Red Flags in the Rolls:
New York Voter List Integrity & Compliance Findings (2024–2025)

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Prepared by

Project CIVICA Research Team

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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This report is dedicated to the memory of Dean Anthony, whose volunteer contributions to this research effort and commitment to civic engagement remain an enduring part of this work. Dean passed away in September, 2025.

EXECUTIVE SUMMARY

New York's voter-registration system is failing the public.

In New York, a state with 28 Electoral College votes and frequent competitive congressional districts, the integrity of the voter-registration system carries statewide and national weight. Yet Project Civica's review of monthly NYSVoter data (2023–2025), cross-jurisdictional matches, and forensic case studies reveals persistent structural vulnerabilities: low front-end verification, episodic and non-uniform list maintenance, untraceable voter-history changes, widespread stale/ineligible records, and deficient interstate coordination. These failures point to an apparent lack of compliance with NVRA §8 and HAVA §303, inflate registration totals, erode public trust, and risk dilution of lawful votes. This report documents the evidence and proposes targeted reforms to restore reliability and confidence.

Predominant Low-Verification Registration Channels

- Over 94.6% of registrations originate from low-verification channels (mail-in forms, agency registrations, local boards of elections, decentralized intake).

- Eligibility and citizenship are established primarily through self-attestation, without routine documentary proof or authoritative federal database verification.

- This structure increases systemic exposure to:

    - Data-entry errors and incomplete identity records

    - Identity ambiguity and weak duplicate detection

    - Absence of direct citizenship verification

- Post-registration verification only partially mitigates risks, especially where placeholder or inconsistent fields satisfy automated logic.

- Registration source serves as a critical proxy for evaluating administrative risk, data reliability, and compliance with NVRA's uniform and accurate list-maintenance mandate.

Clustered and Infrequent List Maintenance

- Monthly FOIL extracts (January 2023 – October 2025) show highly concentrated voter-removal activity, with major purge spikes immediately following November 2022 and November 2024 federal elections.

- Largest single-month purge exceeded 400,000 records in February 2025, coinciding with:

    - Expiration of NVRA's 90-day "quiet period"

    - Completion of the two-federal-election inactivity window

- Removal activity clusters heavily in January–February of odd-numbered years.

- Most counties show minimal or near-zero maintenance during the remainder of the NVRA cycle.

- This episodic approach raises compliance concerns under NVRA, which requires a general, uniform, and continuous program not post- federal election mass purges.

- Extended low-activity periods suggest delayed address verification, inconsistent duplicate remediation, and uneven county enforcement, undermining statewide uniformity and roll accuracy.

Apparent Evidence of Incomplete NVRA-Mandated Maintenance

- New York's statewide rolls contain exceptionally large volumes of stale and long-term inactive registrants, including:
  - Over 1.8 million registrants who have never voted since registration
  - More than 1.01 million registrants with no voting activity in the 6+ years since registration
    - of which 698,711 have no voting history since registration in 10+ years
  - Approximately 1.87 million registrants did not vote in the last two federal cycles (peaking at 1,874,101 in October 2025)
- These groups represent approximately 13–15% of the total statewide voter file (13–14 million active and inactive records).
- Large concentrations of long-term non-voters generate systemic risks, including:
  - Inflated registration totals
  - Distorted turnout metrics
  - Increased administrative costs
  - Erosion of public confidence
  - Elevated exposure to unlawful voting
  - Impairment of legally protected civil rights

Out-of-State Movers and Interstate Conflicts

- 520,835 registrants filed USPS NCOA notices indicating out-of-state relocation before the 2024 general election, yet remained Active or Inactive on NYSVoter.
- 23,298 of these voted in New York after the reported relocation.
- Cross-state comparisons identified substantial dual-registration concerns:
  - 81,000+ NY–NJ duplicates
  - 12,454 NY–Florida duplicates
  - At least 800 confirmed double votes in 2024 federal contests across the two state pairs requiring investigation
- NVRA permits NCOA-triggered maintenance but requires timely notice and structured follow-up. Large retained volumes indicate maintenance deficiencies in cross state duplicates and enforcement.

Duplicate, Missing, and Irregular Records

- Widespread data-quality failures undermine verification and compliance, including:
  - 125,210 unresolved in-state duplicates
  - 220 duplicate statewide voter IDs (SBOEIDs)

- 26,834 records lacking valid residential addresses
- 72,482 voters recorded as voting after purge dates
- 3,087 irregular or invalid birthdates impairing data quality

Voter-History Integrity Failures — Suffolk County Case Study

- 43 registrants confirmed deceased prior to November 2022 General Election appeared as having voted.
- In September 2024, their 2022 voting entries had disappeared from NYSVoter without audit logs, preservation records, or explanation.
- Serious concerns are raised under HAVA auditability requirements and federal/state record-retention laws (52 U.S.C. § 20701, NY Election Law § 3-222).

Placeholder Birthdate (January 1) Anomalies and Citizenship Risk Indicators

- Over 107,000 registrants list January 1 as DOB - a 55%+ statistical overrepresentation.
- Presidential-year spikes show persistent, active use of placeholder dates.
- January 1 is a standard USCIS placeholder for immigrants/refugees lacking documented birthdates.
- Combined with no routine citizenship verification, this weakens identity matching and raises substantial risk of non-citizen registrations.

Identity-Verification Weaknesses and Systemic Compliance Risks

- New York does not routinely verify citizenship using federal databases (e.g., DHS SAVE, USCIS).
- HAVA verification focuses only on name, DOB, SSN matching, not citizenship confirmation.
- Acceptance of placeholder DOBs allows questionable records to pass checks.
- When combined with high self-attestation reliance, large stale populations, inconsistent maintenance, and weak auditability, these gaps create systemic vulnerabilities not isolated errors.
- Deficiencies impair ability to demonstrate compliance with NVRA Accuracy/uniformity/auditability and HAVA database integrity mandates.

Statewide Voter Registration Trends by Party Affiliation in New York (2024–2025)

- New York's voter registration system experiences intense, predictable enrollment churn driven by the statutory February 14 party-change deadline under Election Law § 5-304,
- This deadline concentrates administrative workload, straining county–state synchronization, increasing risks of processing delays, record mismatches, and auditability gaps during the period of documented post- federal election mass purges. The long-term surge in Blank/No Party enrollment (now ~25–27% and the

second-largest bloc) reflects structural disengagement in the current democratic framework. One contributing factor may be mistrust in the election process.

Conclusion:

New York's voter-registration system is failing to deliver accurate, current, and lawfully maintained rolls. The cumulative effect is a significantly inflated voter file that is inconsistently updated and vulnerable to administrative error and unlawful activity. Locally, this directly dilutes the votes of legitimate citizens, skews participation metrics, creates administrative chaos, and erodes public trust in elections. With 28 Electoral College votes and multiple swing congressional districts, systemic inflation, unverified entries, and untraceable changes in New York's voter rolls can distort statewide results, influence presidential outcomes, tip control of the U.S. House, and undermine confidence in federal elections. At its core, dilution of lawful votes through inflated or unverified rolls impairs the civil rights of eligible citizens to equal representation, a consequence that extends far beyond New York.

Core Reform Recommendations: Modernizing NVRA & HAVA Compliance

- Mandate continuous, automated voter-roll maintenance statewide, replacing episodic post-election purges, and require uniform data fields and list-maintenance standards across all counties to ensure compliance with NVRA § 8.

- Require routine cross-checks with authoritative federal and state databases, including NCOA, SSA Death Master File, interstate DMV systems, corrections records, and DHS/USCIS databases, with enforceable timelines for verification and removal.

- Implement strong identity and citizenship verification at registration, requiring:

    - Documentary proof of identity and U.S. citizenship, or

    - Secure verification through federal databases (e.g., DHS SAVE),
      while providing free state-issued ID alternatives to ensure access.

- Eliminate acceptance of placeholder or default identity data, including default DOBs (e.g., January 1), and require validated residential address verification.

- Strengthen HAVA database integrity requirements, mandating immutable audit logs, permanent voter-history preservation, and independent audit capability with records publicly available to ensure traceability, transparency, and statutory compliance.

- Mandate public, standardized monthly reporting of voter-roll activity, including additions, inactivations, removals, and corrections, to enable independent oversight and public accountability.

- Condition state and federal election funding on verified compliance, with automatic enforcement mechanisms and penalties for persistent noncompliance.

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I. Introduction

New York's voter roll is one of the largest and most complex in the nation, containing over 23 million registration records, including more than 12 million active and almost 1 million inactive voter files maintained across 62 counties. The integrity of this statewide system is essential to ensuring fair elections, accurate voter lists, and public confidence in electoral outcomes. New York also plays a critical role in the national electoral landscape, with 28 Electoral College votes, the state remains one of the most influential in presidential elections, and its voter registration patterns directly shape national outcomes. In addition, multiple New York congressional districts, particularly in Long Island, the Hudson Valley, and Central New York, are among the most competitive in the country, regularly determining the balance of power in the U.S. House of Representatives. As a result, the accuracy and reliability of New York's voter rolls have consequences not only for state-level administration, but for national governance.

This report presents the findings of Project Civica's comprehensive analysis of the New York State voter registration database, including registration patterns, list-maintenance activity, demographic anomalies, duplicate-risk indicators, and identity-verification vulnerabilities. Drawing on monthly state-provided NYSVoter datasets, county-level extracts, and publicly available federal identity-system data, this report identifies structural weaknesses that impact the accuracy, reliability, and transparency of New York's voter rolls.

Our analysis documents systemic issues such as the statistically improbable concentration of the placeholder birthdate January 1, inconsistent county-level maintenance timing, incomplete address data, and heavy reliance on self-attestation of citizenship . These factors collectively create conditions under which inaccurate or ineligible records can persist undetected.

The most significant findings include:

- Extreme concentration of the placeholder date of birth, January 1, which undermines the effectiveness of identity matching and may reflect upstream data-entry practices in citizenship, naturalization, DMV, and federal identity systems.

- Evidence of incomplete or inconsistent list-maintenance practices, including removal spikes immediately after major election cycles and long periods of minimal or zero activity in many counties across the state.

- Large populations of registrants with no recorded voting history, some of whom have been on the rolls for decades without ever participating, increasing the likelihood of stale or inaccurate records and illegal voting activity.

- Duplicate-risk patterns, including multiple registrants sharing the same residential address or identity traits across states and within the state..

- Unclear or undocumented citizenship-verification procedures, which rely heavily on registrant honesty and comprehension, leaving New York unable to reliably confirm citizenship status and identity during registration.

- A significant long-term rise in the number of "Blank / No Party" registrants, pointing to dissatisfaction in the current system.

These findings raise serious questions about the robustness of voter-roll management processes, the sufficiency of identity-validation safeguards, and the transparency of list-maintenance operations. They also highlight areas where state-level policy updates, county-level process improvements, and greater public reporting can strengthen confidence in the electoral system.

The goal of this report is to present accurate, data-driven insights that support improved voter-roll integrity, enhance administrative reliability, and strengthen public trust in New York's elections.

II. Legal Framework Governing Voter Registration and List Maintenance in New York

Federal Legal Framework Governing Voter Registration and List Maintenance

While states administer elections, federal law establishes a nationwide framework that sets minimum standards for voter eligibility, registration, list maintenance, and election integrity. New York's election laws operate within, and are constrained by, this federal structure.

The U.S. Constitution gives states primary responsibility for conducting elections, including setting the time, place, and manner of voting. Under the Constitution's Elections Clause (Article I, Section 4), Congress may override or supplement state election rules for federal offices. Congress has exercised this authority by enacting uniform national standards that apply to every state.

Several constitutional amendments establish baseline protections for voters nationwide:
- The Fifteenth Amendment prohibits denial of the right to vote based on race.

- The Nineteenth Amendment prohibits discrimination based on sex.

- The Twenty-Fourth Amendment bans poll taxes in federal elections.

- The Twenty-Sixth Amendment guarantees the right to vote to citizens aged 18 and older.

These amendments protect eligible voters but do not eliminate the requirement that voters be United States citizens. Federal law reinforces state eligibility rules:
- 18 U.S.C. § 611 criminalizes non-citizen voting in federal elections.

- 8 U.S.C. § 1227(a)(6) renders unlawful voting by non-citizens a deportable offense.

The Voting Rights Act of 1965 (VRA) prohibits voting practices that deny or abridge the right to vote based on race or language-minority status. Section 2 remains in effect nationwide and applies to voter-registration and list-maintenance practices.

The National Voter Registration Act of 1993 (NVRA) governs how states register voters and maintain voter rolls. It requires:

- Voter-registration opportunities at motor-vehicle agencies, public assistance offices, and by mail.

- Accurate and current voter rolls.

- Prohibitions on removal solely for failure to vote.

- Uniform and nondiscriminatory procedures before removal for change of residence.

The Help America Vote Act of 2002 (HAVA) requires:

- A single statewide computerized voter-registration database.

- Unique voter identifiers and provisional ballots.

- Uniform statewide standards for voter registration records.

Federal statutes prohibit fraudulent registration, double voting, and voting under false identities.

New York's voter-registration and list-maintenance system, Election Law §§ 5-102, 5-500, and 5-614, and 9 NYCRR Part 6217, was designed to comply with federal law, including NVRA Section 8, HAVA's database mandate, and constitutional citizenship requirements. Noncompliance exposes the state to civil litigation and federal enforcement.

Citizenship as a Prerequisite for Voting in New York

New York law unambiguously restricts the right to vote in all elections, federal, state, and local, to United States citizens. This requirement is firmly embedded in the New York State Constitution, codified in statute, reinforced through criminal penalties, and definitively confirmed by the judiciary. Under current law, non-citizen voting is neither permissible nor discretionary and cannot be authorized by local governments absent a constitutional amendment.

The citizenship requirement for voting in New York originates in the State Constitution and is implemented through the Election Law:

- New York Constitution, Article II, § 1: "Every citizen shall be entitled to vote at every election for all officers elected by the people…"

- Election Law § 5-102(1): "No person shall be qualified to register for and vote at any election unless he is a citizen of the United States…"

- Election Law § 5-500 (Voter Registration Form): Applicants must affirm under penalty of perjury: "I am a citizen of the United States."

Violations of New York's citizenship requirement carry significant criminal, civil, and immigration consequences, and attempts to expand the franchise to non-citizens have been conclusively rejected by the state's highest court. A false affirmation constitutes perjury under Penal Law § 210.15, a Class E felony. Election Law § 17-132 makes voting by a non-citizen a misdemeanor punishable by up to one year of imprisonment and/or a $1,000 fine. Related fraudulent registration or voting conduct may be prosecuted as felonies. Federal law (8 U.S.C. § 1227(a)(6)) renders unlawful voting by a non-citizen a deportable offense.

In 2021, New York City enacted Local Law 11 ("Our City, Our Vote"), which sought to authorize non-citizens to vote in municipal elections. On March 20, 2025, the New York Court of Appeals invalidated the law in Fossella v. Adams (2025 NY Slip Op 01668), holding that the New York Constitution restricts voting to citizens. The decision is binding statewide and precludes non-citizen voting absent a constitutional amendment.

Under current New York law, only United States citizens may lawfully register or vote in any election conducted within the state. Voter registration requires affirmative attestation of citizenship, the NYSVoter database and list-maintenance procedures under Election Law § 5-614 and 9 NYCRR Part 6217 are designed to identify and remove ineligible registrations, and non-citizen voting is prohibited by the New York Constitution, statute, criminal penalties, and binding judicial precedent.

Statutory Responsibility for Voter-Registration Records

Under New York Election Law, responsibility for maintaining accurate voter-registration records rests primarily with the county Boards of Elections ("local boards"), each of which maintains its own county-level voter roll using locally configured databases that include differing and non-standardized data fields across all 62 counties. State law assigns counties the authority to process new registrations (Election Law §§ 5-210, 5-212), update and correct voter information such as name, address, and party enrollment (§§ 5-302, 5-304), and remove ineligible voters due to death, felony conviction, change of residence, or other disqualifying factors (§§ 5-400, 5-402, 5-708).

