



VIA EMAIL ([rulemaking.sboe@ncsbe.gov](mailto:rulemaking.sboe@ncsbe.gov))

January 27, 2026

TO: North Carolina State Board of Elections  
Francis X. De Luca, Chair  
Stacy “Four” Eggers IV, Secretary  
Jeff Carmon, Member  
Siobhan O’Duffy Millen, Member  
Robert Rucho, Member

CC: Sam Hayes, Executive Director  
Tim Hoegemeyer, General Counsel  
Adam Steele, Deputy General Counsel

**Re: Public Comment on Non-Citizen List Maintenance Proposed Rules**

Dear Mr. Chair, Mr. Secretary, and Members Carmon, Millen, and Rucho,

We are non-partisan, non-profit voter advocacy organizations writing pursuant to the State Board of Elections’ invitation to provide public comment on several proposed permanent rules related to voter roll list maintenance on the basis of non-citizenship (Proposed 08 NCAC 23 .0101–0104, hereafter the “Proposed Rules”).<sup>1</sup> The below comments and suggested revisions are based on extensive experience registering and assisting eligible voters in successfully navigating North Carolina’s voting procedures, as well as issues observed in other states that have implemented similar schemes.

Our objective is thus to provide the State Board with proposed amendments that will remedy significant issues with the current Proposed Rules as well as improve the administrability of those rules. We believe these suggestions, if taken, would allow the State Board to achieve its objective of ensuring North Carolina’s voter rolls include only eligible voters, while mitigating the significant risk that eligible voters will be removed in error under the Proposed Rules.

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<sup>1</sup> See *Rulemaking*, N.C. State Bd. of Elections, [https://www.ncsbe.gov/about-elections/legal-resources/rulemaking#list\\_maintenance](https://www.ncsbe.gov/about-elections/legal-resources/rulemaking#list_maintenance) (last visited Jan. 20, 2026).

## 1. Ensure Reliability Before a “Presumptive Noncitizen” Finding.

The current Proposed Rules do not specify which “government records and databases” will be used to render an individual a “presumptive noncitizen” triggering a “notice of non-citizenship.” *See generally* Proposed 08 NCAC 23 .0101. Based upon the statements of staff in the State Board’s December 17, 2025 meeting, we understand that this process for identifying “presumptive noncitizens” will likely include database matching with the federal SAVE system.

We urge the State Board and staff to investigate closely the myriad of reliability issues with the new, revamped SAVE system as noted in a December 16, 2025 letter to this Board from Fair Elections Center and Southern Coalition for Social Justice.<sup>2</sup> The State Board of Elections has already noted that the system is “not a reliable indicator that a person is not a U.S. citizen because the database is not always updated in a timely manner and individuals who derived citizenship from their parents through naturalization or adoption may show up as non-citizens in SAVE” and previously declined to remove a voter from the rolls based on a SAVE match “absent independent confirmation that they are not citizens.”<sup>3</sup> As set forth in the December 16 letter, the incorporation of new data from the Social Security Administration has introduced additional reliability issues, and there are documented examples in which citizens are being erroneously flagged at a high rate under the new SAVE system. For example, the election director for St. Louis County, Missouri, found that approximately 35 percent of those individuals initially flagged by the SAVE tool were registered at naturalization ceremonies.<sup>4</sup> The State Board can learn from these issues experienced in other states and take steps to avoid them.

We therefore urge the State Board to:

- (i) make the procedures for identifying any “presumptive noncitizen” public for comment;
- (ii) require the State Board staff to exhaust all available information it may have access to indicating citizenship for anyone flagged by federal SAVE system matching before identifying any individual as a “presumptive noncitizen” and before distributing any list of names to county officials. This information may include any record that proof of citizenship was provided to the Department of Motor Vehicles or to elections officials (for example, as HAVA documentation or Photo ID in any county in the state), and any record of whether the individual has already been

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<sup>2</sup> Available at <https://southerncoalition.org/wp-content/uploads/2025/12/Final-Fair-Elections-Ctr-Letter-to-NCSBE-re-SAVE.pdf>.

<sup>3</sup> *See* N.C. State Bd. of Elections, *Post-Election Audit Report - General Election 2016*, app. 1 at 2 (Apr. 21, 2017), [https://dl.ncsbe.gov/sboe/Post-Election%20Audit%20Report\\_2016%20General%20Election/Post-Election\\_Audit\\_Report.pdf](https://dl.ncsbe.gov/sboe/Post-Election%20Audit%20Report_2016%20General%20Election/Post-Election_Audit_Report.pdf).

