

Mass Voter Challenges

The Exploitation of Voter Roll Procedures to Undermine Elections

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Introduction

Since 2020, mass voter challenges have become a key element in the campaign to use election integrity as a pretext for voter suppression. Challenges are a process by which private individuals and groups contest people’s eligibility to be on the rolls or cast a ballot. In 2024, election deniers — in addition to spreading lies about widespread fraud, refusing to certify results, discrediting voting machines, engaging in bad faith poll watching, filing frivolous lawsuits, and threatening election officials with physical harm or criminal penalties — lodged well more than 100,000 challenges.

They used these tactics to lay extensive groundwork for subverting the election, only to go silent when they were satisfied with the outcome. But that’s not the end of the story. In the 2026 midterms and future elections, challenges will continue to be an integral strategy in the playbook to undermine the democratic process.

Voter challenges in the United States took place mostly on a smaller scale until the past few years. Mass challenges are a newer phenomenon: Taking advantage of increased election transparency and technology, election deniers and partisan groups can now contest the eligibility of thousands of people at once, promoting flagrant falsehoods to undermine trust in elections and disenfranchise voters.

Mass challenges rarely find ineligible people on the rolls, but they impose significant burdens on voters and election officials. They add basically zero value while creating new costs. Even unsuccessful challenges can suppress the vote. Challenged voters often receive intimidating or confusing notices questioning their eligibility and may be forced to defend their right to vote in public meetings. Election officials are already required under federal law to keep rolls updated — a process known as list maintenance — and they have better tools and understanding than outsiders with minimal election expertise. Yet they must waste significant time and resources resolving challenges.

This report lays out the basics of voter challenges before turning to 2024 as a case study. Using public reporting and a large dataset compiled from dozens of public records requests, we found that at least 185,232 challenges were filed in 2024. The real number is likely higher: We sent public records requests to only a select number of jurisdictions where reporting indicated that challenges occurred, and we often received incomplete responses.

There is no reason to believe mass challenges will subside. Instead, they may now have the backing of a powerful new ally: the federal government. Supporters of mass challenges occupy key posts in the administration;

the U.S. Department of Justice (DOJ) seeks to aggregate vast voter data, which it may give to challengers or use to pressure states to remove people from the rolls. These actions are part of a broader campaign to sway elections by driving down turnout, justify disenfranchisement and interference, and undermine confidence in order to more easily overturn results.¹

In some ways, the concerns surrounding mass challenges are greater than ever. The Trump administration has collected massive amounts of Americans’ personal data.² Several agencies have experienced large-scale data leaks, exposing millions of voters’ sensitive information.³ Challengers may intentionally find or unwittingly come across confidential data that they have no business seeing.

In addition, as part of a federal government effort to create a national voter file, the DOJ has issued a memorandum of understanding that specifically allows it to share sensitive data with any “contractor” who “perform[s] duties related to the Department’s list maintenance verification procedures.”⁴ The DOJ reportedly intends to share this data with outside groups that file mass challenges and met with the founder of one such group, EagleAI, to discuss data sharing.⁵

Challengers have proved themselves persistent and adaptive. Early this year, for example, the creators of EagleAI reportedly launched a new program with “modifications and enhancements” known as ELLY and, through the North Carolina Election Integrity Team, an election denier group, pitched the tool to the North Carolina State Board of Elections as a means to find fraudulent voters.⁶

States and Congress can pass laws to alleviate these harms. They can ban mass challenges and implement safeguards to ensure that challenges are limited to cases that have unique, reliable information and won’t impact eligible voters who have followed all the rules. To protect U.S. elections, responses to and precautions against mass challengers must be proactive and consistent.

I. The Rise of Mass Challenges

Most states have laws allowing voter challenges, whereby private citizens, poll workers, political party designees, or poll watchers may contest voters' rights to remain on the voter rolls or cast a ballot. Challenge laws have a long and often discriminatory history.⁷ Generally, to be successful, a challenge must show that a voter has died, has permanently moved away from the address at which they are registered, or otherwise has become ineligible. If a challenge successfully removes someone from the rolls, that person must reregister before voting.⁸

When used carefully, challenge laws can help election officials identify small numbers of names for removal from voter rolls. Someone might alert officials that a family member has died. But targeting hundreds, thousands, or tens of thousands of voters at a time, on the basis of flimsy evidence that can't stand up to scrutiny, is an abuse of the process.

State Challenge Laws

Voter challenge procedures vary widely from state to state, differing on who may issue a challenge, when they can do it, the evidence they must provide, and whether there are consequences for baseless challenges.

In almost half of all states, any registered voter can file a challenge.⁹ Some states impose limitations, however, such as requiring challengers to be registered voters in the county of the challenge.¹⁰ Around one-third of the states require challengers to be appointed by political parties.¹¹ And about five states allow only election workers to lodge challenges.¹²

A little more than half of the states only allow challenges to a voter's ballot.¹³ Nearly 20 allow challenges to both ballots and registrations.¹⁴ Texas and Washington allow them only to registrations.¹⁵

Almost every state permits challenges at the point where a vote is cast, either at a polling place or on receipt of a mail ballot.¹⁶ Among these, around one-third allow challenges only at the polling place.¹⁷ Around 10 allow challenges at the polling place or to a mail ballot.¹⁸ More than a dozen allow challenges at most times to voter registration lists.¹⁹ And a few allow only registration challenges during a specific period before Election Day.²⁰

States may require election officials to reach out to challenged voters as soon as they are challenged.²¹ Others require challengers to demonstrate a higher standard of proof before officials take action.²² About 10 states allow or require hearings for challenged voters, including some that impose automatic hearings following a challenge and cancel voters' registrations if they fail to respond within

a certain time frame.²³ More than 30 states permit or require challenged voters to submit an oath or declaration or otherwise establish their eligibility on the spot if challenged while voting.²⁴

Several states allow challenges only when the challenger has "personal knowledge" that the challenged voter is not eligible.²⁵ While state definitions of personal knowledge vary, Nevada provides a good example, requiring the challenger to have "firsthand knowledge through experience or observation of the facts upon each ground that the challenge is based."²⁶

Some states have thresholds for the standard of evidence, such as "probable cause," that challengers must meet before officials take any action.²⁷ Others require "clear and convincing evidence" of ineligibility or proof "beyond a reasonable doubt" before removing a voter.²⁸

A few states, including Florida, Michigan, and Wisconsin, hold challengers accountable by imposing penalties on those who bring frivolous challenges.²⁹

The History of Challenges

Voter challenges stem from a time when voting was an extremely local activity and officials lacked tools such as computerized registration systems for monitoring who voted. Some states' laws predate the Civil War, when people of color and women faced formal disenfranchisement. Indeed, some were enacted for the express purpose of preventing people of color from voting.³⁰

In 2020, challengers began to contest voter eligibility on unprecedented scales. On December 18, 2020, three weeks before Senate runoff elections in Georgia, a group called True the Vote filed challenges to 364,541 voters across the state.³¹ These challenges were amateurish and no voter was removed from the rolls, but they were a harbinger of what was to come.³²

Georgia, a swing state with extremely permissive challenge laws, has become a hotbed for challenges. In 2022, private citizens reportedly challenged the registrations of

at least 92,000 Georgians. Reportedly, around 89,000 of these were submitted by only six people.³³ Officials rejected the vast majority of the challenges, removing about 2,208 registrations and putting another 3,500 voters in challenged status. Under Georgia law, voters in challenged status must cast provisional ballots.³⁴ Local officials meet post-election to decide, case by case, whether each ballot should be counted.³⁵ About 47,000 of these challenges were lodged in Gwinnett County, creating a significant time sink for election workers. A

resident of Forsyth County challenged almost 16,000 voters (about 6 percent of the county's voter rolls) in one go. After review, officials apparently dismissed both sets of challenges without a single removal.³⁶

Challengers were active in several other states in 2022, including Michigan, where a group named Election Integrity Fund and Force led efforts; Texas, led by the Texas Election Network; Florida; and Iowa. These challenges were widely rejected for lack of evidence or failure to comply with state law.³⁷

II. Mass Challenges in the 2024 Election

The 2024 election cycle saw the filing of more than 185,000 voter challenges.³⁸ Very few succeeded in removing people from the rolls, but they caused extensive problems for voters and election officials.

The records we received reveal that private citizens filed at least 185,232 voter challenges in 2024.³⁹ The real number is likely higher, given the thousands of election administrators to whom we did not send requests and the sometimes incomplete responses we received. Officials accepted at least 5,477 of these challenges, meaning they removed the challenged voters from the rolls, placed them into inactive status, or took other steps that jeopardized their ability to vote.⁴⁰ Officials likely accepted more challenges than this, as some of the records were unclear as to outcomes. In these cases, we attempted to determine the result by reviewing any available records of public meetings and reporting. One takeaway is evident: With only around 3 percent of challenges clearly accepted, challenges contributed little to list maintenance in 2024. For context, Georgia contacted nearly 875,000 voters in 2023 who had moved or had not voted for several years, more than 100 times the number of voters in the state who were successfully challenged in 2024 (many of whom ended up not being removed).⁴¹

Georgia had at least 89,256 challenges. Per public records requests, we identified at least 14,694 challenges across 34 sets in Forsyth County; of these, the board rejected or challengers withdrew 10,994, the board upheld 2,684, and the outcome of 1,016 is unknown. Gwinnett County received no fewer than nine sets of challenges to more than 37,000 voters from just four challengers, with 31,193 of these coming in a single action. In most cases, the documents didn't specify the outcome, and we couldn't determine it, although the board sent notice letters to 2,436 voters and placed 98 more in challenged status. One individual in Cobb County challenged 5,605 voters. The board dismissed 5,583 of these challenges and sent six voters notices, of whom three confirmed their addresses and three asked to be taken off the rolls. The outcome of the other 16 is unclear. The *Atlanta Journal-Constitution* reported that counties in Georgia rejected more than 45,000 voter challenges from July onward.⁴²

Maricopa County, Arizona, was another hot spot. The county provided us with records of 39 mass challenges to 49,730 voters. Whether officials upheld any of these is unclear as the documentation included lengthy spreadsheets — some of them thousands of pages long — listing the voters challenged that lacked information on the outcomes. It is likely that most of the challenges in Maricopa County were rejected; there is no public reporting to the contrary.⁴³

Media outlets covered challenges throughout the country in 2024, as well.⁴⁴ In Pennsylvania, reports found that at least 4,000 challenges against mail ballot applications occurred, but all were withdrawn or rejected.⁴⁵ A state senator in Bucks County challenged almost 1,200 mail ballots just before the receipt deadline. These challenges largely targeted U.S. citizens voting from international addresses.⁴⁶

In Allegheny County, Pennsylvania, a local “informal group” announced that its members had challenged more than 16,000 people by March 2024 and had plans to challenge 10,000 more by the election. The group used an “assembly line” to fill out paperwork. The election board overwhelmingly rejected the challenges.⁴⁷ In Ohio, at least 13 counties received thousands of challenges, which largely failed and drew rebukes from election officials.⁴⁸

Methodology

The Brennan Center sent public records requests to 42 state and local government entities.⁴⁹ We sought all documents that identified how many voter challenges they had received in 2024, how officials had adjudicated those challenges, and what rationales they had relied on for their decisions. We sent requests to Arizona, Florida, Georgia, Michigan, Nevada, North Carolina, Ohio, Pennsylvania, and Texas and to numerous counties in those states, which we chose on the basis of prior reporting of challenges in those places. We received extensive records, including email exchanges between challengers and election officials, challengers' spreadsheets, voters' responses to notices, and election board deliberations.