While the New York State Board of Elections (NYSBOE) maintains the statewide computerized voter-registration system that receives, aggregates, and consolidates voter-registration data from all 62 counties and issues uniform list-maintenance rules (§ 5-614), it is the county boards that execute virtually all additions, modifications, and cancellations within the voter rolls. Because counties employ different data schemas, field definitions, validation rules, and formatting standards, voter-record information is not uniform at the county level when transmitted to the state system.

Accordingly, the State bears responsibility for accurately aggregating and standardizing 62 distinct county voter databases into a single statewide voter file. This aggregation function is critical not only to the accuracy of the statewide database itself, but also to the accuracy and integrity of the voter rolls maintained by each county. Any deficiencies in the State's ability to standardize, reconcile, and synchronize non-uniform county data directly affect the reliability of both the statewide voter file and the underlying county voter rolls.

Real-Time Synchronization Requirements

New York law requires that county Boards of Elections continuously synchronize their local records with the statewide NYSVoter system. Election Law § 5-614 mandates:

- "One official record" of each voter

- A uniform, interactive, computerized statewide list

- Information entered on an expedited basis by county boards (§ 5-614(3)(f))

Implementing regulations reinforce these obligations. Under 9 NYCRR § 6217.2(a):

"Using the county's voter registration system as their direct interface to NYSVoter, county election officials shall enter all voter registration information into the list on an expedited basis at the time the information is provided to the county official. Each county board must enter and maintain voter registration records in a county voter registration system. County boards have the responsibility for adding, changing, canceling or removing voter registration records through an interface. NYSVoter shall normalize to standards and store voter registrant information provided on the registration applicant."

Additionally, 9 NYCRR § 6217.4(c) states: "County voter registration systems shall maintain near real-time synchronization." Other regulations, such as 9 NYCRR § 6217.10, require counties to follow state-issued schedules for processing NCOA, DMV, death, felony, and duplicate records.

Together, these provisions establish that New York's voter-roll system is legally designed to function as a real-time, continuously updated statewide database.

Documentation and Identity Requirements for Voter Registration

New York employs a minimal documentation standard for voter registration. Applicants are not required to present documentary proof of U.S. citizenship, age, or lawful immigration status. Instead, eligibility is verified solely through the registrant's signed attestation under penalty of perjury.

To register, applicants must provide one of the following identifiers:

- A New York State driver's license or non-driver ID number

- The last four digits of their Social Security number

- Or, if neither is available, a copy of a photo ID or a document showing the registrant's name and address (e.g., utility bill, paycheck, bank statement, or government document)

If identity cannot be verified at the time of registration, the applicant may still be added to the voter roll and required to present identification the first time they vote.

There is a serious question as to whether New York's voter-registration form and implementing rules comply with the federal Help America Vote Act (HAVA) Section 303(a)(5)(A). New York permits an applicant to provide either a driver's license number or the last four digits of a Social Security number on its voter registration form. However, HAVA establishes a conditional requirement: the last four digits of the Social Security number may be used only if the applicant does not have a driver's license. Treating these identifiers as interchangeable alternatives, rather than sequential requirements, raises potential compliance concerns under federal law.

Because New York does not verify citizenship against immigration or naturalization databases and because acceptable documents prove only identity and residence, not citizenship, the registration system depends heavily on the registrant's honesty and comprehension. This structure creates vulnerabilities, particularly for individuals with limited English proficiency or identity records containing placeholder fields (such as January 1 birthdates), and is relevant to evaluating the integrity of the statewide voter file.

Legal Challenges and Compliance Failures

New York has faced federal and state scrutiny for failures in list-maintenance and synchronization. In Common Cause New York v. Board of Elections in the City of New York (No. 16-cv-6122, E.D.N.Y., filed Nov. 3, 2016), the U.S. Department of Justice intervened in January 2017 citing state regulations requiring counties to synchronize updates with NYSVoter "at least every 24 hours" (9 NYCRR § 6217.4(b)). While the core claims focused on the improper removal of over 117,000 voters, primarily based solely on non-voting in prior elections, without proper notice or confirmation under NVRA § 8(b)(2), the DOJ highlighted broader deficiencies in the New York City Board of Elections' (NYCBOE) oversight of list maintenance procedures. These included failures to integrate timely updates from sources like death records, felony convictions, and address changes into the statewide NYSVoter system, leading to outdated and inaccurate poll books at polling places. The complaint described how failures to synchronize data resulted in outdated or inaccurate voter information being displayed at polling places, contributing to improper voter challenges and Election Day confusion.

This case illustrates that although state law mandates near real-time updates, and federal oversight has reinforced those requirements, counties have not always complied. These lapses expose vulnerabilities in the consistency, accuracy, and reliability of New York's statewide voter file.

Importance of an Accurate, Synchronized Statewide System

An accurate, properly maintained statewide voter-registration system is essential to ensuring fair elections, preventing improper disenfranchisement, and maintaining public confidence in electoral outcomes. The statutory and regulatory framework governing voter-registration records in New York, centered on Election Law § 5-614's mandate for a centralized, interactive NYSVoter list with real-time capabilities, supports this imperative, aligning with NVRA (§ 8) and HAVA (§ 303) goals of accurate rolls without undue burdens on voters. However, county-level implementation, documentation standards, and maintenance practices ultimately determine whether the system functions as intended.

Identifier Numbers, Identity Verification, and the HAVA (HAVV) Verification System

New York's voter-registration system relies on both county-level and statewide identifiers, as well as federally mandated identity-verification procedures arising from the Help America Vote Act of 2002 (HAVA) and New York Election Law § 5-614.

Unique Identifier Requirement
HAVA mandates that every state's centralized computerized voter registration list assign a unique identifier to each legally registered voter (52 U.S.C. § 21083(a)(1)(A)(iii); HAVA § 303(a)(1)(A)(iii)). In compliance, New York Election Law § 5-614 requires the State Board of Elections to maintain "one official record" for each voter within the statewide NYSVoter database (N.Y. Election Law § 5-614(1)–(3)). County boards generate local voter ID numbers, while NYSVoter automatically assigns a statewide unique identifier (the "NYSVoterID"). This dual-ID structure permits local boards to retain operational autonomy while enabling statewide deduplication, interstate and inter-county move tracking, and uniform list maintenance (9 NYCRR §§ 6217.2(f)–(g), 6217.4(a)–(c)).

Identity Verification (HAVV) – Limited to Identity, Not Citizenship
HAVA requires states to verify the identity of new registrants who provide a driver's license number or the last four digits of a Social Security number by matching against Department of Motor Vehicles (DMV) or Social Security Administration (SSA) records (52 U.S.C. § 21083(a)(5)(A)–(B); HAVA § 303(a)(5)). New York implements the latter through the HAVA Verification (HAVV) system, which checks only name, date of birth, SSN-4, and returns a match or no-match result. HAVV does not verify U.S. citizenship and has no access to USCIS, Department of State passport, or DHS immigration databases (SSA HAVV Model User Agreement § 4.2 (2024); DOJ HAVA Guidance (2023)). Because millions of non-citizens lawfully hold both SSNs and New York-issued driver's licenses or non-driver IDs, a successful HAVV match confirms identity but does not confirm voter eligibility.

Placeholder Dates of Birth (January 1)

SSA policy explicitly instructs staff to use January 1 as a placeholder when the exact month and day are unknown, a practice especially common for immigrants, refugees, and non-citizens issued SSNs under work-authorization programs (SSA POMS RM 10205.020(B) (Oct. 2023)). These placeholder records are used directly in HAVV queries: HAVV performs an exact match against SSA's Numident database and returns a successful match when the name and SSN-4 also align, even if the underlying SSA record contains a January 1 placeholder and belongs to a non-citizen (SSA HAVV Technical Specifications v5.0, Nov. 2024, §§ 2.1, 4.1–4.3). No provision in HAVA or New York law requires rejection of such placeholder dates during voter-registration processing.

Limitations of HAVV

HAVV is not designed to, and does not, detect duplicate registrations, identity collisions, or intra-state moves. Those functions remain the responsibility of NYSVoter and county-level maintenance processes (9 NYCRR § 6217.10).

Together, these federal and state requirements: mandatory unique identifiers, identity-only verification via HAVV, acceptance of SSA-issued placeholder birthdates, and the complete absence of any citizenship cross-check, create structural vulnerabilities in New York's voter-registration system that can permit ineligible individuals to be added to the rolls.

III. Project Civica Research Team Methodology

Project Civica's analysis of New York's voter registration system is conducted using a structured, multi-layered validation process designed to assess voter-roll accuracy, maintenance performance, and identity-management vulnerabilities across both state and county systems. Our methodology integrates SQL-based querying, Excel-driven statistical analysis, cross-jurisdictional comparisons, and verification against public and legal records.

Data Sources and Acquisition

- **Statewide Data**

  NYSVoter statewide voter file, obtained monthly through Freedom of Information Law (FOIL) requests from the New York State Board of Elections (October 2025 extract includes ~13 million active/inactive records).

- **County-Level Data**
  - FOIL-obtained county voter-registration files.
  - County voter-history reports (e.g., Suffolk County 2022–2024).

- **Federal, State, and Public Records**

- USPS National Change of Address (NCOA) (January 19, 2025).

- SSA Death Master File.

- Publicly available obituaries.

- USCIS naturalization trend data (1955–2025).

- **Cross-State Comparisons**

  - New Jersey and Florida voter-roll extracts.

Analytical Techniques

- **Database and Identity Analysis**
  - SQL queries for duplicates, multi-county inconsistencies, cross-state matches, DOB anomalies, status changes.
  - Address normalization and match scoring.
- **Statistical and Pattern Analysis**
  - Excel-based DOB clustering, frequency distributions,
  - Trend analysis of registrations, party affiliation shifts and non-voting voter registration trends.
  - Examination of absentee and mail-in ballot participation rates

Validation Across Sources
- Statewide vs. county file comparisons.
- Deceased-voter validation via SSA and obituaries.
- Cross-verification with NCOA.
- Consistency checks with NYSBOE reports where they exist.

Methodological Limitations

- No access to real-time NYSVoter maintenance logs or update logs.

- Citizenship status is self-attested and cannot be independently confirmed.

- Analysis reflects data obtained monthly from 2023–2025 FOIL extracts, representing snapshots rather than continuous real-time records.

- Limited access to sensitive personal identifiers: The voter registration files obtained through FOIL do not include the last four digits of Social Security numbers (SSN-4) or New York State driver's license/non-driver ID numbers. These fields are redacted by the New York State Board of Elections and county boards for privacy and security reasons, consistent with state and federal law. As a result, our duplicate detection and identity verification processes cannot incorporate these unique identifiers, which are used internally by election officials for HAVA-mandated verification and deduplication. We therefore rely exclusively on non-redacted fields (e.g., full name, exact date of birth, and address) combined with exact-match criteria and manual cross-verification against external sources. This limitation reduces our ability to detect certain

types of duplicate or ineligible registrations that might only be distinguishable through SSN-4 or driver's license matches, but our strict exact-match standard and multi-source manual confirmation process helps mitigate false positives.

- By design, our strict exact-match requirement and manual multi-source verification process may under-identify certain subtle discrepancies (e.g., name variations due to marriage or data-entry errors), prioritizing precision over fuzzy matches.

Research Team Identity and Mission

Project Civica is an all-volunteer, New York–based nonprofit organization focused on election transparency and data accuracy. Our team includes SQL analysts, Excel researchers, election inspectors, public-record specialists, and trained civic volunteers.

Focus areas include:

- FOIL acquisition and auditing statewide and county data.

- Cross-state comparisons with high-migration states.

- Identity verification using NCOA, SSA, public obituary records, and analytical tools and cross-dataset comparison techniques

- for pattern analysis and cross-checking.

- Documentation of list-maintenance patterns.

- Reporting findings to legislators, district attorneys, boards of elections, and the public.

These methods reveal persistent weaknesses in New York's voter-roll management, including delayed updates, inaccurate records, and cross-jurisdictional discrepancies, raising concerns about compliance with state and federal election-administration standards.

IV. Registration Source Analysis

Predominant Low-Verification Registration Channels

New York State's voter registration system offers multiple intake channels, each varying in the level of identity verification applied during the registration transaction. Among these, mail-in (paper forms mailed directly through the USPS), in-person submissions at County Boards of Elections (county election officials), Local Registrars (town, village, municipal clerks), agency-based registrations (public assistance agencies, disability offices, and other designated agencies), school-based programs, and Department of Motor Vehicles (DMV) transactions, only DMV registrations consistently involve an in-person identity verification process tied to the issuance or renewal of a state-issued driver's license or non-driver ID. While all channels require self-attestation of citizenship and eligibility under penalty of perjury, and HAVA-mandated matching

against DMV or SSA records occurs post-submission where identifiers are provided, the DMV stands alone as the sole channel requiring presentation of identity documents at the point of registration. This distinction is significant, as over 94.6% of registrations originate from lower-verification pathways, with DMV accounting for approximately 5.4% based on the October 2025 NYSVoter extract including active, inactive, and purged records. Eliminating the purged records from the analysis changes the percentages only slightly where the DMV represents 7.2% of the source records leaving 92.8% from low verification sources, a critical point for evaluating identity verification rigor, auditability, and NVRA / HAVA compliance. Although New York reports to the Election Administration and Voting Survey (EAVS) that the DMV is the primary source of registration activity, EAVS measures registration-related transactions, including updates and record changes, whereas NYSVoter reflects record-level registration source data; as a result, high volumes of DMV-related update transactions may not be reflected in NYSVoter new registration source totals. (EAC, EAVS 2024).

Overview of New York Registration Sources

Source	# of Records	Percentage
Mail-in USPS	8,544,682	36.9%
County Board of Election	7,817,275	33.8%
Local Registrar	5,301,860	22.9%
Dept. of Motor Vehicles	1,256,527	5.4%
Agency Based Registration	211,907	0.9%
School Registration	9,651	0.04%
Total	23,141,902	100%

Table 1 - Overview of New York Registration Sources
Record totals and percentages include active, inactive and purged records
Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

In-person voter registration applications submitted through County Boards of Elections or local registrars are subject to administrative review by election officials; however, New York Election Law does not require verification through a mandatory photo-identification check at the point of intake. Consistent with New York law, the State permits voter pre-registration beginning at age 16. Individuals who pre-register are maintained within the statewide voter registration database but are not designated

as "active" or "inactive" voters until they reach voting eligibility and satisfy statutory activation criteria.
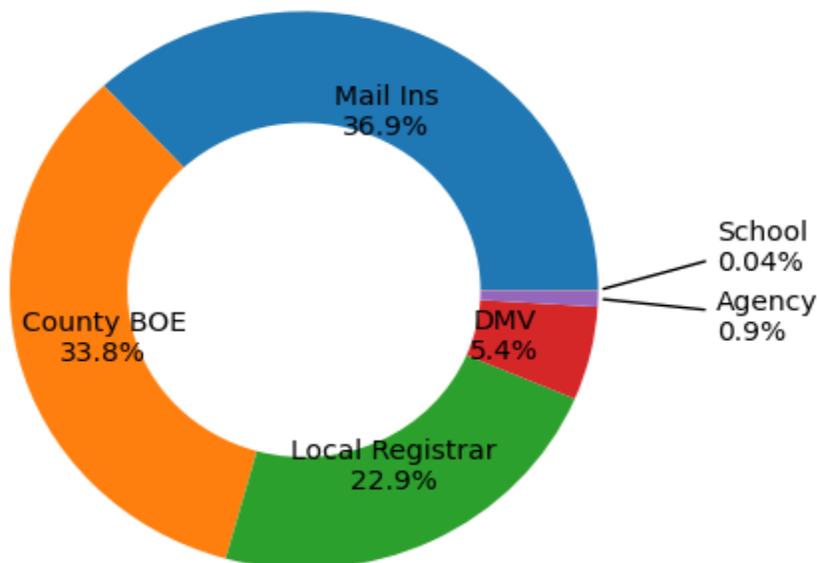

New York Voter Registrations by Source

Figure 1 - New York Voter Registrations by Source

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

New York State Election Law Requirements

Under NY Election Law §5-102, registrants must be U.S. citizens, but the law does not require citizenship verification through federal databases. Registration methods allowed under §5-210 and 5-211 include mail-in forms, BOE/local registrar delivery, DMV transactions, and certain agency filings. No in-person ID is required at registration.