<sup>4</sup> *See* Alexandra Berzon & Nick Corasaniti, *Initial Review Finds No Widespread Illegal Voting by Migrants, Puncturing a Trump Claim*, N.Y. Times (Jan. 14, 2026), <https://www.nytimes.com/2026/01/14/us/politics/noncitizen-voters-save-tool.html>; *see also*, Jude Joffe-Block, *Trump’s SAVE tool is looking for noncitizen voters. But it’s flagging U.S. citizens too*, NPR (Dec. 10, 2025), <https://www.npr.org/2025/12/10/nx-s1-5588384/save-voting-data-us-citizens> (reporting issues in Texas).

- challenged and provided evidence of citizenship (including while registered in another county);
- (iii) require USCIS to confirm, for each individual flagged, whether the source of non-citizenship information is SSA records, DHS records, or both, and the date that information was acquired by that agency; and
  - (iv) require State Board staff to track the source of non-citizenship information and whether voters subsequently provided proof of citizenship to assess the reliability of the SAVE system comparisons, and to update the voter's record to reflect that they have provided proof of citizenship in order to prevent voters from being unnecessarily challenged several times.

These steps will both further election security and confidence in elections by preventing citizens from being wrongfully challenged and save the State Board and county board staff the time spent administering a challenge process for individuals who are eligible to vote. It will also allow the State Board to track and refine the procedure for identifying any “presumptive noncitizens” over time to make it more accurate and reliable.

## **2. Make Clear That Removals Under This Process Will *Not* Occur Within the 90 Days Before Any Election.**

The National Voter Registration Act (“NVRA”) requires states to complete any program that systematically removes names from their list of registered voters no later than 90 days prior to the date of any federal primary or general election. 52 U.S.C. § 20507(c)(2)(A). In enacting this 90-day protected period before elections, Congress struck a careful balance between requiring states to take reasonable measures to maintain accurate voter rolls and protecting eligible voters from erroneous removals on the eve of elections, “when the risk of disenfranchising eligible voters is the greatest.”<sup>5</sup> By ensuring that systematic list maintenance efforts occur at least 90 days ahead of an election, the NVRA provides the opportunity for erroneous removals to be caught and corrected with enough time for a mistakenly removed registrant to still cast a ballot in the election at issue. These same considerations apply to all elections in which North Carolina’s voters are eligible.

If the identification of individuals as “presumptive noncitizens” is prompted by systematic matching with the federal SAVE system, this process would be considered a systematic program for the purpose of removal subject to the 90-day prohibition under the NVRA. This is true even if, as set forth in the Proposed Rules, elections staff work to identify whether voters have provided proof of citizenship and do not challenge some voters as a result. This is because, notwithstanding additional research and voter notice, under the current Proposed Rules “the

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<sup>5</sup> See *Arcia v. Fla. Sec’y of State*, 772 F.3d 1335, 1346 (11th Cir. 2014); *id.* at 1344 (finding Florida list maintenance program was “systematic” when it used “a mass computerized data-matching process to compare the voter rolls with other state and federal databases, followed by the mailing of notices. Certainly, it is telling that the database that [the Secretary of State] used before the general election—SAVE—stands for *Systematic* Alien Verification for Entitlements.” (emphasis in original)).

inclusion of a person’s name on a list electronically compared to other agency databases is enough for removal from the voter rolls” if no information comes to light and the voter never responds to any notice.<sup>6</sup> It is therefore important to specify that no removals can occur within this period solely due to the proposed non-citizen challenge procedure, unless at the request of the registrant. *See* 52 U.S.C. § 20507(c)(2)(B) (describing exceptions to the 90-day prohibition, including removal “at the request of the registrant” under section 20507(a)(3)(A)).

*Suggested New Subsection 08 NCAC 23 .0104(e)*

(e) No challenge made under this provision shall result in the removal of any name from the official list of registered voters within 90 days of any election unless the challenged voter has made a request to be removed.

**3. Modify the “Documentation of Citizenship” Definition under Proposed 08 NCAC 23 .0101 to Account for Name Changes and Derived Citizens.**

Proposed Rule 08 NCAC 23 .0101 defines “documentation of citizenship” to include “an original or copy of a document issued by a state, federal, or tribal government showing the citizenship of the person to whom the document was issued” with specific examples.

