These 14 counties represent only about 10% of New York State's total population (roughly 2.0–2.1 million residents out of a statewide population of approximately 20 million). They are predominantly mid-sized and smaller jurisdictions and do not include New York City or the state's largest suburban counties.

In these 14 counties the team found approximately 10,680 records carrying non-citizen indicators (roughly 463 from the Voter Status Reason column and 10,248 from the Citizen Status "N" column, with limited overlap). Of these, 88 show voting history.

Because many of the remaining 48 counties do not release a "Voter Is Citizen" field or a non-citizen reason code, the true statewide total is almost certainly higher than the numbers observed so far.

Cautious extrapolation

A simple county-count proportion (14/62) produces an estimate of roughly 45,000–50,000 flagged records statewide.

A simple population-based proportion (using the 10% population share) produces a higher estimate on the order of 100,000–110,000.

Because the 14 counties under-represent the most populous areas of the state, and because many remaining counties have not released the relevant data fields, both figures should be treated with caution.

A realistic working range at this stage is:

- **Lower-bound estimate:** 40,000 – 60,000 records statewide
- **Mid-range estimate:** 70,000 – 110,000 records statewide
- **Upper-bound possibility:** 120,000+ if rates in the largest counties prove comparable to or higher than those observed in the 14 counties studied.

These estimates remain provisional and will be refined as additional counties release citizenship-indicator and reason-code data.

14. Conclusion

The findings in this report document serious and systemic failures in New York's voter-registration system.

Across just 14 counties, representing only about 10% of the state's population, approximately 10,680 records carry non-citizen indicators. Eighty-eight of those records show that the individual voted. The large majority of these records originated through DMVI or DMV transactions.

Under New York law, an application that answers "N" to the citizenship question is incomplete. It is not supposed to be transmitted by the Department of Motor Vehicles or any other designated agency. It is not supposed to receive an SBOEID. It is not supposed to become a voter record. Yet thousands of such applications were transmitted, accepted, and processed. Some were assigned statewide identifiers. Some were allowed to vote as recently as 2024 and 2025. The problem is compounded by New York's Green Light Law, which allows individuals to obtain driver's licenses without proof of citizenship. While the law itself does not authorize the transmission of voter applications from non-citizens, the combination of that licensing pathway with the DMV's electronic transmission practices created a route in which self-attestation became the primary (and, in practice, insufficient) safeguard against ineligible registrations.

When counties later cancelled registrations because the person was not a citizen, NYSVoter most often recorded the reason as "Duplicate," or other codes such as "Death," or "Moved." New York's regulations contain no standardized non-citizen reason code. As a result, the official statewide database systematically misstates the basis for removal and obscures the true nature of the problem.

These are not isolated data anomalies or clerical mistakes. They reflect breakdowns at multiple points in the registration pipeline: agency transmission of ineligible applications, county acceptance and processing of those applications, flawed coding in the statewide database, and the absence of a reliable audit trail.

HAVA requires an accurate statewide list with unique identifiers. The NVRA requires states to maintain accurate voter rolls and to preserve records of their list-maintenance activities. New York Election Law and regulations prohibit the registration of non-citizens and establish procedures intended to keep ineligible applications out of the system. The patterns documented in this report raise substantial questions about compliance with all of these requirements.

The problem is not confined to a handful of counties. The 14 counties examined so far represent only a fraction of the state. Many other counties do not release the fields necessary to conduct the same analysis. The true statewide scale of the problem is almost certainly larger.

What the dataset shows is a voter-registration system that, in practice, has allowed applications marked "not a citizen" to enter the rolls, receive identifiers, and in some cases cast ballots, while the official statewide database fails to accurately record why those registrations were later cancelled. These are fundamental failures of eligibility screening, list accuracy, and auditability.

About Project CIVICA, Inc.

Project CIVICA is a New York-focused civic engagement and research nonprofit structured as a social welfare organization under Section 501(c)(4) of the Internal Revenue Code. Its work centers on public transparency, election administration integrity, and citizen oversight of government processes.

All Project CIVICA work is conducted by volunteers. The organization does not employ paid staff; its research, analysis, and civic education efforts are carried out by individuals contributing their time and expertise in support of informed public dialogue.

Project CIVICA conducts independent review of publicly available records, statutory frameworks, and administrative procedures. Its research emphasizes primary-source documentation, public records analysis, cross-jurisdictional comparison, and procedural review to inform policymakers, stakeholders, and the public.