Additionally, we reviewed public reporting, court filings, and records of county and state election board meetings. The watchdog groups American Oversight and Documented also provided us with documents they had received from public records requests.

Acquiring a complete record of challenges is impossible: They are often made ad hoc, officials may have no obligation to track them, and the records produced are often incomplete.⁵⁰ Some jurisdictions either refused to produce records or asserted that they had received no challenges.

Several counties in Texas also experienced mass challenges in 2024. Reportedly, 11 people brought more than 15,000 challenges in Tarrant County; more than half of these were from a single person. Collin County received more than 12,000 challenges from one person, and Denton County received more than 17,000 challenges.⁵¹ One woman in Travis County challenged more than

9,600 voters herself, according to documents provided by the county. Officials in those counties told reporters that the challenges were overwhelmingly directed toward people who had already been slated for removal, indicating that those who filed challenges had relied on outdated information.⁵²

III. Why Mass Challenges Are Unreliable

Mass challenges seek to remove potentially thousands of people from the rolls on the basis of bad, incomplete, or misunderstood data. And they sometimes attempt to circumvent voter protections by being presented under the guise of helping officials with list maintenance rather than challenging voters.

Problems with Challengers' Approaches

Many mass challenges rely on comparisons of the National Change of Address (NCOA) database with static copies of the voter rolls. NCOA is the postal service form people fill out to forward their mail to a different address. But people who have their mail forwarded often are still eligible to vote at their address of voter registration.⁵³ Common examples include active-duty military personnel, people with work assignments who live outside their home states for part of the year, and college students.⁵⁴ Further, NCOA–voter roll comparisons can create false positives: People with the same or similar names can be mistaken for each other. Taken alone, then, NCOA data is insufficient evidence for removing people from the rolls.

Voters' responses to a mass challenge in Delaware County, Pennsylvania, just before the 2024 election exemplify how mail forwarding records can be misleading. We received documents showing that one woman challenged 144 voters' mail ballots. After the county's election office sent notices to the challenged voters, 58 responded saying their registration address remained their permanent home. Among them were a military service member stationed in Virginia, an individual who spent weekends in the summer playing golf in Ohio and preferred receiving mail there, a nun temporarily assigned to serve in California, a lifelong Pennsylvanian who spent several months working as a contractor in South Carolina, an out-of-state college student, and a woman who was spending part of the year in Virginia to help her daughter care for her grandson with a disability. In fact, of the 58 voter responses that Delaware County sent us, only three people confirmed they had moved permanently and consented to removal. Angry and confused voters expressed concerns about whether their ballot would count. Some of them sent photos of their driver's license, property records, employment histories, or, in one case, a U-Haul receipt for their move back to Pennsylvania.

Similar issues plague challenges based on Google scrapes, commercial address databases, and death records. Web scrapes can access only publicly available

records, which can be incomplete or inaccurate. For example, mass challenges in Georgia have relied in part on data pulled from qPublic, a website that explicitly disavows any warranty as to the “accuracy, quality, or completeness” of its data.⁵⁵ Scraping commercial address databases to find voters registered at business addresses leads to typo-driven mismatches. In Atlanta, for example, more than 100 people were registered at an abandoned property because the system listed the address as being “Northeast” when it should have been “Northwest.”⁵⁶ Moreover, some states permit homeless voters to list business addresses as their place of residence, so registration at a business address may not be disqualifying.⁵⁷

For death records, challengers often use sources such as the Find a Grave website or obituaries, which are prone to mistakes, in addition to typos and name similarities.⁵⁸ Scammers produce fake obituaries with very little effort, a growing industry for a variety of cons.⁵⁹

Challengers sometimes try to shore up data inaccuracies by physically canvassing the addresses they flag, but that presents additional concerns. Voters may be intimidated by strangers who show up at their house asking invasive, personal questions about their other addresses or voting history.⁶⁰ The problem is amplified when challengers claim authority: One organization urged door-knockers to call themselves “elected precinct delegates.”⁶¹ The DOJ noted that this type of canvassing can deter people from exercising their right to vote.⁶² It may even constitute illegal voter intimidation under both state and federal laws.⁶³

Door-to-door canvassing often generates false or unreliable information. The people answering the door may give fake answers in hopes of getting the canvasser to leave.⁶⁴ Some canvassers ask leading questions and misconstrue answers to invent fraud. A report from Lancaster County, Pennsylvania, exemplifies these issues.⁶⁵ There, a canvasser concluded that a “phantom voter” lived at an address because the 16-year-old resident who opened the door was “not sure” about voting records associated with the house. Another volunteer reported that three “phantom voters” had cast ballots because of an interviewee's inconclusive answers; the canvasser said the interviewee “seemed distracted” because he had been hosting a funeral for his grandchild.

In 2024, a federal court in Georgia determined that the True the Vote (TTV) mass challenge based on simple database matching carried an “enormous possibility” of disenfranchising eligible voters.⁶⁶

TTV’s list utterly lacked reliability. Indeed, it verges on recklessness. The Court has heard no testimony and seen no evidence of any significant quality control efforts, or any expertise guiding the data process. [An expert] convincingly communicated that a lack of description of the process makes any meaningful assessment of TTV’s inputs impossible. . . . As far as the resulting list, [the] expert opinion rings without rebuttal: the list was shoddy and rife with errors. A mere visual inspection of the list by a layperson would have returned an obvious concern for the datasets used. It is clear that TTV did not engage in a quality process to create the list, nor did they have proper review or controls in place. . . . TTV’s list was not made with the proper care or deliberation. . . . Such errors became easily apparent to a layperson.⁶⁷

Other federal courts have derided mass challengers for relying on a “flawed process” that lacks “any reliable first-hand evidence” and employs “intimidation and needless hurdles” to disenfranchise “thousands of voters.”⁶⁸ The tools, strategies, and resources that mass challengers use are not rigorous enough to produce reliable results.

The Growth of Unreliable Software

Some mass challengers use software to automate their processes. While burgeoning technologies promise data analysis improvements, existing voter challenge programs perpetuate the known flaws of mass challenges.

One representative software is EagleAI, whose founder reportedly met with the DOJ to discuss data sharing. The AI name is a misnomer; the tool is a web scraper that compares databases for potential matches. Available information suggests it has no ability to identify false positives or distinguish a typo from a faulty registration.⁶⁹ The founder called it “Excel on steroids,” a shortcut to speed up list matching.⁷⁰ It compares copies of voter rolls (which are purchased intermittently and quickly out of date) with sources such as the NCOA database, criminal justice records, death records, and property data. A user selects parameters and the system spits out a set of names to challenge. EagleAI even pre-fills challenge forms — potentially preparing thousands of forms with just a few clicks — and queues them up for submission shortly before the

relevant election board’s next meeting.⁷¹ As a result, EagleAI increases the quantity of voter challenges without addressing the repeated errors.

Election officials agree. Blake Evans, Georgia’s director of elections, stated that company presentations “are confused and seem to steer counties towards improper list maintenance activities. . . . EagleAI draws inaccurate conclusions and then presents them as if they are evidence of wrongdoing.”⁷² He continued: “EagleAI data offers zero additional value to Georgia’s existing list maintenance procedures.”⁷³

Company brass has put out mixed messages about EagleAI’s true purpose. Sometimes the founder suggests it is an aid meant to point challengers and officials toward registrations they should investigate on their own.⁷⁴ On other occasions, he has said that EagleAI can allow “thousands of challenges” to be “checked, validated or not in minutes.” He has even suggested that EagleAI can be used to generate so many challenges that officials turn to it “for a solution that they can hire and outsource their headaches.”⁷⁵ He’s also oscillated between claiming that the system uses AI such as “multitiered algorithms” and saying that it is merely a data aggregator that “does not make any decisions or recommendations.”⁷⁶

EagleAI spurred many challenges in 2024. In Bibb County, Georgia, the election board sent notices of removal to 45 voters challenged with information from EagleAI, although it rejected challenges to 198 voters from the same person.⁷⁷ Earlier, the board had rejected a challenge to nearly 800 voters whom the system flagged for reasons such as sharing a college dormitory address.⁷⁸ Also in Georgia, the Cobb County board dismissed an EagleAI-based challenge to 2,472 voters, noting errors in the data.⁷⁹ And the Forsyth County board dismissed a challenge to 742 voters based on EagleAI for having insufficient data, although it upheld 45 challenges that included additional information such as screenshots of government websites alleging that the voters had registered elsewhere.⁸⁰

Florida officials received a challenge to 10,000 voters derived from EagleAI.⁸¹ In addition, Sarasota County received challenges to 2,828 and 227 people based on EagleAI data, per records the county produced.⁸² A group called the Pigpen Project, which has reportedly relied on EagleAI, unsuccessfully tried to remove almost 1,000 voters in Nevada and challenged a total of more than 30,000 voters in 2024.⁸³ In North Carolina, a group sent weekly emails to its members with “suspicious registrant lists” assembled in part with EagleAI and encouraged recipients to challenge those voters or “investigate further.” The group’s founder and president recommended challenging, among other “suspicious” registrations, people with “Hispanic-sounding” last names.⁸⁴

True the Vote has pushed a tool called IV3 that reportedly cross-references state voter rolls with NCOA data and

flags matches for review. It can then prepare challenge forms for registrations the user wants to challenge.⁸⁵ The app highlights purportedly irregular addresses such as P.O. boxes.⁸⁶ There are valid reasons why voters may register at P.O. boxes, such as lacking a permanent home, having moved temporarily, or needing to conceal their address after being a domestic abuse victim. Those voters still need a home address for precinct assignment, although in the case of the unhoused, depending on state law, that may be something like cross streets where they sleep.⁸⁷ There is no evidence that P.O. boxes facilitate voter fraud.

Much of IV3's work is shrouded in secrecy: To use the platform, one must submit a copy of their driver's license for approval. According to one report, the founder has encouraged users to do minimal research, decide whether to challenge, and "keep moving because the goal here is to get the most obvious potential offenders — potential problems — submitted as quickly as possible."⁸⁸ A page from its website titled "What Can I Do with IV3" (attributed only to "Anna") instructed users to submit challenges based on alleged mismatches between the voter rolls and U.S. Postal Service data, with no mention of taking precautions to avoid false positives.⁸⁹

In 2024, True the Vote's founder claimed that 6,937 users had submitted 645,610 challenges in 1,322 counties nationwide.⁹⁰ Among those challenged were nursing home residents in Pennsylvania, a Texas resident who had lived in his county for two decades, and people registered at a marine base in California.⁹¹ Retirement communities and other large housing units have long been the target of voter fraud accusations. Challengers routinely allege, without any evidence, that the presence of many registrations at one address is indicative of voter impersonation.

