



STATE OF MISSOURI
OFFICE OF THE SECRETARY OF STATE
ELECTIONS DIVISION

HAVA Complaint – Filed 15 October 2025

CONSTANCE KRAMER, COMPLAINANT *V*
DENNY HOSKINS, *IN HIS OFFICIAL CAPACITY AS SECRETARY OF*
STATE OF MISSOURI, RESPONDENT.

DETERMINATION

[1 JUNE 2026]

1. BACKGROUND

1.1. FEDERAL AND STATE LAWS/REGULATIONS

By passing Public Law 107-252, known as the Help America Vote Act of 2002 (“HAVA”), Congress established requirements for each state to “implement, in a uniform and nondiscriminatory manner, a single, uniform, official, centralized, interactive computerized statewide voter registration list” and to “establish and maintain State-based administrative complaint procedures”, among other provisions.

In 2003, Missouri enacted Section 28.035, RSMo, identifying the Secretary of State (“Respondent”) as the “chief state election official responsible for the administration and coordination of state responsibilities pursuant to the Help America Vote Act of 2002”. That section also required Respondent to establish specified procedures for complaints about violations of Title III of HAVA and authorized Respondent to promulgate administrative rules for enforcing the section. In 2004, Respondent promulgated 15 CSR 30-12.010, an administrative rule establishing the statewide HAVA grievance procedure, further governing complaints about violations of Title III of HAVA including, among other items, a requirement for conducting an investigation and, if requested, a public hearing about a complaint. In 2006, Missouri enacted Section 115.219, RSMo, nearly mirroring that administrative rule.

1.2. HAVA COMPLAINT

On October 15, 2025, Constance “Connie” Kramer (“Complainant”) filed a written, notarized, signed, and sworn Complaint Form with the Elections Division of Respondent’s office. The complaint alleged that the State violates Section 303(a)(1) of Title III of HAVA (52 U.S.C. §21083(a)(1)) by failing to maintain a “single, uniform, official, centralized’ statewide voter registration list that serves as *the* official list for conducting federal elections” (Complaint Doc. 2, p. 4). The complaint also alleged that the violation occurs “[b]ecause Missouri’s EAC [U.S.

Elections Assistance Commission], SOS [Missouri Secretary of State], and MCVR [Missouri Centralized Voter Registration system] outputs for the same election do not reconcile” (Complaint Doc. 2, p. 4). The complaint referenced several exhibits (composed of data gleaned from the State, some of which is represented in various forms generated by Complainant) in support of Complainant’s contention that, since Complainant cannot reconcile the State’s EAC, SOS, and MCVR outputs for federal elections held in 2022 and 2024, the State is not maintaining the voter registration list required by Section 303(a)(1) of Title III of HAVA. The complaint further alleged that the State’s violations occurred in the Federal elections in 2022 and 2024 and will also occur in the 2026 election for Federal offices (Complaint Doc. 2, p. 4).

After a review of Complainant’s complaint and exhibits, the Elections Division of the Respondent’s office dismissed the complaint on October 20, 2025, for failure to file the complaint timely and to adequately identify the name and address of the alleged violator as required by 15 CSR 30-12.010. Complainant then brought an action in the United States District Court for the Western District of Missouri, Central Division, seeking a Temporary Restraining Order or a Preliminary Injunction requiring Respondent to accept the complaint, preserve all relevant data and records, and provide a meaningful hearing as required under HAVA. On March 5, 2026, the Court issued a preliminary injunction granting Complainant’s request and ordering Respondent

to conduct a hearing and make a determination on the issues within ninety days of the date of the Order so Complainant could exercise her rights under HAVA. The Court issued an additional Order on April 14, 2026, with further requirements for the hearing process and production of witnesses, data, and records.

1.3. HAVA HEARING

On April 24, 2026, Missouri held its first hearing requested under HAVA since Congress enacted the law. The hearing was held so that the parties could present evidence and testimony to address Complainant's request to know whether Respondent has complied with HAVA's requirements for the State to establish a single, uniform, official, centralized, interactive computerized statewide voter registration list for the conduct of Federal elections in Missouri.

