



N.C. HAVA ADMINISTRATIVE COMPLAINT FORM

**FRAUDULENTLY OR FALSELY COMPLETING THIS FORM IS A CLASS I FELONY
UNDER CHAPTER 163 OF THE NC GENERAL STATUTES.**

Any person who believes that there is a violation of any provision of Title III of the Help America Voting Act (HAVA), 52 U.S.C. §§ 21081–21102, may file a complaint. A complaint shall be in writing and notarized, signed and sworn by the complainant. You (the complainant) may use: (1) this form prescribed by the State Board of Elections; or (2) any other document providing the same information required in this Board-prescribed form, if signed and notarized.

A complaint shall be filed within 30 days after the occurrence of the actions or events that form the basis for the complaint, including the actions or events that form the basis for your (complainant's) belief that a violation is about to occur, or, if later, within 30 days after you knew or, with the exercise of reasonable diligence, should have known of those actions or events. The complaint is filed when it is either: delivered to 430 N. Salisbury St., Third Floor, Raleigh, N.C.; mailed to P.O. Box 27255, Raleigh, N.C. 27611; faxed to (919) 715-0135 to the attention of the General Counsel of the State Board of Elections; or scanned and emailed to legal@ncsbe.gov. The complainant shall also mail, fax, email, or otherwise deliver a copy of the complaint to each state or local election official or board whose actions are asserted to have been in violation of Title III of HAVA. More information on the procedures as to this complaint can be found on the website of the State Board of Elections at www.ncsbe.gov or you may call the State Board at (919) 814-0700.

PLEASE PRINT AND ADD ADDITIONAL PAGES IF NEEDED

1. My name, address, phone numbers, and e-mails are (please print)

Carol L. Snow
6281 Jenkins Rd
Morganton, NC 28655
cls28655@gmail.com

2. I am alleging a violation of Title III of HAVA as follows (mark all that apply):

- ☐ 52 U.S.C. § 21081 (Section 301) (Voting systems standards and accessibility)
- ☐ 52 U.S.C. § 21082 (Section 302) (Provisional voting and voting information)
- ☒ 52 U.S.C. § 21083 (Section 303) (Voter registration and voter identification)

3. As to each violation alleged above, state in detail the circumstances of the alleged violation, election officials involved, and what occurred as a result of the alleged violation. (Please print)

Please see attached.

Also attached are:

- Exhibit A, a list of likely duplicate registrations from the 2/3/2024 copy of the voter registration list
- Exhibit B, the selective criteria used to locate duplicate registrations.

Dated February 20, 2024. Carol L. Snow
Signature of Person Complaining

STATE OF NORTH CAROLINA, COUNTY OF Burke

The forgoing complaint was sworn to as true and subscribed before me this day by
Carol Lynn Snow

My Commission Expires 4-20-2028

Jessica Vestal
Signature of Notary Public
Jessica Vestal
Printed Name of Notary Public



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2. I am alleging a violation of Title III of HAVA as follows (mark all that apply):

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3. As to each violation alleged above, state in detail the circumstances of the alleged violation, election officials involved, and what occurred as a result of the alleged violation. (Please print)

Pursuant to Sec 402 (a)(2)(B) of the Help America Vote Act passed by Congress in 2002, *“any person who believes that there is a violation or any provision of title III (including a violation which has occurred, is occurring, or is about to occur) may file a complaint.”*

Pursuant to Sec 402(a)(2)(E) of the Help America Vote Act, *“At the request of the complainant, there shall be a hearing on the record.”*

Pursuant to § 254(a){9) State-Based Administrative Complaint Procedures, *“the hearing shall be conducted no sooner than 10 days and no later than 20 days after the Board receives the complaint. The Board shall give at least 5 business days’ advance notice of the date, time, and place of the hearing by mail, fax, e-mail, or any other means of delivery, to the Complainant, and each named Respondent.”*

I am hereby requesting a hearing on this matter.

The subject of this Complaint is the State Board’s non-compliance with Section 303(a)(B)(iii) of the Help America Vote Act. This section of HAVA is as follows:

HELP AMERICA VOTE ACT OF 2002

SEC. 303. COMPUTERIZED STATEWIDE VOTER REGISTRATION LIST REQUIREMENTS AND REQUIREMENTS FOR VOTERS WHO REGISTER BY MAIL.

- (a) COMPUTERIZED STATEWIDE VOTER REGISTRATION LIST REQUIREMENTS.—
2) COMPUTERIZED LIST MAINTENANCE.—

(A) IN GENERAL.—The appropriate State or local election official shall perform list maintenance with respect to the computerized list on a regular basis as follows: ...

(B) CONDUCT.—The list maintenance performed under subparagraph (A) shall be conducted in a manner that ensures that—

(iii) duplicate names are eliminated from the computerized list.

Summary

- A.** The State Board of Elections’ methods for identifying duplicate registration records in the official computerized voter registration list are deficient.
- B.** The lack of personal identifying information on hundreds of thousands of voter registration records impedes the Board’s ability to locate and remove duplicate registration records.
- C.** Fictitious or cloned names on the voter rolls allow for fraudulent ballots, which can be used to stuff the ballot box.

A. The State Board of Elections’ methods for identifying duplicate registration records in the official computerized voter registration list are deficient.

Exact Matches

According to the [North Carolina Voter Registration List Maintenance procedures](#) dated June 21, 2023, the “Duplicate Registrations – Exact Match” report is a list of potential duplicate registration matches using this highly selective criteria list:

1. Last name, first name, birth date, and Driver’s License number
2. Last name, first name, birth date and Social Security number.
3. Last name, first name, middle name, birth date, race and gender.