Identity verification is only required at first-time voting per HAVA (Election Law §8-304(5)), but enforcement varies and does not confirm citizenship.

Federal Law Requirements

The NVRA and HAVA are designed to reduce barriers to voter registration by relying on attestations made under penalty of perjury and on post-registration list-maintenance procedures rather than front-end screening. The NVRA mandates the availability of registration through DMVs, designated public agencies, and mail-in forms, and expressly prohibits states from requiring documentary proof of citizenship as a condition of registration. HAVA, in turn, requires states to verify identifying information against DMV and Social Security Administration databases; however, these

checks do not establish citizenship status. As a result, federal law compels states to accept low-verification registration pathways while limiting their ability to conduct robust eligibility screening at the point of registration.

Implications of Registration Source Patterns

- Minimal front-end identity verification in most voter registration pathways: Eligibility relies primarily on self-attestation under penalty of perjury.

- Federal law (NVRA/HAVA) mandates broad access through:
  - DMV transactions
  - Designated agencies
  - Mail-in forms
  - In-person submissions

- Prohibits documentary proof of citizenship at registration.

- HAVA requirements: Limited database checks verify only the validity of identifying numbers (e.g., driver's license/SSN digits) not identity or citizenship; enforcement is inconsistent.

- Systemic vulnerabilities arise from heavy reliance on low-verification channels (e.g., mail-in, agency-based, some DMV), leading to risks like:
  - Clerical errors
  - Incomplete data capture
  - Identity ambiguity

- In-person submissions at County Boards of Elections provide some staff review but lack mandatory photo ID.

- DMV-based registration (routinely linked to identity documentation and standardized validation) is the highest-integrity major pathway but represents a relatively small share of total registrations (approximately 5%; note: national data from EAC reports shows higher averages in recent years, e.g., ~39% in 2018–2020 and up to ~55% in 2022 for NVRA-covered sources, varying by state and year).

- Underutilization of this higher-integrity source increases dependence on lower-verification methods.

- Downstream safeguards provide limited correction:
  - First-time voter ID requirements deferred until Election Day
  - Easily satisfied with non-photo documentation
  - Do not reliably address upstream identity deficiencies

- Federal statutory constraints restrict states from imposing stronger verification or citizenship-confirmation requirements at registration, limiting state officials' ability to mitigate vulnerabilities through regulation.

Summary

New York's registration-source distribution reflects a system shaped by federal access mandates and limited state authority to impose front-end verification. The predominance of mail-in and other decentralized registration pathways contributes directly to the data-quality and integrity challenges documented throughout this report.

Taken together, federal and New York election law establish a framework in which identity is presumed, rather than verified, at the point of registration. Subsequent verification mechanisms are narrow in scope, inconsistently enforced, and non-determinative, and neither identity nor citizenship is affirmatively confirmed at any stage of the registration or voting process.

This framework relies heavily on deterrence and post hoc correction while providing few tools for proactive identity assurance or independent audit. These structural constraints have significant implications for voter-roll integrity, administrative accountability, and public confidence, and they underscore the central importance of registration source analysis as one of the only available proxies for assessing verification rigor under the existing legal regime.

Interpretation of Voter Registrations by Source and Party

The stacked bar chart in Figure 2 below reveals significant structural variation in New York's voter-registration patterns by source. Mail-in (USPS) and County BOE registrations account for the majority of all statewide records, together representing over 70% of total registrations.

Mail-in registrations show a disproportionate concentration of Democratic and No-Party Affiliation (blanks) enrollments, suggesting demographic self-selection and highlighting the potential vulnerability of mail-based registration pathways to incomplete data capture (e.g., missing DOB elements or address irregularities).

County BOE registrations, by contrast, produce a more evenly distributed partisan profile and represent a higher degree of administrative oversight, which should result in comparatively lower rates of missing or inconsistent fields in the underlying NYSVoter data.

Local Registrar registrations, often processed through municipal clerks or city offices, exhibit intermediate characteristics, with a high proportion of "blank" registrants and moderate partisan balance, reflecting decentralized intake practices.

DMV registrations show a distinct demographic signature, with elevated Democratic and "blank" enrollment rates that track with national patterns observed in Motor-Voter intake, and a notably small Republican share. Agency and School registrations

constitute less than 1% of the total and therefore offer limited statistical weight, though their extremely small Republican and Conservative shares may reflect program-specific eligibility (e.g., youth pre-registration or social-service agency interactions).

Overall, the distribution across sources demonstrates that registration pathway is a material driver of partisan composition, likely due to differing intake populations, verification standards, and external programmatic influences (e.g., NCOA flagging patterns or DMV data-entry protocols).

These distinctions are relevant to both list-maintenance analysis and identity-verification risk modeling, as source-specific intake characteristics correlate strongly with downstream anomalies identified elsewhere in this report.
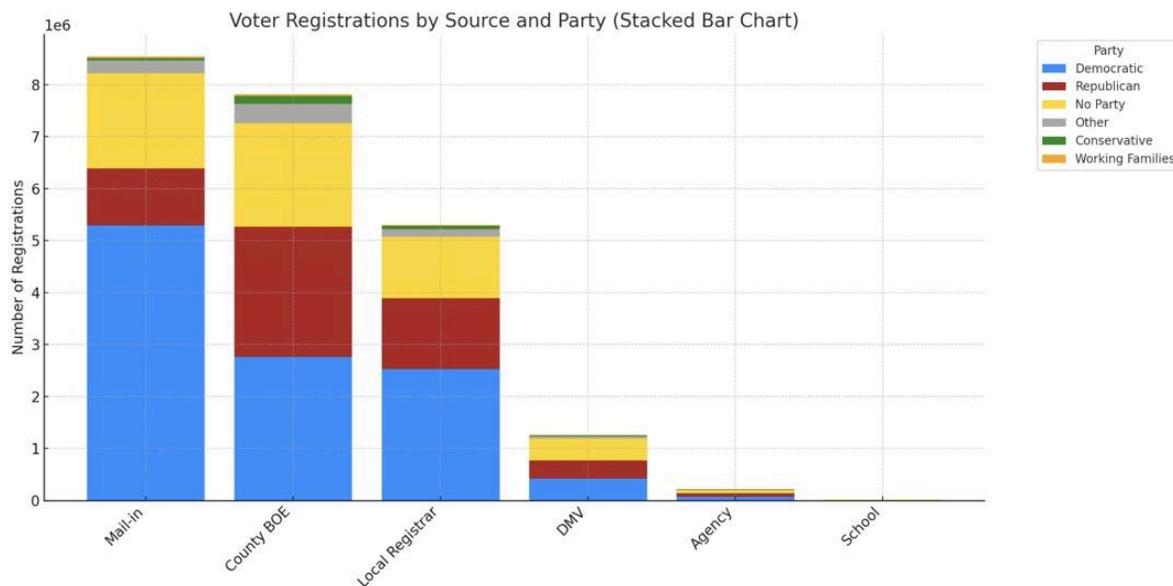

Figure 2 - Voter Registrations by Source and Party

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

V. Voter List Maintenance and Purge Activity in New York

Overview of Federal and State Requirements

Federal law, principally Section 8 of the National Voter Registration Act of 1993 (NVRA), 52 U.S.C. § 20507, and New York State Election Law together establish strict and interlocking rules governing when voters may be removed from the registration rolls.

Under the NVRA, states are required to conduct voter-list maintenance through a general, uniform, and nondiscriminatory program implemented on a regular basis. The statute permits removal of registrants only for limited, enumerated reasons: death; a voter's written request; confirmed change of residence outside the jurisdiction; disqualifying felony conviction where permitted by state law; adjudication of mental incompetence; or the resolution of verified duplicate registrations (52 U.S.C. § 20507(a)(3)–(4)).

When a registrant's eligibility is questioned due to a potential change of residence, the NVRA prescribes a mandatory, multi-step process. The state must first send a forwardable address-confirmation notice. If the registrant fails to respond, the voter may be placed in inactive status but may not be removed unless the registrant subsequently fails to vote in two consecutive federal general elections (52 U.S.C. § 20507(d)(1)).

This structure is designed to preserve access for eligible voters while ensuring that removals are based on verified ineligibility rather than administrative inference or voter inactivity alone. As part of requirements to keep rolls accurate, a state as part of its routine maintenance can cross check death records, felony convictions via the courts, DMV data or NCOA databases for moves. New York does not allow additional time-based removals for long-term non-engagement. Several states treat long term activity of a statutorily set number of years as a trigger to start the NVRA. Ohio's use of non-voting as a trigger has been upheld by the Supreme Court in the 2018 Husted vs Philip Randolph Institute decision.

The Help America Vote Act of 2002 (HAVA), 52 U.S.C. § 21083, does not create independent authority to remove voters. Instead, it imposes data-integrity, verification, and auditability requirements, mandating that each state maintain a single, centralized, official, and auditable statewide voter registration database. HAVA's role is to ensure that list-maintenance actions taken pursuant to the NVRA are accurately recorded, verifiable, and subject to oversight.

New York Election Law implements these federal requirements at the state level. Election Law § 5-400(1) authorizes cancellation of a voter's registration when the voter:

- Has moved residence outside the state;
- Has been convicted of a disqualifying felony;
- Has been adjudicated mentally incompetent;
- Has refused to take a required challenge oath;
- Has died;
- Has failed to vote and remained unresponsive after placement in inactive status (inactivity-based cancellation);
- Has personally requested cancellation; or

- Is otherwise no longer qualified to vote.

Historically, Election Law § 5-400(1)(f) included an inactivity-based cancellation provision tied to failure to vote following inactive status, reflecting the NVRA's two-federal-election inactivity framework.

Read together, federal and state law permit immediate removal only in narrow, objectively verifiable circumstances, such as death, certain felony convictions, voter-initiated cancellation, confirmed relocation outside the jurisdiction, or verified duplicate registrations. Inactivity-based removals remain tightly constrained by NVRA process requirements and timing restrictions, with HAVA reinforcing the obligation that all such actions be traceable, documented, and auditable within the statewide voter registration system.

Federal List-Maintenance Requirements: NVRA and HAVA

Section 8 of the National Voter Registration Act (NVRA), 52 U.S.C. § 20507, requires states to conduct a general program of voter-list maintenance that is uniform, nondiscriminatory, and continuous, with the objective of maintaining accurate and current voter registration rolls. As part of this obligation, states must make reasonable efforts to remove registrants who have died, moved outside the jurisdiction, or otherwise become ineligible, using reliable information sources. Permissible tools for this purpose include data from the U.S. Postal Service National Change of Address (NCOA) system, among others.

At the same time, the NVRA imposes a critical protective restriction commonly known as the 90-day "quiet period." Under 52 U.S.C. § 20507(c)(2), states are prohibited from completing any systematic program designed to remove ineligible voters during the 90 days preceding a federal primary or general election. This safeguard is intended to prevent large-scale, time-compressed purge activity that could increase the risk of error and improperly disenfranchise eligible voters immediately before Election Day.

Importantly, the quiet-period restriction applies only to systematic removal programs. It does not suspend voter-list maintenance altogether. Individualized, non-systematic maintenance actions remain both permissible and required year-round. These include:

- Removal upon confirmation of a registrant's death;

- Removal at the registrant's own written request;

- Removal due to a disqualifying felony conviction or adjudicated mental incapacity, where permitted by state law; and

- Non-eligibility-related record maintenance, such as clerical corrections or updates to names or addresses that do not result in cancellation.

The Help America Vote Act of 2002 (HAVA) complements the NVRA by regulating how voter-list maintenance is implemented and documented, rather than by expanding the

grounds for removal. HAVA's principal list-maintenance provisions are codified at 52 U.S.C. § 21083.

HAVA requires each state to maintain a single, centralized, statewide computerized voter registration database that is:

- Official;

- Uniform and nondiscriminatory; and

- Coordinated with other state and federal data sources, including motor-vehicle and vital-records agencies.

Although HAVA does not itself authorize voter removals, it imposes data-integrity and verification obligations that directly affect the legality of purge activity. At a minimum, HAVA requires that:

- Changes to voter records be trackable and preserved over time;

- Updates be attributable to identifiable actions or data sources; and

- The statewide database is capable of supporting lawful list maintenance conducted under the NVRA.

As a result, when a voter is removed from the rolls, the state must be able to demonstrate:

- What data source or event triggered the change;

- When the change occurred;

- What verification or confirmation step was relied upon; and

- Whether applicable NVRA timing and process requirements were satisfied.

Absent such records, a state may be unable to demonstrate compliance with the NVRA's substantive and timing protections, a deficiency that itself constitutes a HAVA violation, due to failure to maintain a compliant and auditable statewide voter registration system.

Taken together, the NVRA and HAVA establish an integrated statutory framework that seeks to balance ongoing voter-roll accuracy with strong procedural safeguards against improper or poorly documented disenfranchisement, particularly in the period immediately preceding federal elections.

Compliance Concerns Under NVRA

New York law defines voter registration as a continuous process (Election Law §5-708). Counties must regularly update rolls as new information is received, including address changes, duplicate detection, deaths, and changes in eligibility. Election Law §§5-400 and 5-402 further require cancellation or correction of records when statutory criteria are met.

To ensure statewide integrity, New York regulations require near real-time synchronization of county updates with the HAVA-mandated computerized voter database: NYSVoter. Under 9 NYCRR §6217.4(b)–(c), counties must enter list-maintenance updates "in a timely manner" and synchronize such updates to NYSVoter within 24 hours. Although counties are not required to perform maintenance tasks daily, any change they do make must be reflected promptly to maintain uniform eligibility status across precinct records and poll-book systems.

Interestingly, New York's Election Law assumes the existence of maintenance records, and multiple provisions implicitly require record keeping sufficient to explain changes, but New York does not proactively publish maintenance logs. Although New York Election Law does not expressly mandate publication of voter-roll maintenance logs, federal law requires that voter removals be traceable, verifiable, and timed in compliance with the NVRA. Where the State or local boards cannot produce records showing the basis, timing, and verification of voter-roll changes, the State cannot demonstrate compliance with NVRA § 8 or HAVA § 303. The absence of maintenance records would therefore itself be evidence of noncompliance.

Project Civica's Monthly Snapshot Methodology

Project Civica obtains monthly snapshots of the NYSVoter database, enabling a level of temporal audit capacity that is not possible through annual extracts or periodic sampling. The snapshots provide visibility into real-time list-maintenance activities across New York's 62 counties.

This longitudinal dataset reveals structural patterns, including prolonged periods of minimal maintenance activity in many counties, disparities in county execution practices, and large removal spikes following federal elections, that illustrate weaknesses in statutory compliance. The January 2023–October 2025 dataset displays clear clustering of purge activity aligned with NVRA's federally mandated removal cycle.

Purge Activity Observed in Monthly Snapshots (January 2023–October 2025)

Project Civica's monthly FOIL extracts of the NYSVoter database enable detailed tracking of voter-removal activity over time. The longitudinal data reveals clear patterns in purge volume by month.

Significant spikes in removals occur immediately following the November 2022 and November 2024 federal general elections, with the largest single-month purge exceeding 400,000 records in early 2025. These peaks align directly with the conclusion of NVRA's two-federal-election-cycle inactivity window, during which systematic removals for suspected change of residence become permissible once again after the 90-day quiet period.

