

# Wyoming Secretary of State

## Chuck Gray



July 24, 2025

*Via E-mail*

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Dear Ms. Riordan and Mr. Gates:

This letter serves as a response to your letter dated June 25, 2025, in which you inquired about Wyoming's compliance with several provisions of the Help America Vote Act ("HAVA"), and for processes, controls, and procedures pertaining to voter registration and voter list maintenance. I truly appreciate you reaching out, and I appreciate President Trump's and the entire Trump Administration's commitment to election integrity. Our office is committed to maintaining accurate voter rolls, and working to continually improve statutes, processes, and procedures to ensure proper voter roll hygiene, secure voter registration and list maintenance, and ongoing compliance with HAVA. The below answers and documents referenced and shared via the Justice Enterprise File Sharing ("JEFS") System outline our office's work to ensure Wyoming's voter registry list, as set forth in Wyoming statute, is adequately maintained in accordance with federal law.

**1) Describe how the State processes new applications to register to vote for elections for federal office, as required by HAVA Section 303.**

Wyoming has several processes and procedures in place to ensure a uniform process by which new applications to register to vote are processed by counties in accordance with HAVA Section 303. The Wyoming Election Code defines "registration" as the "entry and verification of the name and voter information of a qualified elector on the official registry list," as provided in W.S. 22-3-104(f) and W.S. 22-3-108. *See* W.S. 22-1-102(a)(xxvii). The Wyoming Secretary of State's Office oversees several processes and procedures to ensure only eligible applicants register to vote in Wyoming. To be eligible to register to vote in Wyoming, a person must be a United States citizen, as evidenced by providing proof of United States citizenship, at least 18 years of age on the day of the next general election, a bona fide resident of Wyoming, must not be adjudicated mentally incompetent or convicted of a felony (or if convicted, had his voting

rights restored), and a bona fide resident of Wyoming for not less than thirty days before the date of the election at which he offers to vote. *See* W.S. 22-3-102(a). As discussed further below, our office has entered into data sharing agreements with other agencies to run a cross-check upon voter registration to verify the applicant's registration information as entered on the voter registration application with driver's license information, social security information, and information obtained by the Wyoming Department of Health, Wyoming Division of Criminal Investigation, the Wyoming Department of Transportation, and Wyoming Department of Corrections to determine eligibility for purposes of voter registration.

When a qualified elector registers to vote, their name, date of birth, and either their driver's license number or the last four digits of their Social Security number are run through what is commonly referred to as a "HAVA" check. This check uses data received from the state agencies referenced above to confirm the individual's eligibility. If the elector fails the "HAVA" check, they are given the opportunity to provide additional documentation to verify that they are, in fact, qualified to vote. For example, they may submit a Certificate of Naturalization if the "HAVA" check indicates non-citizen status, or a Restoration of Rights Certificate if it indicates a felony conviction. If they do not have those documents, the county clerk denies registration, and may refer the case to the county's prosecuting attorney.

This area has been a large priority of my administration. To that end, prior to the 2025 Legislative Session, I launched our election integrity reform agenda, which included a series of safeguards to increase the confidence and security in the voter registration process. My number one priority was requiring documentary proof of citizenship and proof of residency for registering to vote. During the 2025 Legislative Session, the Wyoming Legislature passed 2025 House Enrolled Act 57, "Proof of voter residency-registration qualifications," which became law without the Governor's signature on March 21, 2025. *See* HEA 57 and press release on our election integrity agenda, shared via JEFS. The passage of HEA 57, which became effective July 1, 2025, requires documentary proof of United States citizenship and Wyoming residency to register to vote in Wyoming, and also requires electors to attest that they have been a bona fide resident of the state of Wyoming for not less than thirty (30) days before the date of the election in which they offer to vote.

HEA 57 was the number one priority of our administration's election integrity reform agenda announced ahead of the 2025 Legislative Session, and follows an administrative rulemaking to ensure documentary proof of residency, which was adopted by our office in 2023 and vetoed by the Governor. As a result, we decided to go to the Legislature to work to pass a bill on the subject and we were able to do so. With HEA 57's effective date of July 1, 2025, our office has promulgated rules to amend Chapter 2 of its Election Procedures Rules pertaining to Identification for Voter Registration to provide further clarity and uniformity for purposes of providing proof of a voter's identity, residency, and United States citizenship for voter registration as authorized by HEA 57. Copies of these rules may be found [here](#), and have been shared via JEFS. During the intervening period between the effective date of HEA 57, July 1, 2025, and the time for which the regular rulemaking process is completed, the Secretary of State's Office has also adopted emergency rules which are identical to the regular rules. The emergency rules packet can be found [here](#) and has been provided via JEFS. Once regular rules become effective, the emergency rules will be superseded.