This provision does not account for derived citizens, who automatically become citizens as a direct consequence of their parent’s citizenship and thus may not have specific naturalization paperwork nor a record of their citizenship on file with DHS. The State Board should modify this term to include evidence of derived citizenship, including the proof that a parent has been naturalized while the voter was a minor.<sup>7</sup>

This provision also does not specifically account for individuals who have experienced a name change, which includes over 2.3 million female citizens of North Carolina.<sup>8</sup> The State Board should thus modify this provision to be consistent with its administration of voter photo ID, i.e., specify in this provision that the name on any proof of citizenship document need only be the same as or substantially equivalent to a voter’s name in the registration records, and that election officials must consider all circumstances and construe all evidence, along with any explanation or documentation voluntarily offered by the person, in the light most favorable to that voter.<sup>9</sup>

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<sup>6</sup> *See Va. Coal. for Immigrant Rts. v. Beals*, 2024 U.S. App. LEXIS 27584, No. 24-2071, at \*12–13 (4th Cir. Oct. 27, 2024).

<sup>7</sup> *See I am the Child of a U.S. Citizen*, U.S. Citizenship and Immigr. Servs., <https://www.uscis.gov/citizenship/learn-about-citizenship/i-am-the-child-of-a-us-citizen>.

<sup>8</sup> *See The SAVE Act Would Disenfranchise Millions of Citizens, tables*, Ctr. For Am. Progress, <https://www.americanprogress.org/wp-content/uploads/sites/2/2025/01/SAVEact-tables.pdf> (table “Female U.S. citizens without a valid birth certificate, by state”).

<sup>9</sup> *See* N.C. State Bd. of Elections, *Numbered Memo 2023-03*, at 8 (Oct. 11, 2024), <https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbermemo/2023/Numbered%20Memo%202023-03%20Photo%20ID%20and%20In-Person%20Voting.pdf> (addressing the frequently asked question “What can an

*Suggested Revisions to Subsection 08 NCAC 23 .0101(6)*

(6) “Documentation of citizenship” means an original or copy of a document issued by a state, federal, or tribal government showing the citizenship of the person to whom the document was issued. Documentation of citizenship shall include, but is not limited to, a birth certificate, a document showing place of birth issued by a vital records office, a passport or passport card issued by the United States Department of State, a consular report of birth abroad issued by the United States Department of State, or a certificate of citizenship or naturalization issued by the Department of Homeland Security’s United States Citizenship and Immigration Services. Documentation of citizenship can also include, for derived citizens, documentation showing the citizenship of a parent along with documentation indicating the parental relationship to the individual. A determination that documentation of citizenship was issued to a registered voter shall be based on a finding that the name appearing on the documentation of citizenship is the same as or substantially equivalent to the name contained in the voter’s registration record. The election official shall make this determination based on the same process outlined for photo identification, as set forth in 08 NCAC 17 .0101(a)(3) (as amended April 1, 2024).

**4. Clarify the “Entry of Challenge” Process under Proposed 08 NCAC 23 .0102(a).**

Subsection (a) of Proposed 08 NCAC 23 .0102 requires county boards of elections to “review the county board’s records to determine if the presumptive noncitizen has previously provided documentation of citizenship.” As set forth above, we urge State Board staff to conduct this review in the first instance, in addition to investigating other information available, before anyone is identified as a “presumptive noncitizen” in any communication between the State Board and county boards.

Subsection (a) also provides that a challenge be entered “[i]f county board staff cannot locate documentation of citizenship.” This implies that the county board might need a copy of that document on file instead of a record of it having been provided (which is what is logged by county boards). Accordingly, we suggest a revision to specify only a record that documentation of citizenship was provided by the voter is required.

*Suggested Revisions to Subsection 08 NCAC 23 .0102(a)*

(a) No later than five business days after receiving a notice of non-citizenship from the State Board of Elections, county board staff shall review the county board’s records to determine if the presumptive noncitizen has previously provided documentation of citizenship. If county board staff cannot locate a record that the presumptive noncitizen has provided documentation of citizenship ~~for the presumptive noncitizen~~ in the county board’s records, then the director of elections for the county board receiving the notice or their designee on the county board staff shall enter a challenge to the presumptive noncitizen’s eligibility to remain registered to vote under G.S. 163-85(c)(7). *[remaining subsection text omitted here but should remain unaltered]*

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election official consider when comparing the name on the photo ID with the name in the registration records?”); 08 NCAC 17 .0101(a)(3).