Denton County, Texas, received more than 1,000 challenges in a single day on multiple occasions.⁹² Many of the tens of thousands of challenges received in Denton, Collin, and Tarrant Counties in Texas were created with IV3.⁹³ Officials receiving the challenges stated the challengers "did not understand the procedures we have in place" and that responding to them "distracts" staff from essential election preparation.⁹⁴

VoteRef is an organization that obtains and publishes voter rolls for public use.⁹⁵ Its operations have at least three problems. First, the voter data it publishes is usually insufficient to reliably match people against other databases, which can lead to challenges of eligible voters based on, for example, mistaken matches of similar names. A bipartisan group of election officials across a dozen states found that "the methodology used to identify the discrepancies was flawed, the data incomplete or the math wrong."⁹⁶ Second, VoteRef updates its voter rolls with only occasional snapshots, meaning that the accessible information is often outdated, sometimes by years.⁹⁷ Third, publishing voter information online may not be permissible under state laws, and it presents privacy concerns for people

whose addresses and party affiliations are free for the world to see.⁹⁸

Lack of Accountability for Informal Challenges

Informal challenges, in which challengers send officials lists of voters they think should be removed from the rolls, present the same concerns as official challenges, along with decreased transparency, less of a process — or none at all — for challenged voters to confirm their eligibility, and bad data smuggled into official channels.

When voters face formal challenges, they are at least entitled to receive notice and to respond. That may not be true for informal challenges, as laws don't account for private citizens inserting themselves into list maintenance outside standard procedure. While legal protections technically apply to informal challenges, officials may not realize they must go through these processes because such actions aren't framed as challenges.

The explanation given by informal challengers that they only mean to help does nothing to alleviate risks to voters. Challenge processes, for all their flaws, should be formal.

When officials treat informal challenges as no more than suggestions to be considered or ignored, they pose only a minor threat. Concerns are also mitigated when officials demand full transparency and closely scrutinize the data sources before acting. But as is the case with other challenges, action may come on weak or hidden data.

In Florida, the head of an election denial group sent the secretary of state a list of 10,000 registrations to investigate in 2024. The director of the division of elections in the secretary of state's office forwarded the list to all the county supervisors of elections, instructing them to "take action . . . as you deem appropriate and helpful." This official didn't vet the data; in fact, she admitted she did "not know when the information was exactly compiled and what all sources were consulted to derive this list." She then noted to the supervisors that some had "received and already worked" data from lists that the same challenger had sent previously.⁹⁹

The list came from EagleAI data and needed far more scrutiny before receiving even a tepid stamp of approval. One county supervisor found that 95 percent of the records were already under review and that the challenger had misspelled the county's name.¹⁰⁰ In Miami-Dade County, with more than 1.5 million registrants, the supervisor said only one person on the list may have been ineligible.¹⁰¹

Public records requests showed that in Georgia's Gwinnett County, the board of elections sent letters to more than 31,000 voters to confirm their registrations in response to an informal challenge lodged on July 8, 2024. Representatives of the county indicated they didn't know

the source of the data or how the lists were generated, yet it became a basis for contacting voters.

In Cobb County, Georgia, an informal challenger alleged that 245 voters were dead; some of those names were removed from the rolls, although neither reporting nor public records specified how many.¹⁰² Through public records requests, we identified at least 401 informal challenges from the same person, including some in which he noted the use of EagleAI. Other documents we received show that the same person challenged at least 5,605 voters formally, as well, including at least 2,950 for which he said he used EagleAI.

Jason Frazier — known for bringing thousands of challenges in Fulton County, Georgia — described informal challenges as “a free service” for election officials. In reality, they are an attempt by challengers to use the back door when they can’t succeed under the official rules.¹⁰³ Recasting meddlesome informal challenges as a public service doesn’t change the fact that they are error prone and without legal foundation.

In Forsyth County, the county produced emails in which Frazier recommended to the county board 548 voters for removal. Georgia law allows people to bring challenges only in the county in which they are registered to vote. Frazier was aware of this, stating in the email that he was “NOT challenging” the registrations, yet he still urged the board to remove the voters and stated he would be attending the board’s upcoming challenge hearing. While officials have no legal obligation to respond to these requests, they know that ignoring them encourages the challengers to publicly attack them.

Informal challenges are a mechanism for evading accountability. Challengers should not be able to enjoy the purported benefits of engaging in voter list maintenance while avoiding the potential consequences of abusing the system.

Inferiority to Existing List Maintenance

Voter challenges, especially mass challenges, do vanishingly little for election security that election officials aren’t already doing. Keeping voter lists updated is a key task for those officials; in fact, it’s a requirement under federal law.

The National Voter Registration Act (NVRA) requires most state and local election officials to keep the rolls up to date.¹⁰⁴ Officials must “conduct a general program that makes a reasonable effort to remove” voters who have died or moved away.¹⁰⁵ Officials can remove voters who request it; depending on state law, they can also remove voters on the basis of criminal conviction or mental incapacity.¹⁰⁶ State laws flesh out specifics and build on these minimum standards.

Importantly, under the NVRA, there are only two situations in which officials can remove voters because they have moved. First, they can remove a voter who requests this in writing. Second, they can send a voter a notice that they believe the voter has moved and remove the voter if that person neither responds nor votes for the next two federal election cycles.¹⁰⁷ Officials often use NCOA data to identify voters who may have moved, but they cannot remove anyone flagged by that list unless one of these two criteria is met.

The NVRA also requires officials to complete any program that “systematically remove[s]” voters at least 90 days before a federal election (general or primary), creating a blackout period during which officials may remove voters from the rolls only on an individualized basis.¹⁰⁸

IV. Mass Challenges' Harms

Even when mass challenges aren't useful, proponents argue that officials can look to them as a source of assistance that's downside-free. This is wrong. Mass challenges harm voters and election officials and reduce trust in elections, even when no one is removed from the rolls.

Harms to Voters

Mass challenges spur voter confusion, intimidation, and disenfranchisement. Voter suppression doesn't occur just when voters are taken off the rolls or denied a ballot. It happens when they are made so frustrated or afraid that they forgo their right to vote. Research shows that a negative voting experience can dampen someone's participation rate for years.¹⁰⁹ Any instance of confusion or intimidation may amount to future votes not cast.

Confusion

Eligible voters facing challenges sometimes don't vote simply because the process is too confusing. Responding to a challenge requires numerous steps that can trip up voters. They may not understand their options for verifying their identity. They may believe a notification that they may be removed is actually a confirmation of removal or ineligibility to vote. Such uncertainty increases barriers to voting and foments distrust in the electoral system, which in turn discourages people from voting.¹¹⁰

The hassles that challenges create can be astronomical. In Fulton County, Georgia, Chris Ramsey was in cancer treatment when he received a notice to appear before the election board to contest a challenge. Getting to the meeting left him "extremely exhausted." After waiting two hours, he discovered he had been challenged because of a small clerical error in the file.¹¹¹ The board didn't explain in its letter to Ramsey that he could handle the issue without appearing in person. The challenge process can be impossibly opaque to people who can't — and shouldn't have to — dedicate significant time to parsing it.

Jennifer Jones, also of Fulton County, had to vote with a provisional ballot in 2022 when she arrived at her polling place and learned she had been challenged.¹¹² The poll worker didn't tell her why she'd been challenged, only that she had to vote provisionally. Jones, a PhD student at the time, reported feeling "disenfranchised, especially as a Black voter," because she didn't know if the provisional ballot "would be counted properly." She contacted a local voting rights organization, which helped her work out the issue. There is no way to know how many people in a similar situation lacked the time or knowledge to ask for help. Those people may have begrudgingly accepted a provisional ballot and gone home with their faith in the system shaken.¹¹³

Challenged voters' provisional ballots often aren't counted because many state laws require those voters to provide affirmative proof of residence within several days of the election, a burden even for those voters who have easy access to such documents. Provisional ballots are not a fail-safe for challenged voters, and the fact that states such as Georgia make it so easy for challengers to push people to provisional ballots is a significant problem.

Further, counties handle challenges differently, leaving voters unsure of how the law will apply to them. Even within the same state, some counties are quick to dismiss clearly deficient challenges without hearings.¹¹⁴ Others dedicate significant staff time to researching them, then dismiss them without contacting voters.¹¹⁵ Still others send notices to and hold hearings for challenged voters.¹¹⁶

Election officials also face confusion with handling challenges. For example, the Forsyth County election board's lawyer reportedly told its members that she did not know whether ruling on systematic challenges could violate the NVRA.¹¹⁷ Voters don't know how to respond to challenges partly because the way officials handle them varies, even within one state.

Intimidation

Voter intimidation has a long and dark history in the United States. Voters of color have been disproportionately impacted by widespread intimidation campaigns. As a result, members of those communities may feel outside effects from seemingly neutral behavior such as challenging everyone who appears on an NCOA list without regard to their race, neighborhood, or other specific factors.

Intimidation can take many forms. Federal law prohibits any action that threatens, intimidates, or coerces anyone for voting, registering to vote, or encouraging another person to register or vote, as well as any action that attempts to do so.¹¹⁸ Many forms of intimidation are obvious, such as yelling at voters or sending threatening messages, but there are more subtle ways to scare voters as well.¹¹⁹

Even though challenges are a state-sanctioned process, when done systematically or targeted toward certain groups they can make people afraid to register or vote. Receiving an official government notice that one's right to vote is challenged can be frightening, especially in recent years, as politicians have called on law enforcement to

target voter fraud and election deniers have suggested they are “arming the army” of poll watchers.¹²⁰ The president and key administration officials have suggested deploying armed federal agents to polling places.¹²¹ Individuals may be fearful of going to a government hearing or sending in documents proving their right to vote, especially when personal information about voters is often publicly available. Fears are heightened in places, such as Florida and Texas, where people have been charged with crimes for honest mistakes about their eligibility.¹²²

In the litigation surrounding *True the Vote*’s 2020 mass challenges, several witnesses testified about how a challenge intimidated them. A 69-year-old veteran testified that learning of the challenge reminded him of growing up in the Jim Crow South: “Anguish. Confusion. [P]ossible PTSD from having to revisit the ’60s and voting in Georgia.” Another witness said it made her voting experience “stressful, confusing, and [a] little scary” and that she was “concerned about voting in future elections.”¹²³

A third voter was “overwhelmed” and “discouraged,” saying, “It was intimidating to me to be told that somebody had accused me of doing something wrong.” When he went to vote, he had been pulled out of line, had to cast a provisional ballot, and spent hours locating documents that were “actually quite difficult to find” to prove that his ballot should count. A fourth person said she began feeling uncomfortable at the polling place after learning she’d been challenged. The voting process ended up taking her “several hours” because she had to wait in line twice and retrieve documents between those trips through the line, during which she was afraid she would “get in trouble for voting.” She testified she had consistently voted between 2016 and 2020 but had stopped after this experience.¹²⁴

Americans living abroad and subjected to challenges have also reported feelings of intimidation. Under the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA), U.S. citizens living overseas have the right to vote by mail in all federal elections. In 2024’s presidential election, challengers went after UOCAVA voters on a baseless theory that absentee ballots sent to foreign addresses were evidence of wrongdoing. In Dauphin County, Pennsylvania, a challenger contested more than 100 overseas voters, one of whom reported feeling “targeted,” as if she had done “something wrong.”¹²⁵ Another voter thought the email she received alerting her to a challenge was a scam because it mentioned a \$15,000 fine, which left her feeling nervous and angry.¹²⁶ Many UOCAVA voters are active-duty military and move around often, meaning the people serving in the armed forces are more likely than other voters to be targeted by challenges and other tactics that limit voting rights.