HEA 57 makes Wyoming a leader in implementing President Trump's Executive Order Preserving and Protecting the Integrity of American Elections by requiring documentary proof of United States citizenship and Wyoming residency at the time of voter registration. Unlike many other states' proof of citizenship laws, which fall under the requirements of the National Voter Registration Act, Wyoming's HEA 57 applies to all elections, including federal, and doesn't contain any exceptions. It is thus largely patterned off of the SAVE Act, with a defined list of acceptable documents for providing proof of citizenship for voter registration, as specified. HEA 57 is in full force and effect to protect the integrity of Wyoming's elections and ensure non-citizens and non-Wyomingites are not entered onto Wyoming's voter registration list through 2026 and beyond.

On May 9, 2025, I was sued in my official capacity by a coalition of individuals through their attorney Marc Elias and the Elias Law Group in a federal lawsuit challenging the constitutionality of HEA 57 in the United States District Court for the District of Wyoming. Elias later filed a motion to enjoin HEA 57 from taking effect. We worked quickly to bring a vigorous defense of HEA 57 through our counsel by filing an opposition to Elias' request for an injunction, as well as a motion to dismiss the lawsuit in its entirety. We were very thankful to the Trump Administration and the Department of Justice for filing a statement of interest in the case. On July 22, the court granted our motion to dismiss this lawsuit.

Upon voter registration, successful registrations are entered into Wyoming's voter registration system, otherwise known as the official registry list. W.S. 22-3-108(a) specifies that the "official registry list" contains at least the following information as to each registered elector: name in full, residence by street number and name, voting district and precinct numbers, party affiliation, if declared, house and senate district numbers, date of birth, driver's license number, or, if no driver's license, the last four digits of the elector's social security number or unique identifying number generated by the state, information related to absentee ballot status, and date of registration. W.S. 22-3-108(b) specifies that the registry list may contain county of residence, municipal corporation of residence, if any, school district number, mailing address, gender, and telephone number, if any.

**2) Describe the process by which Wyoming assigns a unique identifier to each legally registered voter in Wyoming, as required by HAVA Section 303(a)(1)(A).**

At the time of voter registration for a first-time registrant, Wyoming's statewide voter registration system automatically assigns a unique identification number to each voter in compliance with HAVA Section 303(a)(1)(A). The Wyoming Election Code's definition of "Registry List," found in W.S. 22-1-102(a)(xxix), includes a unique identifying number generated by the State of Wyoming. As set forth by policy of our office in early 2023, and later codified into law with the Wyoming Legislature's passage of 2023 House Enrolled Act 30, shared via JEFS, Wyoming law mandates that unique identifying numbers of voters are public record, and are to be released in all election records, including voter registry lists furnished under W.S. 22-2-113.

Importantly, this unique identifying number remains associated with the voter's record, regardless of registration status (i.e. active, pending, or inactive). Therefore, a voter whose registration is cancelled and inactivated for any reason set forth in W.S. 22-3-115 (e.g. removal

of residency from one county to another), will retain that unique identifier in the event they register to vote again.

**3) Describe how the statewide voter registration list is coordinated with the databases of other state agencies, as required by HAVA Section 303(a)(1)(A). Provide the name of each state database used for coordination, and describe the procedures used for the coordination as well as how often the databases are coordinated with the statewide voter registration list.**

Our office has entered into several perpetual agreements with various state agencies in Wyoming to ensure proper voter list maintenance, not just at the time of registration as discussed above, but also to ensure ongoing voter list maintenance and removal in accordance with HAVA Section 303 and Wyoming law. W.S. 22-3-102(e) provides statutory authority to our office to enter into agreements with the Wyoming Department of Transportation, the Wyoming Attorney General, the Department of Health, and the Wyoming Department of Corrections to ensure individuals on Wyoming's voter rolls are eligible to vote.