Regarding #1 and #2, **over 779,000** registration records with an eligible voting status were lacking the registrant’s Driver’s License #, last 4 digits of the Social Security Number, or both – according to the data received from the State Board on 8/28/2023, [request #23-128](#). *Duplicate registrations that do indeed match any of those ~~779,000~~ the 427,785 registrations missing both will not be located using this method. (# of records missing both: 427,785)*

Regarding #3, **over 775,700** registration records with an eligible voting status have an Undesignated race and/or gender, according to the state’s voter rolls dated 2/3/2024. This demographic information is optional on the voter registration application. *Duplicate registration records which include race or gender but do indeed match any of these 775,700 registrations will not be located.*

Regarding all three, registrants’ names are inconsistently spelled and/or have inconsistent punctuation. *Duplicate registrations with inconsistently spelled names, name changes, or inconsistent punctuation but do indeed match another registered voter will not be located.*

Examples of potential duplicate registrations are provided below which evidently were not located using the Board’s selection criteria.

A list of ~7,700 voters from the 2/3/2024 copy of the voter rolls, each potentially having more than one registration, is provided in Exhibit 1. Citizen analysts use the following criteria to locate potential duplicate registrations:

- Name,
- Residential Address, Phone Number, or Mailing Address
- Birth Year

Exhibit 2 provides an explanation of the citizen analysts’ various search criteria with additional examples.

Since the public does not have access to the full birth date, SSN-4 or Driver’s License #, the list is likely incomplete. Screenshots were taken from the [Voter Lookup tool](#); empty space was deleted.

Potential Duplicates - Example 1.

DH73885 & DH80860. Same first, middle and last name. Both registrants' birth years are 2000. Each show Race: White, Gender: Male. According to Public Records Request #23-128 filed on 8/28/2023, only DH73885 is missing the SSN-4 and Driver's License #.

STEVEN JOSEPH HUTZENBILER 766 POND RD ROCKY POINT, NC 28457		STEVEN JOSEPH HUTZENBILER 766 POND RD ROCKY POINT, NC 28457	
YOUR VOTER DETAILS		YOUR VOTER DETAILS	
County:	PENDER	County:	PENDER
Status:	ACTIVE	Status:	ACTIVE
Voter Reg Num:	000000148376	Voter Reg Num:	000000160297
NCID:	DH73885	NCID:	DH80860
Party:	REP	Party:	UNA
Race:	WHITE	Race:	WHITE
Ethnicity:	UNDESIGNATED	Ethnicity:	NOT HISPANIC
Gender:	MALE	Gender:	MALE
Registration Date:	10/31/2020	Registration Date:	08/03/2023
NCDMV Customer:	No	NCDMV Customer:	Yes

Potential Duplicates - Example 2.

AF30420 & AF30421 (in sequential order). Same first, middle and last name. Both registrants' birth years are 2005. Registration date for each is 1/22/2023. Each show Race: White, Gender: Female. According to Public Records Request #23-128 filed on 8/28/2023, neither are missing the Driver's License # nor the SSN-4. So perhaps the full birth dates, DL# or SSN-4 differ.

ABIGAIL FAITH CROSBY 7867 S US HWY 19E NEWLAND, NC 28657		ABIGAIL FAITH CROSBY 7867 S US HWY 19E NEWLAND, NC 28657	
YOUR VOTER DETAILS		YOUR VOTER DETAILS	
County:	AVERY	County:	AVERY
Status:	ACTIVE	Status:	ACTIVE
Voter Reg Num:	000000032913	Voter Reg Num:	000000032914
NCID:	AF30420	NCID:	AF30421
Party:	REP	Party:	REP
Race:	WHITE	Race:	WHITE
Ethnicity:	UNDESIGNATED	Ethnicity:	UNDESIGNATED
Gender:	FEMALE	Gender:	FEMALE
Registration Date:	01/22/2023	Registration Date:	01/22/2023
NCDMV Customer:	Yes	NCDMV Customer:	Yes

Potential Duplicates - Example 3.

CW1328976 & CW1329968. Punctuation difference in first name. Both registrants' birth years are 2002. Registration date for each is in June 2020. According to Public Records Request #23-128 filed on 8/28/2023, neither are missing the Driver's License # nor the SSN-4.

Z-DARRIOUS ANTONIO CLYBURN 7912 MCGARRY TRL CHARLOTTE, NC 28214		ZDARRIOUS ANTONIO CLYBURN 7912 MCGARRY TRL CHARLOTTE, NC 28214	
YOUR VOTER DETAILS		YOUR VOTER DETAILS	
County:	MECKLENBURG	County:	MECKLENBURG
Status:	INACTIVE	Status:	ACTIVE
Voter Reg Num:	001000587419	Voter Reg Num:	001000588758
NCID:	CW1328976	NCID:	CW1329968
Party:	UNA	Party:	UNA
Race:	BLACK or AFRIC	Race:	BLACK or AFRIC
Ethnicity:	NOT HISPANIC c	Ethnicity:	NOT HISPANIC c
Gender:	MALE	Gender:	MALE
Registration Date:	06/02/2020	Registration Date:	06/05/2020
NCDMV Customer:	Yes	NCDMV Customer:	Yes

Possible Matches

Also according to NC's Voter Registration List Maintenance procedures dated June 21, 2023, only two Possible Match reports list potential registration matches using loosely selective criteria.

1. Last name, first name, and birth date
2. First name, middle name, phone number, and birth year.

Regarding #1, the County Boards of Election would need to wade through all common names since those will be identified as possible duplicates. Criteria that are too loose provides too many false duplicates.

Regarding #2, of the ~7.47 million registration records with an eligible voting status and the personal information is not being held in confidence,

- ~3.95 million registration records have no phone number information whatsoever,
- ~11,000 registration records contain nonsensical phone numbers such as all 9's, or area code 252 followed by all 0s, or a 10-digit phone numbers beginning with the number 1.

If registration records do indeed have duplicate registration matches in the database, they can't be found amongst these ~3,96 million registration records with missing or nonsensical phone numbers.

Regarding both, registrants' names are inconsistently spelled and/or have inconsistent punctuation.

When names in a registration record have inconsistent spelling or punctuation, its duplicate registration record can't be found using this criteria.