In Nevada, challengers from the Pigpen Project knocked on doors and described themselves as “part of a quasi-governmental effort.”¹²⁷ Private citizens have carried clipboards with a county seal or badges identifying

themselves as part of a voter integrity board.¹²⁸ In 2022, at least 23 states saw door-to-door canvassing efforts that allegedly “crossed the line into intimidation.”¹²⁹ The individuals behind these efforts had no association with government agencies but through words or appearances sometimes implied that they did. This can make people feel they must answer questions about their voting behaviors, turning inquiries such as “Did you know voter fraud is a crime?” into veritable threats that deter some eligible citizens from voting.

Disenfranchisement

Most voter challenges in recent years have been rejected. But there are instances of eligible voters being removed from the rolls and learning of their removal after the deadline to register and vote in the next election.

As is often the case with voter suppression, vulnerable individuals frequently suffer the effects. Challengers target people most likely to lack the resources to easily defend their registrations, including those who live in mass housing (large apartment buildings, student dorms, homeless shelters, and nursing homes). They also target people registered at so-called suspicious addresses (post offices, P.O. boxes, courthouses, business places, and empty lots), which may include individuals who need to keep their home addresses hidden, as well as people whose names on the rolls have typos or special characters despite their being properly registered to vote.

Students, homeless people, the elderly, people who need to keep their home address hidden for security reasons, and citizens who are members of immigrant communities may be more likely to struggle to get to a board meeting or compile documentation. They may also be more likely to feel intimidated by an official letter telling them that someone contested their registration and they must defend it. And they may move more often and deal with these allegations repeatedly.

Challengers often target students or others associated with educational institutions on flimsy grounds. For example, we learned through a public records request that a May 2024 challenge in Travis County, Texas, contested the registrations of 276 people because they were registered at a campus address but had “aged out of university housing.” Many of the people were 40 to 60 years old and most likely were professors and other university employees living in campus accommodations. Some of the challenged voters were as young as 21. In addition, not all students complete college by 22, and graduate students may live in university housing.

A group in Michigan called Check My Vote reportedly assembled challenge lists comprising people living in places with many registered voters such as apartment buildings and student housing. A person training potential users of the Check My Vote system admitted it would turn up large numbers in Detroit and at the University of

Michigan — despite no evidence of voter fraud in either location. Among the consequences was the temporary removal of more than 1,000 people in Waterford Township, including an active air force service member, a fact that might have gone unnoticed and unrectified had *The New York Times* not investigated Check My Vote.¹³⁰

In Georgia, reporters have found some people who either couldn't vote due to a challenge or had to make an extensive effort to do so. One woman, who was homeless and legally registered at a post office, learned she was off the rolls when she tried to vote in 2022.¹³¹ Her vote was counted, but only after she showed up to a county board meeting to “beg” for it, an unreasonable ask for any person, let alone someone struggling to make ends meet.¹³²

During Georgia's Senate runoff in 2021, a 50-year Muscogee County resident had his mail temporarily forwarded to California during a work assignment. When he didn't receive his mail ballot around the expected time, he called the registrar's office and learned that because of a challenge his registration was under investigation. It took a lawsuit to fix it.¹³³

In 2024, another Georgia voter received a letter informing him of a challenge to his registration because his address was a P.O. box. He was homeless and could not find the time or money to get to the elections office. He didn't reregister because the letter made him believe he was ineligible without a permanent address and he was afraid he could be arrested.¹³⁴ This case is an example of how confusion, fear, and lack of resources contribute to disenfranchisement. He was eligible to vote and properly registered. A careless challenge to people registered at P.O. boxes ensnared him. Balancing multiple part-time jobs and saving money were his priorities and he didn't know he could mail in his paperwork rather than appear in person. Yet challengers have dismissed the realities that prevent citizens like him from navigating the maze that a challenge imposes on them.¹³⁵

Further, voters challenged at the polls may end up submitting provisional ballots. This is a problem for those voters, as well as other voters who must then wait in slower lines and poll workers who become overwhelmed by the disruptions and the provisional ballots they must process. Further, poll watchers recruited by the same networks underlying mass challenges may be observing and drawing inaccurate conclusions.¹³⁶

A Waste of Election Officials' Time and Resources

For election officials and workers, the consequences of mass challenges are often immediate, harsh, and obnoxious. When faced with thousands of challenges, they are forced to dedicate significant time to resolving them while navigating competing obligations. This is a huge drag on taxpayer money.

Mass challenges amplify existing issues for elections staff. Several experiences in Georgia demonstrate the effects. In 2022, in Gwinnett County, an organization known as VoterGA challenged the eligibility of 37,000 voters.¹³⁷ For the county's election director, the first issue was how to handle these: The best reading of Georgia's challenge laws is that officials can immediately dismiss facially defective challenges, but the law isn't so clear that an official can confidently wave away a mass challenge.¹³⁸ Pressure from the state legislature to take challenges seriously compounds the concern.

For weeks, the Gwinnett County election staff dedicated 5 to 10 people to evaluate these challenges, “all day, every day, six days a week.” Around half of the challenges were objections to absentee ballots cast two years earlier; such objections aren't allowed by Georgia law.¹³⁹ Thousands more were to voters that administrators had already flagged for removal or to people whose addresses contained a typo such as a missing apartment number. VoterGA retracted 6,000 of the challenges while they were under review, indicating how poorly researched they were.¹⁴⁰

These challenges forced elections staff to undertake extraordinary amounts of work for no reason. In the end, not a single ineligible voter was removed from the rolls, but county staff wasted hundreds of hours on a wild goose chase at the taxpayers' expense.

Gwinnett's election director said of the experience: “My biggest concern probably is burning out the staff sooner in the cycle. Then, it makes it harder and harder to run a quality election as we get closer to Election Day.”¹⁴¹ While offices regularly hire hundreds of temporary staff near elections, resolving challenges requires experienced staff who understand how voter registration systems work, intensifying the drain on time and morale.

A 2022 challenge in Forsyth County sought to remove more than 13,000 voters — about 8 percent of the rolls — on the basis of a single NCOA list match. The challenge was filed less than two weeks before the primary election, when early voting was already underway. Officials and the county election board had to drop other time-sensitive tasks to attend to it. The board, which had been more receptive to voter challenges than most other boards in Georgia, noted that this challenge created an unreasonable time crunch and dismissed it.¹⁴²

In July 2024, the Forsyth County election board held an eight-hour hearing to review 1,265 challenges brought by just three people. Several voters attended the meeting and confirmed that they were properly registered at their current addresses, although the board upheld hundreds of other challenges at the meeting.¹⁴³ An entire workday for a county board of elections was lost to voter list maintenance work they were already doing months before a presidential election.

In Fulton County, elections director Nadine Williams lamented that challenges “significantly” impacted staff “due to the short turnaround time to complete the challenge process.” She described the challenge as “distracting us from important work” and “supplant[ing] our priorities with the priorities of a very small group of people.”¹⁴⁴

In Chatham County, in 2024, one person’s challenges were so extensive that officials ran out of envelopes to respond to them. The director of the board of registrars described feeling overwhelmed one day upon seeing 11 boxes of documents from the challenger in her office; each box took 40 hours of working time to process. She said she could “think of a thousand better ways to use our time. . . . It’s busywork that muddies the waters.” The challenger endorsed conspiracy theories such as the notion that the Georgia secretary of state had created “phantom, fake” voters on the rolls and called registrations at Savannah State University, the student body of which is 85 percent Black, an “anomaly” to be redressed through mass removals.¹⁴⁵

In DeKalb County, election officials faced a lawsuit filed less than two months before the 2024 election seeking a court order to force the county to hold challenge hearings.¹⁴⁶ The lawsuit did not resolve before the election.

The problem isn’t confined to Georgia. In Waterford Township, Michigan, challenges to more than 1,000 voters resulted in the town clerk hiring extra staff to contact all of them. In Clark County, Nevada, challengers brought landlords into the registrar’s office to claim that people had moved. As a result, the county had to conduct follow-up investigations on the alleged movers (the department did not know how many removals this prompted).¹⁴⁷ In response to challenges in Tarrant County, Texas, county commissioners voted in July 2025 to approve \$46,000 for additional software that would allow them to respond to challenges more quickly.¹⁴⁸

Other officials in Texas, in emails obtained through our public records requests, expressed confusion to the secretary of state’s office about how to apply Texas law and the NVRA, in turn putting additional strain on that office. Officials in Collin County asked whether NCOA information constitutes “personal knowledge”; workers in Hardin County asked how to “proceed” with the challenges, and those in Burnet County asked whether they were “required to do anything or . . . let the system take care of these in due time.”

In Maricopa County, Arizona, one person sent election officials a 445-page spreadsheet of all the voters she thought ineligible, while another sent six lists containing thousands of names; in both cases, the challenges were based primarily or entirely on NCOA data. In Bucks County, Pennsylvania, a challenger who contested 192 voters’ mail ballots two weeks before the 2024 election ended up withdrawing the challenges. In so doing, she acknowledged that the ballots were legitimate and that she had taken up “a great deal” of workers’ “time and effort.” We learned of these through public records requests.

In Ohio in the months before the 2024 election, local officials in at least 13 counties dealt with thousands of challenges.¹⁴⁹ Although officials dismissed some challenges outright, they held hearings for thousands of others. A Republican member of the Allegheny County, Pennsylvania, board of elections griped, “I can’t tell you how many hours of my life I’ve wasted trying to debunk” the false narratives of voter challengers.¹⁵⁰

Given the EagleAI founder’s comments about wanting to create a “headache” for election officials, this harassment may be a feature, not a bug, for some challengers. When officials reject challenges in full, election deniers accuse them of not doing their job. One activist turned Georgia state election board member accused counties of “blanket refusals” to accept voter challenges.¹⁵¹ More time wasted adjudicating challenges increases the chances of a mistake or inefficiency elsewhere, which election deniers can then capitalize on as the basis for disinformation about results they don’t like.

The list of tasks required to run a safe and secure election is enormous: secure polling places, print dozens of different ballots, buy and test voting machines, develop and test contingency plans, hire and train staff (many of whom are temporary), send out mail ballots, register voters and conduct list maintenance, update security measures, and much more. When you have a seamless voting experience, it’s because experts have spent thousands of hours preparing for the election.