A. Data Sharing for Driver's License, Social Security, and Immigration Records through the Wyoming Department of Transportation

W.S. 22-3-102(e)(i) specifically authorizes our office to enter into an agreement with the Wyoming Department of Transportation for verification of driver's license information, and states as follows:

(i) The secretary of state and the director of the department of transportation shall enter into an agreement to match voter registration data with information maintained by the department regarding driver's licenses, in order to verify the information provided on applications for voter registration;

In accordance with W.S. 22-3-102(e)(i), the Wyoming Secretary of State's Office and the Wyoming Department of Transportation have entered into a memorandum of understanding outlining the processes of our office's ingestion of data from the Wyoming Department of Transportation to match voter registration data with information maintained by the Wyoming Department of Transportation, including driver's license information and social security number verification through the Social Security Administration. The memorandum of understanding with the Wyoming Department of Transportation, has been shared via JEFS, as redacted in accordance with W.S. 16-4-203(d).

Another key priority of our administration was to ensure passage of 2025 House Enrolled Act 62 (HEA 62), "Maintenance of Voter Lists," which passed the Legislature and was signed into law on March 18, 2025. HEA 62, shared via JEFS, enables our office to enhance our relationship with the Wyoming Department of Transportation to obtain data that will allow us to analyze and communicate to Wyoming's county clerks if a registered voter in the State of Wyoming should have their registration cancelled by virtue of a number of new data metrics to be shared by the Wyoming Department of Transportation. First, HEA 62 amends W.S. 22-3-102(e)(i) as follows:

(i) The secretary of state and the director of the department of transportation shall

enter into an agreement to match voter registration data with information maintained by the department regarding driver's licenses, in order to verify the information provided on applications for voter registration, determine if any alien identification number or other evidence of non-United States citizenship is kept within corresponding driver's license records, determine if any voters listed in the Wyoming voter registration system have subsequently received a driver's license from another state as indicated by information received from other states, including but not limited to information received from the state-to-state verification service operated by the American association of motor vehicle administrators or verify any other information indicating a voter should be ineligible to vote at the request of the secretary of state;

While giving our office statutory authority to receive information indicating a voter may have moved out of state, it also amends W.S. 22-3-116 to provide that this information may be used to further investigate if an individual's registration should be cancelled based on this information.

HEA 62 also amends W.S. 22-3-102 to allow for enhanced tools for verification and maintenance of Wyoming's voter registration list concerning non-citizen status. HEA 62 specifies through the creation of a new subsection (f) that the Wyoming Department of Transportation shall, in addition to the other data, provide additional data of individuals who have indicated independently that they are a noncitizen as follows:

(f) The department of transportation shall furnish monthly to the secretary of state a complete list of all persons who have indicated a noncitizen status in obtaining any document, or renewal thereof, issued pursuant to W.S. 31-7-115 and 31-8-102. The secretary of state may transmit the information from the list to appropriate county clerks. Information in these lists shall be kept confidential and available only for official use.

As discussed further below, this information obtained by the Wyoming Department of Transportation will be utilized to conduct enhanced searches for potential non-citizen status conducted in partnership with the Department of Homeland Security, U.S. Citizenship and Immigration Services Systematic Alien Verification System, otherwise known as the SAVE System.

Our office is currently in the process of revising our memorandum of understanding with the Wyoming Department of Transportation to ensure the new data contemplated by HEA 62, including immigration enumerators, as well as information obtained by the Wyoming Department of Transportation from the State-to-State Verification Service, can be ingested into Wyoming's voter registration system. Concurrently, the Wyoming Department of Transportation has begun sharing this information with our office pursuant to HEA 62 to manually enter this information.

#### B. Data Sharing for Removal of Convicted Felons from Voter Registry List

To ensure new and existing felons are not registered to vote pursuant to the requirements under Wyoming law, our office has undertaken several measures, including direct integration of

Wyoming felony records obtained by the Wyoming Division of Criminal Investigation, as well as manual cross-checks of felony records received from other states. W.S. 22-3-102(e)(ii) states as follows:

(ii) The secretary of state and the attorney general shall enter into an agreement to compare data in the voter registration system with information maintained by the division of criminal investigation regarding state felony convictions in order to deny voter registration to, and remove from voter registration lists, individuals who are not qualified electors;

In accordance with the Memorandum of Understanding between our office and the Division of Criminal Investigation, shared via JEFS as redacted in accordance with W.S. 16-4-203(d)(xii), the Division of Criminal Investigation provides felony records to our office to be ingested into the Wyoming voter registration system in order to deny voter registration to, and remove from voter registration lists, individuals who are not qualified electors. Once records obtained by the Division of Criminal Investigation are ingested by the Wyoming voter registration system, they are used to match against records during voter registration to deny registrants who match this information. These records are also used to match against existing registrants, and will notify counties of registrations which match the felony record to begin the cancellation process at the county level.