Potential Duplicates - Example 4.

BE421798 & BE501191. Same first and middle names (and last name as well). Both registrants' birth years are 1999, and they share the same phone number. According to Public Records Request #23-128 filled on 8/28/2023, only BE501191 is missing the SSN-4 and Driver's License #. If this is indeed a duplicate registration, the registration date indicates it's been on the voter rolls since 8/3/2023.

OLIVIA KAYE CYRUS 3204 CHECKER DR RAEFORD, NC 28376		OLIVIA KAYE CYRUS 257 CASTLE DR FORT LIBERTY, NC 28307	
YOUR VOTER DETAILS		YOUR VOTER DETAILS	
County:	HOKE	County:	CUMBERLAND
Status:	ACTIVE	Status:	ACTIVE
Voter Reg Num:	000000077759	Voter Reg Num:	000166281320
NCID:	BE421798	NCID:	BE501191
Party:	UNA	Party:	UNA
Race:	WHITE	Race:	WHITE
Ethnicity:	NOT HISPANIC	Ethnicity:	UNDESIGNATED
Gender:	FEMALE	Gender:	FEMALE
Registration Date:	06/28/2022	Registration Date:	08/03/2023
NCDMV Customer:	Yes	NCDMV Customer:	No

Potential Duplicates - Example 5.

BP60584 & BP77564. Same first and middle names (and last name as well). Both registrants' birth years are 1995, and they share the same phone number. According to Public Records Request #23-128 filled on 8/28/2023, neither is missing the SSN-4 or Driver's License #. Perhaps the phone number is incorrect on one registration, or the birth date, SSN-4 or Driver's License # differs between the registrations.

KRISTEN SMITH PEIFFER 2014 TOWER PL # 4 GREENVILLE, NC 27858		KRISTEN SMITH PEIFFER 170 VERNONS WAY KITTRELL, NC 27544	
YOUR VOTER DETAILS		YOUR VOTER DETAILS	
County:	PITT	County:	FRANKLIN
Status:	TEMPORARY	Status:	ACTIVE
Voter Reg Num:	000030195410	Voter Reg Num:	000000105466
NCID:	BP60584	NCID:	BP77564
Party:	REP	Party:	REP
Race:	UNDESIGNATED	Race:	WHITE
Ethnicity:	UNDESIGNATED	Ethnicity:	UNDESIGNATED
Gender:	FEMALE	Gender:	FEMALE
Registration Date:	09/17/2020	Registration Date:	10/18/2021
NCDMV Customer:	Yes	NCDMV Customer:	Yes

Potential Duplicates - Example 6.

EP113631 & EP113632 (sequential order). Slight difference in first and last name. Both registrants' birth years are 2005, and they share the same phone number. Registration date for each is 4/8/2023. According to Public Records Request #23-128 filled on 8/28/2023, both are missing the Driver's License # and the SSN-4.

KAITLYNN LANAI REMOND 3203 DOLOSTONE CT SW WILSON, NC 27893		KAITLYNN LANAI REDMOND 3203 DOLOSTONE CT SW WILSON, NC 27893	
YOUR VOTER DETAILS		YOUR VOTER DETAILS	
County:	WILSON	County:	WILSON
Status:	ACTIVE	Status:	ACTIVE
Voter Reg Num:	000757529903	Voter Reg Num:	000757529904
NCID:	EP113631	NCID:	EP113632
Party:	DEM	Party:	DEM
Race:	UNDESIGNATED	Race:	BLACK or AFRICA
Ethnicity:	UNDESIGNATED	Ethnicity:	UNDESIGNATED
Gender:	FEMALE	Gender:	FEMALE
Registration Date:	04/08/2023	Registration Date:	04/08/2023
NCDMV Customer:	No	NCDMV Customer:	No

Potential Duplicates - Example 7.

AL348241 & EL106839. Same first name, but there's a punctuation difference in middle name. Both registrants' birth years are 2002, and they share the same phone number. According to Public Records Request #23-128 filled on 8/28/2023, only EL106839 is missing the SSN-4 and Driver's License Number.

ALEXIS ANN MARIE SWANN 120 BENSON RD ASHEVILLE, NC 28806		ALEXIS ANN-MARIE SWAN 949 BLOWING ROCK-MOUNTAIN LAUREL D RD # 203 BOONE, NC 28608	
YOUR VOTER DETAILS		YOUR VOTER DETAILS	
County:	BUNCOMBE	County:	WATAUGA
Status:	ACTIVE	Status:	ACTIVE
Voter Reg Num:	000000487868	Voter Reg Num:	000000157709
NCID:	AL348241	NCID:	EL106839
Party:	UNA	Party:	UNA
Race:	WHITE	Race:	WHITE
Ethnicity:	UNDESIGNATED	Ethnicity:	NOT HISPANIC or NOT LATINO
Gender:	FEMALE	Gender:	FEMALE
Registration Date:	01/03/2020	Registration Date:	08/26/2022
NCDMV Customer:	Yes	NCDMV Customer:	No

Potential Duplicates - Example 8.

BN339244 & CW1121041. Last name and first name are reversed. Both registrants' birth years are 1985, and they share the same residential address. Like the other 3.95 million registration records, neither has phone number information. According to Public Records Request #23-128 filled on 8/28/2023, only CW1121041 is missing the SSN-4 and Driver's License Number.

BYRON ROSS PEIFFER 1101 HULSTON CT CHARLOTTE, NC 28211		PEIFFER ROSS BYRON 1101 HULSTON CT CHARLOTTE, NC 28211	
YOUR VOTER DETAILS		YOUR VOTER DETAILS	
County:	MECKLENBURG	County:	MECKLENBURG
Status:	ACTIVE	Status:	ACTIVE
Voter Reg Num:	001000130905	Voter Reg Num:	001000302302
NCID:	BN339244	NCID:	CW1121041
Party:	REP	Party:	REP
Race:	WHITE	Race:	WHITE
Ethnicity:	NOT HISPANIC o	Ethnicity:	UNDESIGNATED
Gender:	MALE	Gender:	MALE
Registration Date:	10/01/2012	Registration Date:	03/21/2016
NCDMV Customer:	Yes	NCDMV Customer:	No

B. The lack of personal identifying information on hundreds of thousands of voter registration records impedes the Board's ability to locate and remove duplicate registration records.