In contrast, many counties show very low or near-zero removal activity during non-post-election periods and throughout much of the two-year NVRA cycle. This results in extended stretches of minimal statewide maintenance relative to population outside the post-election clusters.
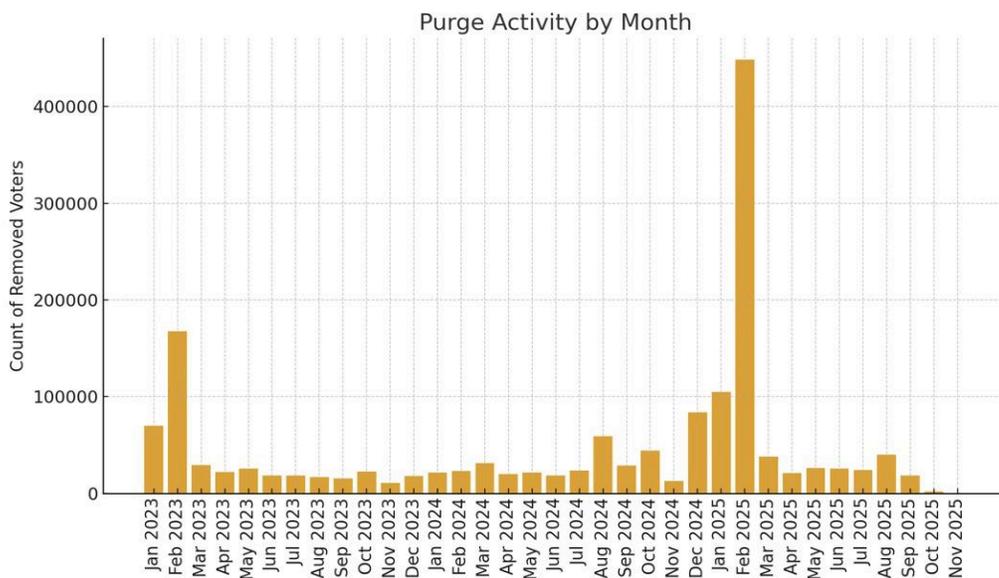

Figure 3 - *Purge Activity by Month (Jan 2023–October 2025)*

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

Interpretation and Implications

The concentrated timing of removals, primarily in January and February of odd-numbered years, indicates that counties execute list-maintenance work when NVRA expressly allows removal of voters inactive over two federal cycles. This clustering raises concerns that counties may not be executing a "general and uniform program conducted on a regular basis," as required by NVRA.

Extended periods of low maintenance activity suggest delayed address verification, inadequate duplicate remediation, and inconsistent monitoring across counties. Such disparities undermine uniformity in election administration and raise questions regarding statewide roll accuracy. While synchronization delays, exacerbated by non-uniform county data fields and terminology, account for many observed discrepancies in monthly snapshots, the persistence and scale of certain anomalies (e.g., verified duplicates, post-purge activity) suggest issues beyond mere timing lags. These should warrant targeted investigation by the NYSBOE, county boards, or independent auditors to assess root causes and ensure full compliance with real-time mandates.

Persistent Ineligible Records ("Dead Wood") During Election Cycles

Although NVRA's 90-day quiet period prohibits systematic removal programs before federal elections (as detailed above), individualized maintenance for clear ineligibility remains fully permissible and statutorily required year-round under New York Election Law §§5-400 and 5-708.

Project Civica's monthly snapshots, however, consistently show substantial "dead wood" -deceased registrants, long-inactive records, and other clearly ineligible entries, remaining on the rolls well into election periods and throughout quiet-period windows. This persistence indicates that counties are not fully or uniformly utilizing the individualized exceptions that federal and state law expressly allow during these restricted times.

Evidence of underuse includes:

- Prolonged retention of deceased registrants, in some cases years or decades after death, despite mandated notifications from the New York State Department of Health and local vital records offices.

- Accumulation of large inactive populations (e.g., 746,283 inactive voters and over 1.1 million registrants inactive for more than five years in the October 2025 extract) without timely individualized processing.

- Synchronization delays and discrepancies arising from non-uniform county data fields, terminology, and validation practices, which slow the application of death notifications and other exception-based removals even when evidence is available.

The continued presence of ineligible records during active election cycles increases administrative burdens, creates opportunities for potential misuse, and erodes public confidence in roll accuracy. More importantly, it represents a missed opportunity: aggressive use of NVRA-permitted individualized exceptions would enable significant, compliant cleanup precisely when systematic programs are barred, resulting in more accurate rolls on Election Day without violating federal safeguards.

Monthly Election-Integrity Indicator Summary (October 2025)

Project Civica conducts continuous monitoring of New York's voter-registration records to identify deficiencies in list maintenance and areas of statutory noncompliance. Consistent with NVRA §8, HAVA §303, and New York Election Law §§5-708, 5-402, and 8-302, accurate and timely maintenance of voter rolls is a statutory obligation essential to ensuring that only eligible voters remain registered.

The dataset below reflects the October 2025 values for key metrics tracked through Project Civica's Election Integrity Score Sheet and highlights areas where compliance failures may be occurring.

Table 2- October 2025 Election-Integrity Indicators

Category	October
Active Voters Count	12,617,945
Inactive Voters Count	746,283
Purged Voters Count	9,894,668
Voters Added Last Month	95,567
Voters Removed Last Month	2,046
Democratic Count	6,461,970
No Party Affiliation Designated Count	3,371,063
Republican Count	3,024,092
New York Duplicate Voters	125,210
NY / NJ Duplicates	86,681
Voters who Voted after the Purge Date	72,482
Duplicate SBOEID numbers	220
Registrants under the age of 16	0
Registered Voters with no address	26,834
Inactive/Active Voters Who Have Not Voted in the Last Two Federal Elections	1,874,101
Non-Voting Voters (Inactive/Active) – 5+ years since registration	1,145,185
Active Voters with irregular Birthdates	3,087
NY / Florida Duplicates	12,454

Table 2 - October 2025 Election Integrity Indicator Score Card

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

Duplicate Registrations and Cross-State Conflicts

The October dataset reveals substantial duplicate registrations—both within New York and across state lines. A total of 125,210 in-state duplicates, 86,681 New York–New Jersey duplicates, and 12,454 New York–Florida duplicates reflect systemic identity-matching failures in violation of New York Election Law §§5-500 and 5-302 and federal requirements under HAVA (52 U.S.C. §21083(a)(2)(B)(iii) for duplicate elimination).

This volume of duplication also implicates federal obligations under 52 U.S.C. §20507, exposing the voter-registration system to increased risk of double voting and administrative breakdown.

Inactive, Stale, and Long-Term Non-Voting Records

The presence of 746,283 inactive voters, 1,874,101 registrants who have not voted in two consecutive federal election cycles, and 1,145,185 voters inactive for more than five years indicates large-scale failure to execute NVRA's confirmation and removal timelines. New York Election Law §5-708 requires counties to mail address-confirmation notices and remove voters who fail to respond and fail to vote in two federal cycles. These categories suggest that counties may not be executing mandatory processes in a uniform or timely manner.

Voting Activity After Purge Dates

Project Civica identified 72,482 records in which voters appeared to cast ballots despite having purge dates recorded in NYSVoter. Once purged, an individual must re-register to regain eligibility under Election Law §§5-210 and 5-213.

Voting after purge suggests potential breakdowns in list synchronization, insufficient poll-pad controls, or unauthorized manual overrides. These findings raise significant compliance concerns under both state law and HAVA's real-time eligibility verification requirements.

Identity-Verification Irregularities

The identification of 220 duplicate SBOEID numbers and 3,087 records with irregular birthdates signals failures in identity verification and data integrity within the statewide voter database. Duplicate identifiers may represent improper merging or splitting of records, while abnormal birthdates may indicate flawed data imports, incomplete validation procedures, or intentional misreporting. These issues undermine trust in list-maintenance practices and increase systemic vulnerability.

Missing Address Information

A total of 26,834 registrants lack valid residential addresses. Election Law §§5-104 and 8-302 require known district assignments and ballot style application for each registrant. Individuals without assignable addresses cannot be correctly placed in election districts, posing challenges for ballot allocation and potentially disrupting mail-ballot chain-of-custody systems.

Conclusion and Recommendations

To ensure compliance with the National Voter Registration Act (NVRA), the Help America Vote Act (HAVA), and New York Election Law and to restore public confidence in voter-roll accuracy, the following reforms are recommended:

- Require monthly county-level public reporting of voter-list maintenance actions.
- Establish minimum statewide maintenance activity standards to ensure uniform execution.

- Publish NCOA processing results and confirmation-notice timelines.
- Disclose step-level NVRA process dates for inactivity-based removals.
- Provide public access to non-sensitive voter-roll audit fields.
- Mandate disclosure of inactive-voter populations, maintenance cycles, and removal criteria.
- Require public reporting on duplicate registrations and resolution outcomes.
- Require investigation and disclosure of voting activity occurring after purge dates.
- Increase state-level oversight capacity and enforcement authority.
- Implement independent post-federal-election compliance audits with public findings.

In short, New York already discloses why voters are removed. To meet federal and state legal obligations, it must also disclose when, how, and based on what verified information those removals occur.

VI. Voter Registration, Out-of-State Movers, and Cross-State Duplicate Findings

Out-of-State Movers (NCOA vs. NYSVoter)

Project Civica conducted a statewide residency-verification analysis by matching the January 2, 2025 NYSVoter extract against a January 19, 2025 USPS National Change of Address (NCOA) report. This comparison identified substantial discrepancies indicative of systemic breakdowns in list-maintenance practices:

Key findings include:

- 520,835 registrants filed NCOA notices indicating a move out of New York State prior to the November 2024 general election, yet remained listed in NYSVoter as Active or Inactive. The distribution of states to which New Yorkers relocated prior to the November 2024 general election, based on NCOA data, is presented in Figure 4. Florida and New Jersey were the primary destinations.
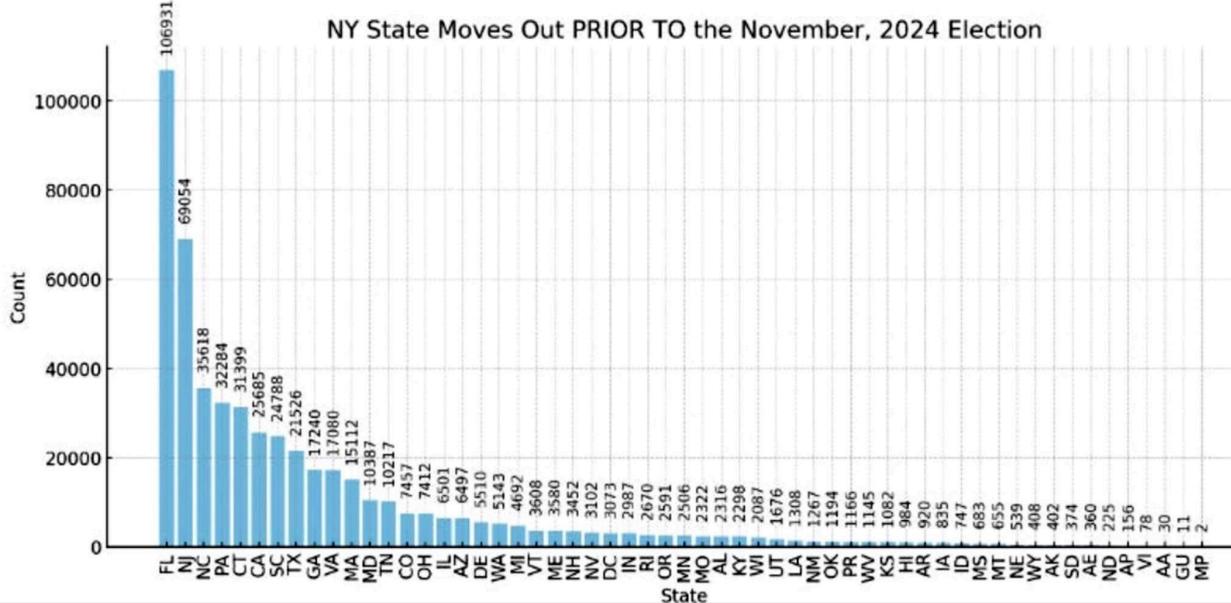
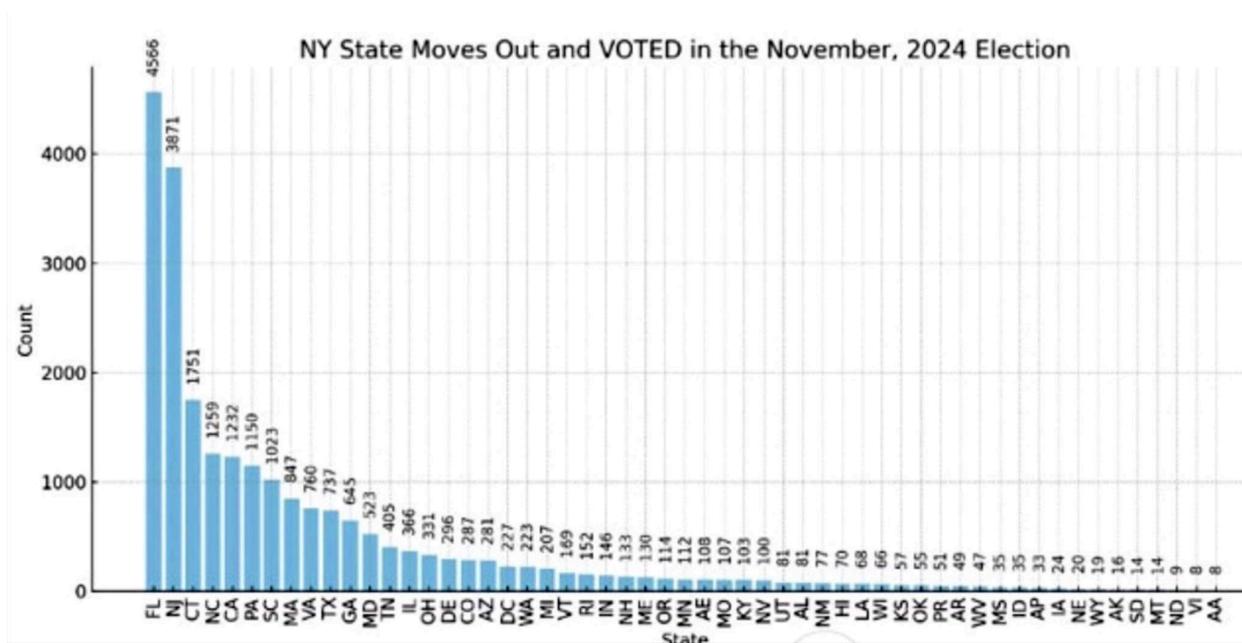*Figure 4 - NY State Moves Out PRIOR TO the November, 2024 Election*

Source: New York State Board of Elections, NYSVoter file, (snapshot dated Jan. 2, 2025) obtained Jan 7, 2025.

- Among this group, 23,298 registrants who had officially moved out of state nevertheless show recorded voting activity in New York's November 2024 Presidential Election. The state breakdown of individuals who moved out of New York but still voted in NYS is shown in Figure 5. Florida and New Jersey were again the top two states.

-

Figure 5 *- NY State Moves Out and VOTED in the November, 2024 Election*

Source: New York State Board of Elections, NYSVoter file, (snapshot dated Jan. 2, 2025) obtained Jan 7, 2025.

Legal Framework and Compliance Indications

Under Section 8 of the National Voter Registration Act (NVRA), states may use NCOA data as a trigger for list maintenance. When a change of residence is identified, the statute requires issuance of a forwardable address-confirmation notice. If the registrant fails to respond and does not vote in two consecutive federal elections, the registration may then be removed.

The presence of more than half a million out-of-state movers, including tens of thousands with post-move voting activity, indicates:

- Delayed or incomplete compliance with NVRA list-maintenance steps;
- Insufficient tracking and adjudication of interstate relocations; and
- Potential exposure to unlawful out-of-jurisdiction voting, whether through administrative failure or unlawful conduct.

These outcomes reflect the cumulative effects of years of deferred maintenance, which culminated in large, post-election purge activity. More than 700,000 registrations were removed only after the 2024 election, including approximately 448,000 removals in February 2025 alone, illustrating reliance on delayed, clustered remediation rather than continuous compliance.

NY–NJ Dual Registrants and Double Voting

New Jersey was the second most common relocation destination for departing New York registrants, and the first jurisdiction in which Project Civica conducted cross-state duplicate testing. In coordination with Citizens for New Jersey Election Integrity, voter-file comparisons between NY and NJ revealed:

- More than 81,000 dual registrants appearing in both official voter rolls;
- 396 cases of likely double voting in the 2024 federal election cycle—ballots cast in both states for the same federal contests.

Applicable Law

Documented double voting implicates multiple felony statutes, including:

- 52 U.S.C. § 10307(e) – prohibits voting more than once in an election for federal office.
- 52 U.S.C. § 20511(2) – criminalizes knowingly and willfully casting multiple ballots.
- NY Election Law § 17-132 – makes voting more than once in any election a felony.