## 5. Account for Practical Considerations in the Notice of Preliminary Hearing under Proposed 08 NCAC 23 .0102(b).

Subsection (b) provides for the setting of a preliminary hearing on any challenges brought and notice to the challenged voter. Clarifications are needed for this process to increase the likelihood eligible voters will understand and be able to respond to such a notice, including:

- (i) Require any notice be drafted in plain language and available in alternative languages, including Spanish, French, Arabic, Chinese, Vietnamese, Korean, Hindi, and Urdu;
- (ii) Include electronic methods, such as email or secure upload, among instructions on “how the challenged voter can submit such documentation or information” of citizenship;
- (iii) Require county board staff to also contact the voter by phone using all phone numbers, if any, in the voter’s file;
- (iv) Ensure that the “information contained within the notice of non-citizenship” provided to the voter includes the specific database (DHS or SSA) and the date of the database match, and any other information provided to the State Board from the SAVE system match, to allow the voter to understand why they were flagged and so they can seek to remedy that issue directly with the relevant federal department;
- (v) Require the county board to continue a voter’s preliminary hearing to a later date when the voter provides documentation or attests that they have requested documentation of citizenship from a government agency;<sup>10</sup>
- (vi) Specify that voters may provide an attestation by themselves or others under penalty of perjury concerning their citizenship among the “documentation or information” they may provide for consideration at the preliminary hearing stage;<sup>11</sup> and
- (vii) Specify that relevant documentation or information must be considered by the county board regardless of whether the voter appears at a preliminary hearing.

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<sup>10</sup> Continuances are crucial for those voters that need to request documentation. According to USCIS, the median processing time in 2025 was 2.9 months for Certificates of Citizenship and 4.9 months for requests for replacement certificates of naturalization or citizenship. See <https://egov.uscis.gov/processing-times/historic-pt>. The processing time is 4-6 weeks for passports and 4-8 weeks for replacement Consular Reports of Birth Abroad, not including mailing time. See <https://travel.state.gov/content/travel/en/passports/how-apply/processing-times.html> (passports); <https://travel.state.gov/content/travel/en/replace-certify-docs/requesting-a-record/replace-amend-CRBA.html> (CRBAs).

<sup>11</sup> This is consistent with the ability of voters to provide testimony as to their citizenship, as noted by staff when the rules were presented. See *State Board of Elections Meeting December 17, 2025*, at 3:03:00, [https://s3.amazonaws.com/dl.ncsbe.gov/State\\_Board\\_Meeting\\_Docs/2025-12-17/State%20Board%20of%20Elections%20Meeting%20December%2017%2C%202025.mp4](https://s3.amazonaws.com/dl.ncsbe.gov/State_Board_Meeting_Docs/2025-12-17/State%20Board%20of%20Elections%20Meeting%20December%2017%2C%202025.mp4). Attestation of citizenship is necessary for those voters with limited economic means. The fee to get a first-time passport is \$165 plus \$60 for optional expedited processing. See <https://travel.state.gov/content/travel/en/passports/need-passport/apply-in-person.html>. The fee to renew a passport is \$130. See <https://travel.state.gov/content/travel/en/passports/have-passport/renew.html#Step%20Six>. The fee to get a

This notice process should also account for the possibility of mail delivery delays and issues, which are expected to increase for rural areas in particular due to USPS administrative changes.<sup>12</sup> These clarifications include:

- (i) requiring forwardable mailings;
- (ii) requiring county boards to send a second notice within 1 business day of receiving a notice of undeliverable mail; and
- (iii) requiring the county board to reschedule the preliminary hearing from the time of the second notice mailing.