2. HEARING TESTIMONY AND EVIDENCE

At the hearing, Complainant appeared on her own behalf and called three witnesses: Chrissy Peters, Director of the Elections Division, Office of Missouri Secretary of State; Nick La Strada, Director of Election Integrity, Office of Missouri Secretary of State; and Daniel Hume, data analyst volunteer. Complainant also questioned a witness called by Respondent, Eric Fey, Democratic Director of Elections for the St. Louis County Board of Election Commissioners. Complainant presented numerous exhibits and indicated in her questioning and testimony that there

are still various forms of data and records she desires to obtain from Respondent to assist in reconciling different vote totals and voter turnout totals reported by the State for the 2022 and 2024 elections. Complainant also sought to determine further the name, form, and content of data and reports produced for the 2022 and 2024 elections and changes made to voter records in the MCVR system afterward.

2.1. COMPLAINANT'S FIRST WITNESS

Starting at approximately 9:15 a.m. and continuing for the first two hours of the hearing, Complainant questioned Ms. Peters about: her role as Director of the Elections Division; the certification process, the records produced for the official number of votes, and the official total number of votes certified for the November 2024 general election; the total voter turnout and participation numbers and the records used to produce those numbers reported by the State to the EAC; queries to the MCVR to produce reports of who voted in the November 2024 general election; records received by the State from counties for election result certification and verification purposes; reports related to local election authority changes to voter records between the reporting of unofficial and official election results; how local election authorities determine whether an individual is eligible to vote; whether the MCVR uses and reuses unique numbers to identify individual voters; reports and logs of changes from MCVR relating to duplicate voter data; the management of the MCVR as a

database; verification of voter information in MCVR; HAVA funding provided to the State and audits of those funds; point-in-time voter history records produced from MCVR; and the treatment of inactive voter information in MCVR.

2.2. RESPONDENT'S FIRST WITNESS

For the third hour of the hearing, Jacqueline Bryant, the Deputy General Counsel for the Office of Missouri Secretary of State, called Eric Fey as a witness on behalf of Respondent. Mr. Fey answered Respondent's questions and provided information about a local election authority's responsibilities in incorporating a voter's registration, participation in an election, and voting history into the MCVR; public services requests ("PSR") regarding registered voter information from MCVR; special-case voter information in MCVR (provisional ballot voters, voters who move, Safe-At-Home voters, and other voters whose information is confidential by law); regular maintenance of the voter registration list in MCVR; and local canvassing of voters to verify residence information.

Also in the third hour, Complainant questioned Mr. Fey about local records showing voter participation, uploads of local voter information into the MCVR, local efforts at reconciling voter participation and voter history after updates are made and the logs of those efforts and updates, which local record becomes the official local record for voter participation uploaded to the MCVR, and discrepancies in

voter history data between specific reports generated from MCVR.

2.3. COMPLAINANT'S SECOND & THIRD WITNESS

In the hearing's fourth hour, Complainant called Nick La Strada to testify about: which county record becomes voter history in MCVR; voter and election integrity; roles of Respondent's employees; records and logs of changes to registration information in MCVR; records that show whether a vote cast in a particular election was accepted or rejected; which state records connected the voter participation records with certification records; local verification boards that verify the local election process; and who participated in a particular election and what voter history was certified.

Complainant also called Daniel Hume to testify in the hearing's fifth hour about the results of his analysis of the voter data extracted from MCVR on different dates as part of his and Complainant's efforts at reconciling the data's differences. They also conversed about differences between the MCVR data and other voter history and voter results data displayed on Respondent's and the EAC's websites. When Complainant questioned him on reconciling that voter history and voter results data, he testified that he is unable to know from that data whether "the voters who have been given credit are the total number of voters who actually voted or whether they're actually the voters who

voted.” (Transcript of Proceedings of April 24, 2026, pp. 218-219).

Complainant questioned Mr. Hume for the remainder of the hearing’s fifth hour and into the sixth hour about samples of voter history, participation, and registration records illustrating changes to that data that confused Complainant and Mr. Hume and raised questions about why that data would change and who would make the changes. Complainant and Mr. Hume also discussed discovering differences in data relating to duplicate and merged voter records and county voter rolls and history and being unable to explain those differences. Mr. Hume explained how he processed the voter participation totals to reach the various results and both he and Complainant indicated that they were unable to tell from those results who voted and what numbers were certified. After stating his opinion that the full record of all changes made to voter records should be preserved to allow for the reconciliation of the differences and errors in the data, Mr. Hume concluded his testimony by responding to questions from Ms. Bryant. Her questions sought to ascertain Mr. Hume’s position on what should happen as alterations are necessary to a voter’s record, which he clarified generally as believing that necessary changes should be made and documented so that, if a change is not readily explainable, the record of the change could explain who made the change and why.