Project Civica, in coordination with county-level volunteers and data-analysis teams, has referred all identified New York–New Jersey double-vote cases to the appropriate District Attorneys across New York as well as the Department of Election Law

Enforcement (DELE). Investigations have apparently commenced in at least four jurisdictions.

These findings demonstrate the real-world consequences of cross-state list-maintenance failures and underscore the urgent need for structured interstate data sharing, an area in which New York remains deficient.

NY/FL Dual Registrants and Cross-State Risk Indicators

Florida is now the leading relocation destination for former New York residents and accounts for a significant share of the 520,835 NCOA-flagged movers in the 2024–2025 period.

Comparison of NYSVoter data with Florida's statewide voter file identified:

- 12,454 dual registrants appear as active in both states as of October 2025.

Most of these appear to be attributable to incomplete removals following relocation, where registrants established a new Florida residency but were not timely removed from New York's rolls. However:

- Approximately 385 cases show overlapping voting histories in federal-election years.
- These cases are undergoing further review to determine whether ballot activity constitutes double voting or administrative misclassification.

Florida's participation in multiple verification systems, including more robust DMV identity matching, highlights New York's inconsistent and delayed approach to interstate list maintenance procedures.

Conclusion and Recommendations

Based on the findings in this section, Project Civica recommends the following actions:

- Require public reporting of interstate mover activity, including counts of NCOA-flagged out-of-state movers, confirmation notices sent, inactive placements, and removals, by county and month.
- Disclose cross-state duplicate and dual-registration statistics, including investigation and resolution outcomes.
- Mandate public documentation of NVRA process timelines for out-of-state movers, including notice issuance dates and cancellation timing, to allow independent verification of compliance.
- Establish formal interstate data-sharing agreements with neighboring and high-migration states to facilitate timely detection and resolution of dual registrations.
- Implement routine post-election audits of cross-state voting activity, including reconciliation of purge dates, re-registration records, and ballot-casting history.

- Treat cross-state list maintenance as a civil-rights and election-integrity obligation, recognizing that delayed or incomplete removals create conditions that threaten lawful suffrage, dilute valid votes, and undermine public confidence in election outcomes.

VII. Long-term Non-Voting Registrants: NVRA Compliance Deficiencies and Election Administration Risks

Overview

Project Civica's analysis of NYSVoter data identified a large population of registrants who have never cast a ballot or have not voted in many years. These long-term non-voting registrants highlight important gaps in New York's voter roll maintenance required by federal laws, including the National Voter Registration Act (NVRA §8) and Help America Vote Act (HAVA §303), as well as state rules.

Federal Requirements Under the NVRA

Section 8(d) of the National Voter Registration Act (NVRA), codified in 52 U.S.C. § 20507(d), establishes a specific, multi-step process that states must follow before removing a registrant for a suspected change of residence (often identified through non-voting or change-of-address data). The required sequence is:

- Send a forwardable address-confirmation notice to the registrant.

- If the notice is returned as undeliverable or the registrant does not respond, place the registrant in "inactive" status.

- Retain the registrant on the rolls during a waiting period covering two consecutive federal general elections. Inactive voters remain eligible to vote (e.g., by affidavit ballot or updating their information).

- Remove the registrant only if they fail to vote, respond, or update their registration following that waiting period.

Federal law explicitly prohibits removal solely for failure to vote (52 U.S.C. § 20507(b)(2)). The full confirmation-notice and inactivity process must be completed first.

New York's Implementation and Constraints

New York Election Law fully implements this federal framework through several interlocking provisions:

- § 5-213 governs the issuance of confirmation notices and placement of voters in inactive status when notices are undeliverable or unanswered.

- § 5-400(1)(f) expressly authorizes cancellation when a voter, after being placed in inactive status, "did not vote in any election… during the period ending with the second general election… and for whom the board… did not… receive any information that such voter still resides in the same county or city."

- § 5-402 outlines general procedures for cancellation and required notices to affected voters.

- § 5-708 requires boards of elections to use official data, most notably USPS National Change of Address information and certain court or municipal reports, to identify voters who may have moved or become ineligible and to initiate required list-maintenance actions such as address updates, confirmation notices, or placement into inactive status.

New York tracks this process in the statewide NYSVoter database through status fields (Active → Inactive → Removed/Purged).

Because systematic removals based on the two-federal-election inactivity cycle qualify as a "systematic program" under NVRA § 8(c)(2) (52 U.S.C. § 20507(c)(2)), large-scale (bulk) inactivity-based purges are prohibited during the 90-day "quiet period" preceding any federal primary or general election. Individualized removals for other reasons (death, felony conviction, voter request, confirmed out-of-state move, etc.) remain permissible year-round.

Key Findings

Project Civica's longitudinal data from NYSVoter reveals large numbers of long-term non-voting registrants who remain in active status without evidence of required confirmation notices, progression to inactive status, or timely removal after the waiting period. This pattern indicates incomplete or non-uniform execution of both federal and state list-maintenance obligations across counties.

- Over 1.8 Million Registrants Who Have Never Voted: More than 1.8 million have no voting record since registration.

- More Than 1 Million with No Votes in Six or More Years: Table 3 shows a total of 1,012,605 registrants without votes in at least six years (often due to moves, outdated addresses, or unreported deaths), equaling three or more federal election cycles and at least one past NVRA's removal protocols.

Years Registered Without Voting	Voter Count
10+ years	698,711
9 years	70,569
8 years	69,943
7 years	75,097
6 years	98,285

Table 3 *- Non-Voting Voters by Years Registered*

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

- The voter count totals in Table 3 collectively reflect 1,012,605 non-voting registrants who have not cast ballots in six years over more — a duration that should have triggered the full NVRA maintenance procedures (cross checking, confirmation notices, inactive status placement, and eventual removal after two federal election cycles). Within this group, 698,711 registrants have been registered for 10+ years and have never voted — the largest and most alarming category, as it represents decades of unaddressed inactivity without apparent progression through required NVRA steps.

- Registrants who missed the last two federal elections show a similar persistent trend. Table 4 details monthly figures exceeding 1.8 million registrants who did not vote in these cycles (peaking at 1,874,101 in October 2025), with no clear evidence of required NVRA maintenance actions such as cross checking, being systematically applied across counties.

Active–Inactive Voters Who Have Not Voted in the Last Two Federal Elections (2025)

Month	Number of Registrants
June	1,909,753
July	1,882,024
August	1,878,190
September	1,877,506
October	1,874,101

Table 4: *Active/Inactive Voters Who Have Not Voted in the Last Two Federal Elections (2025)*

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

Monthly trends in Table 4 show a gradual decline from June (1.91M) to October (1.87M), with a sharper drop in November (~1.80M). This suggests some removals occurred but were insufficient to address the scale.

Impact of Non-Voting Registrants on Voter Roll Integrity

Inflated Voter Rolls
More than 1.8 million registrants who have never-voted artificially raise New York's registration totals and distort the active voter counts.

Reduced Data Accuracy
Non-updated records contribute to:

- Duplicate registrations
- Cross-state matches
- Incorrect status codes
- Outdated addresses
- Wrongful classification of voters as Active

Vulnerability to Administrative Error
Large pools of non-voting registrants increase the chance of:

- Mis-assigning voter histories
- Incorrectly associating ballots
- Improper absentee-ballot mailings

- Poll-pad assignment errors

- Higher provisional-ballot issuance

Election-Administration Burden

Counties must continually manage large numbers of stale, inactive, or never-voted records, a task made harder by:

- Lack of modern automation

- Apparent State - county data overwrites

- Limited staffing and funding

Consistent application of NVRA procedures would reduce these impacts without improper disenfranchisement.

This issue is larger in New York than in states with stronger maintenance, where inactive rates are often lower. Nationally, inactive registrants comprise approximately 10–12% of total voter registrations, based on U.S. Election Assistance Commission Election Administration and Voting Survey (EAVS) data aggregated across recent election cycles. In contrast, Virginia implemented daily automated voter-roll updates and cross-database verification, requiring continuous list maintenance through its statewide election system.

Potential Influence of the New York Voting Rights Act

The John R. Lewis Voting Rights Act of New York (passed in 2022, with key oversight starting September 2024) adds review requirements for major changes to roll maintenance in certain counties with past voting rights concerns. Routine NVRA steps do not need this review, but the extra oversight by the NY Attorney General on larger maintenance activities may lead officials to be more cautious, potentially slowing processing of long-term non-voting records.

Limitations of NYSVoter Data

Although the NYSVoter database provides valuable aggregate information on voter status and categorical reasons for registration changes, the data made publicly available through FOIL extracts and routine disclosures is insufficient to independently verify compliance with federal and state voter-list maintenance requirements.

Publicly available NYSVoter data does not include records documenting execution of NVRA-mandated maintenance steps, including:

- Whether a forwardable address-confirmation notice was mailed;

- The date such notice was generated or sent;

- Whether mail was returned as undeliverable;

- Whether and when a registrant was placed into inactive status; or

- Whether the statutorily required two-federal-election waiting period elapsed prior to removal.

As a result, the public can observe outcomes (e.g., "inactive" or "removed") but cannot easily verify whether the required statutory process was followed.

While categorical removal reasons (e.g., NVRA, death, felony) are available, NYSVoter extracts do not reliably disclose:

- The precise date each intermediate action occurred;

- Whether actions occurred inside or outside NVRA's 90-day quiet period; or

- Whether removals resulted from individualized determinations or systematic programs.

This limitation prevents independent assessment of NVRA timing compliance, which is central to lawful list maintenance.

NYSVoter does not provide public access to:

- Maintenance logs;

- Transaction histories;

- User-initiated change records; or

- Batch-processing or automated job documentation.

Without these records, it is impossible to determine who initiated a change, what triggered it, or what verification was relied upon, all of which are required to demonstrate compliance under HAVA §303.

Although voter records are maintained at the county level and synchronized to the statewide system, publicly available data:

- Masks county-level variation in execution practices;

- Obscures delay between local action and statewide synchronization; and

- Prevents identification of counties that fail to carry out required maintenance steps consistently.

This limitation undermines evaluation of whether list maintenance is being conducted in a general, uniform, and nondiscriminatory manner, as required by NVRA §8. The absence of step-level and audit data prevents public reconciliation of anomalies observed elsewhere in this report, including:

- Long-term non-voting registrants remaining active for many years;

- Voting activity recorded after purge dates;

- Persistent duplicate registrations; and

- Identity and address irregularities.

In sum, NYSVoter's publicly available data reflects what happened, but not how or why it happened. Federal law requires that voter-list maintenance be not only lawful, but demonstrably lawful. Where the public cannot access records sufficient to reconstruct voter-roll changes, compliance with NVRA §8 and HAVA §303 cannot be independently verified. These limitations do not merely constrain academic analysis; they frustrate statutory oversight, inhibit public confidence, and impede the ability of courts, regulators, and citizens to assess whether voter-roll maintenance is being executed in accordance with law.

Summary: Clear Evidence of Incomplete NVRA-Mandated Maintenance

Project Civica's analysis of NYSVoter data reveals clear evidence of incomplete execution of NVRA-mandated voter roll maintenance for long-term non-voting registrants. In total, the database includes:

- Over 1.8 million registrants who never voted since registration;

- More than 1.01 million registrants who never voted since registration still on the rolls six or more years,

- 698,711 registrants on the rolls who have never voted since registration 10 or more years, and;

- Approximately 1.87 million registrants who did not vote in the last two federal election cycles (peaking at 1,874,101 in October 2025).

These figures collectively represent a substantial portion—potentially 13–15%—of New York's total voter rolls (approximately 13–14 million active and inactive registrants). The lack of progression through required confirmation notices, inactive status assignment, and timely removal underscores systemic gaps in maintaining accurate and current rolls as mandated by federal law.

Large numbers of long-term non-voting registrants can lead to:

- Inflated registration totals that do not reflect the eligible, active electorate

- Distorted turnout and participation metrics

- Increased administrative and operational costs for election officials

- Erosion of public confidence in voter roll accuracy

- Increased risk of unlawful voting and other illegal activities

- Undermined legally protected civil rights

Recommendations

To address NVRA compliance deficiencies, restore voter-roll accuracy, enable independent verification, and rebuild public confidence, Project Civica recommends that the following actions be made publicly available and independently verifiable:

- Publish monthly, county-level reports documenting NVRA list-maintenance actions for long-term non-voting registrants, including confirmation notices issued, inactive-status placements, reactivations, and removals.

- Publicly disclose NVRA process timelines, including the dates of confirmation-notice issuance, inactive-status designation, and registration cancellation for long-term non-voting registrants.

- Release non-sensitive, machine-readable maintenance audit fields sufficient to reconstruct the full Active → Inactive → Removed workflow for long-term non-voting records.

- Publish aggregate county-level counts of long-term non-voting registrants, including never-voted, multi-cycle non-voting, and long-term inactive populations.

- Disclose statewide standards, rules, and schedules governing inactivity review and confirmation-notice processing to ensure uniform and nondiscriminatory application across counties.

- Publicly report audit findings from any post-election, internal, or external reviews addressing NVRA compliance for long-term non-voting registrants.

- Establish clear statewide audit authority and, where records are incomplete, reconstruct list-maintenance logs necessary to verify NVRA compliance.

- Implement automated list-maintenance workflows that strictly adhere to NVRA removal protocols while accounting for administrative caution and any indirect effects of state-level voting-rights protections.

Prompt corrective action by the New York State Board of Elections is essential to ensure election integrity and protect public confidence.

To address these deficiencies and strengthen compliance with NVRA, HAVA, and New York Election Law, the following steps by the New York State Board of Elections are recommended:

- Require counties to conduct regular, documented reviews of long-term non-voting registrants and report progress on NVRA process execution.

- Mandate public disclosure of aggregate counts of registrants who have not voted in two or more federal election cycles, including status progression metrics.

- Enhance training and oversight to ensure uniform use of confirmation notices and inactive status assignment.

- Strengthen integration of reliable data sources (e.g., NCOA, vital records) to trigger timely maintenance actions.

- Conduct independent audits of inactivity-based maintenance compliance following each federal election cycle.

Internal activities that cannot be independently verified do not satisfy the transparency and auditability requirements of NVRA § 8 and HAVA § 303. Implementing these recommendations including monthly public reports, disclosed process timelines, machine-readable audit fields, aggregate voter-status counts, uniform statewide standards, and independent post-election audits would close existing NVRA compliance gaps, enable verifiable transparency, and restore public confidence in New York's voter-roll maintenance. Prompt action by the New York State Board of Elections is essential to safeguard election integrity while fully protecting the rights of eligible voters.

VIII. "Dead Voter Society" Suffolk County Case Study

Case Study Overview and Findings

Project Civica launched its "Dead Voter Society" initiative to identify deceased individuals who remained listed as active voters and, in some cases, appeared to have voted after their date of death. Researchers cross-referenced federal death records, including Social Security Administration data, with voter-registration and voter-history records, supplemented by AI-assisted obituary searches to corroborate identity and dates of death.

As part of this initiative, Project Civica examined Suffolk County voter-history records for the November 2022 General Election. Researchers identified 43 registrants who were confirmed deceased prior to the election yet appeared in the NYSVoter system as having voted after death.

In October 2024, approximately 23 months after the election, the research team re-queried these same 43 records in advance of briefing county officials. The updated NYSVoter extract no longer displayed the 2022 voting entries for these registrants, despite multiple earlier monthly snapshots showing that the vote records had previously existed.

Because New York does not make voter-record audit logs, field-level metadata, or version histories publicly available, and because prior requests by independent researchers for such records have been denied, there is currently no statutory or practical mechanism to determine:

- Who altered the voter-history records;

- When the changes occurred;

- What authority governed the changes; or

- Whether the changes were corrective, administrative, or erroneous?

Project Civica has submitted its own formal Freedom of Information Law (FOIL) request for access to voter-record audit logs and awaits a response.

Further review revealed additional anomalies and unexplained changes as shown in Figure 6. For example, one registrant died in July 2021, yet the August 2024 NYSVoter dataset reflected that individual as having voted in the November 2022 General Election, more than a year after death. Subsequent September and October 2024 datasets no longer contained the 2022 vote entry.