Getting all this done is made extra challenging by the large number of elections many states and localities have, not to mention the spotlight shined on any hiccups on Election Day. Officials must pull it off with limited resources. Election officials have spoken repeatedly about

budget shortfalls and the tradeoffs those entail; for instance, the former North Carolina state board of elections director lamented the need to cut cybersecurity programs due to insufficient state and federal funding.¹⁵² The Kentucky secretary of state noted that the state gave the same amount of money to counties for election administration in 2020 as it did in the 1980s.¹⁵³

Moreover, the challenges themselves often primarily find voters whom officials have already marked for potential removal. Our records requests yielded documents showing that in Cobb County, Georgia, an August 2024 challenge to 2,939 people included 2,763 voters already in inactive status — about 94 percent. Another challenge mere days earlier targeted 165 inactive voters out of 178 total. A June 2024 challenge from the same person included only 106 active voters out of 2,472 challenged, meaning almost 96 percent of the list was out of date. Election officials are already doing this work.

The mass challenge project has risen alongside threats leading to unprecedented turnover among election officials. The Brennan Center's 2025 survey of election officials found that 38 percent of them have experienced threats, harassment, or abuse, and 52 percent are concerned about their or their colleagues' safety. Roughly 75 percent said they need their budget to grow in the next five years to keep up with needs.¹⁵⁴ Retention has suffered: 34 percent know someone who left their job due to fear, and about 25 percent of local election officials served in their first presidential election in 2024.¹⁵⁵

Federal law requires local officials to regularly review their voter lists and use specific procedures to remove ineligible voters. That's why so many challenges target people already identified for removal. Even if none of the other concerns existed, mass challenges are a waste of election officials' time. They transfer the decision of when to perform list maintenance from the experts to amateurs. In no other profession can any citizen force professionals to drop everything and chase dead ends.

Attacks on Federal Voter Protections

Voter challenges in recent years have served to undermine, if not outright contest, a key federal law protecting the right to vote.

Congress enacted the National Voter Registration Act to “increase the number of eligible citizens who register to vote” and “ensure that accurate and current voter registration rolls are maintained.”¹⁵⁶ The NVRA shows that these two goals can coexist in harmony. The law requires states to conduct regular reviews of their voter rolls and defines procedures to remove ineligible voters, while simultaneously placing limitations on how and when they may do

so.¹⁵⁷ The law has a notice-and-waiting period for removals based on address changes and a prohibition on systematic list maintenance within 90 days of a federal election.

The NVRA has been a target since its passage in 1993. Representatives in Congress introduced bills that would repeal it in every session from its passage until 2003 and again from 2019 to the present.¹⁵⁸ Another bill would repeal everything in the law except the provisions that require list maintenance.¹⁵⁹ The current Trump administration has aggressively pushed an antidemocratic bill called the SAVE Act that would turn the NVRA into a tool of voter suppression by requiring documents like a passport or birth certificate to register and mandating voter purges every 30 days.¹⁶⁰ In early 2026, the SAVE Act passed the House but stalled in the Senate. The same baseless conspiracy theories about voter rolls that motivate these bills are used to attack the NVRA.¹⁶¹ For instance, the head of the election-denying North Carolina Election Integrity Team said the law is a “problem” that stops officials from “eliminat[ing] people from the list.”¹⁶²

Alongside the attempts to repeal or rewrite the NVRA, its opponents have turned to other tactics to undermine it. Groups filed dozens of lawsuits in 2024 arguing that states are in violation of the law and must undertake voter purges that would, ironically, be prohibited by the NVRA.¹⁶³ They are trying to smuggle through the courts a misreading of the NVRA that would turn it from a protection against voter purges into a mandate of them.¹⁶⁴

These actors also use voter challenges to push for removals outside the federally prescribed processes. The NVRA's notice-and-waiting and 90-day blackout periods keep many challenges from succeeding, despite some arguments that challenges are exempt from the NVRA.¹⁶⁵ One unsuccessful lawsuit in Georgia advanced the theory that the NVRA requires states to have a list maintenance “program” and that only such a “program” is subject to the law's voter protections.¹⁶⁶ This view is plainly incorrect: Challenges themselves have no legal effect until election officials grant them and remove voters from the rolls — a power the NVRA limits no matter how it is triggered. The NVRA forbids election officials from upholding challenges when doing so would contradict it (and often requires officials to put voters into the notice-and-waiting process rather than removing them from the rolls immediately).¹⁶⁷

Challengers frequently push for acceptance of their challenges without mentioning the limitations imposed by the NVRA. Paired up with local election officials who lack expertise on the intersection of federal and state law, this can result in the removal of voters in violation of the NVRA with scarcely anyone noticing. In a hearing in February 2022, for instance, the Fulton County, Georgia, board of elections engaged in extensive discussion with a county lawyer regarding whether it could remove voters identified by a challenger as having moved without the required

notice-and-waiting process. The attorney provided mixed guidance, and the board voted to remove 428 voters.¹⁶⁸

Challengers rarely acknowledge that successful challenges should result only in the placement of voters into the NVRA's notice-and-waiting process, nor do they acknowledge that database matching is systematic and therefore not allowed within 90 days of a federal election.¹⁶⁹ State laws routinely fail to incorporate the NVRA's requirements into their challenge processes. Challengers exploit this lack of clarity to pretend a federal law that they dislike doesn't exist.

The NVRA is a bulwark against both intentional voter suppression and the accidental removal of voters during routine voter list maintenance. Courts have upheld its meaning and given it appropriate force against dozens of attempts to subvert it. Mass voter challenges are a broad attack on the NVRA disguised as a tool for list maintenance.

A Tool to Undermine Confidence in Elections

Mass challenges are part of the campaign to create the illusion of widespread voter fraud where it doesn't exist.¹⁷⁰ Many serial challengers and the networks underlying them have argued that the list maintenance done by election officials is inadequate. They use this supposed deficiency to claim that the voter rolls are unreliable and, therefore, election outcomes can't be trusted. These theories are baseless.¹⁷¹ But election deniers use them to damage public confidence in elections.

The goal is to make mass challenges the center of the public's knowledge of the voter rolls. Then, election deniers can have it both ways: If challenges are accepted, it's supposed proof that election officials haven't been doing their jobs and outside help is needed. If challenges are denied, that's spun as proof that officials are unwilling to clean up the rolls. Officials must either aggressively purge voters or see their denials of voter challenges bootstrapped into further supposed proof that Americans should question the integrity of our elections — and demonize the civil servants who run them.

Efforts to destroy the Electronic Registration Information Center (ERIC) and replace it with something weaker demonstrate that this campaign is a messaging effort, not an election security one. ERIC is a bipartisan data-sharing agreement among secretaries of state that allows them to exchange information on who has moved or died. While ERIC partially relies on publicly available data such as the NCOA database, it has access to additional, confidential information and employs sophisticated encrypting and matching technologies.¹⁷²

ERIC works effectively.¹⁷³ State officials in Ohio, Florida, and Alabama have praised it in recent years.¹⁷⁴ The

Iowa secretary of state called it a “godsend.”¹⁷⁵ Only after President Trump falsely claimed it “pumps the rolls” for Democrats did officials begin devising disprovable pretexts for leaving ERIC. Documents obtained by American Oversight laid bare that these departures are motivated by politics, not election integrity: Ohio's secretary of state confessed he “really worked as hard as I possibly could to avoid” the state's departure.¹⁷⁶

ERIC's membership has declined from 33 states in early 2023 to 27 today, lessening its effectiveness by taking states out of the information-sharing pool.¹⁷⁷ Some of these states are trying to set up smaller data-sharing agreements that lack the membership numbers to be as successful as ERIC and rely on methods proved unworkable. For instance, after leaving ERIC in 2023, Texas reportedly began developing an interstate program; similar efforts by the state in 2019 (it joined ERIC in 2020) resulted in a legal settlement for the state to end development and reinstate people to the rolls.¹⁷⁸

EagleAI and similar programs are centerpieces of the campaign to take list maintenance away from the experts who have the best tools and hand it to partisan amateurs.¹⁷⁹ It is an effort to elevate flawed data by laundering it into official processes. People associated with EagleAI have talked openly about using it as a replacement for ERIC.¹⁸⁰ The founder claims it can “do what ERIC is supposed to be doing.”¹⁸¹ One of EagleAI's stated goals is to enter into contracts with states and counties so that they can use the software to resolve challenges and conduct list maintenance, a goal reportedly facilitated by a group associated with Cleta Mitchell, an election denier and former lawyer to President Trump.¹⁸² Challenges are a focal point of these efforts: EagleAI wants people filing as many challenges as possible to overwhelm election workers, who would then, out of desperation, agree to use the tool.

The attacks on list maintenance facilitated by challenges extend beyond the deficient efforts to replace ERIC. Former Georgia State Election Board Executive Director Mike Coan — who confessed to knowing very little about voter challenges before being appointed to the board in September 2024 — criticized counties for dismissing challenges. In October 2024, he claimed that an investigation had determined the state's list maintenance tools were lacking and that challengers had “way more sophisticated technology.” Yet he reportedly did not consult county election boards who hear challenges.¹⁸³ At the same time, the state board tried to push through various rules based on conspiracy theories and hired someone who had questioned the 2020 election outcome and challenged voter registrations to investigate the secretary of state's office.¹⁸⁴ Making challenges look trustworthy is part of making the elections system look flawed.

The use of challenges to undermine elections was also visible in a February 2024 Georgia Senate Ethics Committee hearing on a bill that would make voter challenges

easier to bring.¹⁸⁵ The committee invited several speakers, including the chief operating officer and the director of elections from the secretary of state's office. The two explained in detail how they conduct list maintenance and why the tactics used by challengers are insufficient. Afterward, several speakers, including some frequent challengers and the founder of EagleAI, gave presentations using flawed data to assert that the voter rolls were rampant with errors.¹⁸⁶ The officials repeatedly rebutted the allegations. For example, one speaker claimed he had found proof that 20 people were registered at an abandoned house. The chief operating officer was familiar with the case and noted it was an error in the system. The people were lawfully registered voters.

But the invited presenters didn't stop there: They claimed that their misleading and incomplete data somehow proved that voter fraud had occurred in the state. The allegations were fantastical, and the testifiers openly blamed election officials for them.¹⁸⁷ They claimed officials ignored mass challenges and that "no one's held accountable" for purported voter fraud. Their only support was conjecture and misconstrued data, while the election officials methodically showed each claim was untrue. Time and again, when put to the test, dramatic claims about problems with existing voter list maintenance are proved untrue.

A Justification for Voter Suppression

Election disinformation has become a major illness affecting U.S. democracy. The goal of election deniers is to create enough doubt about disfavored election outcomes to make people question the reliability of results. In turn, this justifies voter suppression through legislation and public campaigns. Lies about voter fraud were the basis for the January 6 insurrection and attack on the Capitol and have been the basis for some of the Trump administration's attacks on perceived political enemies.