*Suggested Revisions to Subsection 08 NCAC 23 .0102(b)*

(b) Within three business days of the challenge being entered, the county board shall set a date for the preliminary hearing in accordance with Rule .0103(a) of this Section and send notice of the challenge to the challenged voter along with the date, time, and location of the preliminary hearing. The notice of the challenge shall be in writing, in plain language and in English as well as Spanish, French, Arabic, Chinese, Vietnamese, Korean, Hindi, and Urdu, and sent by U.S. mail that is forwardable and using a method of delivery that documents receipt. The notice shall also be provided by any email address that the county board possesses for the challenged voter, and the voter shall also be contacted by phone at any phone number that the county board possesses for the challenged voter. If the first notice of the challenge is returned undeliverable, a second notice of the challenge shall be sent by U.S. mail that is forwardable and the preliminary hearing shall be rescheduled in accordance with Rule .0103(a). The following shall be included with the notice of the challenge:

- (1) a copy of the entered challenge;
- (2) the information contained within the notice of non-citizenship, including the name and date of any federal record or records determined to have matched to the challenged voter;
- (3) information about the qualifications to vote in North Carolina;
- (4) a copy of the rules in this Section;
- (5) instructions for how the challenged voter may respond to the challenge, which shall include examples of documentation of citizenship or information the challenged voter may submit for the county board's consideration such as a statement under penalty of perjury by the voter or another individual, and that the challenged voter may submit documentation or an attestation showing the challenged voter has made a request to a government agency to obtain documentation of citizenship, how the challenged voter can submit such documentation or information by mail, in person, or by secure electronic means, and how to voluntarily cancel their registration should they desire to do so; ~~and~~
- (6) the following statement: "If the information we have that you are not a U.S. citizen is incorrect or outdated, please contact the county board of elections to provide proof of

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Certificate of Citizenship is \$1,335 or \$1,385 depending on how the application is filed. See <https://www.uscis.gov/g-1055?form=n-600>. The fee to get a replacement Certificate of Citizenship or Certificate of Naturalization is \$505 or \$555 depending on how the application is filed. See <https://www.uscis.gov/g-1055?form=n-565>.

<sup>12</sup> See *Postal Service Implements Nationwide Changes to Mail Service*, Postal Regul. Comm'n (Apr. 29, 2025), <https://prc.gov/postal-service-implements-nationwide-changes-mail-service>.

citizenship, so that we can update our records. If you are a U.S. citizen and meet all other qualifications to vote, then you can remain registered and vote;” and  
(7) instructions that the voter may attend the preliminary hearing and/or have an authorized representative do so, but does not need to for their submitted documentation or information to be considered.

## **6. Increase Efficacy of Preliminary Hearing under Proposed 08 NCAC 23 .0103.**

The scheduling of the preliminary hearing should likewise account for mail delays and provide time for individuals to comply with the request for information. Accordingly, the current proposal of requiring county boards to schedule a preliminary hearing “no later than 15 business days after” notice is mailed should be modified to specify a more realistic time period for voters to have notice and provide documentation and plan to attend: no earlier than 10 business days and no later than 20 business days from the time notice is sent.

### *Suggested Revision to Subsection 08 NCAC 23 .0103(a)*

(a) A preliminary hearing shall be held no earlier than 10 business days and no later than 1520 business days after the notice of preliminary hearing is mailed to the challenged voter in accordance with Rule .0102 of this Section. The preliminary hearing shall be noticed as a special meeting in accordance with G.S. 143-318.12(b). The written notice required by G.S. 143-318.12(b)(2) shall be emailed at least five business days before the preliminary hearing to the county board’s notice list and any other person who has requested that the county board give them notice of proceedings under this Section.

To increase the accuracy of information that the county board will have before it during the preliminary hearing, the process should require the county board challenging official and the State Board of Elections staff member responsible for transmitting the notice of non-citizenship to be present, at least virtually, to answer county board member questions during the preliminary hearing, including about the steps taken to confirm non-citizenship and contact the voter. It should also allow for a continuation of the preliminary hearing if the challenged voter has provided documentation or an attestation that they have requested documentation of citizenship and are waiting to get it (as is provided for the challenge hearing already under Proposed 08 NCAC 23 .0104(c)(4)).

Finally, to prevent unnecessary challenge hearings, the Proposed Rules should also clarify that there is no probable cause to proceed with a challenge if the county board finds by majority vote that documentation or information provided by the voter is authentic and accurate as to substantiating their citizenship.

*Suggested Revision to Subsection 08 NCAC 23 .0103(b)*

(b) The county board shall follow the procedures in G.S. 163-85(d) for the receipt of evidence at the preliminary hearing. The challenging official and the State Board of Elections official responsible for transmitting the notice of non-citizenship must be present, at least virtually, at the preliminary hearing, but the official entering the challenge shall not be required to present sworn testimony. At the conclusion of the preliminary hearing, the county board shall make the probable cause determination required under G.S. 163-85(d) as to whether the challenged voter is a United States citizen. The county board's determination of probable cause shall be based on only the following:

- (1) the notice of non-citizenship;
- (2) official government documents and information from official government records and databases obtained by the county board; and
- ~~(2)~~ (3) any documentation of citizenship or information that can be used to determine the challenged voter's citizenship that is submitted to the county board by the challenged voter.