2.4. RESPONDENT'S SECOND WITNESS

At 4:00 p.m., Respondent's counsel began questioning Ms. Peters about her knowledge of Complainant's scorecards derived from Complainant's compilation of the data extracted from the MCVR and her explanation of possible reasons for the variances in the data. Ms. Bryant also worked through the written testimony Ms. Peters provided for the hearing, testimony that focused on how the MCVR system stores and tracks voter registrations and complies with the required elements of Section 303(a)(1) of HAVA. Ms. Peters' testimony also explained how data extracted from MCVR shows numbers different from the data provided by the State to the EAC because those numbers track voter participation rather than voter turnout or voter registration and history. Ms. Peters then ended her testimony with a description of the process for certification of election results by the State.

2.5. HEARING END AND POST-HEARING FILINGS

A few minutes after 4:30 p.m., Complainant submitted oral testimony further describing her reasons for filing the complaint and seeking the election records she desires, then submitted her closing statement describing her desired outcome of the hearing. Respondent's counsel submitted an oral closing statement describing how testimony elicited by Respondent's counsel showed how MCVR satisfies Section 303(a)(1) of HAVA. After closing remarks and the statement of Friday, May 1, 2026, as the

deadline for submitting proposed findings or other arguments, the hearing adjourned.

On Tuesday, April 28, 2026, the hearing officer agreed that the May first deadline for submitting post-hearing filings was unworkable for all parties because of the absence of the hearing transcript and extended the deadline for the submissions. While waiting for the transcript, Respondent submitted additional documentation to Complainant and Complainant submitted additional files and exhibits. After both parties acknowledged receipt of the transcript on Tuesday, May 12, 2026, the hearing officer set the deadline for post-hearing submissions for 5:00 p.m. on Friday, May 22, 2026. Both parties timely submitted the requested proposed findings and Complainant submitted additional files and exhibits in the several days following the May 22 deadline.

3. ISSUE

Complainant alleges the following: in violation of Section 303(a)(1) of HAVA (52 U.S.C. §21083(a)(1)), for the 2022 and 2024 elections and the upcoming 2026 Federal election, Missouri did not and is not maintaining a single, uniform, official, centralized, interactive computerized statewide voter registration list serving as the official list for the conduct of Federal elections in Missouri.

4. LEGAL AUTHORITY

4.1. VOTER REGISTRATION LIST REQUIREMENTS

Section 303(a) of Title III of HAVA (52 U.S.C. §21083(a)) lists the requirements for a voter registration list in a state that has voter registration requirements for elections for Federal office. Particularly, subparagraph (a)(1)(A) of that section states the following:

- The “chief State election official” must fulfill duties imposed by the section;
- The state “shall implement, in a uniform and nondiscriminatory manner, a single, uniform, official, centralized, interactive computerized statewide voter registration list”;
- The state must “define[], maintain[], and administer[] at the State level” the required list;
- The list must:
 - “[C]ontain[] the name and registration information of every legally registered voter in the State”;
 - “[A]ssign[] a unique identifier to each legally registered voter in the State”; and
 - “[I]nclude[] the following:
 - (i) The computerized list shall serve as the single system for storing and managing the official list of registered voters throughout the State.

(ii) The computerized list contains the name and registration information of every legally registered voter in the State.

(iii) Under the computerized list, a unique identifier is assigned to each legally registered voter in the State.

(iv) The computerized list shall be coordinated with other agency databases within the State.

(v) Any election official in the State, including any local election official, may obtain immediate electronic access to the information contained in the computerized list.

(vi) All voter registration information obtained by any local election official in the State shall be electronically entered into the computerized list on an expedited basis at the time the information is provided to the local official.

(vii) The chief State election official shall provide such support as may be required so that local election officials are able to enter information as described in clause (vi).

(viii) The computerized list shall serve as the official voter registration list for the conduct

of all elections for Federal office in the State.”.