Other registrants exhibited similar patterns: voter-history entries present in earlier datasets disappeared in later ones, and in some cases the method of voting appeared altered. These changes occurred despite voter-history records being required to be accurate, preserved, and auditable, and notwithstanding the absence of any preserved copy of the original record.

Because Suffolk County does not provide public audit trails, change-control documentation, or immutable record archives, the responsible entity, timing, and rationale for these changes cannot be determined.

Figure 6 - Suffolk County Disappearing and Altered Voter History from NYSVoter
11/2023 - 11/2024
Source: NYS Board of Elections, NYSVoter files (Nov. 20, 2023; May 6, 2024; Oct. 9, 2024; Nov. 3, 2024).

Federal Record-Retention and Integrity Requirements

Federal law requires preservation and integrity of election records. Under 52 U.S.C. § 20701, states and local election officials must preserve all records relating to a federal election, including voter-history records, for 22 months following the election. 52 U.S.C. § 20703 prohibits the destruction, concealment, removal, or alteration of such records. If voter-history records were altered or removed before the 22-month retention period expired, this would constitute a direct violation of federal law. Even if changes occurred after the retention period, federal law requires that original records remain preserved and reconstructable, a standard not met where no immutable archive or audit trail exists.

HAVA Auditability and Accuracy Requirements

The Help America Vote Act (HAVA), 52 U.S.C. § 21083, requires each state to maintain a single, centralized, official, and auditable statewide voter registration database. HAVA imposes affirmative obligations that voter-registration and voter-history records be:

- Accurate and current;

- Uniform and nondiscriminatory; and

- Capable of supporting verification, error correction, and reinstatement of erroneously altered records.

An auditable database necessarily requires traceable change histories and preservation of prior record versions. Where voter-history data can be altered or overwritten without retention of the original record or documentation of the change, the database fails to meet HAVA's auditability and accuracy requirements.

New York State Law Requirements

Under New York Election Law § 3-222, election records must be preserved for two years. If voter-history records were altered before November 2024, this would constitute a violation of state law. Even beyond the two-year retention period, Election Law § 3-412 requires that "true and complete records" remain publicly accessible.

Because it appears no preserved copy of the original voter-history records exists, and if no audit trail is available to reconstruct prior versions, New York's statutory obligations to maintain complete and accurate election records would not be satisfied.

Implications

The absence of *publicly* available audit logs, immutable archives, and version histories permits historical voter-record data to be modified, overwritten, or removed without accountability or reconstruction capability. This undermines:

- Compliance with federal record-retention laws;

- HAVA's auditability and accuracy requirements; and

- New York's obligation to maintain true, complete, and publicly accessible election records.

New York Election Law assigns counties responsibility for record updates, eligibility corrections, and synchronization with the statewide voter registration system. Yet in Suffolk County, voter-history entries appear to have been modified across multiple datasets and years without any public mechanism for verifying the accuracy, authority, or legality of those changes.

Absent auditable records, it is impossible to determine whether the observed changes reflect lawful corrections, administrative error, or impermissible alteration of election records. Regardless of intent, the lack of traceability and preservation prevents independent verification, frustrates statutory oversight, and erodes public confidence in the integrity of New York's voter-registration system.

Recommendations – Voter-History Integrity and Auditability

To address the voter-history deficiencies identified in the Suffolk County case study and ensure compliance with federal and state law, Project Civica recommends:

- Require immutable preservation of voter-history records, with publicly available versioned retention of original entries and documented corrections.

- Mandate publicly available audit logs for all voter-history changes, including change date, action taken, statutory basis, data source, and responsible authority.

- Publicly disclose post-election voter-history modifications, including explanation and timing, to permit verification of record-retention compliance.

- Codify HAVA auditability and accuracy requirements in state law or regulation, explicitly requiring traceable, reviewable voter-history change records.

- Implement independent post-election record-integrity audits, with public findings assessing compliance with federal retention laws and New York preservation requirements.

Election records that cannot be independently audited cannot be presumed accurate. Preservation, traceability, and public verification are not optional administrative practices; they are statutory requirements essential to protecting lawful votes and civil-rights guarantees.

IX. January 1 DOB Anomalies, Citizenship Data Connections, and Identity-Verification Risks

Overview and Findings

New York Election Law requires that only U.S. citizens register to vote, and applicants must affirm citizenship under penalty of perjury on the registration form. However, the state does not mandate operational verification of citizenship status through federal

databases (e.g., SAVE, USCIS, SSA citizenship codes) or documentary proof. This reliance on self-attestation, combined with data quality issues such as placeholder birthdates, creates vulnerabilities in identity verification during registration. Unintentional misregistration by non-citizens can have severe consequences, including barriers to future naturalization under federal immigration law (INA §316), where unlawful voting is grounds for denial.

Day-of-Month Anomaly: January 1 Is a Statistical Outlier

NYSVoter data shows a statistically implausible overrepresentation of January 1 birthdates (over 107,000 occurrences, ~65% above the 63,000–69,000 range for other first-of-month dates), as illustrated in Figure 7.
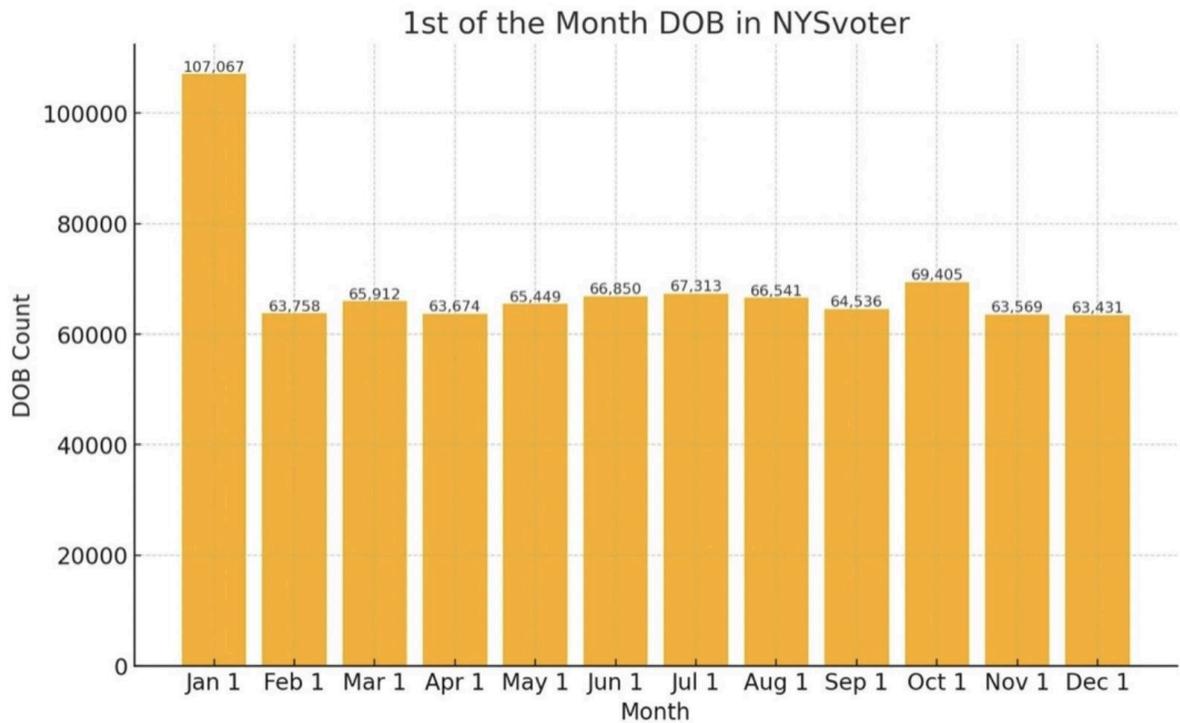
Figure 7 - *First of the Month Date of Birth Anomaly in NYSvoter*

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated May 6, 2025), obtained May 6, 2025

January 1 DOBs often originate in federal immigration/naturalization systems

January 1 DOBs often originate in federal immigration/naturalization systems for individuals with incomplete birth records, propagating into state databases. While not proof of non-citizenship, this anomaly also weakens identity matching and deduplication, making it harder to detect registration errors.

Historical Growth of January 1 Registrations (1955–2025)

This placeholder pattern spans decades, with surges during high-volume registration periods. Figure 8 shows a seventy-year trend analysis with accelerating and cyclical use of January 1 placeholder birthdates. Surges are especially pronounced during presidential election cycles, suggesting that intake pressures led to expedited data entry without adequate verification of identifying information and possibly citizenship. These surges reflect failure conditions for reasonable list-maintenance standards contemplated under NVRA.
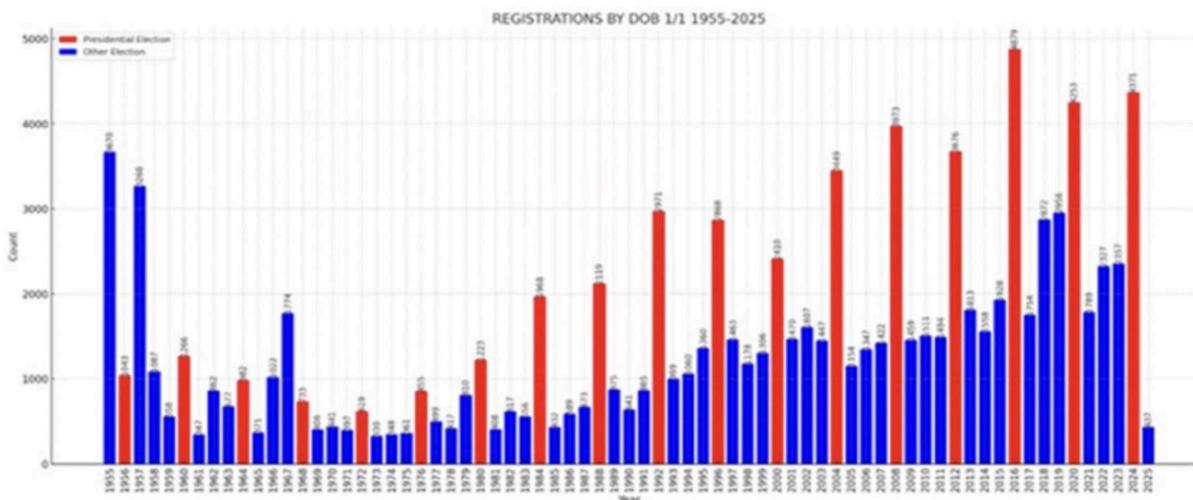
Figure 8 - *Registrations by Date of Birth January 1, All Registrants 1955-2025*

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated May 6, 2025), obtained May 6, 2025

Active Registrations Confirm Ongoing Placeholder Usage

The placeholder-date anomaly is not just a legacy issue. When purged and inactive registrations are removed from the dataset, active registrations from 1955–2025 show the same presidential-cycle spikes and exponential growth, as illustrated in Figure 9. This confirms that modern front-end registration systems continue to accept placeholder dates, creating ongoing data-quality risks.
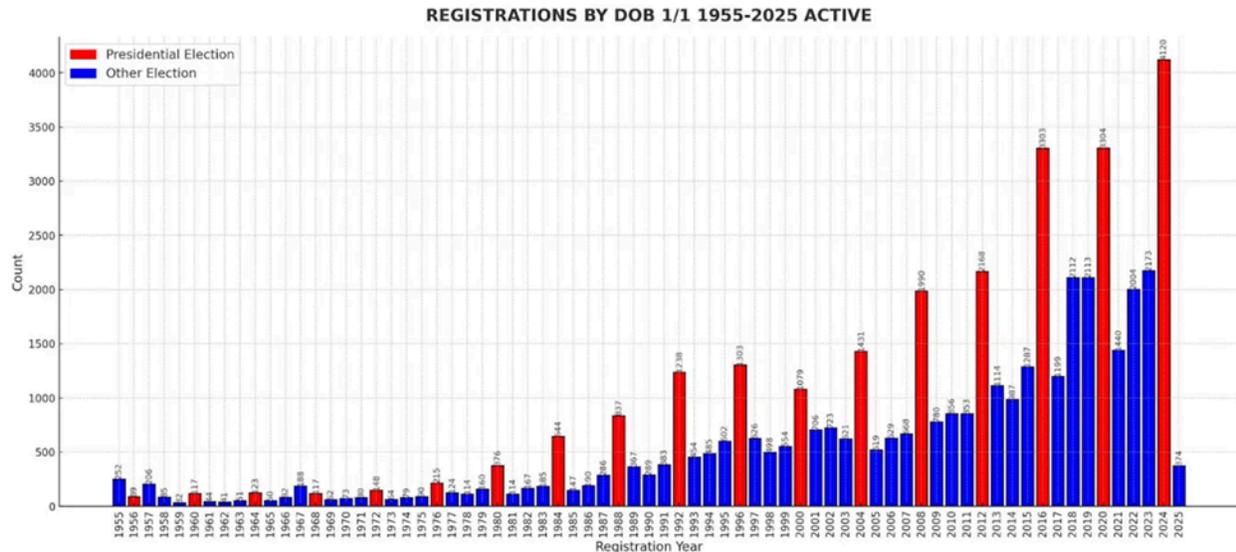
Figure 9 - *Registrations by January 1 Date of Birth ACTIVE, 1955 - 2025*

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated May 6, 2025),
obtained May 6, 2025

Connection to Citizenship Data Systems and Federal Identity Pipelines

January 1 placeholder birthdates originate in federal naturalization and identity systems, where unresolved or unknown birthdates were historically substituted (particularly from regions without formal birth registration), with January 1 used as a default value. Because NVRA requires motor-voter integration via SSN and DMV-based registration channels, these placeholders propagate into New York's voter file through identity-system ingestion.

The federal identity pipeline feeding state systems is expanding rapidly. Figure 10 shows SSA records with non-citizen SSN issuance increasing from 350,399 in FY2019 to more than 2 million in FY2024, with 900,649 already issued mid-FY2025. This upstream volume amplifies placeholder DOB penetration into voter-registration records.

New Non-Citizen Social Security Numbers Issued

2,095,247

964,163

900,649

590,193

350,399   400,621

270,425

FY2019   FY2020   FY2021   FY2022   FY2023   FY2024   FY2025

Source: Enumeration-Beyond-Entry System, Social Security Administration (as of March 14, 2025)

Note: Sept. fiscal year end, FY2025 figures show Oct. 1, 2024 through March 14, 2025
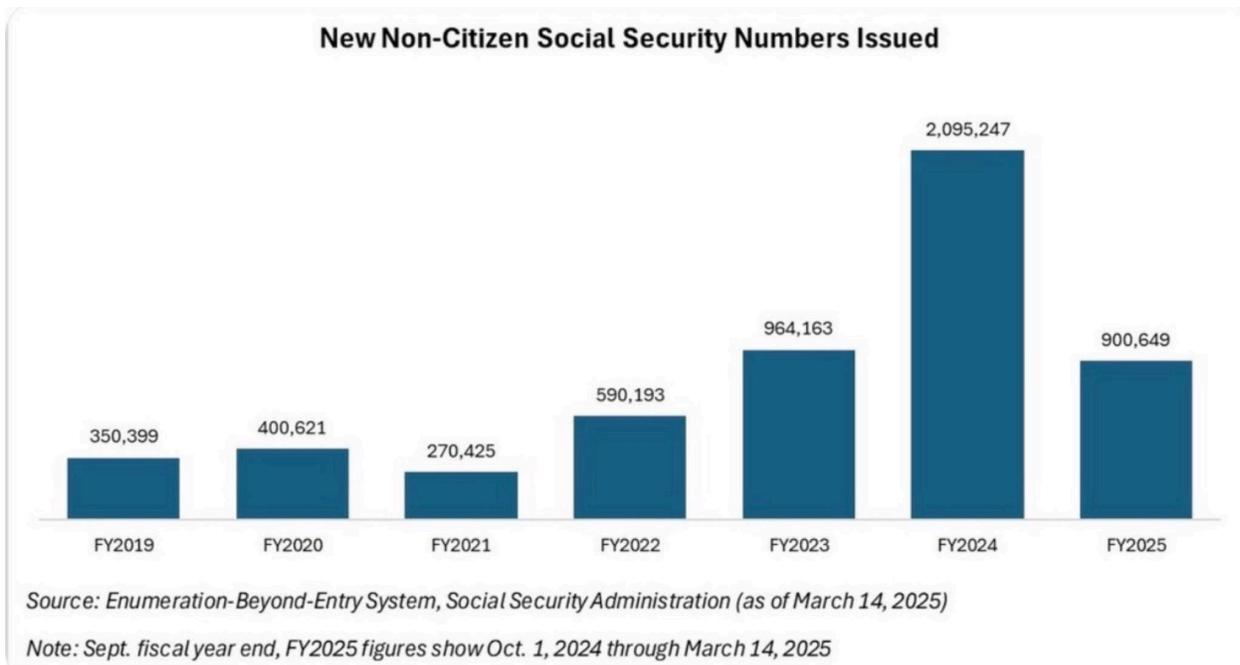
***Figure 10** - New Non-Citizen Social Security Numbers Issued*

Placeholder DOBs in these records can collide with voter-registration identity fields

The surge of non-citizen SSNs, over 2 million issued in FY2024, illustrates the scale of upstream identity records feeding into state DMV systems. Placeholder DOBs in these records can collide with voter-registration identity fields, weakening deduplication and complicating citizenship-verification checks that rely on accurate DOBs.

