



**VIA FEDERAL EXPRESS**

March 9, 2020

Hon. Alex Padilla  
California Secretary of State  
Elections Division  
1500 11<sup>th</sup> Street  
Sacramento, CA 95814

Mr. Dean Logan  
Los Angeles County Registrar-Recorder/County Clerk  
12400 Imperial Highway  
Norwalk, CA 90650

**Re: Significant Risks to Los Angeles County Election Integrity if Ballots Mailed to Every Voter**

Dear Secretary Padilla and Registrar Logan,

Election Integrity Project, California Inc. (EIPCa) purchased the VoteCal voter registration and voting history files on February 18, 2020. In its initial review of the data, EIPCa identified significant list maintenance deficiencies in Los Angeles (LA) County. The purpose of this letter is to alert you both to these deficiencies as LA County considers the Secretary's direction to send vote-by-mail (VBM) ballots to all active registrants in the November 2020 election (March 5, 2020 letter from Sec. Padilla to RR/CC Dean Logan).

As you know, EIPCa is a 501(c)(3) non-partisan, non-profit, tax-exempt public benefit corporation. We monitor California's elections and provide feedback to election officials and voters. EIPCa's goal is to improve the integrity of-- and confidence in-- California elections. We appreciate the opportunity to participate in the implementation of the federal mandate that California comply with NVRA's Section 8 and HAVA for current and accurate voter registration list maintenance.

The following findings illustrate that, if the county chooses to mail all active registrants a VBM ballot, **LA County will send vote-by-mail (VBM) ballots to hundreds of thousands of likely ineligible registrants (moved, died). Additionally, thousands of duplicated registrants will be mailed more than one VBM ballot for the November election.**

**LA Finding # 1: "No Show" Registrants**

LA County currently has 206,728 registrants who have not voted or updated their registrations since November 2008 or prior. Though they have likely died or relocated, these "no show" registrants remain in active status and will be mailed VBM ballots in November if the county mails ballots to every active registrant. 1,486 are over 100 years old and 117,500 have no record of ever having voted, yet they remain on the active file list.

EIPCa recommends that LA county mail all “no show” registrants a card under NVRA Section 8(d)(2) and inactivate these registrants while the county researches their respective eligibility. Though an inactivated “no show” will not be mailed a VBM ballot, he/she but can still vote in person while on the inactive list.

**LA Finding #2: Duplicated Registrations**- LA County has 10,556 registrants who appear to be registered to vote more than once. Of these, 21 appear to be registered three times. Each occurrence entails two or more registrations under the same name, same/similar birthdate and same address. Suspected duplicates living at differing addresses in the county have additional matching criteria such as email, phone number or mailing address. Persons who appear to be registered under both married and maiden names are included, while likely twins are excluded. The DMV voter registration system appears to be the source of many duplicated voter registrations. Data errors also contribute (misspellings, spacing mistakes, flipped names (e.g., John Smith, Smith John), flipped birthdates (e.g., 2/4/57, 4/2/57)).

**LA Finding #3: Duplicate Registrants with Matching EMS IDs**

Of the 10,556 suspected duplicates, 324 have different VoteCal Registration IDs but matching county EMS IDs. Matching EMS IDs should make it easy for the county and state to identify and merge these duplicates, yet they remain on the VoteCal file as two distinct active-status registrations for each person.

**LA Finding #4: Duplicated Registrants to Receive 2+ VBM Ballots**

If LA County mails ballots to all active registrants in November, 8,158 of the duplicated registrants will each be mailed two VBM ballots and five will be mailed three VBM ballots. This because they have two or three active-status registrations each. Persons receiving more than one VBM ballot can easily vote more than once undetected, since the system has them documented as different registrants.

**LA Finding #5- Possible Double Voting**

The data show that 1,300 LA County duplicate registrants have already voted more than once in at least one election. This may be actual double voting, accidental duplication of voting histories, or some of both. VoteCal may be auto-duplicating voting histories for some LA County voters who use DMV registration.

**LA Finding #6: Registered in LA County Plus One Other County**

2,439 additional persons are registered in LA County plus one other county, primarily Orange County and San Diego County. Some will receive one VBM from LA County and one VBM from the other county, if LA County mails VBMs to every active registrant.

**LA Finding #7: Other Ineligible Registrants**

LA County currently has 855,788 ineligible registrants (total LA County active plus inactive registrants on February 18, 2020 compared to the Secretary of State’s February 18, 2020 estimate of eligible citizens). While there are 1,539,513 inactives that LA County is currently working to update or cancel, the 206,728 active “no show” registrants, 10,556 duplicated registrants and 2,439 cross-county duplicates discussed above are further contributing to LA County’s unacceptably high level of ineligible registrations.

Sec. Alex Padilla  
RR/CC Dean Logan  
March 9, 2020  
Page 3

EIPCa wishes to share the VoteCal data supporting these findings with Registrar Logan and listed LA County Supervisors copied below. **Per our contractual agreement, EIPCa requests written permission from Secretary of State Padilla to do so.**

It is imperative that LA County fully understand its voter list maintenance deficiencies and their potential impact as it considers Secretary Padilla's March 5 direction. **Unless and until LA County's above-referenced deficiencies are corrected, there are clear risks to LA County's election integrity- and voter confidence- if all current active registrants are mailed ballots for the November 2020 election.** Immediate inactivation of the more than 200,000 "no show" registrants EIPCa has identified will ensure ineligible persons are not mailed VBM ballots, while preserving their respective right to vote as their eligibility is researched. LA County has several months to investigate the suspect duplicated registrations EIPCa will provide and merge those it confirms as duplicate, so persons are not mailed multiple VBM ballots.

We look forward to receiving Secretary Padilla's permission to share with Registrar Logan and the Supervisors the supporting data for these important findings. I can be reached at (661) 313-5251 or [linda@eip-ca.com](mailto:linda@eip-ca.com).

Sincerely,

Election Integrity Project California, Inc.

Linda Paine  
President

Cc: Los Angeles Co. Board of Supervisors:  
Kathryn Barger- Chair, Fifth District  
Hilda L. Solis- Chair Pro Tem, First District  
Sheila Kuehl- Supervisor, Third District  
Mark Ridley-Thomas- Supervisor, Second District  
Janice Hahn- Supervisor, Fourth District  
Celia Zavala- Executive Officer

Attorney Steven Bailey, Bailey & Romero