Paragraph (a)(2) of that section requires regular maintenance of the list relating to removing individuals and ineligible voters and describes the manner in which such maintenance is to be performed. Paragraph (a)(3) requires “adequate technological security measures” to protect access to the list. Paragraph (a)(4) establishes a minimum standard of accuracy and regular updates. Paragraph (a)(5) establishes provisions governing registration application contents, agreements made by state officials for verifying “information provided on applications for voter registration”, and applications that use Social Security numbers for identification purposes.

4.2. HEARING REQUIREMENTS

Section 402(a) of Title IV of HAVA (52 U.S.C. §21112(a)) establishes requirements for states to establish “administrative complaint procedures” for complaints relating to violations of Title III of HAVA to be filed.

Sections 28.035 and 115.219, RSMo, and 15 CSR 30-12.010 establish the corresponding state requirements for complaints and hearings under HAVA relating to violations of Title III of HAVA.

5. FINDINGS OF FACT

1. Complainant was provided a hearing on the record as required by HAVA and state law to investigate the allegations raised in the complaint.

2. Complainant was permitted to present information and witnesses and to question witnesses called by Respondent.

3. Ms. Peters appeared at the hearing and, as listed below, provided credible testimony in person and submitted credible written testimony:

3.1. In 2004, Missouri implemented the Missouri Centralized Voter Registration (“MCVR”) database.

3.2. The MCVR is the single computerized system for storing and managing voter registration information in the state. All local election authorities use the system.

3.3. The MCVR is the centralized system that contains the computerized list with each legally registered Missouri voter’s name and registration information.

3.4. Each legally registered Missouri voter in the computerized list in the MCVR is assigned a unique identifier.

3.5. The MCVR is an interactive system that coordinates with other agency databases in Missouri and with the Social Security Administration.

3.5.1. Such state agencies include the state Department of Revenue, Department of Corrections, and Department of Health and Senior Services.

3.5.2. For example, the system uploads death records through an interface. This allows the local election authorities to mark a registered voter as deceased and to

remove the deceased individual from the official list of registered voters.

3.6. The MCVR allows any election official in the state to obtain immediate access to the information in the computerized system. Since updates are immediate, it is a live system.

3.7. The MCVR contains voter registration information obtained by local election authorities that such authorities enter or update at the time the information is provided to them:

3.7.1. The MCVR contains the official list used by the Missouri Secretary of State's Office and Missouri's 116 local election authorities.

3.7.2. The local election authorities are responsible for entering voter registration data into the MCVR system and making updates to the voter's registration record when a voter's information changes.

3.7.3. The MCVR is a uniform system in which voter registration data is entered the same way by all local election authorities.

3.7.4. There is no local election authority in the state who does not interact or communicate with the MCVR system.

3.7.5. The local election authorities use the MCVR daily. Changes to a voter's record are immediate. Once a local election authority makes an update, that update is reflected in the statewide system.

3.7.6. A PSR, which is a snapshot of the MCVR, shows the list of Missouri's registered voters at a given point in time.

3.8. The Secretary of State's Office is responsible for maintaining the system and providing technological support:

3.8.1. The Secretary of State's Office sends procedures and reminders to local election authorities about steps to keep the voter rolls accurate.

3.8.2. The Secretary of State's Office also can perform audits of the local election authorities' list maintenance activities.

3.8.3. The Secretary of State's Office provides support to the local election authorities so that local election authorities are able to enter voter information as expeditiously as possible. For example, the Office built an online registration interface that coordinates with the Motor Vehicle and Driver Licensing Division for voter registrations. When a person registers to vote at the Division, MCVR prefills the data fields in MCVR to eliminate duplicating data and to reduce the number of data entry errors.

3.9. The list of registered voters in MCVR is the official voter registration list that is used in elections for Federal offices in Missouri.

3.10. The local election authorities perform maintenance on the list of registered voters daily. This maintenance

occurs when the local election authorities update voter registration information. List maintenance even occurs on election day. For example, if an individual moves from one county to another within the state, that individual can update their address with the local election authority even on election day.

3.11. Individuals are removed from the list in accordance with the National Voter Registration Act of 1993. The local election authorities make reasonable efforts to remove the names of ineligible voters from the list:

3.11.1. These removals occur primarily in one of five ways: at the request of the registrant; by reason of criminal conviction; mental incapacity; death; or change of residence.