New York State law requires that only U.S. citizens may register to vote. Applicants must affirm their citizenship status on the voter-registration form under penalty of perjury.

However, New York Election Law does not mandate a specific citizenship-verification procedure, and public NYS Board of Elections materials do not describe any automated process that confirms citizenship using federal databases such as USCIS, DHS, SAVE, SSA citizenship codes, or passport records. If internal verification procedures exist, they are not described in statute, regulation, or public guidance. Under HAVA §303 and NVRA §8, this gap poses compliance risk because the state must maintain accurate and eligible voter lists.

As a result, New York's registration process relies primarily on self-attestation, making both the registrant's honesty and *comprehension* of the citizenship requirement critically important. For many lawful residents, refugees, asylees, long-term non-citizens, or individuals with limited English proficiency, the distinction between "citizen" and "resident" is not always clear. This increases the risk of unintentional misregistration.

This concern becomes more significant when combined with the extreme overuse of January 1 placeholder birthdates, many of which originate in naturalization and immigration-based identity files that use January 1 when an exact birthdate is unknown or incomplete. Because placeholder DOBs weaken identity-matching systems, the state's ability to detect registration errors, duplicates, or ineligible records is reduced.

When placeholder DOB saturation is combined with unverifiable citizenship attestation and no automated cross-matching, the presence of ineligible registrants (such as non-citizens) cannot be ruled out and may be undetectable within current processes. Together, these factors create a structural vulnerability.

Citizenship Verification Processes in New York: Recommendations

- Prohibit acceptance of known placeholder DOBs, including January 1, without supporting documentation.

- Conduct a statewide DOB audit targeting January 1 and other placeholder dates for verification.

- Flag January 1 DOB registrants in deduplication algorithms for enhanced review.

- Require DOB re-verification when voters update names, addresses, or party affiliation.

- Publish annual DOB-distribution transparency reports to monitor system integrity.

- Codify citizenship-verification procedures in statute or regulation to align with HAVA expectations for database reliability.

Conclusion and Compliance Implications

The scale and persistence of placeholder DOB usage, combined with reliance on unaudited citizenship self-attestation, constitute evidence of potential failure to satisfy NVRA list-maintenance obligations and HAVA-mandated identity-integrity requirements. Exposure categories include NVRA private-right-of-action risk, DOJ enforcement inquiries, state audit mandates, and legislative intervention.

The January 1 anomaly reveals measurable identity-system defects affecting list-maintenance, eligibility enforcement, and confidence in database integrity. These findings justify independent forensic review, statutory reform, and routine audit authority. These metrics provide evidentiary foundation for federal inquiry, state administrative enforcement, and NVRA-based private right-of-action review.

X. Statewide Voter Registration Trends by Party Affiliation in New York (2024–2025)

This section analyzes statewide and monthly party affiliation changes using NYSVoter data, revealing composition shifts and switching patterns.

Long-Term Shift Toward Blank (No Party) Enrollment

Figure 11 shows the result of a sustained long-term rise in Blank (No Party) registrations, which now make up nearly 27% of all registered voters in New York and are the second-largest voting bloc in the state. This growth reflects rising disengagement from formal political parties, younger voters opting out of affiliation, and post-primary reversion from party enrollment. Blank enrollment is now one of the most important structural features of New York's electorate and strongly shapes the enrollment-change patterns illustrated in Figures 12–13.
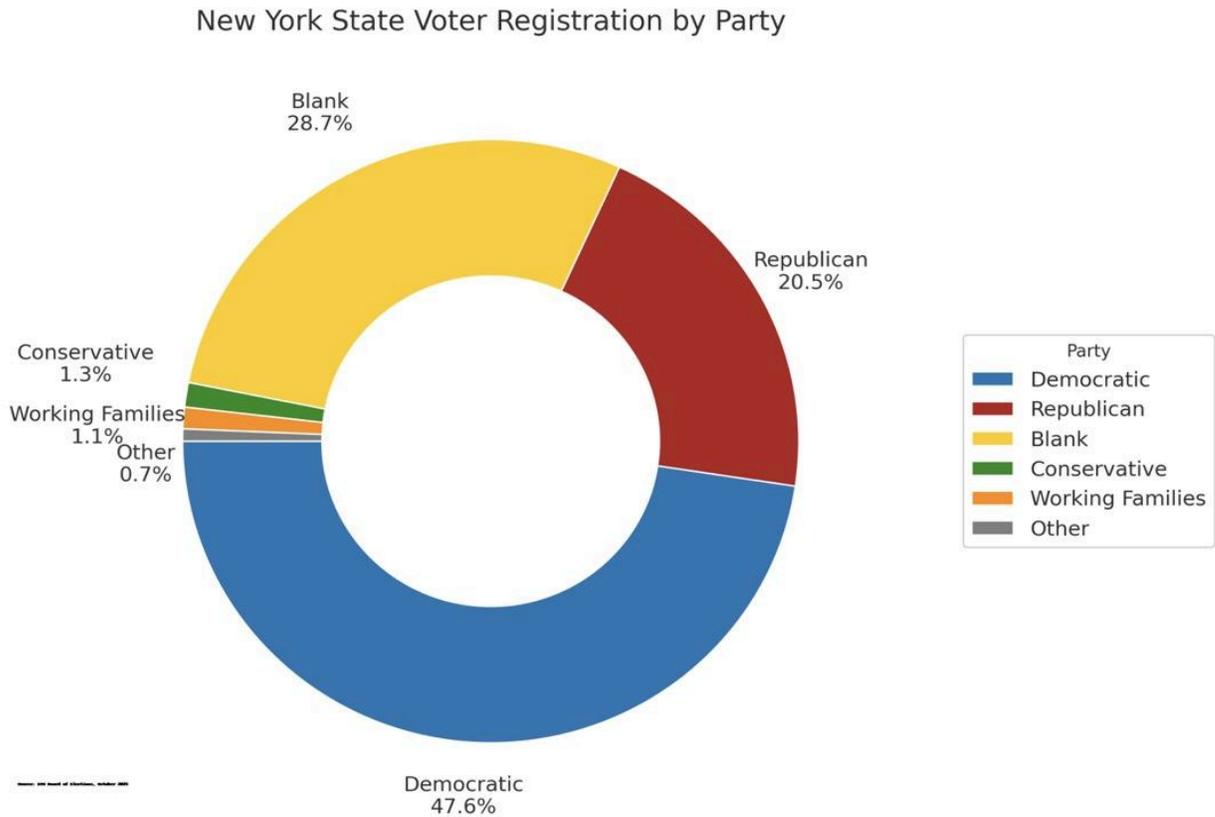
Figure 11 - New York State Voter Registrations by Party

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

High Enrollment Churn Driven by NY Election Law §5-304

The spikes in enrollment changes seen in Figures 12 and 13 correspond directly with the statutory deadlines for party enrollment changes defined in New York Election Law

§5-304(3). The law requires that any voter wishing to participate in a party primary must submit an enrollment change no later than February 14. Changes submitted on or after February 15 do not take effect until the seventh day after the primary, usually July 1, producing a predictable surge of enrollment activity before and after the cutoff. These movements reflect statutory timing rather than ideological shifts.

Figure 12 *-   Changes TO Party Affiliation (Feb - Oct 2025***)**

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.

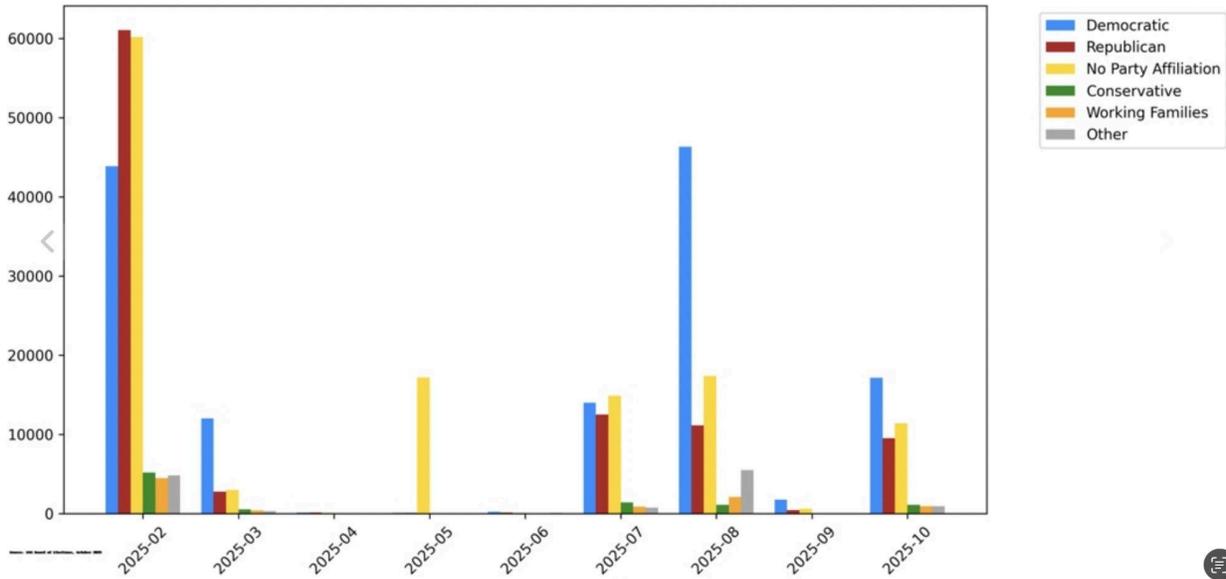***Figure 13*** *- Changes FROM Party Affiliation (Feb - Oct 2025)*

Source: New York State Board of Elections, NYSVoter statewide voter file (snapshot dated October 3, 2025), obtained October 6, 2025.
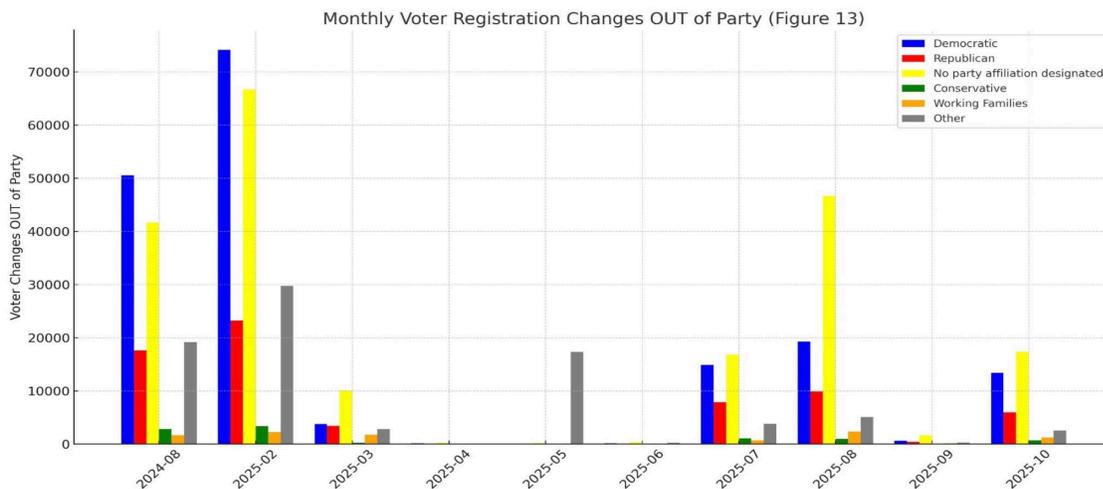
Administrative Impact of the February 14 Deadline

The statutory deadline creates concentrated administrative workload and strains county to state synchronization. Because thousands of enrollment changes arrive immediately before February 14, timing mismatches, delayed updates, and overwriting of historical records become more likely. Enrollment changes submitted February 15–July 1 are held and processed only after the primary, creating a second spike of enrollment changes post-primary. Figures 12 and 13 illustrate how these statutory requirements shape statewide patterns of voter movement.

XI. Conclusion

Project Civica's analysis reveals deep, systemic problems in New York's voter-roll administration that undermine the accuracy, reliability, transparency, and independent auditability of the statewide voter file.

These core issues include:

- Predominantly low-verification registration channels that rely almost entirely on self-attestation without routine documentary proof or authoritative federal checks, allowing incomplete, placeholder, or unverified data to enter and persist in the system.

- Episodic and clustered list-maintenance practices that fail to provide the continuous, uniform, and regular program required by federal law.

- Prolonged retention of large numbers of stale, inactive, and potentially ineligible registrants, resulting in inflated and outdated rolls.

- Inadequate resolution of out-of-state movers, interstate duplicates, and cross-jurisdiction conflicts.

- Widespread data-quality defects, including unresolved duplicates, invalid or missing fields, and irregular entries that impair identity matching and eligibility tracking.

- Voter-history alterations and erasures without immutable audit logs or verifiable documentation.

- Structural gaps in citizenship verification that leave eligibility determinations vulnerable and unverifiable.

- A February 14 party-enrollment deadline that creates intense workload surges straining administration, increasing risks to voter-roll accuracy, data integrity, and verifiability.

Collectively, these deficiencies demonstrate **non-compliance** with key federal mandates:

- **NVRA § 8** requires states to conduct a general program of voter-list maintenance that is uniform, nondiscriminatory, and carried out on a regular basis, yet New York's maintenance is neither continuous nor consistently applied.

- **HAVA § 303** demands a single, centralized, official, and auditable statewide voter database capable of accurate updates and verifiable corrections, yet the current system lacks the transparency, traceability, and auditability necessary to meet this standard.

The result is a voter file that cannot be confidently relied upon as an accurate, independently verifiable record of eligible voters and lawful maintenance actions.These are not isolated administrative shortcomings but fundamental structural weaknesses that erode public confidence and threaten the integrity of elections.

The rapid growth of unaffiliated (Blank/No Party) voters now approaching 27% and the second-largest bloc statewide reflects deepening disaffection with the political system, a trend that may be accelerated by persistent systemic vulnerabilities in voter-roll accuracy, verification, and auditability. These documented issues serve as a key contributor to eroding public confidence in the democratic framework itself, further driving voters away from major parties and underscoring the urgent need for comprehensive reforms to restore trust.

Core Reform Recommendations: Modernizing NVRA & HAVA Compliance

- Mandate continuous, automated voter-roll maintenance statewide, replacing episodic post-election purges, and require uniform data fields and list-maintenance standards across all counties to ensure compliance with NVRA § 8.

- Require routine cross-checks with authoritative federal and state databases, including NCOA, SSA Death Master File, interstate DMV systems, corrections records, and DHS/USCIS databases, with enforceable timelines for verification and removal.

- Implement strong identity and citizenship verification at registration by requiring documentary proof of identity and U.S. citizenship or secure verification through federal databases (e.g., DHS SAVE), while providing free state-issued ID alternatives to ensure access.