This report is based on analysis of publicly obtainable information and documented processes. It is intended to support transparency and informed discussion and does not constitute legal advice or an official government determination.

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Appendix A: Summary Data Tables

Table A1. Overall Flagged Records

Category	Count
Total records with non-citizen indicators	10,680
Type 1 – County-applied non-citizen reason code	≈ 463
Type 2 – Citizen Status column = “N”	≈ 10,248
Unique records with voting history	88

Table A2. Breakdown of Flagged Records with Voting History

Source of Non-Citizen Flag	Records with Voting History
Type 1: Voter Status Reason Column (county-applied non-citizen code)	34
Type 2: Citizen Status Column (“N”)	57
Combined total (unique records)	88

Note: The combined total of 88 is less than 34 + 57 because some records appear in both categories.

Table A3. Status Distribution of Flagged Records

<u>Status</u>	<u>Count</u>	<u>Percentage</u>
Purged	10,518	99%
Inactive	90	1%
Active	72	1%
Total	10,680	100%

Appendix B: Registration Source Data

Table B1. Voter Registration Source Code (n = 9,616)

<u>Voter Registration Source Code</u>	<u>Count</u>	<u>Percentage</u>
DMVI	9,259	96.0%
DMV	146	1.5%
CBOE	88	0.9%
BOE	63	0.7%
Agency	33	0.3%
Mail	27	0.3%
Total	9,616	100%

**VOTER REGISTRATION SOURCE CODE
(n = 9,616)**

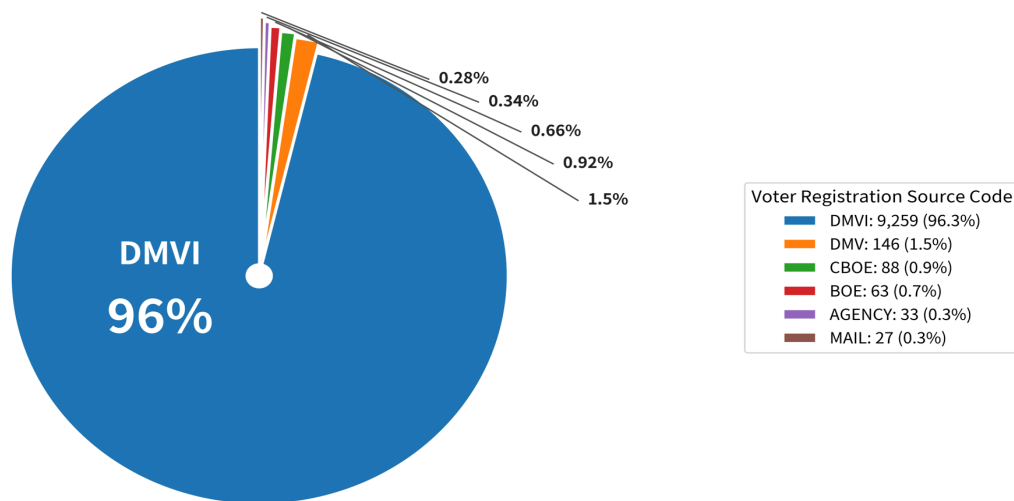


Table B2. Original Registration Source (n = 580)

<u>Original Registration Source</u>	<u>Count</u>	<u>Percentage</u>
DMVI	441	76.0%
Agency	30	5.2%
DMV	26	4.5%
AM	24	4.1%
Central	22	3.8%
SchoolReg	13	2.2%
Agencies	12	2.1%
BOE	12	2.1%