3.11.2. A local election authority's ability to remove an individual for change of residence is limited. By law, a local election authority does not remove an individual for a change in residence unless the registrant confirms in writing that the registrant has changed addresses to a place outside the jurisdiction or the registrant fails to respond to a notice and the registrant has not voted in an election during the period beginning on the date of the notice and ending on the day after the second general election for federal office that occurs after the date of the notice.

3.12. The MCVR flags potential duplicates that the local election authorities can remedy. Potential duplicate

records arise from, among other reasons, data entry errors or a change to an individual's maiden name. Duplicate records for the same individual, as in the case of duplicates arising from a name change, are cured by merging the records into a single record.

3.13. Because the MCVR is interactive, when one local election authority registers a voter who previously resided in another county, the system locates the possible registration so that the local election authority does not create a new registration for the already-existing registration record.

3.14. The Secretary of State's Office provides technological security measures to prevent unauthorized access to the list. The system requires multiple authentication steps before a user can access the system.

3.15. Changes to a voter's record are shown in the audit logs. Audit logs show every action made to a voter's record and who completed the action.

4. Ms. Peters provided credible testimony as listed below describing possible reasons for discrepancies and differences in the data in the EAC, SOS, and MCVR outputs that Complainant desires to reconcile:

4.1. Following federal elections since 2004, the EAC asks all 50 U.S. states and territories to provide data about the ways Americans vote and how elections are administered.

4.2. The data collected by the EAC is published in the Election Administration Voting Survey ("EAVS"). Like the

other states, Missouri participates in this survey and participated in 2022 and 2024. This survey is designed to measure voter participation and votes cast and counted, which includes military and overseas absentee, traditional absentee voting, election day voting, provisional ballots, and federal write-in absentee ballots for military voters.

4.3. The numbers in the EAVS report are different from the numbers reported in Missouri's official election results because the numbers reflect different things.

4.4. The EAVS report measures voter participation, whereas "voter turnout" in Missouri's election results refers to the total number of votes counted in the race or issue with the most votes statewide.

4.5. Likewise, the numbers from the MCVR snapshots, the PSRs, will not match because MCVR is a live system. Once a voter is removed from the MCVR system, that voter's history will not show up on the list, even if they voted in a particular election. This is because the purpose of the PSR is to show the names of registered voters at the time the list is generated—not who voted in a particular election, whether that voter voted on all issues, or whether that vote counted.

4.6. Following an election, local election authorities have three months to enter voter history into the computerized registration system.

4.7. The number from the snapshot in the PSR is never going to match the numbers provided in the EAVS report

to the EAC or the certified results because the PSR list reflects those who remain registered to vote in Missouri at the time the list is generated.

4.8. Many changes happen in the three months between the election and when the PSR is generated. Changes to the voter list occur if a voter moves out of state, dies, is convicted of a felony, or is removed from the list for another reason required by law. In those situations, that individual will not appear on the PSR even though they voted in a particular election.

5. Ms. Peters credibly testified that the Secretary of State's Office, in response to similar information contained in Complainant's election scorecards that the office had received previously, developed data integrity modules for MCVR to address data inconsistencies and data entry errors.

6. Mr. Fey appeared at the hearing and provided credible testimony as described below:

6.1. Local elections authorities use the MCVR system daily. The system is used by local election authorities to update and maintain the voter registration records and list of registered voters.

6.2. When an individual registers to vote or updates their registration, the local election authority is responsible for entering that information into the MCVR system:

6.2.1. An individual who desires to register to vote in Missouri, particularly St. Louis County, fills out a voter registration application.

6.2.2. Applications can be completed online, at a Missouri motor vehicle or driver license office or a social service agency, on a paper form in person, or through the mail.

6.2.3. When the election authority receives that registration application, an employee (a clerk at the election authority) enters that information into the MCVR system. The data includes the applicant's name, date of birth, address, and either the last four digits of the applicant's Social Security Number or their Missouri driver license number, or both.

6.2.4. Steps are taken to verify the information is correct. MCVR has a live link to the Social Security Administration database, the Missouri Department of Revenue's Motor Vehicle and Driver Licensing Division database, Missouri Department of Corrections, Missouri Department of Health, and the county's own address library that the county is responsible for maintaining. All of those databases confirm that the applicant is who they say they are and the applicant registered an address that is a legitimate residential address for voter registration.