Unique, unchanging personal identifying information, consisting of Driver's License #, or last 4 of the Social Security Number coupled with the registrant's full birth date, is critical in locating duplicate registrations for removal.

Of the potential duplicate registrations the citizen analysts identified with registration dates prior to 8/28/2023 (the date Public Records Request #23-128 was filled), *almost all of the registration records in a potential duplicate pair were lacking this personal identifying information.*

This begs the question: how many of the 779,700 registrations have an invalid duplicate registration match?

It has been suggested by the NCSBE staff that citizens challenge the registrants suspected of being duplicates. With all due respect, Section 303 of the Help America Vote Act requires the appropriate State or local election officials to perform list maintenance as to the computerized official voter registration list.

C. Fictitious or cloned names on the voter rolls allow for fraudulent ballots, which can be used to stuff the ballot box.

Item C is a paraphrased statement from page 40 of the [Federal Prosecution of Election Offenses](#), Eighth Edition, dated December 2017. This document also states on page 43 that voter rolls containing “deadwood” names undermines public confidence in the election process.

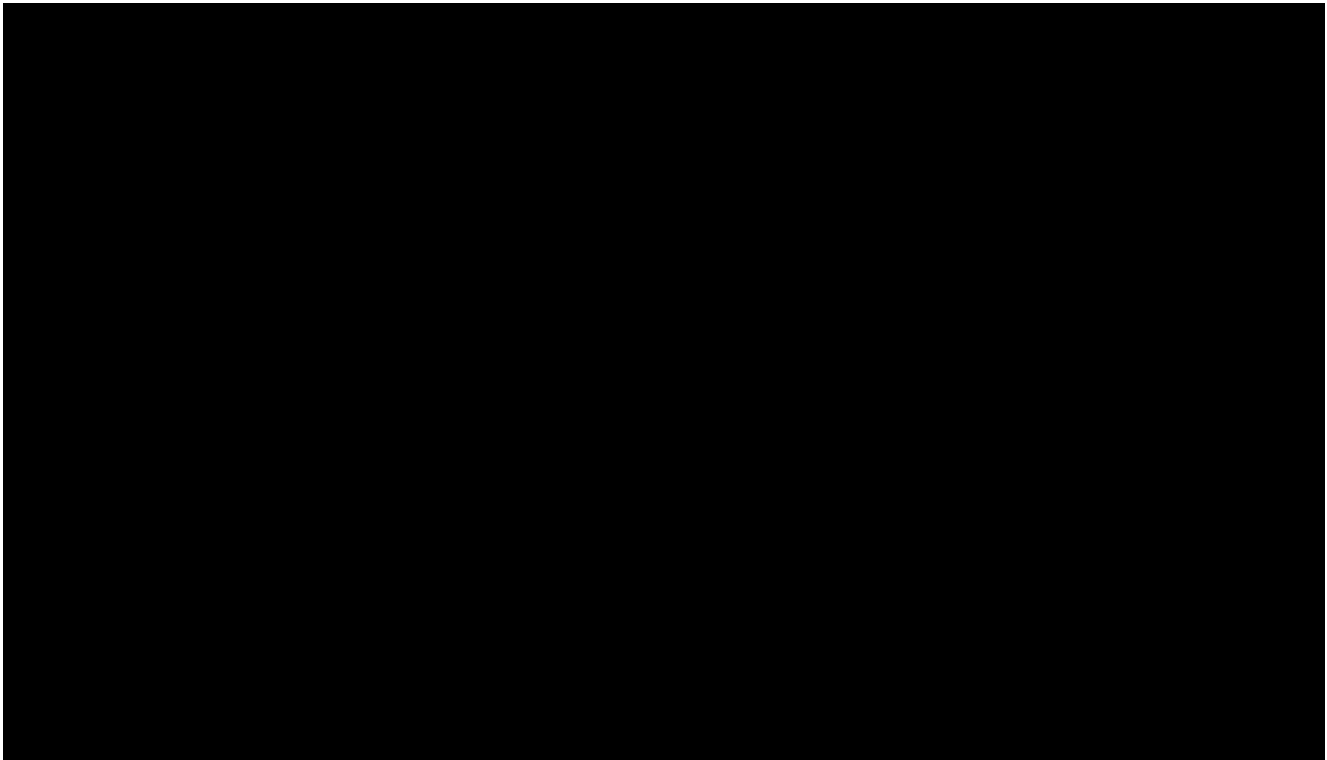
The following is stated in the introductory paragraphs of this document, *“Our constitutional system of representative government only works when the worth of honest ballots is not diluted by invalid ballots procured by corruption. As the Supreme Court stated in a case upholding federal convictions for ballot box stuffing: “Every voter in a federal . . . election, . . . whether he votes for a candidate with little chance of winning or for one with little chance of losing, has a right under the Constitution to have his vote fairly counted, without its being distorted by fraudulently cast votes.” Anderson v. United States, 417 U.S. 211, 227 (1974). When the election process is corrupted, democracy is jeopardized.”*

There is little room for error in North Carolina elections. According to NCSBE Executive Director Bell, there were more than 6 races in but less than 12 that ended in a tie in the 2023 municipal elections. In the 2020 General Election, the State Supreme Court Justice race ended in a statistical tie, won by 401 votes out of over 5.39 million votes cast. The outcome could have been different had each county allowed 4 – 5 invalid ballots.

