



EPEC DATA FOR VOTERS

ELECTORAL PROCESS EDUCATION CORP.

The Honorable Susan Beals
Commissioner of Elections
Dept. of Elections, 1100 Bank Street
Richmond, VA 23219

August 21, 2025

Dear Commissioner Susan Beals,

We write to inform you of what appear to be numerous errors on Virginia's registered voter list (RVL) and respectfully request your office and relevant authorities make the appropriate, routine corrections under Virginiaⁱ and federal statute.ⁱⁱ

They include the following:

1. Possible Duplicate Voter Registrations

As documentedⁱⁱⁱ by Jon Lareau, chief technology officer of Electoral Process Education Corporation (a nonprofit, nonpartisan charity), Virginia's RVL appears to show 1,250 potential duplicate registrant "pairs" with an exact match of First, Middle, Last, Suffix, and date of birth information.

The analysis EPEC applied also shows that 5,116 potential duplicates are different by one or less than one character, which we would categorize as "likely" matches.

Additionally, we see 29,000 potential duplicates that are different by two or less characters that may benefit from a check for potential duplicate registrations.

Our methodology involved utilizing and evaluating the official Registered Voter List (RVL), purchased from the Department of Elections, and cross referencing the results with Voter History List (VHL) data.

We respectfully request an audit of what appear to be duplicate registrations on the statewide voter list.

The full file with specific voter information and calculations applied to make these findings can be securely provided to parties authorized by ELECT to receive and process voter information, Election Officials, or Law Enforcement upon [request](#).^{iv}



2. ‘Declared Noncitizens’ with Voting History Before Removal from Voter Rolls

We have identified at least 6,086 unique registrations that were self-identified as “Declared Non-Citizen” and removed by ELECT from the voter rolls since May of 2023.

Of those 6,086 removals, we see 1,003 that also had corresponding records of recent ballots cast at some point in official Voter History records that we could observe.

We request that these apparent voting violations be addressed, and also request a hearing of the State Board of Elections (under the Help America Vote Act) regarding what appear to be ineligible registrants casting repeated ballots in Virginia’s statewide and federal elections.

We are standing by to securely transmit these results to the relevant authorities for review.^v

3. Spike in Elderly, First-Time Registrations May Need Auditing

We have observed in official records a higher than statistically expected number of elderly residents who appear to be registered for the first time in Virginia. This raises questions as to whether these records are being added or updated correctly.

We have found 9,913 voters in the Registered Voter List who registered to vote only after turning 85 years of age (6,578 females, 3,266 males, 68 undefined, and 1 gender X).

When we adjust to include first-time registrations aged 77 and up, the number grows to about 10,000 or higher.

Registration drives may be the root cause of so many elderly registrations that are being treated as first-time voters in the registration records.

For example, individuals may have moved into elderly care or retirement communities and, instead of updating their primary residency in their registration records, they were assigned new registrations. With the update to their mailing addresses, the registration date may have been updated so that it looks like a new registration.

We also observed potentially insufficient data validation that appears to allow under-age individuals to be added to registration records.

If these are not data-validation issues, the high number may involve registration manipulation. We thank you for taking a look. We are willing to securely transmit our findings^{vi} to ELECT or relevant authorities for auditing upon request.



4. Request for ELECT to Issue Official Guidance for Same Day Registration

We urge you and your team to issue guidance to General Registrars and, if appropriate, to Electoral Boards about Same Day Registration rules regarding residency.

As you know, Virginia statute requires voters to cast a ballot using a primary address that is their domicile and/or residence.^{vii}

During the 2024 General Election, Chesterfield was among many college towns that handled a large increase in residents who chose SDR to cast a provisional ballot on election day; many were allowed to use a campus office that is not their domicile with their application. It caused much confusion during the provisional canvas about applying voter credit to the ballots.

Guidance from your office would send an important reminder to all localities about residency requirements for SDR to ensure that all eligible ballots are counted properly.

5. Update Logic & Accuracy Documentation Portal for Ranked Choice Voting

Virginia law^{viii} states that voting systems shall be tested and sealed, and they shall be locked after they are prepared for use in an election before the election starts. The links and titles are below.^{ix}

The Virginia Department of Elections (ELECT) provides a portal to help facilitate General Registrars' compliance, such as with form ELECT-633 "Logic and Accuracy Certification (L&A)."

We have discerned that the portal for uploading certification paperwork does not provide the ability to upload documents for the "Ranked Choice Voting" portion of the testing. We ask ELECT to modify form "ELECT-633" to include a section at the bottom for Ranked Choice Voting and to collect all required records from localities to preserve the historical records of actions completed in support of Ranked Choice Voting in Virginia.

6. Standardized Record Keeping

Finally, we would appreciate guidance to General Registrars about standardizing record keeping practices as required under Freedom of Information Act (FOIA) requests per VA statute.

After the 2024 election, EPEC found that many localities' responses to requests for publicly available election records were inconsistent. Some allowed paper-only copies, while others provided digital copies of the public election records we requested.

We found this process helpful to better understand the electoral processes and costs involved with producing these records. Thank you for any assistance that can standardize this aspect of election record-keeping across the Commonwealth.



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The Board of EPEC and its volunteers are grateful for all you do for the Commonwealth of Virginia, and thank you for your attention to these items.

Sincerely,

EPEC Board of Directors
Jon Lareau Ken Lubeck
Rick Naigle Chris Rohland
Erin Marie Joyce

cc: Governor Glenn Youngkin

ⁱ Code of Virginia §24.2-4273 <https://law.lis.virginia.gov/vacodefull/title24.2>

ⁱⁱ VA Dept. of Elections, Handbook, Ch. 8 List Maintenance, August 2025
https://www.elections.virginia.gov/media/grebhandbook/2025-updates/8_List_Maintenance_2025_en.pdf

ⁱⁱⁱ Potential Duplicate Registrations in VA Voter List – August 2025 <https://digitalpollwatchers.org/potential-duplicate-registrations-in-va-voter-list-august-2025>

^{iv} Potential Duplicate Registrations in VA Voter List – August 2025 <https://digitalpollwatchers.org/potential-duplicate-registrations-in-va-voter-list-august-2025>

^v Non-citizen registrations with previous voting history in VA <https://digitalpollwatchers.org/non-citizen-registrations-with-previous-voting-history-in-va-election-data-update-august-2025/>

^{vi} Are Elderly Votes Being Harvested in VA? <https://epec.substack.com/p/are-elderly-votes-being-harvested>

^{vii} VA Dept. of Elections, Handbook, Chapter 13 Provisional Ballots, Sept. 2023
https://www.elections.virginia.gov/media/grebhandbook/2023-updates/13_Provisional_Ballots_FINAL_2023.pdf

^{viii} ELECT Form 633 - Logic and Accuracy Certification (L&A) <https://fs28.formsite.com/vaelect/633LandA/index>

^{ix} Notice of final testing of voting systems; sealing equipment, Locking and security after preparation
<https://law.lis.virginia.gov/vacode/title24.2/chapter6/section24.2-633/>
<https://law.lis.virginia.gov/vacode/title24.2/chapter6/section24.2-634/>