6.2.5. After that information is entered into MCVR, the individual is on the list of registered voters in MCVR. On election day, that individual will appear on the precinct register at the polling place. The voter will present their

government-issued identification and sign the poll book attesting that the information is correct. A Democratic and Republican election judge will attest to that and the voter will be issued a ballot. Only registered voters appear on the poll book. The poll book is a subset of the list of voters that appear in MCVR.

6.3. Following the election, the election authority, if it uses an electronic poll book, will generate a file from the electronic poll book software that will upload the voter credit into MCVR. This is how the vast majority of voter credit that gets assigned. However, there is also voter credit for voters who vote by provisional ballot. There are some voters who vote by affidavit because they did not appear in the poll book. A local election authority has three months from the election to enter the voter history into MCVR.

6.4. In MCVR, election authorities can query an individual's voter record. The results of the query will show that the individual participated in an election and the method of participation, such as by visiting a polling place or by submitting an absentee ballot. Local election authorities can query an individual's voting record in MCVR even if the individual is deleted from MCVR, but that individual will not appear on the PSRs, the current list of registered voters, generated through the MCVR system.

6.5. A local election authority will have a record if an individual voted by provisional ballot because the provisional ballot envelope, which is an affidavit, operates as a voter registration application. This gets scanned into

the voter's records. It will be denoted in MCVR if the individual voted by provisional ballot but will not be denoted on the PSR.

6.6. If a voter moves out of state after voting in a general election and the local election authority updates the voter information, that voter will no longer appear on the PSRs. In contrast, an individual who moves to Missouri from another state and registers to vote in Missouri will appear on the PSRs but will not have any voting history.

6.7. Missouri has a program for individuals who are victims of domestic violence that allows them to keep their address confidential. This program is called "Safe at Home". The address of individuals in this program does not appear on the PSRs. Similarly, "confidential voters", who are usually judges, can request to have their address hidden on the voter registration file. Their name will appear on the PSRs but not their addresses.

6.8. "List maintenance" refers to the regular day-to-day process of making sure the voter's list is as up-to-date as possible:

6.8.1. List maintenance occurs every minute of every day the local election authority is open for business.

6.8.2. There are a number of ways local election authorities are notified that they need to make update to a voter's registration.

6.8.3. Each day, local election authorities receive new registrations from many different sources: the Missouri

Department of Revenue's Motor Vehicle and Driver Licensing Division; social service agencies; the mail; online; and individuals who appear in person at the local election authority's office or in person at a deputy registrar who sends the local election authorities those registration cards.

6.8.4. Additionally, local election authorities receive regular updates from the National Change of Address database, which is maintained by the United States Postal Service. Local election authorities send residential confirmation notices to individuals who show up on the National Change of Address database.

6.8.5. Every election, local election authorities send out a sample ballot to voters. If the post office returns the mailing to the local election authority with a yellow sticker indicating that the individual was not at the address, the local election authority begins the canvassing process on that voter.

6.9. Every week, local election authorities receive a list from the state Department of Health and Senior Services of individuals who have passed away.

6.10. Every week, local election authorities receive a list from the state Department of Corrections of individuals who have been convicted of felonies. Local election authorities also receive a list of individuals in the State corrections system who have completed their felony sentences and should have their voting rights restored.

6.11. Local election authorities periodically receive lists from the judicial system of individuals who have been judged incapacitated.

6.12. Local election authorities receive a host of general correspondence from individuals providing notice of the need to update their information.

6.13. Local election authorities also receive identification information from some other states.

6.14. When a change or an update is made to the MCVR system, the change or update is immediately reflected in the system.

6.15. Each change or update is reflected in the audit logs.

6.16. All election authorities in Missouri have access to the list of registered voters.

6.17. The list is centralized and is a live system.

6.18. Local election authorities make reasonable efforts each year to remove ineligible voters from the list.

6.19. The MCVR system flags potential duplicates for the local election authorities:

6.19.1. MCVR has a few different safeguards in place to try to identify potential duplicates.

6.19.2. Because MCVR is a statewide system, it is easier to spot potential duplicates because the information that is entered is compared against the entire state database. For example, if the record of an individual entered in the system has a different last name but the same last four

digits of the Social Security Number or driver license number as another individual's record, the system will identify that record as a potential duplicate and ask the user if they want to merge the two records.