#### C. Data Sharing for Removal of Deceased Individuals from Voter Registry List

Our office has also been working to streamline the process for processing and ingestion of death records to ensure new registrants are cross-checked with Wyoming mortality records to prevent registration fraud and that registered voters who have died are removed from Wyoming's voter rolls in an expeditious manner, as authorized by Wyoming law. In this regard, W.S. 22-3-102(e)(iii) provides the following:

(iii) The secretary of state and the director of the department of health shall enter into an agreement to match information in the voter registration system with death records in the office of vital records services within the department of health in order to remove names of deceased individuals from voter registration lists;

In order to implement this statute, our office has entered into an agreement with the Wyoming Department of Health requiring the Department to export mortality data daily, to be ingested into Wyoming's voter registration system. These records are matched, both at the time of registration to prevent any new registrants whose records match those of deceased individuals and weekly to match against existing registrants. The voter registration system will notify counties of registrations which match a death record to begin the cancellation process at the county level.

In 2023, upon our administration beginning, we began a comprehensive review of Wyoming's voter rolls to reduce the opportunity for fraud. In August of 2023, we endeavored to streamline this process further to expedite the removal of deceased voters from Wyoming's voter rolls through the modification of the data sharing agreement with the Department of Health to increase the speed of the transfer and ingestion of death records. Whereas mortality records previously took as many as four weeks to be processed and received, they are now received in as

little as 3-7 days, shortening the time period between a registered voter's death and the entry of the death record into Wyoming's voter registration system by more than 75%. Shared via JEFS, please find the revised data sharing agreement dated August 22, 2023 streamlining this process, as well as a media release discussing these enhancements in more detail.

#### D. Data Sharing and Processing Records Related to Restoration of Voting Rights

Similarly, our office has also entered into data sharing agreements to ensure timely processing of restoration of voting rights. W.S. 22-3-102(e)(iv) also authorizes our office to enter into an agreement with the Wyoming Department of Corrections to ensure accurate entry of registration of voting rights into the voter registration system in order to verify voter qualifications, stating as follows:

(iv) The secretary of state, the state board of parole and the department of corrections shall enter into an agreement to match information in the voter registration system with records regarding restoration of voting rights maintained by the state board of parole or the department of corrections in order to verify voter qualifications;

Similar to other records, our office ingests data received from the Wyoming Department of Corrections to ensure voting rights restorations are communicated to ensure individuals who have had their voting rights restored are allowed to register to vote, so long as they are otherwise entitled to register to vote under Wyoming law. Shared via JEFS please find the Memorandum of Understanding with the Wyoming Department of Corrections, as redacted in accordance with W.S. 16-4-203(d)(xii), outlining this process.

#### **4) Describe the process by which any duplicate voter registrations are identified and removed from the statewide voter registration list under HAVA Section 303(a)(2)(B)(iii). Please include an explanation of how the State determines what constitutes a duplicate voter registration record.**

As noted above, Wyoming law requires voter registration to be conducted by the county clerk. If a duplicate voter record is created by the county clerk, it is therefore the responsibility of the county to merge the records in accordance with HAVA Section 303(a)(2)(B)(iii). During this process, the original unique identifier is preserved, and the duplicate unique identifier is archived in the voter's audit log for historical tracking. While it is the responsibility of the county clerk to merge records, our office employs several processes through Wyoming's statewide voter registration system to identify and resolve duplicate records.

First, Wyoming's voter registration system provides real-time checks at the time of registration. When a registrant submits a Wyoming voter registration application, the county clerk is responsible for entering the information into Wyoming's voter registration system. The system automatically checks for existing records using the **registrant's name, date of birth, driver's license number, and the last four digits of their social security number**. This search includes active, pending, and inactive records. If a match is found, the system automatically notifies the county clerk and displays the existing record, thereby preventing a duplicate record from being created.

Additionally, Wyoming's voter registration system employs ongoing checks for duplicate records in the event a duplicate record is created. This includes regular, periodic system-wide scans for potential duplicates using the same identifying data. Suspected duplicates are placed in a queue for the county clerk to review and, if necessary, merge the records.

Clerks may also manually search for potential duplicate records using a module specifically created for this function within Wyoming's voter registration system. After manual review, the county clerk may merge the records if necessary.

**5) Describe the process by which voters who have been convicted of a felony are identified and, if applicable under state law, removed from the statewide voter registration list under HAVA Section 303(a)(2)(A)(ii)(I).**

As noted above, Wyoming employs numerous protections to ensure felons are properly identified and either prevented from registering or removed in accordance with HAVA Section 303(a)(2)(A)(ii)(I) through collaboration with other agencies.

