

## America First Legal's Petition for Rulemaking Body

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I am Margaret Groarke, a professor of political science specializing in elections. I have been a member of the full-time faculty at Manhattan University since 1999. I wrote my dissertation on the process leading to the passage of the National Voter Registration Act, and have also presented papers and published about the NVRA and matters related to it (Piven, Minnite and Groarke, 2009; Groarke, 2016).

I write to ask that the EAC reject the petition of America First Legal Foundation to require Documentary Proof of Citizenship (DPOC) with the Federal Voter Registration Form. I urge you to reject this rulemaking petition, because it violates the letter and spirit of the National Voter Registration Act of 1993, because it wildly exaggerates the extent of non-citizen voting in the United States, and because the remedy they propose for non-citizen voting would actually reduce the access of eligible American citizens to the vote. Overblown threats of fraud are too often used in American politics to restrict the access of eligible Americans to the franchise; I urge you not to let that happen in this case.