6.19.3. Sometimes potential duplicates are just that—"potential"—not actual duplicates. For example, two individuals may have the same last four digits of the Social Security Number and the same birth date, but they are two different individuals and not actual duplicates.

6.20. Local election authorities perform canvassing to verify a voter is still living at a residence where the voter registered to vote:

6.20.1. During the canvassing process, each local election authority sends mail to all its registered voters.

6.20.2. If the local election authority receives returned mail from the Postal Service indicating the individual is not there, the local election authority sends a residential confirmation notice to that voter that the voter needs to update their address within thirty days or be moved to the "inactive" voter list.

6.20.3. The "inactive voter list" is a misnomer. "Inactive" does not mean the voter is not participating in elections. "Inactive" means the local election authority does not know for sure where the voter resides at that particular time. An "inactive" voter is still a registered voter who can vote in Missouri's elections.

6.21. Voter credit can be assigned to an individual's voter record in MCVR after certification of the election.

6.22. In St. Louis County, election reconciliation is done with the ballots cast and the records from the tabulation software against the number of signatures from the poll books combined with the number of provisional ballots cast and any affidavits that may have been filled out at a polling place.

6.23. MCVR is not used for voter reconciliation; it is used for maintaining voter registration records.

6.24. Voter credit, when it is entered into MCVR, does not come from a single source. Most voter credit comes from the poll books. Some voter credit is assigned manually, as with absentee and provisional ballots.

6.25. Poll books are preserved for twenty-two months after an election. Affidavits and provisional ballots are scanned and kept with the voter's record in MCVR.

7. Mr. LaStrada appeared in person and provided credible testimony as described below:

7.1. Local election authorities use the MCVR system for entering and updating voter registration information.

7.2. Voter registration records are updated all the time in the MCVR system by local election authorities when voters register or update their information.

7.3. PSRs reflect the current list of registered voters in the state.

8. Complainant was permitted to submit information at the hearing and following the hearing that Complainant believes is relevant to her allegations.

9. Complainant submitted “election scorecards” with her complaint and addressed the scorecards at the hearing. The scorecards alleged data inconsistencies in voter registration records.

10. Complainant submitted several other exhibits before, during, and after the hearing and questioned witnesses about some of those exhibits. Those exhibits purport to show discrepancies in voter registration records.

11. Complainant was provided several hours at the hearing to present evidence and testimony and to examine witnesses.

12. Both Complainant and Respondent were allowed until 5:00 p.m., Friday, May 22, 2026—an additional three weeks—to submit proposed findings since the transcript of the proceedings was not available in time to submit such proposed findings by the May first deadline set by the hearing officer.

13. The hearing officer received a PDF file containing Complainant’s Proposed Findings via email on Friday, May 22, 2026, at 3:53 p.m., as evidenced by the email header information of the email from Complainant to the hearing officer. Arrival of the email in the hearing officer’s email inbox at that time is deemed a timely submission ahead of

the 5:00 p.m., Friday, May 22, 2026 deadline for such submissions.

14. The hearing officer received three documents (two PDF files and one Word file) containing Respondent's Proposed Findings and Suggestions in Support via email on Friday, May 22, 2026, at 2:55 p.m., as evidenced by the email header information of the email from Respondent to the hearing officer. Arrival of the email in the hearing officer's email inbox at that time is deemed a timely submission ahead of the 5:00 p.m., Friday, May 22, 2026 deadline for such submissions.

6. CONCLUSIONS

15. The MCVR system implemented by the State contains the list ("MCVR list") of registered voters in Missouri.

16. The State maintains and administers the MCVR list at the State level as the single, uniform, official, centralized, interactive, computerized statewide voter registration list for voters in Missouri.

17. The MCVR list contains the name and registration information of every voter legally registered to vote in the State.

18. The MCVR list assigns a unique identifier to each legally registered voter in the State.

19. The MCVR list is used by the Secretary of State's Office and Missouri's 116 local election authorities.

20. The MCVR list coordinates with other state agency databases within the State, including the state Department of Revenue and the state Department of Health and Senior Services, as required by law.