If the county board finds that documentation or information provided by the voter or obtained by the county board is authentic and accurate as to substantiating the voter's citizenship, that shall be considered proof that no probable cause exists. The county board shall continue the preliminary hearing to a later date upon receiving documentation or an attestation showing the challenged voter has made a request to a government agency to obtain documentation of citizenship.

**7. Improve Notice of Challenge Hearing in Proposed 08 NCAC 23 .0104.**

The same consideration regarding notice of the preliminary hearing should apply to the notice of the challenge hearing, including requiring this notice to be in plain language and accessible in multiple languages, requiring the voter to be contacted by phone if provided and sent a forwardable notice, with a second notice sent if the first is returned undeliverable.

*Suggested Revisions to Subsection 08 NCAC 23 .0104(b)*

(b) The county board shall send written notice of the challenge hearing to the challenged voter no later than three business days after the county board has ordered the challenge to proceed to a challenge hearing under Rule .0103(d)(1) of this Section. The notice to the challenged voter shall include the information required under G.S. 163-86(b) and shall be in writing, in plain language and in English as well as Spanish, French, Arabic, Chinese, Vietnamese, Korean, Hindi, and Urdu and sent by U.S. mail that is forwardable and using a method of delivery that documents receipt. The notice shall also be provided by any email address that the county board possesses for the challenged voter, and the voter shall also be contacted by phone at any phone number that the county board possesses for the challenged voter. If the first notice of hearing is returned undeliverable, a second notice of the challenge shall be sent by U.S. mail that is forwardable and the challenge hearing shall be rescheduled in accordance with Rule .0104(a).

Additionally, Subsection (c)(5) should be modified to protect against the erroneous removal of eligible voters who may not receive notice of this challenge process. This Subsection currently provides that “[i]f the challenged voter or an authorized representative does not appear at the challenge hearing, and the challenged voter has not submitted any documentation of citizenship for the county board’s consideration, then the notice of non-citizenship shall be treated by the county board as affirmative proof necessary to sustain the challenge under G.S. 163-90.1(b).”

Assuming that individuals are identified as “presumptive noncitizens” based upon a database match with the federal SAVE system, this provision risks removing voters based on highly unreliable information and possibly without the voter ever having received actual notice. The State Board should instead require individualized information before any voter is removed, which is the process the State Board has followed in the past.<sup>13</sup>

*Suggested Revisions to Subsection 08 NCAC 23 .0104(c)(5)*

(5) If the challenged voter or an authorized representative does not appear at the challenge hearing, and the challenged voter has not submitted any documentation of citizenship for the county board’s consideration, then the county board shall continue the challenge hearing to a later date to allow for further investigation or efforts to contact the challenged voter. then the notice of non-citizenship shall be treated by the county board as affirmative proof necessary to sustain the challenge under G.S. 163-90.1(b).

[...]

(7) The county board may not sustain a challenge absent independent confirmation that the challenged voter is not currently a citizen.

At the very least, the county board members should be permitted to consider all the circumstances, including the reliability of the specific information provided from the SAVE match and whether the county board staff was able to successfully contact the voter, and given the option to continue the challenge hearing to a future date to allow additional efforts to contact the voter or to investigate citizenship. Additionally, any challenged voter who has been removed and subsequently presents to vote should be offered a provisional ballot that is counted when the challenged voter attests to their citizenship in the provisional ballot application.

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We thank the State Board for its time and consideration of these issues. We believe the adoption of these suggestions will allow the State Board to avoid the pitfalls experienced in other states and further its mandate to set forth reasonable rules and regulations for the administration of

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<sup>13</sup> See N.C. State Bd. of Elections, *supra* note 3 (disallowing removals of registered voters flagged as potential noncitizens “absent independent confirmation that they are not citizens”).

elections. *See* N.C. Gen. Stat. § 163-22(a). We would be happy to provide any additional information that might be helpful in the State Board’s consideration of this issue.

Respectfully submitted,

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SOUTHERN COALITION FOR  
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