Like voter registration, cancellation of voter registration is performed at the county level, but our office employs several systems and processes to ensure proper oversight. W.S. 22-3-115 specifies the grounds for cancellation of a voter's registration, and includes removal for disqualification to vote, which includes felony status. In accordance with the MOU between our office and the Division of Criminal Investigation, shared via JEFS, the Division of Criminal Investigation provides felony records to our office to be ingested into the Wyoming voter registration system in order to deny voter registration to, and remove from voter registration lists, individuals who are not qualified electors. Once records obtained by the Division of Criminal Investigation are ingested by the Wyoming voter registration system, they are used to match against existing registrants, and will notify counties of registrations which match the felony record to begin the cancellation process at the county level.

Upon receipt of a notification pertaining to felony status, in accordance with W.S. 22-3-116, the county clerk shall mail a notice of intent to cancel a voter's registration, allowing an opportunity for the voter to respond as prescribed below:

When the county clerk has information that a registration should be cancelled, he shall mail a notice of intent to cancel to the elector at his address on the registry list stating the reason for cancellation. The notice shall state that cancellation shall occur within twenty (20) days unless the elector asks that his name remain on the registry list. A copy of the notice of cancellation shall be retained by the county clerk for three (3) years. A notice is not required if the clerk has received a receipt of notification that the elector has registered to vote in another jurisdiction or if the elector requested cancellation in writing.

While these cancellation records are maintained by the counties, our office has taken many steps to ensure adequate and timely removal of voters from Wyoming's voter rolls through the ongoing data sharing information agreements and ingestion of data into Wyoming's voter registration system, as well as individual communications.



In addition to the bulk records we receive as part of our memorandum of understanding with the Wyoming Division of Criminal Investigation, we also undertake to remove ineligible voters from voter rolls based on information concerning felony convictions in other states. In October of 2023, our office conducted an investigation into an individual named Eli Alan Hunt, who was registered to vote in Campbell County. Following his attempted registration in Crook County, it was discovered by our office that Hunt had a felony conviction from South Dakota from 1994, and that there was no evidence of any restoration of Wyoming voter rights.

In response to this investigation, we again requested, via the attached letter to the Campbell County Clerk and Campbell County Attorney, removal of Hunt from Wyoming's voter rolls, as well as referral of the case to the Campbell County Attorney for further investigation and criminal prosecution, citing Hunt's falsely swearing on his voter registration form that he was either not a felon or that his voting rights had been restored, which is a felony pursuant to W.S. 22-26-108. Hunt was subsequently removed from Wyoming's voter registration list by the Campbell County Clerk. This shows the continued prioritization of this office to ensure proper removal of individuals ineligible to vote from Wyoming's voter rolls.

**6) Describe the process by which deceased registrants are identified and removed from the statewide voter registration list under HAVA Section 303(a)(2)(A)(ii)(II).**

As noted above, Wyoming employs numerous protections to ensure deceased registrants are properly identified and removed from Wyoming's voter registration list as required by HAVA Section 303(a)(2)(A)(ii)(II).

In fact, since 2023 our administration has been working to streamline the process for processing and ingestion of death records to ensure new registrants are cross-checked with Wyoming mortality records to prevent registration fraud and ensure that registered voters who have died are removed from Wyoming's voter rolls in an expeditious manner, as authorized by Wyoming law. As noted earlier, W.S. 22-3-102(e)(iii) provides the statutory authority used to enter into data sharing agreements with the Wyoming Department of Health to obtain mortality data. In order to implement this statute, my administration has entered into a new agreement with the Wyoming Department of Health requiring the Department to export mortality data daily, to be ingested into Wyoming's voter registration system. These records are used both to prevent new registrations that match deceased individuals and to identify existing registrants who have died. At the time of registration, any applicant whose information matches a death record is flagged and prevented from registering. If a potential registrant provides the last four digits of their social security number on their application, as opposed to their Wyoming driver's license number, the voter registration system runs a check with the Social Security Administration to attempt to match the identity of the registrant. If the SSA identifies that the social security number is a match to the name and date of birth provided, but belongs to a deceased individual, the SSA will return a message of "Match – Deceased" which indicates to the county clerk that they should not complete registration or should request additional information of the applicant to ensure the SSA match was a false-positive. Additionally, mortality records are routinely compared against the voter rolls, and when a match is found, counties are notified so they can begin the cancellation process.