21. Any election official including, but not limited to, a local election authority, may obtain immediate electronic access to the information contained in the MCVR list.

22. The local election authorities electronically enter voter registration information into the MCVR list on an expedited bases at the time the voter registration information is provided to them.

23. The Secretary of State's Office provides technological and helpdesk support so that the local election authorities are able to enter voter registration information into the MCVR list on an expedited basis.

24. The Secretary of State's Office provides security measures to prevent the unauthorized access to the MCVR list.

25. The MCVR list serves as the official voter registration list for the conduct of all elections for federal office in Missouri.

26. Missouri performs MCVR list maintenance on a regular basis.

27. Individuals are removed from the MCVR list in accordance with the provisions of the National Voter Registration Act of 1993, as required by law.

28. The State coordinates with other agencies in the state for the purpose of removing voters from the MCVR list based on felony status and death.

29. The MCVR list maintenance performed by the State is done in a manner that ensures each registered voter appears on the MCVR list and only those who are not eligible to vote are removed from the MCVR list.

30. The MCVR list maintenance performed by the State identifies duplicate records, which are merged to eliminate duplicate records.

31. The MCVR system contains measures to ensure the voter registration records are accurate and updated regularly. Such measures include making sure local election authorities make a reasonable effort to remove registrants who are ineligible to vote.

32. No registrant is removed from the MCVR list solely for failure to vote. Registrants who have not responded to a notice and who have not voted in two consecutive general elections for federal office are removed from the MCVR list.

33. Missouri requires that a registrant provide a driver license number, the last four digits of the registrant's Social Security Number, or both, to vote. The MCVR system interfaces with data from the state Department of Revenue to match voter registration information. Missouri also coordinates with the Social Security Administration to verify the accuracy of voter information.

34. Complainant failed to produce any evidence that Missouri has failed to comply with HAVA's Section 303(a)(1) requirement to maintain "a single, uniform, official, centralized, interactive computerized statewide voter registration list" that serves as the official list for all federal elections. *See* 52 U.S.C. 21083(a)(1).

35. The official MCVR list of registered voters is used to determine who is currently registered to vote in Missouri.

36. The totals reported to the EAC are used for the EAVS report to measure voter participation.

37. The totals reported by the SOS for voter turnout in Missouri's election results refer to the total number of votes counted in the race or issue with the most votes statewide.

38. The MCVR list is not used for election totals reconciliation.

39. Complainant failed to produce any evidence that Section 303(a)(1) of HAVA requires Respondent to reconcile the EAC, SOS, and MCVR outputs that Complainant desires to reconcile.

40. Complainant failed to produce any evidence that any provision of HAVA requires respondent to reconcile any voter participation or voter turnout totals with any voter registration information contained in the MCVR list in the manner or by a method by which Complainant desires to reconcile such numbers.

41. Complainant's evidence presented and testimony offered at the hearing raises questions about voter

registration information contained in the MCVR list and the processes involved in adding, changing, or deleting such voter registration information.

42. Complainant's questions about such voter registration information may be answered by MCVR list records maintained by Respondent, but these questions relate to the specific content of specific voter records at specific points in time chosen by Complainant rather than whether Respondent's MCVR list complies with Section 303(a)(1) of HAVA.

43. Section 402(a)(2)(F) of HAVA (52 U.S.C. 21112(a)(2)(F)) requires that the State provide the appropriate remedy if the State determines that there is a violation of any provision of Title III of HAVA.

44. Section 402(a)(2)(G) of HAVA (52 U.S.C. 21112(a)(2)(G)) requires that the State dismiss the complaint if the State determines that there is no violation of any provision of Title III of HAVA.

7. DETERMINATION

For the reasons stated above, the Elections Division declines to determine that there was a violation of Section 303(a)(1) of HAVA as alleged in the Complaint.

However, the Elections Division is encouraged to continue providing Complainant with publicly available data from the MCVS list that may assist Complainant in reconciling the voting totals and voter registration information provided. Such data should be provided in

compliance with federal and state law protecting personal identifying information.

Because the Elections Division finds no violation of Section 303(a)(1) of HAVA by Respondent as alleged in the Complaint, the Complaint filed on October 15, 2025, is hereby dismissed.