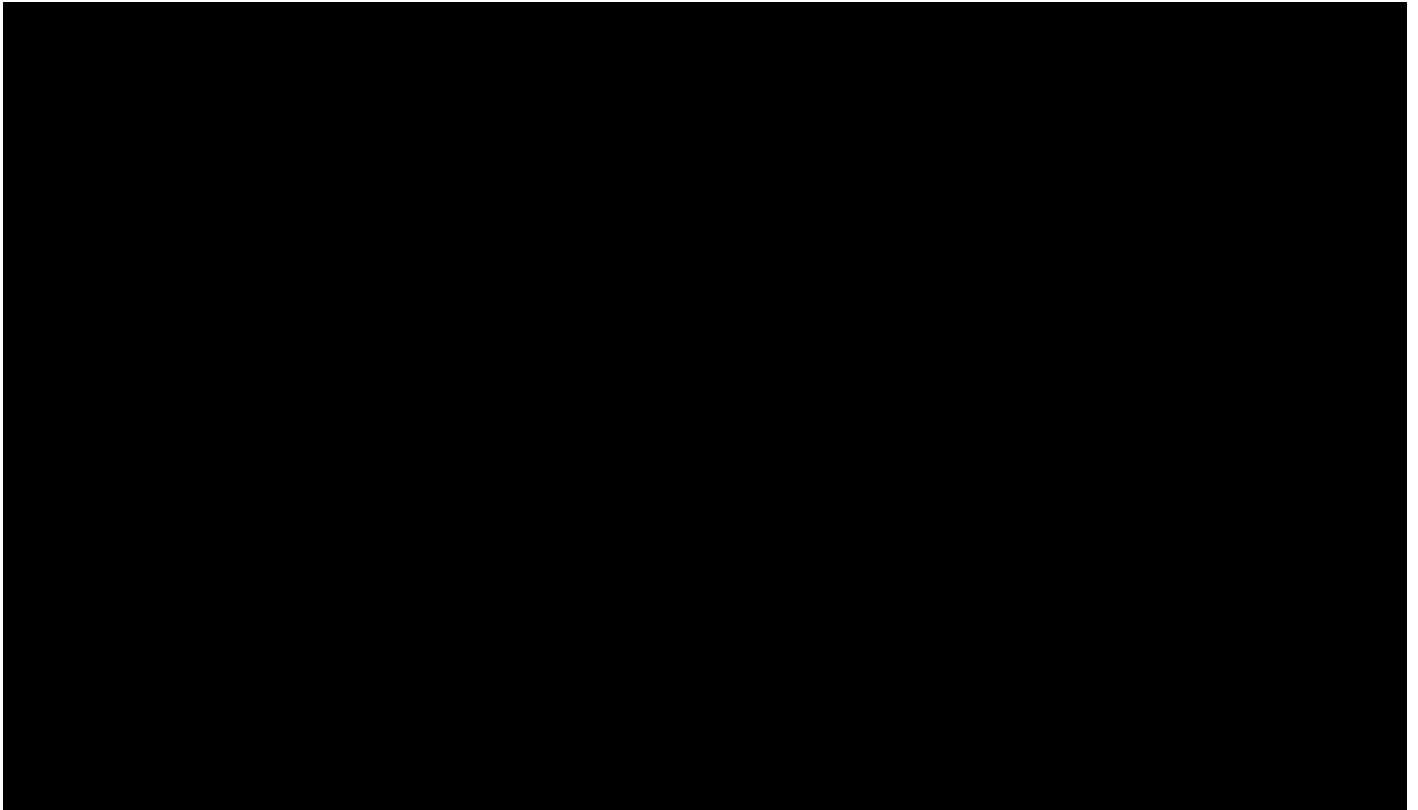
Examples.

It is unknown if the following sets are one or two separate voters, nor who cast the 2nd ballot. Since Public Records Request [#22-150](#) placed more than 18 months ago on 5/13/2022 has not been filled by the State Board, it is unknown if these cases, below, have been investigated.

Potential Duplicates – each with a ballot in the same election - Example 9.