As noted above, in 2023, we began a comprehensive review of Wyoming's voter rolls to

reduce the opportunity for fraud and enhance our ability to remove ineligible voters in a timely manner. In August of 2023, we endeavored to streamline this process to expedite the removal of deceased voters from Wyoming's voter rolls through the modification of the data sharing agreement with the Department of Health to increase the speed of the transfer and ingestion of death records. Whereas mortality records previously took as many as four weeks to be processed and received, they are now received in as little as 3-7 days, shortening the time period between a registered voter's death and the entry of the death record into Wyoming's voter registration system by more than 75%. Shared via JEFS, please find the revised data sharing agreement dated August 22, 2023 streamlining this process, as well as a media release outlining more details on the revised data sharing agreement.

**7) Describe all technological security measures taken by the state to prevent unauthorized access to the statewide voter registration list, as required by HAVA Section 303(a)(3).**

In accordance with HAVA Section 303(a)(3), Wyoming has implemented a number of technological security measures to prevent unauthorized access to Wyoming's statewide voter registration system.

First, the state employs a process of "whitelisting" on the computer network that hosts the Wyoming voter registration system to ensure that no outside networks have access to the voter registration system network. This means that only networks which have been explicitly authorized (i.e. state and county networks) are permitted access to the login page and network. The state also enforces unique user IDs and passwords for system users, strong password requirements, role-based permissions, two-factor authentication, and requires reporting to the state of new user accounts created by county election administrators.

Additionally, to monitor and audit changes and modifications to voter registration records, the voter registration system produces audit logs which record username and timestamp on all modifications, and utilizes a Center for Internet Security (CIS) monitored Albert Sensor installed on the registration system's network to monitor for unauthorized or malicious network activity.

Finally, Wyoming has engaged with federal partners, including the Department of Homeland Security, to ensure monthly cyber hygiene scanning of the network in order to identify potential network vulnerabilities.

**8) Describe the process by which voters who have moved outside the State and subsequently register to vote in another state are identified and removed from the statewide voter registration list, under HAVA Section 303(a)(4)(A).**

In compliance with HAVA and Wyoming law, our office removes voters from Wyoming's voter registration list upon notice received from other states indicating the voter has registered to vote in that state. Our office verifies that the individual is registered to vote in Wyoming, and on the first business day of each month, we send copies of the notices via encrypted email to applicable county clerks in the county where the voter last resided. In the month leading up to an election, our office increases the frequency of these notifications to ensure timely updates for the clerks.

This issue has been a key priority of my administration and a key priority of my election integrity agenda. As part of our commitment to ensure a rigorous process, we worked to pass HEA 62 to increase the vigorousness of this capability beyond notices received from other states, providing new statutory authority to enhance this process.

First, HEA 62 amends W.S. 22-3-102(e)(i) to provide as follows:

(i) The secretary of state and the director of the department of transportation shall enter into an agreement to match voter registration data with information maintained by the department regarding driver's licenses, in order to verify the information provided on applications for voter registration, determine if any alien identification number or other evidence of non-United States citizenship is kept within corresponding driver's license records, determine if any voters listed in the Wyoming voter registration system have subsequently received a driver's license from another state as indicated by information received from other states, including but not limited to information received from the state-to-state verification service operated by the American association of motor vehicle administrators or verify any other information indicating a voter should be ineligible to vote at the request of the secretary of state;

This access to the state-to-state verification system is a pivotal advancement. While giving our office statutory authority to receive information indicating a voter may have moved out of state, it also amends W.S. 22-3-116 to provide that this information may be used to further investigate if an individual's registration should be cancelled based on this information, noting in pertinent part:

When the county clerk has information that a registration should be cancelled, he shall mail a notice of intent to cancel to the elector at his address on the registry list stating the reason for cancellation. When the secretary of state or county clerk receives information indicating that there is evidence that an elector may have moved to another state, the secretary of state and the county clerk may use any lawful means to investigate whether the registration should be cancelled, and based on this investigation, the county clerk may mail a notice of intent to cancel to the elector in accordance with this section.

Our administration is fully implementing HEA 62 with our partners at the Wyoming Department of Transportation to ensure "notices of surrender" received from other states to provide to our office in accordance with HEA 62. Once received, pertinent information will be provided to county clerks for further investigation and removal in accordance with Wyoming law.

**9) Describe the process by which registrants who are ineligible to vote due to non-citizenship are identified and removed from the statewide voter registration list.**

As explained above, the number one priority of my 2025 election integrity agenda was requiring up-front, documentary proof of citizenship for voter registration. We successfully passed this bill, and have successfully defended it in court. Additionally, identification and

removal of non-citizens from Wyoming's voter registration list has also been a top priority.