One hurdle these efforts consistently face is that there is no evidence of widespread fraud in U.S. elections. The response? Make up evidence. That's where voter challenges come in. The voter rolls are a target because they're not perfect. They can't be, for the myriad reasons discussed in this report. Challenges shine a spotlight on these imperfections, portraying them as nefarious.

Challengers consistently say they want to clean up the voter rolls — but they never stop there. VoterGA, a group that has challenged tens of thousands of Georgia voters, is led by a man who has spent more than two decades promoting election conspiracy theories.¹⁸⁸ He claimed there was "significant evidence of fraud" in the 2020 election and has suggested that voting machines produce inaccurate or modifiable results.¹⁸⁹ VoterGA demanded to

inspect ballots in Fulton County and filed a lawsuit to support its efforts. Officials from the secretary of state's office said VoterGA's efforts were "all about the underlying conspiracy theories that we have proven over and over again aren't real."¹⁹⁰

True the Vote — which filed 364,000 challenges in December 2020 — created the *2,000 Mules* film notorious for its debunked claims of election fraud.¹⁹¹ In 2022, a federal court had the group's leaders temporarily jailed on contempt of court charges because they refused to either back down on their false claims or provide evidence to support them.¹⁹² In 2024, True the Vote admitted to a judge in Georgia that it had nothing to support its claims after the court ordered it to produce evidence.¹⁹³ Yet it continues to promote falsities about the accuracy of voter rolls.

The Voter Integrity Project has submitted voter challenges in North Carolina as far back as 2012 and 2016.¹⁹⁴ In 2022, a member of the group spoke at a training on how to file voter challenges in Georgia, claiming that there "were more than enough illegal votes" to change the outcome of the January 2021 senate runoffs.¹⁹⁵ A group called Totes Legit Votes alleged that double voting had occurred in states including Missouri, North Carolina, and Texas; its members filed voter challenges in at least Florida, North Carolina, and South Carolina.¹⁹⁶

Perhaps to create the appearance of problems with voter rolls, challengers have labored to recharacterize many normal variabilities in the voter rolls as problematic. For instance, they've claimed repeatedly that there are more registered voters than eligible people in Georgia, Michigan, and other states, a provocative but misleading claim that counts voters already marked inactive and uses different data sources for the number of registered voters (voter rolls) and the eligible population (census data).¹⁹⁷

Election administrators and other experts have roundly debunked these false and dangerous assertions. Georgia's election director stated in an email obtained by a public records request:

The 105% registration rate is arrived at by including inactive voter records in their calculations, which gives the false appearance that Georgia voter rolls are inflated. In reality, inactive records are records that have already been captured in our lawful and ongoing list maintenance processes. . . . Additionally, [a challenge group] claims to have found 29,554,764 "data entry errors" in our voter rolls. This claim is absurd, reckless, and utterly false. [It] includes things like voter registrations being typed in all upper-case letters as errors. They are not.

The spreading of disinformation about the voter rolls has several objectives. One is to set the stage for contesting disliked election results. Consider how the same

people who spent four years making false claims about the 2020 election and pre-alleging issues with the 2024 election before Election Day went silent as reports came in that Trump was in the lead.¹⁹⁸ Virtually no political leaders or public influencers alleged fraud in the 2024 election, after spending years claiming it was inevitable.

A second objective is to spur restrictive voting legislation. Legislators and other politicians who promoted false claims about the 2020 election subsequently sponsored numerous pieces of legislation in 2021–22 that made it harder for citizens to vote.¹⁹⁹

False claims about the state of the voter rolls continue to support voter suppression in 2026. This year, Republicans in the House and Senate tried repeatedly to advance legislation that would require every American to present a document like a passport or birth certificate to register or reregister to vote.²⁰⁰ Since 2024, Florida, South Dakota, Wyoming, Utah, Kentucky, New Hampshire, Louisiana, Indiana, Ohio, Tennessee, and Mississippi have passed similar laws that require some or all voters to present documents like these.²⁰¹ Utah legislators took action despite a recent investigation determining there was only one noncitizen on the rolls, out of more than two million registrations checked.²⁰² Utah also eliminated universal vote by mail and made mail voting harder in other ways (more than 90 percent of Utah voters had

voted by mail in recent elections).²⁰³ Indiana is trying to reinstate a previously failed ERIC knockoff that is known to remove eligible voters.²⁰⁴ Proponents of these laws have said without evidence that these restrictive changes are necessary to prevent voting by ineligible people.²⁰⁵

Sometimes proponents acknowledge that there is no evidence of widespread voter fraud. They justify their bills by saying people have lost confidence in elections because they *think* there's fraud and that imposing new voting burdens will restore confidence.²⁰⁶ Every time a challenger makes a false allegation about the voter rolls or about the people casting ballots, they contribute to conspiracy theories that legislators rely on to justify voter suppression.

Moreover, these baseless fraud claims inspire people to engage in voter intimidation, such as standing outside polling places with threatening signs and weapons or making bomb threats.²⁰⁷ These claims can also result in violence: Trump's speech telling his supporters that the 2020 election was rigged immediately preceded the attack on the Capitol that resulted in at least five deaths and 140 injured law enforcement officers.²⁰⁸ Voter challengers aren't endorsing violence, but by spreading verifiably false information and increasing political anger, they further the conditions that lead to intimidation and violence.

V. Policy Proposals

Reforms to improve and clarify state challenge processes are essential to protect elections, especially as the federal government works to undermine them. There are several steps states can take.

First, states should ban mass challenges. This can be done outright or accomplished by creating a clear and firm personal knowledge requirement and mandating that a distinct form be filled out for each voter challenged.

Personal knowledge must be defined to require a challenger to know the challenged voter from individual interaction and to have unique information justifying that person's removal. Running a data matching program, seeing a social media post, or checking a property record should not suffice. Nevada's current definition provides a guide: "firsthand knowledge through experience or observation of the facts upon each ground that the challenge is based."²⁰⁹

Further, officials should only consider a challenge that is brought using an official form that must be filled out for every voter challenged; each form should explain the source of the information and be treated as a public record. Currently, many challengers email lists to election officials, taking the challenge process out of the public eye and obscuring sources. Informal challenges must be immediately rejected. If the form is copied verbatim for dozens or hundreds of voters, that should serve as conclusive evidence that the challenges are not individualized; officials in Texas rejected such an attempted workaround in 2022.²¹⁰ Compiling these records will also help officials respond to serial challengers who abuse the system.

Banning mass challenges is a popular proposal. In a nationally representative survey of 1,191 voters conducted by the Brennan Center in the spring of 2025, only 6 percent strongly approved of allowing voters to challenge their neighbors' eligibility to vote. Only 17 percent approved overall and 75 percent disapproved.

Second, states should bring their election codes and regulations in line with the NVRA to clarify that challenges are subject to its safeguards. That would ensure that officials do not immediately remove voters from the rolls following a residency challenge and would give challenged voters a clearer sense of what they will need to do to confirm their eligibility to vote.

Third, states should impose clear and significant burdens of proof on challengers. The rules should state plainly that election workers and challenged voters never have an obligation to investigate or prove eligibility in response to a challenge until the challenger has cleared that bar. Standards such as Arizona's "clear and convincing evidence" require challengers to present a compelling case for removal before officials eliminate voters from the

rolls or take any action that may, even if unintentionally, confuse or intimidate any voters.²¹¹ Administrative rules or secretary of state guidance can explain that methods known to be faulty (such as NCOA-voter roll matching or alleging that typos are bad registrations) do not meet these standards unless accompanied by individualized, quality evidence.

Fourth, state laws and regulations should empower officials to immediately dismiss challenges that don't meet the burden of proof. Allowing quick dismissals means voters are contacted or affected only when there is a high probability they should be removed. North Carolina, for instance, requires challenges to be dismissed unless the challenger attends a preliminary hearing at which they present evidence establishing probable cause that the challenged voter is not eligible.

Fifth, the receipt and adjudication of challenges should end well before early voting starts. Mirroring the NVRA's 90-day window would work well, as even weeks before Election Day officials are already busy with important tasks.²¹² These deadlines give officials sufficient time to review potentially meritorious challenges without sacrificing other priorities. They give voters the opportunity to respond under less stressed conditions and with time to rectify any mistakes.

Additionally, challenges at the polls should be banned. They delay voting for everyone and are a source of fear for voters who may not know what a challenge is before experiencing it in public. Laws can clarify that election officials have authority to determine whether someone appearing to vote is ineligible and mark their registration for removal — but no one can come to the polls and advocate for that outcome. In the 2000s, Alabama, Ohio, and Texas ended Election Day challenges.²¹³

Finally, those who bring abusive or frivolous challenges should face repercussions. Not all failed challenges should trigger penalties, but people who file challenges with no chance of success (especially mass challenges) and those meant to intimidate or harass specific communities or large swaths of voters should be subject to punishment, including fines, payment for election workers' time, and bars on bringing future challenges. Similarly, states should codify that penalties for voter intimidation apply to mass challengers. In Florida, it's a felony to use false information to challenge another voter or to use "any tactic of coercion or intimidation" to influence a voter, and it's a misdemeanor to file a frivolous challenge.²¹⁴

While states are the primary regulators of voter challengers, Congress has the power to set national guardrails. The Freedom to Vote Act requires all challenges to be based on personal knowledge and to be brought at least 10 days before Election Day.²¹⁵

These reforms would end the scourge of mass voter challenges causing fear and confusion for voters and mayhem for election officials. Yet they would still allow engaged citizens to continue playing a role in elections, should they have unique information that officials can't get elsewhere.

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- 91** Curt Devine et al., “A Half-Million Records and One App: The Group Behind a Massive Effort to ‘Clean’ Voter Rolls,” CNN, July 29, 2024, <https://www.cnn.com/2024/07/29/politics/voter-rolls-ballot-challenges-true-the-vote-elections/index.html>.
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- 93** Suarez and Love, “Thousands of North Texas Voter Registrations.”
- 94** Devine et al., “A Half-Million Records and One App.”
- 95** Alice Clapman, “Attacks on Voter Rolls and How to Protect Them,” Brennan Center for Justice, March 11, 2024, <https://www.brennancenter.org/our-work/research-reports/attacks-voter-rolls-and-how-protect-them>.
- 96** Megan O’Matz, “Billionaire-Backed Group Enlists Trump-Supporting Citizens to Hunt for Voter Fraud Using Discredited Techniques,” *ProPublica*, March 7, 2022, <https://www.propublica.org/article/voter-ref-foundation>.
- 97** For instance, as of July 2024 the Mississippi voter file on the website had not been updated since November 2022. Alice Clapman and Mekela Panditharatne, “Four New Initiatives Driving Mass Voter Challenges,” Brennan Center for Justice, July 22, 2024, <https://www.brennancenter.org/our-work/research-reports/four-new-initiatives-driving-mass-voter-challenges>.
- 98** O’Matz, “Billionaire-Backed Group.” On at least one occasion, VoteRef removed the Pennsylvania voter rolls at the state’s request.
- 99** Dixon and Timm, “Florida Is Using a Fraud-Hunting Tool”; and Maria Matthews, email message to SOELust and SOEStaffContacts, May 15, 2024, <https://www.documentcloud.org/documents/24687669-floridaletter/>.
- 100** Dixon and Timm, “Florida Is Using a Fraud-Hunting Tool.”
- 101** Miami-Dade County, “Voter Registration Statistics,” accessed March 27, 2025, <https://www.miamidade.gov/global/elections/voter-registration-statistics.page>; and Dixon and Timm, “Florida Is Using a Fraud-Hunting Tool.” For more, see Alice Clapman, “Florida’s Use of Unreliable Tool Could Wrongly Remove Numerous Voters from

Rolls,” Brennan Center for Justice, May 31, 2024, <https://www.brennancenter.org/our-work/analysis-opinion/floridas-use-unreliable-tool-could-wrongly-remove-numerous-voters-rolls>.