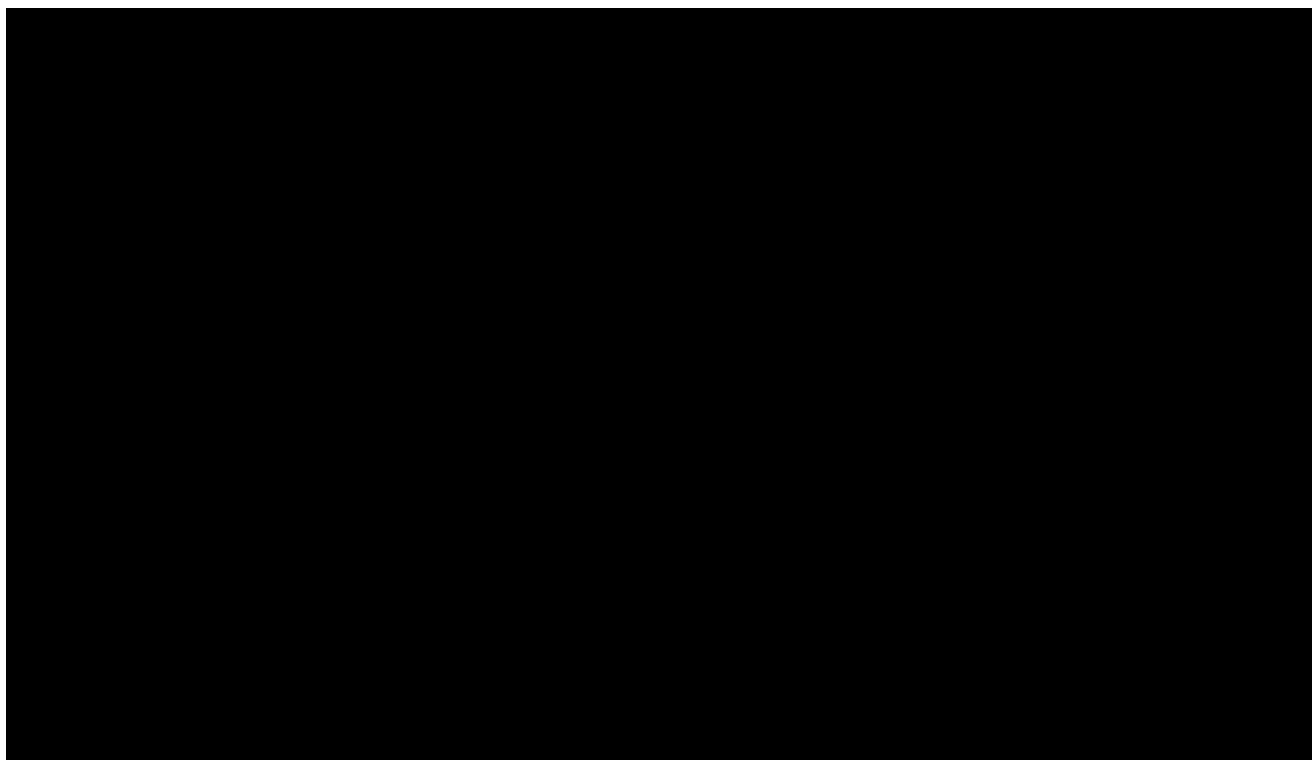


Potential Duplicates – each with a ballot in the same election - Example 10.

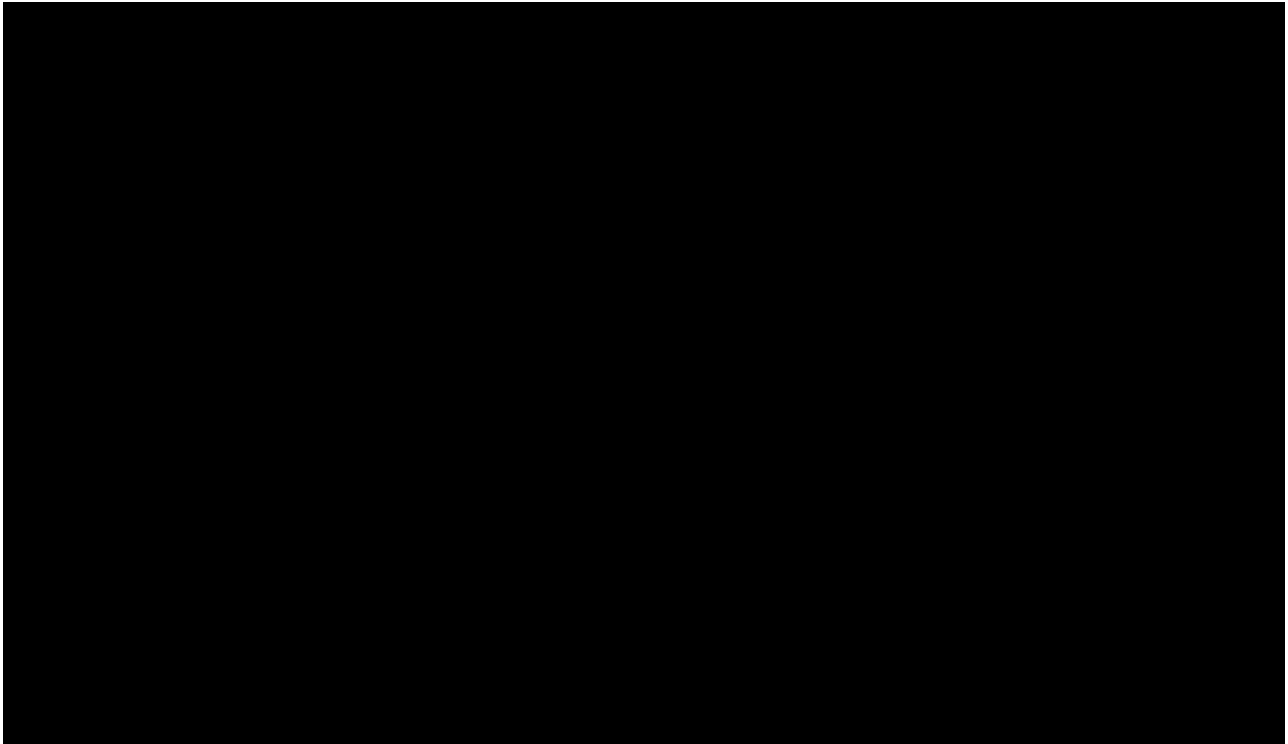


“Every voter in a federal . . . election, . . . whether he votes for a candidate with little chance of winning or for one with little chance of losing, has a right under the Constitution to have his vote fairly counted, without its being distorted by fraudulently cast votes.” Anderson v. United States, 417 U.S. 211, 227 (1974)

Potential Duplicates – each with a ballot in the same election - Example 11.