**ORIGINAL REGISTRATION SOURCE
(n = 580)**

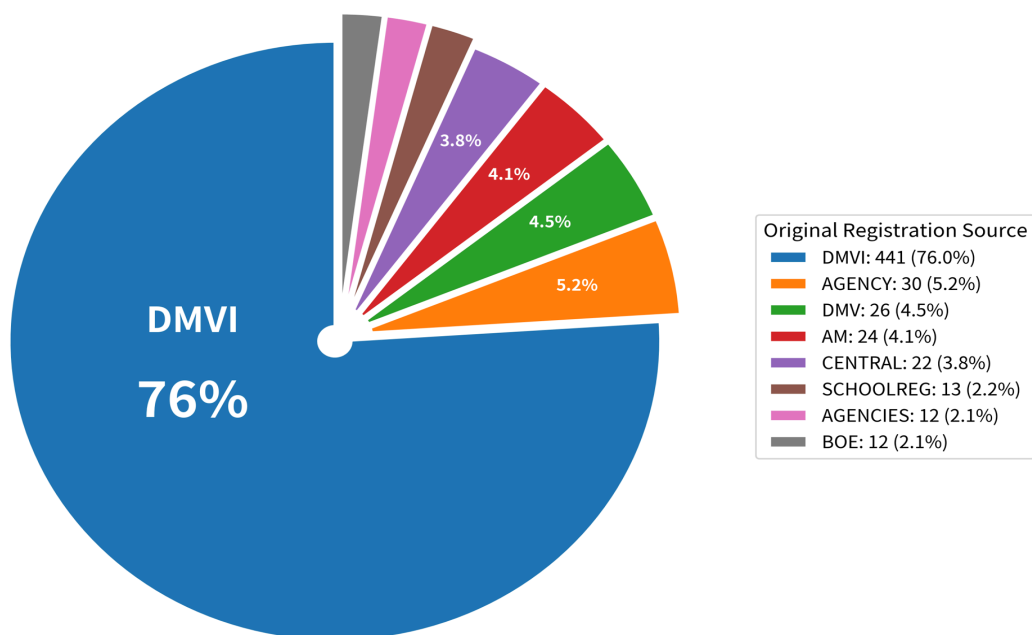
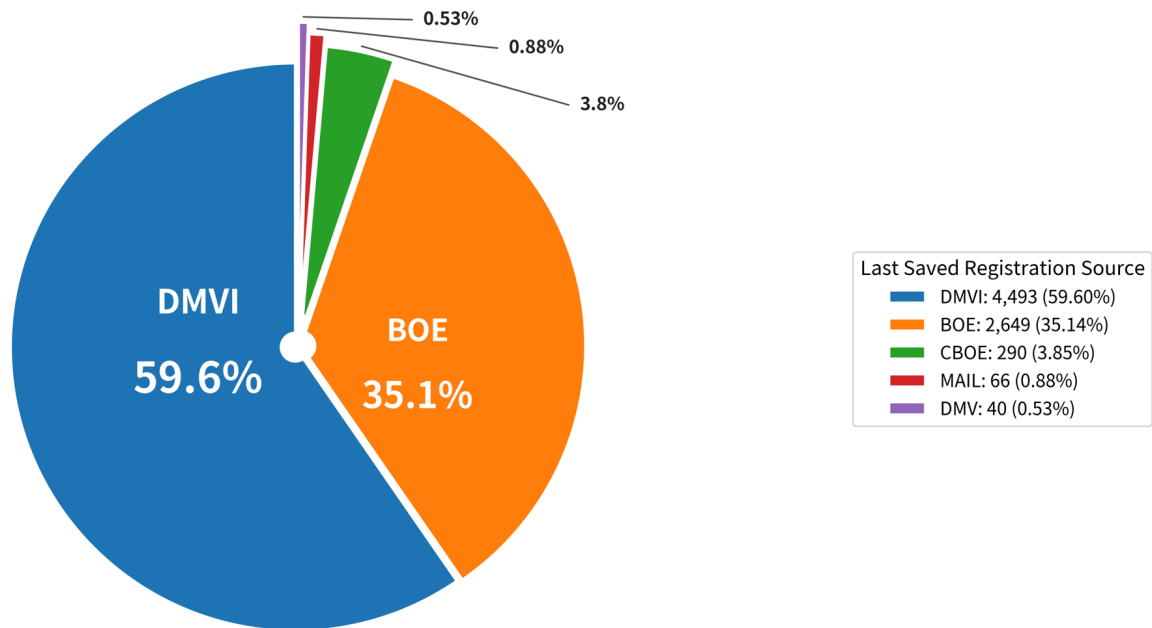


Table B3. Last Saved Registration Source (n = 7,538)

<u>Last Saved Registration Source</u>	<u>Count</u>	<u>Percentage</u>
DMVI	4,493	59.6%
BOE	2,649	35.1%
CBOE	290	3.9%
Mail	66	0.9%
DMV	40	0.5%
Total	7,538	100%

**LAST SAVED REGISTRATION SOURCE
(n = 7,538)**



Appendix C: Key Legal Provisions

1. Federal Citizenship Requirement

18 U.S.C. § 611 – It is a federal crime for any alien to vote in any election for federal office.
U.S. Constitution, Article I, Section 2 and the 14th, 15th, 19th, 24th, and 26th Amendments – Establish that the right to vote in federal elections is reserved to citizens of the United States.