- Eliminate acceptance of placeholder or default identity data (including default DOBs such as January 1) and require validated residential address verification.

- Strengthen HAVA database integrity requirements by mandating immutable audit logs, permanent voter-history preservation, and independent audit capability to ensure traceability, transparency, and statutory compliance.

- Mandate public, standardized monthly reporting of voter-roll activity, including additions, inactivations, removals, and corrections, to enable independent oversight and public accountability.

- Condition state and federal election funding on verified compliance, with automatic enforcement mechanisms and penalties for persistent noncompliance.

New York has both the opportunity and the obligation to correct these failures. Practical, lawful, and essential reforms, many already reflected in pending state legislation and aligned with existing federal tools and executive guidance on citizenship verification, can restore integrity without compromising accessibility. These targeted changes prioritize both voter access and accountability, protect the rights of eligible citizens, and deter ineligible registrations without imposing undue burdens.

Project Civica calls on New York's lawmakers, the State Board of Elections, county election officials, and citizens to act decisively: advance these reforms through legislation, administrative improvements, and public oversight. Secure elections depend on trustworthy voter rolls. The evidence is clear, the time for meaningful, evidence-based change is now, before further erosion of confidence undermines the democratic process. New York must deliver the accountable, transparent, and compliant system its citizens deserve.

APPENDIX A: Legal References

Table A1 - Legal Reference Table with Direct Links

Reference	Full Citation / Section	Official Links
NVRA	52 U.S.C. § 20507 (§8)	https://www.law.cornell.edu/uscode/text/52/20507
HAVA	52 U.S.C. § 21083 (§303)	https://www.law.cornell.edu/uscode/text/52/21083
Federal Record Retention	52 U.S.C. § 20701	https://www.law.cornell.edu/uscode/text/52/20701
Prohibition on Alteration	52 U.S.C. § 20703	https://www.law.cornell.edu/uscode/text/52/20703
Federal Voting Offenses	52 U.S.C. § 10307(e)	https://www.law.cornell.edu/uscode/text/52/10307
NVRA Criminal	52 U.S.C. § 20511(2)	https://www.law.cornell.edu/uscode/text/52/20511
Non-Citizen Voting (Federal)	18 U.S.C. § 611	https://www.law.cornell.edu/uscode/text/18/611
Deportable Offense	8 U.S.C. § 1227(a)(6)	https://www.law.cornell.edu/uscode/text/8/1227
INA Naturalization	INA §316 (8 U.S.C. §1427)	https://www.law.cornell.edu/uscode/text/8/1427
U.S. Election Assistance Commission.	2024 Election Administration and Voting Survey (EAVS) — State Data Files and Codebook (released June 30, 2025)	https://www.eac.gov/research-and-data/studies-and-reports
NY Election Law Citizenship	§5-102(1)	https://www.nysenate.gov/legislation/laws/ELN/5-102
NY Election Law Registration Processing	§5-210	https://www.nysenate.gov/legislation/laws/ELN/5-210
NY Election Law Updates/Party Changes	§5-302	https://www.nysenate.gov/legislation/laws/ELN/5-304

NY Election Law Removals	§5-400	https://www.nysenate.gov/legislation/laws/ELN/5-400
NY Election Law Voter Form	§5-500	https://www.nysenate.gov/legislation/laws/ELN/5-500
NY Election Law Database	§5-614	https://www.nysenate.gov/legislation/laws/ELN/5-614
NY Election Law Maintenance	§5-708	https://www.nysenate.gov/legislation/laws/ELN/5-708
NY Election Law Illegal Voting	§17-132	https://www.nysenate.gov/legislation/laws/ELN/17-132
NY Election Law Preservation	§3-222	https://www.nysenate.gov/legislation/laws/ELN/3-222
NY Election Law Public Access	§3-412	https://www.nysenate.gov/legislation/laws/ELN/3-412
NY Penal Law Perjury	§210.15	https://www.nysenate.gov/legislation/laws/PEN/210.15
NY Constitution	Article II	https://www.nysenate.gov/legislation/laws/CNS/A2S1
NY Regulations Sync	9 NYCRR §6217.2(b)	https://govt.westlaw.com/nycrr/Browse/Home/NewYork/NewYorkCodesRulesandRegulations?guid=I0f9d0a0cd44011dda5ddbd345801c200
NY Regulations Sync	9 NYCRR §6217.4(b)	https://govt.westlaw.com/nycrr/Browse/Home/NewYork/NewYorkCodesRulesandRegulations?guid=I0f9d0a0cd44011dda5ddbd345801c200
Case: Fossella	Fossella v. Adams	https://www.nycourts.gov/ctapps/Decisions/2025/Mar25/150pn25-Decision.pdf
Case: Common Cause	Common Cause New York v. Board of Elections (No. 16-cv-6122	https://www.courtlistener.com/docket/4600000/common-cause-new-york-v-board-of-elections-in-the-city-of-new-york/
Case: Husted	Husted v. A. Philip Randolph Institute (2018)	https://www.supremecourt.gov/opinions/17pdf/16-980_6j37.pdf

SSA POMS	RM 10205.020(B)	https://secure.ssa.gov/poms.nsf/lnx/0110205020

APPENDIX B - List of Acronyms

BOE **Board of Elections**

DELE **Department of Election Law Enforcement**

DHS **Department of Homeland Security**

DMV **Department of Motor Vehicles**

DOJ **Department of Justice**

DOB **Date of Birth**

EAC **U.S. Election Assistance Commission**

EAVS **Election Administration and Voting Survey**

FOIL **Freedom of Information Law**

HAVA **Help America Vote Act**

HAVV **Help America Vote Act Verification System**

INA **Immigration and Nationality Act**

NCOA **National Change of Address**

NVRA **National Voter Registration Act**

NYCRR **New York Codes, Rules and Regulations**

NYSBOE **New York State Board of Elections**

NYSVoter **New York State Voter database**

SAVE **Systematic Alien Verification for Entitlements**

SBOEID **State Board of Election Identification Number**

SSA **Social Security Administration**

SSN **Social Security Number**

USC **United States Code**

USCIS **U.S. Citizenship and Immigration Services**

USPS **United States Postal Service**

VRA **Voting Rights Act**

APPENDIX C — Data Sources and Acquisition Documentation

Methodology — Data Acquisition

Monthly voter registration database snapshots were obtained from the New York State Board of Elections through formal Freedom of Information Law (FOIL) requests submitted via the agency's electronic records portal. Each snapshot represents a point-in-time extract of the statewide voter file and was acquired on a recurring monthly basis to support longitudinal analysis. Upon receipt, original files were preserved without alteration and cataloged with acquisition dates and reference identifiers. Analytical work was conducted only on verified working copies to maintain the integrity of source datasets for verification and reproducibility. This structured acquisition process supports consistent month-to-month comparison while maintaining transparent data provenance.

In addition to recurring New York datasets, comparative voter file records from other jurisdictions were obtained through official public records portals and preserved using the same documentation procedures. Certain analytical reference datasets were received through partner organizations that procured the underlying data; these materials were documented and preserved in their received form. Address-change comparison analysis incorporated a National Change of Address (NCOA) reference report dated January 19, 2025, used solely for comparative evaluation and preserved under the same controls as other analytical materials.

All datasets — whether obtained via FOIL, public records portals, or third-party transfer — are recorded in a centralized Data Acquisition and Provenance Register (Table B1). This register documents jurisdiction, acquisition type, source, receipt date, delivery method, and notes to ensure full traceability and transparency regarding dataset origin and handling.

Data Integrity and Chain of Custody

All datasets were archived immediately upon receipt in their original format. Each file was assigned a unique reference identifier and stored in a read-only repository to prevent modification. Metadata, including acquisition pathway, receipt date, and source confirmation, was recorded in the Data Acquisition and Provenance Register to establish documented provenance. Analytical processing was performed exclusively on derivative working copies, preserving archived source files as authoritative records.

Datasets received via physical media were logged upon receipt, transferred to the archival repository without modification, and preserved with receipt documentation to maintain continuity of custody. No alterations were made to archived source datasets at any stage. These procedures support auditability, reproducibility of findings, and evidentiary integrity across all acquisition types.

Table C1. Data Acquisition and Provenance Register

Jurisdiction	Dataset ID	Acquisition type	Source	Acquisition Date	Coverage Date	Delivery Method	Archive Reference	Notes
New York	AllNYSVoters_20231120.txt	Government public records - recurring FOIL snapshot	NYSBOE	11/20/2023	Initial Snapshot - Nov, 20 2023	BOE Electronic Records Portal Download	AllNYSVoters20231120.zip	Initial Dataset, Point-in-time voter file snapshot used for longitudinal comparison
New York	AllVotersStatewide.txt	Government public records - recurring FOIL snapshot	NYSBOE	8/6/2024	August 6, 2024 snapshot	BOE Electronic Records Portal Download	AllNYSVoters20240806.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	08/30/2024 voters.zip	Government public records - recurring FOIL snapshot	NYSBOE	8/30/2024	August 30, 2024 snapshot	BOE Electronic Records Portal Download	AllNYSVoters20240830.zip	Point-in-time voter file snapshot used for longitudinal comparison, FOIL filled by the NYBOE almost immediately

New York	10/10/2024 voters.zip	Government public records - recurring FOIL snapshot	NYSBOE	10/10/2024	October 9, 2024 snapshot	BOE Electronic Records Portal Download	AllNYSVoters20241009.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	11/13/2024 AllNYSVoterwithpurged.zip	Government public records - recurring FOIL snapshot	NYSBOE	11/13/2024	November 13, 2024 snapshot	BOE Electronic Records Portal Download	AllNYSVoters20241113.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	12/06/2024 AllNYSVoterwithPurged.zip	Government public records - recurring FOIL snapshot	NYSBOE	12/6/2024	December 6, 2024 snapshot	BOE Electronic Records Portal Download	AllNYSVoters20241206.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	01/07/2025 AllNYSVoterswithP.zip	Government public records - recurring FOIL snapshot	NYSBOE	1/7/2025	January 2, 2025 snapshot	BOE Electronic Records Portal Download	AllNYSVoters20250102.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	02/07/2025 purgedvoters.txt	Government public records - recurring FOIL snapshot	NYSBOE	2/7/2025	February 6, 2025 snapshot	BOE Electronic Records Portal Download	AllNYSVoters20250206.zip	Point-in-time voter file snapshot used for longitudinal comparison

New York	03/07/2025 AllNYSVoterwithpurged.zip	Government public records - recurring FOIL snapshot	NYSBOE	3/7/2025	March 6, 2025 snapshot	BOE Electronic Records Portal Download	AllNYSVoters20 250306.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	04/07/2025 AllNYSVoterwithP.zip	Government public records - recurring FOIL snapshot	NYSBOE	4/7/2025	4/7/2025	BOE Electronic Records Portal Download	AllNYSVoters20 250407.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	05/06/2025 AllNYSVoterswithPurged.zip	Government public records - recurring FOIL snapshot	NYSBOE	5/6/2025	5/6/2025	BOE Electronic Records Portal Download	AllNYSVoters20 250506.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	06/10/2025 Purged.zip	Government public records - recurring FOIL snapshot	NYSBOE	6/10/2025	6/9/2025	BOE Electronic Records Portal Download	AllNYSVoters20 250609.zip	Point-in-time voter file snapshot used for longitudinal comparison

New York	07/08/2025 voters.zip	Government public records - recurring FOIL snapshot	NYSBOE	7/8/2025	7/8/2025	BOE Electronic Records Download	AllNYSVoters20 250708.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	08/08/2025 AllNYSVoterswithPurged.zi p	Government public records - recurring FOIL snapshot	NYSBOE	8/8/2025	8/6/2025	BOE Electronic Records Download	AllNYSVoters20 250806.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	09/08/2025 AllNYSVoterswithphoneand email_2_.zip	Government public records - recurring FOIL snapshot	NYSBOE	9/4/2025	9/4/2025	BOE Electronic Records Download	AllNYSVoters20 250904.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	10/06/2025 AllnYSVoterswithpurged_2 _.zip	Government public records - recurring FOIL snapshot	NYSBOE	10/6/2025	10/3/2025	BOE Electronic Records Portal Download	AllNYSVoters20 251003.zip	Point-in-time voter file snapshot used for longitudinal comparison

New York	11/12/2025 AllNYSPurge.zip	Government public records - recurring FOIL snapshot	NYSBOE	11/17/2025	11/17/2025	BOE Electronic Records Portal Download	AllNYSVoters20251117.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	12/10/2025 AllNYSVoter_20251208.zip	Government public records - recurring FOIL snapshot	NYSBOE	12/11/2025	12/11/2025	BOE Electronic Records Portal Download	AllNYSVoters20251211.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	01/08/2026 AllVotters_AT9617.txt	Government public records - recurring FOIL snapshot	NYSBOE	1/6/2026	1/6/2026	BOE Electronic Records Portal Download	AllNYSVoters20260106.zip	Point-in-time voter file snapshot used for longitudinal comparison
New York	02/10/2026 AllvotersPurge.zip	Government public records - recurring FOIL snapshot	NYSBOE	2/10/2026	2/10/2026	BOE Electronic Records Portal Download	AllNYSVoters20260210.zip	Point-in-time voter file snapshot used for longitudinal comparison

New Jersey	opra W231103 submitted on march 1	Government Public Records obtained through Third -party dataset -organizational transfer	NJ Citizens for Election Integrity	Third party: March 3, 2025; report received March 10, 2025	3/3/2025	Secure Digital transfer	Double_Registr ations_NY_NJ_ from_NJC4EI_ 20250310	Point-in-time- voter roll file snapshot; Comparative dataset received unchanged
Multi-State	V150 - Xstate-Movein-NY-65 and V150-Xstate-moveout-NY-1 34.tsv	External analytical dataset - Address Change reference -organizational transfer - one time request	USPS NCOA Reporting Dataset from Cause of America	1/27/2025	1/19/2025 Reporting Period per provider	Secure Digital transfer	NCOA25127.zip	NCOA reference dataset supplied by partner for comparative analysis
Florida	April, 2025	Government public records —recurring FOIL Request	Florida DOS Div. of Elections	7/7/2026	4/1/2025 (includes data up through the end of prior month)	Official public records fulfillment — physical media (disc)	20250408 Florida voter rolls	Original disc preserved in physical archive; digital working copy created
Florida	May, 2025	Government public records —recurring FOIL Request	Florida DOS Div. of Elections	7/7/2026	5/1/2025 (includes data up through the end of prior month)	Official public records fulfillment — physical media (disc)	20250513 Florida voter rolls	Original disc preserved in physical archive; digital working copy created

State	Period	Source Type	Provider	Date Received	Data Period	Fulfillment Method	File Name	Notes
Florida	June, 2025	Government public records —recurring FOIL Request	Florida DOS Div. of Elections	7/7/2026	6/1/2025 (includes data up through the end of prior month)	Official public records fulfillment — physical media (disc)	20250614 Florida Voter Rolls	Original disc preserved in physical archive; digital working copy created
Florida	July, 2025	Government public records —recurring FOIL Request	Florida DOS Div. of Elections	7/21/2025	7/1/2025 (includes data up through the end of prior month)	Official public records fulfillment — physical media (disc)	07082025 Florida Voter Rolls	Original disc preserved in physical archive; digital working copy created
Florida	August, 2025	Government public records —recurring FOIL Request	Florida DOS Div. of Elections	8/1/2025	8/1/2025 (includes data up through the end of prior month)	Official public records fulfillment — physical media (disc)	20250812 Florida Voter Rolls	Original disc preserved in physical archive; digital working copy created
Florida	September, 2025	Government public records —recurring FOIL Request	Florida DOS Div. of Elections	9/1/2025	9/1/2025 (includes data up through the end of prior month)	Official public records fulfillment — physical media (disc)	20250909 Florida Voter Rolls	Original disc preserved in physical archive; digital working copy created
Multi-State	NYdeceased.zip (SSA Death Master data run)	External analytical dataset - - request #1	SSA Deathmaster Report -Org.transfer - Cause of America	6/27/2024	Provider reporting period (June, 2024)	Secure Digital Transfer	20240627-NY-Deceased.zip	SSA Death Master data run 1 supplied by partner for comparative analysis