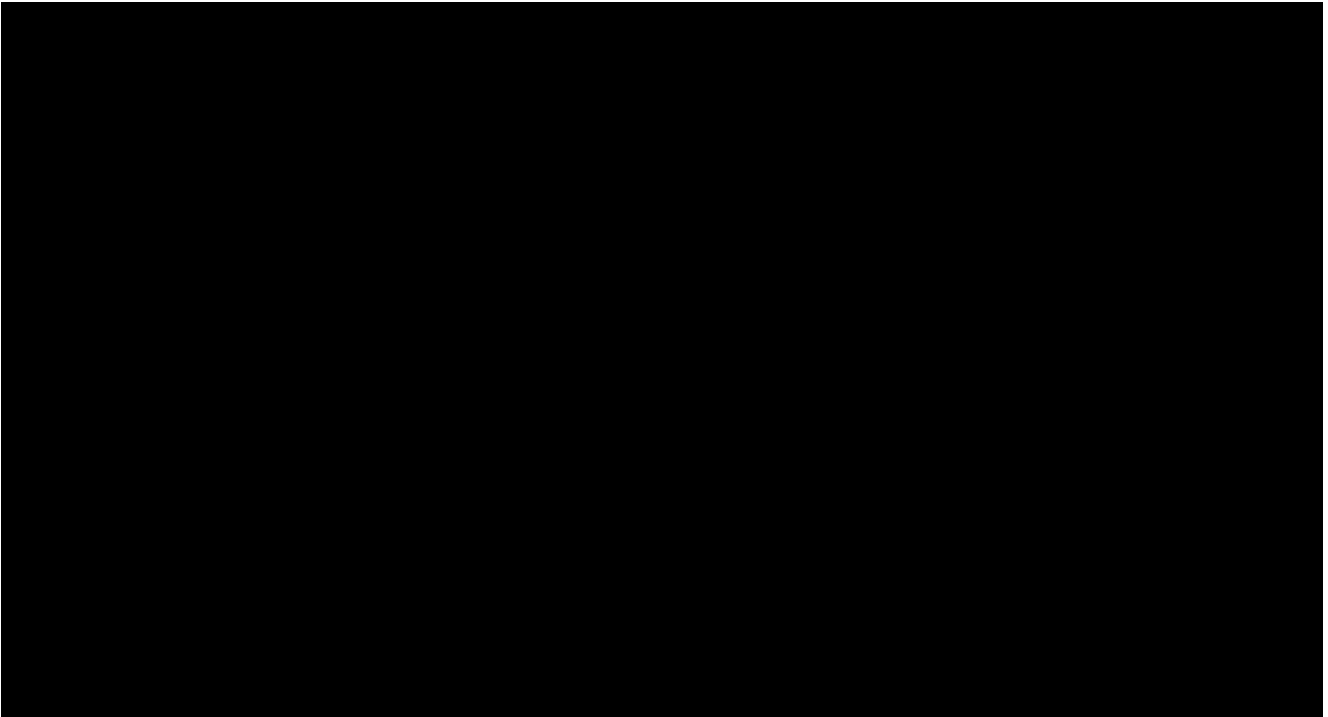


Potential Duplicates – each with a ballot in the same election - Example 12.

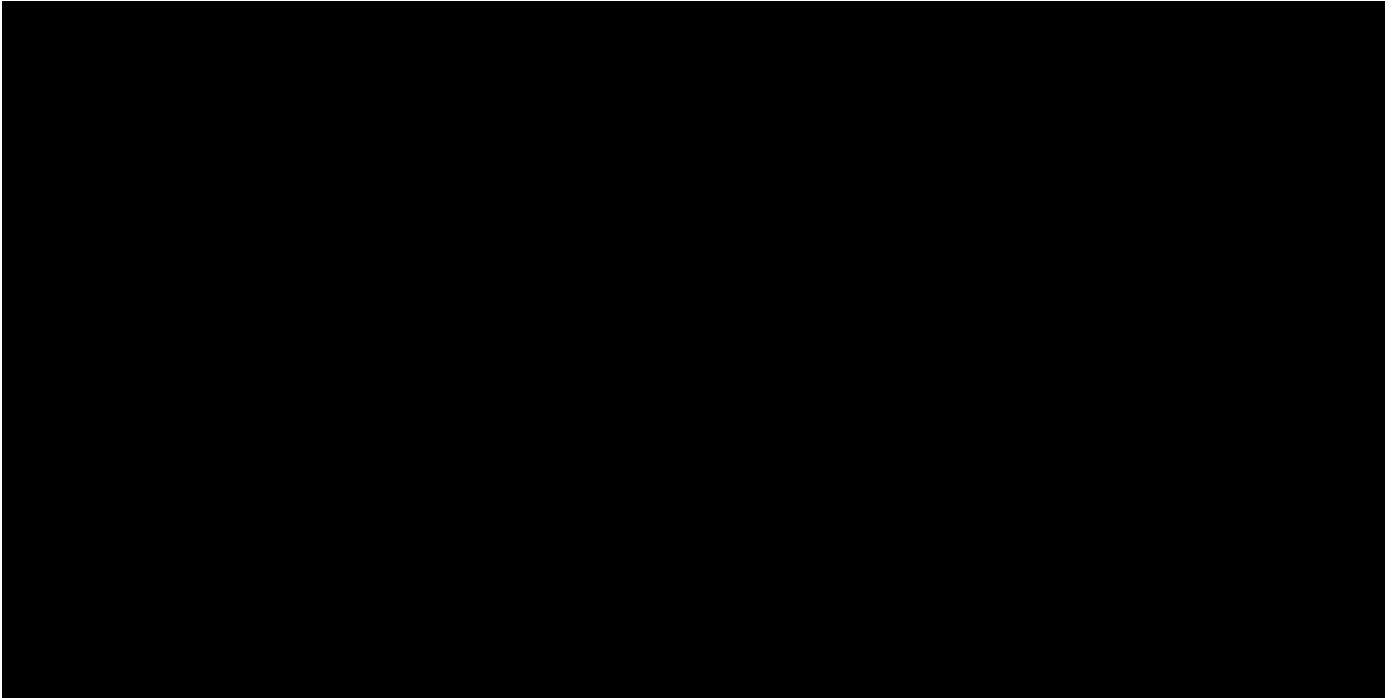


“Every voter in a federal . . . election, . . . whether he votes for a candidate with little chance of winning or for one with little chance of losing, has a right under the Constitution to have his vote fairly counted, without its being distorted by fraudulently cast votes.” Anderson v. United States, 417 U.S. 211, 227 (1974)

Potential Duplicates – each with a ballot in the same election - Example 13.