Although cancellation of registration is performed at the county level pursuant to Wyoming law, our administration has been diligent to request removal of ineligible voters from Wyoming's voter registration list, including those who are not qualified to vote by virtue of non-citizen status. As an example, in August of 2023, we pursued an investigation which led to the removal of an illegal alien from Wyoming's voter rolls, who had voted in the November 3, 2020 Election in Campbell County.

Working with other interested partners, our office discovered that Jesus Lopez Sanchez, an illegal alien who had fraudulently obtained a U.S. passport, registered to vote in Campbell County, listing his address as an industrial building in Campbell county, Wyoming. Our records indicated he even voted in the 2020 General Election. As outlined in the attached letter to Campbell County Clerk and Campbell County Attorney, our office requested removal of Sanchez from Wyoming's voter registration list as an ineligible non-citizen. Due to his suspected violations of the Wyoming Election Code, we also referred Sanchez for criminal prosecution for knowingly voting in an election in which he was not entitled to vote, submitting a false voter registration record, falsely swearing on his voter registration application that he was a U.S. citizen, registering to vote when he was not qualified under Wyoming law, and falsely claiming under oath that he was a United States citizen.

Sanchez was subsequently removed from Wyoming's voter registration list.

In an effort to enhance the amount of data available to our office, our 2025 election integrity reform agenda also included explicit statutory authority to utilize the SAVE System for purposes of verifying that voters listed in the Wyoming voter registration system are United States citizens. With the passage of HEA 62, W.S. 22-3-102(e) provides as follows:

(vi) The secretary of state may utilize the systematic alien verification for entitlements (SAVE) program operated by the United States citizenship and immigration services for purposes of verifying that voters listed in the Wyoming voter registration system are United States citizens.

In accordance with HEA 62, on July 1 our office entered into a Memorandum of Agreement with the Department of Homeland Security, U.S. Citizenship and Immigration Services, to allow for increased voter list maintenance services through the SAVE System. This executed MOA and media release outlining our commitment to utilizing the SAVE System has been shared via JEFS. I want to thank the Trump Administration for the tremendous optimization of the SAVE System. In coordination with the Wyoming Department of Transportation and DHS's internal optimizations, our office is actively engaging to upload a significant dataset of Wyoming voters who have indicated to the Wyoming Department of Transportation they are a non-citizen to the SAVE System for further review via the SAVE System. Once reviewed, if any in this search are determined by this review to be non-citizens, appropriate notice will be provided to county clerks for further investigation and removal in accordance with the procedures set forth in Wyoming statute.

**10) HAVA requires states to verify voter registration information by mandating that**

**applicants provide certain information under HAVA Section 303(a)(5). Please provide a copy of the voter registration application(s) utilized for in-person voter registration, a link to the State’s online voter registration application, and, if applicable, the voter registration application used for same-day registration.**

Wyoming law outlines the contents and process of voter registration, and prescribes the Wyoming Voter Registration Application form. Specifically, W.S. 22-3-103 specifies the contents of the voter registration application, which is on our [website](#). It has also been shared via JEFS. With the passage of HEA 57, the Wyoming Voter Registration Form was modified to require documentary proof of United States citizenship, as well as Wyoming residence, in addition to proof of identity, which was previously required for voter registration. Additional instructions outlining the requirements for proof of identity, United States citizenship, and Wyoming residency can be found on the instructions page of the statewide VR form.

Wyoming is exempt from the National Voter Registration Act, because Wyoming law allows election-day voter registration. This dates back to the passage of the NVRA. There is no distinction between the registration form used for election-day registrations and for all other registrations.

**11) Please describe the verification process under HAVA Section 303(a)(5) that election officials perform to verify the required information supplied by the registrant. Please describe what happens to the registration application if the information cannot be verified.**

Upon voter registration, county clerks enter in pertinent information required to be furnished by the applicant into Wyoming’s voter registration system in what is commonly referred to as the “HAVA” check to verify the information listed by the individual on their Voter Registration Application. As noted above, this information, which includes the registrant’s full name, date of birth, driver’s license number, and/or the last four digits of the applicant’s social security number, is automatically checked against several data sources and agency databases designed to verify the information supplied by the registrant. Through leveraging the data sharing agreements noted above, the information entered is cross-checked with the Wyoming Department of Transportation and the Social Security Administration to verify identity and citizenship status, Wyoming Department of Health to identify deceased individuals, Wyoming Department of Corrections and Division of Criminal Investigation to identify records related to felony convictions.