102 Amy and Daniel, “In Georgia, Conservatives Seek.”

103 Amy and Daniel, “In Georgia, Conservatives Seek.”

104 The NVRA doesn’t apply to two categories of states: those that have offered Election Day registration since 1994 (Idaho, Minnesota, New Hampshire, Wisconsin, and Wyoming) and those that don’t require registration to vote (North Dakota). U.S. Department of Justice Civil Rights Division, “The National Voter Registration Act of 1993 (NVRA),” updated November 1, 2024, <https://www.justice.gov/crt/national-voter-registration-act-1993-nvra>.

105 52 U.S.C. § 20507(a)(4).

106 52 U.S.C. § 20507(a)(3).

107 52 U.S.C. §§ 20507(c)-(d).

108 52 U.S.C. § 20507(c)(2).

109 Michael Miller et al., “The Disparate and Durable Effects of Mail Voting Restrictions: Evidence from Texas,” SSRN, April 24, 2025, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5264736.

110 See, e.g., Mark Kumleben et al., “Electoral Confusion: Contending with Structural Disinformation in Communities of Color,” Protect Democracy, June 2022, <https://protectdemocracy.org/wp-content/uploads/2022/06/electoral-confusion-contending-with-structural-disinformation-in-communities-of-color.pdf>. Voters “are demoralized by . . . structural barriers to participation” and “confused into inaction,” and often-targeted communities such as people of color are particularly bombarded by messaging and tactics designed to make them feel their votes don’t count.

111 Clark, “Close to 100,000 Voter Registrations.”

112 Carlisa Johnson, “Early Voters in Georgia Face Obstacles Under State’s New Election Law,” *The Guardian*, October 22, 2022, <https://www.theguardian.com/us-news/2022/oct/22/georgia-early-voting-obstacles-new-election-law>.

113 Provisional ballots allow people whose names don’t appear on the voter registration list but believe themselves registered to cast a ballot. They are kept separate from regular ballots and counted only if the voter’s registration is confirmed after Election Day. Whether the voter must present documentation within a few days of the election or the issue is resolved without voter action depends on state law and the reason the person voted provisionally. See MIT Election Lab, “Provisional Ballots,” accessed March 17, 2025, <https://electionlab.mit.edu/research/provisional-ballots>. Provisional ballot acceptance rates vary across states. Research from the Election Assistance Commission concluded that around 79 percent of provisional ballots are accepted in midterm elections and about 69 percent are accepted in presidential elections. United States Election Assistance Commission, “EAVS Deep Dive,” accessed March 17, 2025, https://www.eac.gov/sites/default/files/document_library/files/EAVSDeepDive_provisionalballot.pdf.

114 Caleb Groves, “Fulton Election Board Puts Limits on Voter Eligibility Challenges,” *Atlanta Journal-Constitution*, June 14, 2024, <https://www.ajc.com/politics/fulton-election-board-puts-limits-on-voter-eligibility-challenges/FO6VONT5HBFUJOHWXT2DN2MBAY/>.

115 Curt Yeomans, “Gwinnett County Elections Board Dismisses More than 11,000 Voter Registration Challenges, but Decision Is Split on Party Lines,” *Gwinnett Daily Post*, October 3, 2022, https://www.gwinnettdailypost.com/local/gwinnett-county-elections-board-dismisses-more-than-11-000-voter-registration-challenges-but-decision-is/article_d368c6fe-4376-11ed-93b2-d732e4181b3b.html.

116 For instance, the Forsyth County board sends notices and holds hearings. See, e.g., Clark, “Close to 100,000 Voter Registrations.”

117 Clark, “Close to 100,000 Voter Registrations.”

118 See, e.g., 52 U.S.C. § 10307(b); 52 U.S.C. § 10101(b); 42 U.S.C. § 1983; 42 U.S.C. § 1985(3); and 52 U.S.C. § 20511(1)(A).

119 See, e.g., Sweren-Becker and Singh, “Guide to Laws Against Intimidation.”

120 Morgan Trau, “Why Is LaRose Asking Ohio to Investigate Voter Fraud Cases that Prosecutors Believe Have No Merit?,” *Ohio Capital Journal*, September 16, 2024, <https://ohiocapitaljournal.com/2024/09/16/why-is-larose-asking-ohio-to-investigate-voter-fraud-cases-that-prosecutors-believe-have-no-merit/>; and Andrew Garber, “How Poll Watchers Can Help or Hinder Fair Elections,” Brennan Center for Justice, June 26, 2024, <https://www.brennancenter.org/our-work/research-reports/how-poll-watchers-can-help-or-hinder-fair-elections>.

121 Sean Morales-Doyle, “Federal and State Election Laws Ban Federal Forces from Polling Places,” Brennan Center for Justice, February 10, 2026, <https://www.brennancenter.org/our-work/research-reports/federal-and-state-election-laws-ban-federal-forces-polling-places>.

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123 *Fair Fight Inc.*, 710 F. Supp. at 1264.

124 *Fair Fight Inc.*, 710 F. Supp. at 1246-48

125 Jack Silver, “US Voters Call for Reform After Challenges Dropped,” BBC, November 10, 2024, <https://www.bbc.com/news/articles/clyvlywz3n0o>. In 2024, challengers contested at least 4,000 UOCAVA voters in 11 Pennsylvania counties. Additionally, a candidate in a race for a North Carolina Supreme Court seat attempted to overturn a narrow loss by asking courts to throw out more than 60,000 ballots, including many from UOCAVA voters, but only in select counties. That candidate did not allege fraud; he just wanted a retroactive rule change to help his candidacy — a naked assertion of how challenging voters and ballots is about changing unfavorable election outcomes rather than improving election administration. See, e.g., Kendall Verhovek, “North Carolina Voters Oppose Bid to Throw Out 60,000 Ballots in State Supreme Court Race,” Brennan Center for Justice, March 3, 2025, <https://www.brennancenter.org/our-work/analysis-opinion/north-carolina-voters-oppose-bid-throw-out-60000-ballots-state-supreme>.

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128 Katie Friel et al., “‘Citizen Integrity’ Teams’ Efforts Could Be Groundwork for Next False Claims About Election Results,” Brennan Center for Justice, November 4, 2022, <https://www.brennancenter.org/our-work/research-reports/citizen-integrity-teams-efforts-could-be-groundwork-next-false-claims>.

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131 Mark Niesse, “Eligibility Challenges Impede Several Georgia Voters at the Polls,” *Atlanta Journal-Constitution*, November 1, 2022, <https://www.ajc.com/politics/several-georgia-voters-report-hurdles-after-eligibility-challenges/WOUAH77TLRBD5A5HLLFSJV3S44/>.

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134 Mehrotra, “Inside the ‘Election Integrity’ App.” One local election board member who voted to remove homeless voters who had been challenged later determined that his vote had been a “mistake” that “burdened” voters. Clark, “Close to 100,000 Voter Registrations.”

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- 136** Garber, “How Poll Watchers Can Help or Hinder.”
- 137** Fredreka Schouten, “Conservative Activists in Georgia Wage Campaign to Purge Voter Rolls Ahead of November’s Election,” CNN, September 29, 2022, <https://www.cnn.com/2022/09/29/politics/georgia-voter-challenges/index.html>.
- 138** See, e.g., Andrew Garber et al., “Comment to the Georgia State Election Board: County Boards Have Statutory Authority to Dismiss Voter Challenges that Do Not Meet the Requisite Burdens of Proof,” Brennan Center for Justice, October 7, 2024, <https://www.brennancenter.org/our-work/research-reports/comment-georgia-state-election-board-county-boards-have-statutory>.
- 139** Schouten, “Conservative Activists in Georgia.”
- 140** Mark Niesse, “Mass Voter Challenges Thrown Out in Gwinnett,” *Atlanta Journal-Constitution*, October 4, 2022, <https://www.ajc.com/politics/gwinnett-election-board-votes-to-dismiss-voter-challenges/3JY2QZ6VBVCYBFEQLI6VTIRMA/>.
- 141** Schouten, “Conservative Activists in Georgia.”
- 142** Shannon McCaffrey, “Forsyth Election Officials Reject Sweeping Voter Challenge,” *Atlanta Journal-Constitution*, May 12, 2022, <https://www.ajc.com/politics/forsyth-elections-officials-dismiss-sweeping-voter-challenge/5JHVM6LUQVFPJJOZ7WJVJGXL/>. The board accepted a challenge to 580 voters brought on the same day by the same person, John Schneider, who has reportedly promoted QAnon conspiracy theories and written open letters calling for “hearings to hold perpetrators accountable” for alleged election fraud in 2020 and 2022. Clark, “Close to 100,000 Voter Registrations.”
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- 146** *Henderson v. Abhiraman*, No. 24-CV-8564, Compl. (Sup. Ct. DeKalb Cty., Sept. 17, 2024).
- 147** Berzon and Corasaniti, “Trump’s Allies Ramp Up.”
- 148** Miranda Suarez, “Tarrant County Adopts New Software to Clean Voter Rolls, Stay Ahead of Registration Challenges,” KERA, July 7, 2025, <https://www.keranews.org/government/2025-07-07/tarrant-county-elections-voter-rolls>.
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- 151** Dave Williams, “State Board of Election to Investigate Counties Accused of Refusing Voter Challenges,” *Atlanta Voice*, September 24, 2024, <https://theatlantavoices.com/state-election-board-investigates-voter-challenges/>.
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- 154** Brennan Center for Justice, *Local Election Officials Survey — July 2025*, July 10, 2025, <https://www.brennancenter.org/our-work/research-reports/local-election-officials-survey-july-2025>.
- 155** Brennan Center for Justice, *Local Election Officials Survey — May 2024*, May 1, 2024, <https://www.brennancenter.org/our-work/research-reports/local-election-officials-survey-may-2024>.
- 156** 52 U.S.C. § 20501(b)(1), (4).
- 157** 52 U.S.C. § 20507.
- 158** Congress.gov, accessed April 17, 2026, <https://www.congress.gov/search?q=%7B%22source%22%3A%22legislation%22%2C%22search%22%3A%22%5C%22repeal+the+national+voter+registration+act%5C%22%22%7D&pageSort=dateOfIntroduction%3Adesc>.
- 159** H.R. 959, 118th Cong. (2023).
- 160** SAVE America Act, H.R. 7296, 119th Cong. (2026); and Eliza Sweren-Becker and Owen Backsai, “New SAVE Act Bills Would Still Block Millions of Americans from Voting,” Brennan Center for Justice, February 9, 2026, <https://www.brennancenter.org/our-work/analysis-opinion/new-save-act-bills-would-still-block-millions-americans-voting>.
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- 163** See, e.g., League of Women Voters, “The Recent Rise of Anti-Voter Litigation,” January 27, 2025, <https://www.lwv.org/blog/recent-rise-anti-voter-litigation>.
- 164** See, e.g., Eliza Sweren-Becker, “Putting Conspiracy Theories in a Legal Complaint Doesn’t Make Them True,” Brennan Center for Justice, October 22, 2024, <https://www.brennancenter.org/our-work/analysis-opinion/putting-conspiracy-theories-legal-complaint-doesnt-make-them-true>.
- 165** Challenges based on change of address are subject to the notice-and-waiting period, and no challenge that would result in the systematic removal of voters may be considered within 90 days of a federal election.
- 166** *Complaint, Frazier v. Fulton County Department of Registration and Elections*, No. 1:24-cv-3819 (Aug. 28, 2024), ECF No. 1.
- 167** For further analysis of why the NVRA applies to voter challenges, see Garber, “Comment to the Georgia State Election Board.”
- 168** Fulton County Registration & Elections, “Board of Registration and Elections Approved Minutes, Special Meeting — February 22, 2022,” <https://www.fultoncountyga.gov/-/media/Inside-Fulton-County-Documents/Approved-Minutes-Link-List-Container-2022/Approved-Special-Minutes--222022.pdf>.
- 169** The NVRA doesn’t prohibit the immediate removal of voters from the rolls in all challenge cases. Challenges based on death, felony conviction (in applicable states), or an assertion that an entry on the rolls doesn’t correspond to a real voter don’t require notice-and-waiting. Challenges to just one person — such as when the chief operating officer of the Georgia secretary of state’s office challenged the person from whom he bought his house — are not systematic and can happen within 90 days of a federal election. The challenges discussed in this report, however, are systematic.
- 170** Brennan Center for Justice, “The Myth of Voter Fraud,” accessed May 1, 2026, <https://www.brennancenter.org/topics/voting-elections/vote-suppression/myth-voter-fraud>.