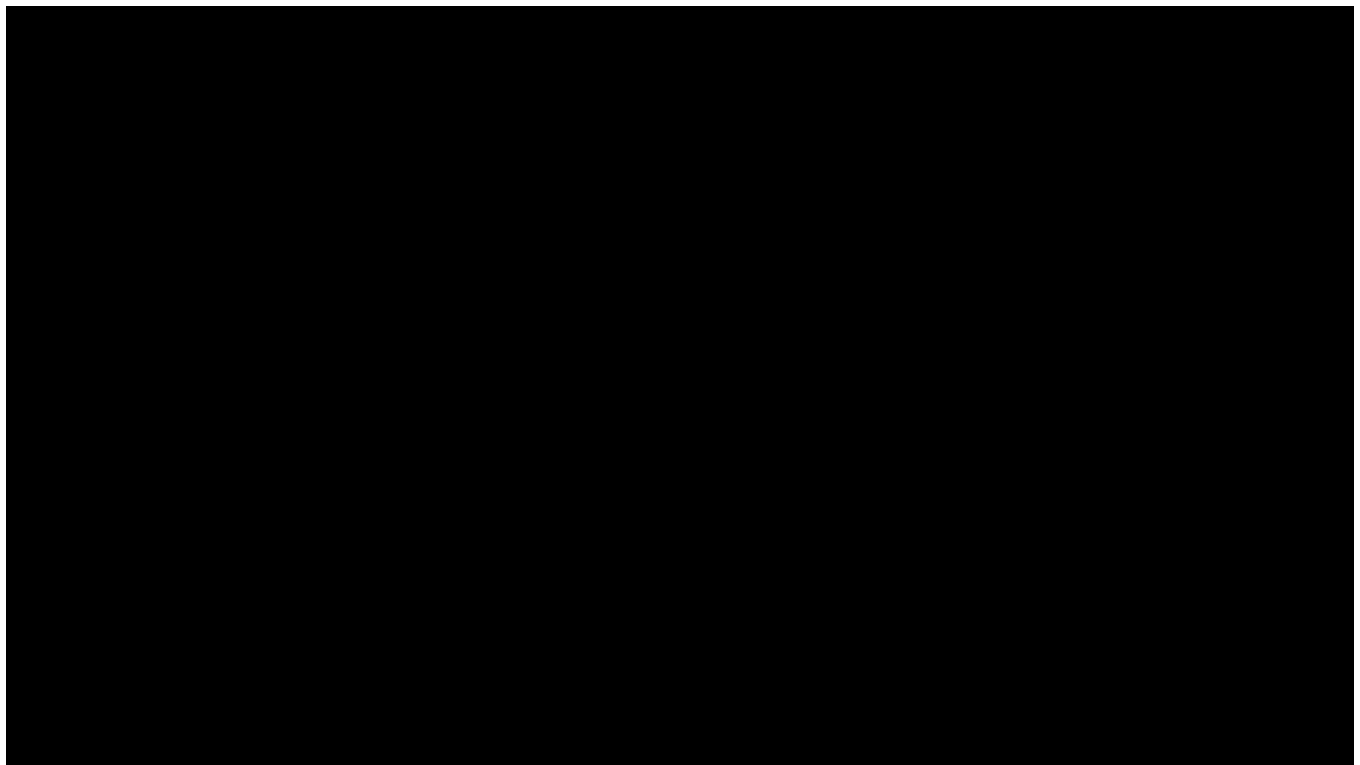


Potential Duplicates – each with a ballot in the same election - Example 14.



“Every voter in a federal . . . election, . . . whether he votes for a candidate with little chance of winning or for one with little chance of losing, has a right under the Constitution to have his vote fairly counted, without its being distorted by fraudulently cast votes.” Anderson v. United States, 417 U.S. 211, 227 (1974)

Potential Duplicates – each with a ballot in the same election - Example 15.



Requested Remedies.

1. Because names are not static nor unique, duplicate registrations records cannot be effectively located without unique personal identifying information, including Driver's License # or SSN-4 + Birth Date. This information should be obtained for every registered voter who possesses a DL# &/or SSN. According to [Public Records Request #23-128](#) filed on 8/28/2023, **779,071 registration records** lacked one or both numbers. **427,785 records were missing both.** It appears North Carolina's former voter registration form that was inconsistent with HAVA Sec 303(a)(2)(A) has frustrated the State's list maintenance efforts.
2. Confirm and ensure the DMV is providing this personal identifying information, if possessed by the registrants, for every new registration record.
3. Require all County Boards of Elections officials to enter the telephone number, when provided on the voter registration form, of new registrants into the SEIMS database. **For example, for their ~823,000 registered eligible voters, Wake County provides no telephone number data whatsoever to the public. For Mecklenburg County's ~790,000 registration records of eligible voters with a non-confidential status, approximately 705,000 contain no phone number.** Matching phone numbers is a useful tool for locating duplicate registrations when voters have changed residential addresses within the county, the state, or when comparing to other states' voter registration information.
4. On a weekly basis, load the current voter registration data onto an SQL database, such as PostgreSQL which is an open-source database offered free of charge at www.postgresql.org. Modify and run the citizen analysts' SQL queries to locate duplicate registrations; modifications should be made to query on the personal identifying information which isn't available to citizen analysts. These queries will also be offered to the Board free of charge.
5. As to the concern that the Board lacks public funding, please prioritize funding to focus on adhering to the HAVA list maintenance requirement, and please fill [Public Records Request #23-184](#) placed on 12/2/2023 which states,

Hello,

I seem to regularly receive automatic messages from Karen Brinson Bell's email account such as the one below. So, if you please,

- provide the travel itinerary including method of travel for Karen Brinson Bell from 1/1/2021 - time of processing this request, and*
- the meetings and conferences that were attended by Karen Brinson Bell from 1/1/2021 - time of process this request, and*
- the agendas of said meetings and conferences.*

"Thank you for your email. I will have limited access to my email the week of November 13-17, while I attend meetings out of town. If you need assistance during this time, please email elections.sboe@ncsbe.gov so NCSBE staff may assist. If this is a legal matter, please email legal.sboe@ncsbe.gov. Thank you and have a great day!"

6. Please don't redact the residential address from the Current Voter Rolls (NCVOTER) or the data behind the Voter Lookup tool for voters placed in Removed Status.