2. New York State Constitution

Article II, § 1 – Qualifications of voters - “Every citizen shall be entitled to vote at every election for all officers elected by the people and upon all questions submitted to the vote of the people provided that such citizen is eighteen years of age or over and shall have been a resident of this state, and of the county, city, or village for thirty days next preceding an election.”

(The New York Court of Appeals has held that this provision restricts the right to vote to United States citizens.)

3. New York Citizenship Requirement

Election Law § 5-102 - No person shall be qualified to register for and vote at any election unless he is a citizen of the United States.

4. New York Citizenship Question on the Application

Election Law § 5-210(5)(k)(vi) - The application form shall include a space for the applicant to indicate whether or not they are a citizen of the United States and the statement:

“If you checked ‘no’ in response to this question, do not complete this form.”

5. New York Incomplete Applications

9 NYCRR § 6217.5 - An application that answers “No” (or leaves the citizenship question unanswered) is incomplete. Incomplete applications shall be rejected by the County Board of Elections. No registration record shall be created and no SBOEID shall be assigned.

6. New York Agency Transmission Prohibition

Election Law § 5-900 and 9 NYCRR Part 6223 - Designated agencies, including the Department of Motor Vehicles, shall not transmit to the State Board of Elections any voter

registration information for a person who indicates on the integrated application that they do not meet the eligibility requirements, including U.S. citizenship.

The integrated application must include a clear opt-out statement:

“I DECLINE USE OF THIS FORM FOR VOTER REGISTRATION AND PRE-REGISTRATION PURPOSES. DO NOT FORWARD MY INFORMATION TO THE BOARD OF ELECTIONS.”

No application for voter registration shall be submitted if the applicant declines registration or fails to sign the integrated application.

7. New York Standardized Purge Reason Codes

9 NYCRR § 6217.9 - The standard purged reason codes used by NYSVoter are limited to: Death, Voter Request, Felon, Adjudicated Incompetent, NVRA, Moved, Duplicate, and a limited set of related codes. “Non-citizen” is not among the standardized codes.

8. New York Notice Before Cancellation

Election Law § 5-402 - Before cancelling a registration, the board of elections must mail a notice to the voter and provide a 14-day period to respond (with limited exceptions).

9. Federal Requirements

- **Help America Vote Act (HAVA), 52 U.S.C. § 21083** – Requires a single, accurate statewide voter registration list with unique identifiers.
- **National Voter Registration Act (NVRA), 52 U.S.C. § 20507** – Requires reasonable efforts to remove ineligible voters and to maintain records of list-maintenance activities for at least two years.

Appendix D: NYSVoter Statewide Voter Database Status Reason Codes (Field Position 43)

The official NYSVoter data dictionary lists the following standardized status reason codes for Field Position 43 (REASONCODE). Note that “Non-citizen” (or any equivalent code) is not included. As a result, when a county cancels a registration for non-citizenship using a local reason code, NYSVoter most often maps the cancellation to one of the existing codes — most commonly “DUPLICATE.”

Data File Layout for voter list exports from NYSVOTER Statewide voter database

Field Position	Max Field Size	Field Name	Field Type	Description
36	150	PREVNAME	CHARACTER	Last registered name (if different) Optional
37	50	COUNTYVRNUMBER	CHARACTER	County Voter Registration Number Assigned by County
38	8	REGDATE	CHARACTER	Application Date YYYYMMDD (date application was received or postmarked)
39	10	VRSOURCE	CHARACTER	Application Source AGCY = Agency CBOE = County Board of Elections DMV = Department of Motor Vehicle LOCALREG = Local Registrar MAIL = Mail-in through USPS SCHOOL = School
40	1	IDREQUIRED	CHARACTER	Identification Required Flag. • Y=Yes • N=No
41	1	IDMET	CHARACTER	Identification Verification Requirement Met Flag. Indicates verification requirements (SSN, Driver ID verified or other acceptable ID) • Y=Yes • N=No
42	10	STATUS	CHARACTER	Voter Status Codes. A = Active AM = Active Military AF = Active Special Federal AP = Active Special Presidential AU = Active UOCAVA I = Inactive P = Purged 17 = Prereg - includes 16 and 17 year- olds
43	15	REASONCODE	CHARACTER	Status Reason Codes ADJ-INCOMP = Adjudged Incompetent DEATH = Death DUPLICATE = Duplicate FELON = Felon MAIL-CHECK = Mail Check MOVED = Moved out of County NCOA = National Change of Address via US Postal Service NVRA = Cancellations per interstate notices RETURN-MAIL = Returned Mail VOTER-REQ = Voter Request Date Voter made "Inactive"