If this search results in a potential match with a record that would be ineligible to register to vote under Wyoming law, the Wyoming Voter Registration System automatically notifies county election officials of the potential match. It is then up to the local county election official to request additional documentation from the registrant in order to manually determine eligibility. For example, a HAVA check which returns a status of a potential felon would notify the clerk to require the registrant to provide evidence that their civil or voting rights have been restored by a competent Wyoming authority.

**12) Provide a copy of the current agreement, under HAVA Section 303(a)(5)(B)(i), between the chief State election official and the State’s motor vehicle authority.**

As elaborated on in more detail in response to question (3) above, the Wyoming Secretary of State's Office has entered into a perpetual MOU with the Wyoming Department of Transportation. The current agreement has been shared via the JEFS System.

In implementing and streamlining the processes set forth in HEA 62, our office is currently working with the Wyoming Department of Transportation to revise this agreement.

**13) Provide a copy of the current agreement between the official responsible for the State's motor vehicle authority and the Commissioner of Social Security Administration under HAVA Section 303(a)(5)(B)(ii).**

In response to this question, our office contacted the Wyoming Department of Transportation, who is in custody of records and materials responsive to this request. Once received, this document will be provided through JEFS via a supplement to this response.

**14) Under HAVA Section 303(b), describe the State's requirements for an individual to vote if the individual registered to vote by mail and has not previously voted in an election for federal office in the State.**

In order to ensure compliance with HAVA Section 303(b), Wyoming law and administrative rule provides for a uniform process whereby new registrants who register by mail are required to furnish the same information as those who register in person.

As noted above, W.S. 22-3-103 provides that the county clerk shall furnish voter registration oath forms and require certain voter information from applicants when they register to vote, including acceptable identification as defined pursuant to W.S. 22-1-102(a)(xxxix) and further enumerated in Chapter 2 of the Secretary of State's Election Procedures pertaining to identification for voter registration, the applicant's driver's license number or the last four digits of his social security number, a tribal identification card, proof of residence, and proof of United States citizenship. *See* W.S. 22-3-103(a).

W.S. 22-3-104(d) specifies that the requirements set forth in W.S. 22-3-103, including providing the documentation sufficient to satisfy HAVA Section 303(b), be required for applicants who register by mail, noting in pertinent part:

(d) An applicant may only register to vote in person or by mail at which time he shall provide the information required by W.S. 22-3-103(a) and sign the registration oath as required by W.S. 22-3-103(b).

Thus, in this way, HAVA Section 303(b) is satisfied.

**15) Please send us Wyoming's current statewide voter registration list. Please include both active and inactive voters.**

As discussed further above, Wyoming's voter registration list, or "registry list," is defined as "the list by precinct of the names, addresses, party affiliations, unique identifying numbers

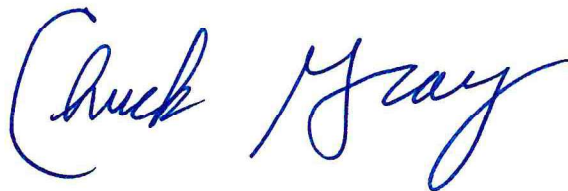
generated by the state, information relating to absentee ballot status, registration dates and precinct and district numbers of the registered electors in the county prepared by the secretary of state or county clerks for distribution as provided in W.S. 22-2-113.” See W.S. 22-1-102(a)(xxix). In essence this list is the list of active registered voters at the time of export. W.S. 22-2-113 outlines the process of exporting registry lists upon request to eligible recipients. Subsection (d) also outlines that unless otherwise provided, all election records of the county clerk are public, and shall be made in accordance with the Wyoming Public Records Act. In accordance with these provisions, our office has furnished previously exported registry lists and history files upon receipt of a public records request, and has routinely provided previously exported lists when requested. Accordingly, a voter registry list exported on July 10, 2025, which is now a public record, has been shared via JEFS.

#### **16) Commitment to HAVA Compliance**

In Wyoming, we continue to make great strides to improve statutes, policies, and procedures to ensure compliance with HAVA. We will strive to continue these efforts throughout the remainder of my term as Secretary of State. Should you have any questions or concerns, please don’t hesitate to contact our office.

I want to thank President Trump and the entire Trump Administration for prioritizing enhanced procedures for voter list maintenance, and for supporting additional safeguards to ensure eligible voters are able to register to vote and vote in American elections.

Sincerely,



Chuck Gray  
Wyoming Secretary of State