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- 172** For more information about how ERIC operates, see Electronic Registration Information Center, "What Is ERIC?," accessed March 6, 2025, <https://ericstates.org/about/>; and Alice Clapman, "States Cave to Conspiracy Theories and Leave Voter Data Cooperative, ERIC," Brennan Center for Justice, March 13, 2023, <https://www.brennancenter.org/our-work/analysis-opinion/states-cave-conspiracy-theories-and-leave-voter-data-cooperative-eric>.
- 173** Even some prominent ERIC critics concede its usefulness. The Public Interest Legal Foundation — long a promoter of misleading claims about the breadth of errors on voting rolls — sent letters to several states in August 2025 asserting that it had developed a "database" that identified people for removal from the rolls. To support the credibility of its data, it claimed the database was "like the ERIC system." Logan Churchwell (Research Director, Public Interest Legal Foundation) to Sam Hayes (Executive Director, North Carolina Board of Elections), Re: Introduction of Voter Registration Data Findings, Request for Meeting, August 4, 2025, <https://publicinterestlegal.org/wp-content/uploads/2025/08/8.4.2025-NC-Data-Findings-Overview.pdf>.
- 174** In 2023, the Ohio secretary of state called ERIC "one of the best fraud-fighting tools that we have." Karen Kasler, "LaRose Says Ohio May Drop Out of Voter Registration Program He Praised Last Month," Statehouse News Bureau, March 7, 2023, <https://www.stateneews.org/government-politics/2023-03-07/larose-says-ohio-may-drop-out-of-voter-registration-program-he-praised-last-month>. In 2019, Florida Governor Ron DeSantis said joining ERIC would "enhance the security and integrity" of the state's elections. Clapman, "States Cave to Conspiracy Theories." In 2023, the outgoing secretary of state of Alabama published an op-ed trumpeting the value of ERIC. John Merrill, "John Merrill: Response to Representative Wes Allen on ERIC Membership," *Alabama Today*, February 1, 2022, <https://altoday.com/archives/43963-john-merrill-response-to-representative-wes-allen-on-eric-membership>.
- 175** Miles Parks, "3 More Republican States Announce They're Leaving a Key Voting Data Partnership," NPR, March 6, 2023, <https://www.npr.org/2023/03/06/1161374479/electronic-registration-information-center-eric-florida-missouri-west-virginia>; and Zach Montellaro, "2 More Republican States Abruptly Depart from Interstate Voter List Program," Politico, March 18, 2023, <https://www.politico.com/news/2023/03/18/republican-states-depart-from-interstate-voter-list-program-00087728>.
- 176** American Oversight, "The Campaign to Dismantle ERIC," December 13, 2023, <https://americanoversight.org/resource/the-campaign-to-dismantle-eric>.
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- 178** Amy Sherman, "Successful Program Finds Voters Who Moved or Died. Why Are States Leaving It Before 2024 Elections?," *Politifact*, May 4, 2023, <https://www.politifact.com/article/2023/may/04/successful-program-finds-voters-who-moved-or-died/>. Kansas and Indiana had similar programs shuttered by court orders.
- 179** A spokesperson for the Georgia secretary of state's office agreed: "We have much, much better tools [than EagleAI] in the form of the Electronic Registration Information Center."
- 180** See, e.g., Documented, "Eagle AI Introduced to SOSs that Left ERIC, and Is 'Under Consideration to Replace ERIC in Texas,'" August 17, 2023, <https://documented.net/media/georgia-state-board-of-elections-email-showing-eagle-ai-under-consideration-to-replace-eric-in-texas>.
- 181** Documented, "Meet 'EagleAI.'"
- 182** Documented, "Meet 'EagleAI.'"
- 183** Sam Gringlas, "State Election Board Member Wants to Give Georgians' Personal Data to EagleAI," WABE, November 21, 2024, <https://www.wabe.org/state-election-board-member-wants-to-give-georgians-personal-data-to-eagleai/>.
- 184** Mark Niesse, "Election Skeptic Chosen for Job as Georgia Election Investigator," *Atlanta Journal-Constitution*, February 4, 2025, <https://www.ajc.com/politics/state-election-board-votes-to-hire-election-skeptic-as-an-investigator/SIJ7QSKYVHCRE5YVX4UWKX56M/>.
- 185** Georgia State Senate, "2/15/24 Senate Committee on Ethics." The bill, GA S.B. 189 (2024), became law.
- 186** Most of these allegations collapsed under scrutiny. For example, after a claim that the rolls in Fulton County were above 100 percent registration, the committee chair asked how it was calculated. The speaker didn't know. Another speaker answered, but when a committee member pointed out flaws in the methodology (the number used outdated data and included voters already marked inactive as registered), the speaker confessed, "We can't fully rely on this."
- 187** Among other things, the panelists claimed that people with "major residency issues" had cast "thousands" of ballots, that officials were allowing people to register "in violation of state law," and that people were voting in person and by mail in the same election. Perhaps the most appalling comment came from one presenter who suggested that all people with "foreign characters" in their names be removed from the rolls. When the chair pointed out that many eligible voters have special characters in their names, the presenter retorted, "We do English." Discriminatory and xenophobic language like this is often used as justification for de jure voter suppression. For more, see Andrew Garber, "Election Denial Rhetoric from Sponsors of State Voter Suppression Litigation," Brennan Center for Justice, April 13, 2022, <https://www.brennancenter.org/our-work/research-reports/election-denial-rhetoric-sponsors-state-voter-suppression-legislation>.
- 188** Curt Devine and Donie O'Sullivan, "Georgia Group that Pushes Election Misinformation Gains Influence with Election Officials," CNN, October 9, 2024, <https://www.cnn.com/2024/10/09/politics/georgia-election-misinformation-voterga-garland-favorito/index.html>.
- 189** Devine and O'Sullivan, "Georgia Group"; and Kate Brumback and Ali Swenson, "Posts Misrepresent Impact of Missing Ballot Images in Georgia," Associated Press, November 12, 2021, <https://apnews.com/article/fact-checking-757465548352>. In 2006, the VoterGA leader filed an unsuccessful lawsuit alleging that the voting machines used in Georgia were illegal because he wasn't satisfied with records he saw.
- 190** Devine and O'Sullivan, "Georgia Group."
- 191** Danny Hakim and Alexandra Berzon, "A Big Lie in a New Package," *New York Times*, May 29, 2022, <https://www.nytimes.com/2022/05/29/us/politics/2000-mules-trump-conspiracy-theory.html>.
- 192** Juan Lozano, "Election Conspiracy Theorists Ordered Freed in Texas Lawsuit," Associated Press, November 7, 2022, <https://apnews.com/article/2022-midterm-elections-technology-texas-lawsuits-houston-19acb7ba58d296148463e51004274815>.
- 193** Russ Bynum, "Conservative Group Tells Judge It Has No Evidence to Back Up Its Claims of Georgia Ballot Stuffing," Associated Press, February 14, 2024, <https://apnews.com/article/georgia-elections-true-vote-ballot-stuffing-199113b47bc2df79c63fdf007cd23115>.
- 194** Nicholas Riley, "A Lesson from North Carolina on Challengers," Brennan Center for Justice, July 2, 2012, <https://www.brennancenter.org/our-work/analysis-opinion/lesson-north-carolina-challengers>; and Laura Lee and Jordan Wilkie, "Inside the 'Election Integrity'

Efforts Targeting North Carolina,” Assembly NC, October 11, 2022, <https://www.theassemblync.com/politics/north-carolina-election-integrity/>.

195 Corasaniti and Berzon, “Activists Flood Election Offices.”

196 American Oversight received many of these relevant records and reported publicly on some. See, e.g., American Oversight, “Flaw in Right-Wing ‘Election Integrity’ App Exposes Voter-Suppression Plan and User Data,” November 5, 2024, <https://americanoversight.org/press/flaw-in-right-wing-election-integrity-app-exposes-voter-suppression-plan-and-user-data/>; and American Oversight, “How New Arizona GOP Chair Gina Swoboda’s Website Fuels Voter Fraud Activists,” February 1, 2024, <https://americanoversight.org/how-new-arizona-gop-chair-gina-swoboda-website-fuels-voter-fraud-activists/>.

197 Timm, “Inside the Right’s Effort”; and Republican Nat’l Comm. v. Benson, Compl., 1:24-cv-262 (W.D. Mich. March 13, 2024). Some state laws call for voters to be marked “inactive” if they have not voted in a set number of recent elections. Such voters receive the notice required by the NVRA that they will be removed from the rolls unless they take action. People who vote while marked inactive often have to take additional steps before casting a ballot.

198 See, e.g., Stuart Thompson et al., “After Trump Took the Lead, Election Deniers Went Suddenly Silent,” *New York Times*, November 6, 2024, <https://www.nytimes.com/2024/11/06/technology/trump-election-denial.html>.

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