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U.S. Election Assistance Commission  
633 3rd Street NW, Suite 200  
Washington, DC 20001

Submitted Via Federal eRulemaking Portal at [www.regulations.gov](http://www.regulations.gov)

[Docket ID EAC–2025-0236]

Re: Comments in Response to America First Legal’s Petition for Rulemaking

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.

Additionally, as a scholar who has focused much attention on the uses of claims of fraud in American politics, I recognize this effort as yet the latest example of exaggerating claims of fraud, with limited or no evidence, in an effort to restrict the franchise (Groarke, 2016). In my article, I laid out the claims of fraud brought to oppose various Congressional efforts to make it easier to register, from the mail registration efforts of the early 70s, to Jimmy Carter’s effort to enact Election Day Registration to the opposition to the National Voter Registration Act. I argue below that non-citizen voting is rare, as many others have already proven. Prudent use of existing strategies can keep it rare, without making it harder for eligible American citizens to vote by requiring DPOC with the National Voter Registration Form.

**PURPOSE OF THE NVRA IS TO MAKE IT EASIER FOR ELIGIBLE AMERICAN CITIZENS TO VOTE**

In enacting the NVRA, Congress recognized that “the right of citizens of the United States to vote is a fundamental right” and it established as the first two purposes of the Act,

“(1) to establish procedures that will increase the number of eligible citizens who register to vote in elections for Federal office;  
(2) to make it possible for Federal, State, and local governments to implement this chapter in a manner that enhances the participation of eligible citizens as voters in elections for Federal office;<sup>1</sup>

Prior to the NVRA, states varied greatly in how easy or hard they made it for eligible American citizens to register to vote. By 1986, when Congress began serious work on what would eventually become the NVRA, only 19 states allowed all voters to register by mail, and another 18 allowed some categories of persons to register by mail. A citizen would otherwise need to go to the board of elections office personally during business hours (Mitchell and Wlezian, 1995). One state, North Dakota, did not require pre-registration; four states allowed citizens to register to vote on Election Day, although only two of them, Minnesota and Wisconsin, allowed them to do so at the polls. Four states – Michigan, Arizona, North Carolina and Colorado had incorporated voter registration into motor vehicle agency application processes.

Comparative research has shown that making it easier for citizens to register increased registration and turnout of voters. Just two examples from the voluminous political science literature on this: Richard Smolka showed that instituting Election Day Registration in Minnesota and Wisconsin caused a 3 percentage point increase in turnout between 1972 and 1976 (Smolka, 1977). Steven Knack demonstrated that an active “motor voter” program had a significant impact on registration and turnout: “Registration effects are estimated to reach about 13 percentage points, with a turnout impact of roughly half of that level.” (Knack, 1993)

In drafting the National Voter Registration Act, Congress required all covered states to adopt mail registration, and registration in motor vehicle agencies, public assistance agencies, and agencies serving the disabled. It authorized the creation of a national voter registration form, that could be used by a resident of any state to register, and required each state to accept the form. The goal underlining all of these strategies was to make it easier for all Americans to register, so that more Americans would participate in our democratic process.

In their petition requesting rulemaking from the EAC, the Washington Legal Foundation quotes fragments of section 9(b) of the National Voter Registration Act in a way that changes the emphasis of the language. They write:

The National Voter Registration Act (NVRA) mandates that states “accept and use the mail voter registration application form prescribed by the [EAC] . . . for the registration of voters in elections for Federal office”<sup>3</sup> ; that the form contain the following question: “Are you a citizen of the United States of America?”<sup>4</sup>; and that the form “include a statement that . . . specifies each eligibility requirement (including citizenship)” and “requires the signature of the applicant,

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<sup>1</sup> ([Pub. L. 103–31, §2, May 20, 1993, 107 Stat. 77.](#))

under penalty of perjury.”<sup>5</sup> The NVRA also empowers the EAC to “require . . . information . . . necessary to enable the appropriate State election official to assess the eligibility of the applicant and to administer voter registration and other parts of the election process.”<sup>6</sup>

the Section reads in full:

(b)CONTENTS OF MAIL VOTER REGISTRATION FORM The mail voter registration form developed under subsection (a)(2)—

(1) may require only such identifying information (including the signature of the applicant) and other information (including data relating to previous registration by the applicant), as is necessary to enable the appropriate State election official to assess the eligibility of the applicant and to administer voter registration and other parts of the election process;

(2) shall include a statement that—

(A) specifies each eligibility requirement (including citizenship);

(B) contains an attestation that the applicant meets each such requirement; and

(C) requires the signature of the applicant, under penalty of perjury;

(3) may not include any requirement for notarization or other formal authentication; and

(4) shall include, in print that is identical to that used in the attestation portion of the application

—

(i) the information required in section 20507(a)(5)(A) and (B) of this title;

(ii) a statement that, if an applicant declines to register to vote, the fact that the applicant has declined to register will remain confidential and will be used only for voter registration purposes; and

(iii) a statement that if an applicant does register to vote, the office at which the applicant submits a voter registration application will remain confidential and will be used only for voter registration purposes.

([Pub. L. 103–31, § 9](#), May 20, 1993, [107 Stat. 87](#); [Pub. L. 107–252, title VIII, § 802\(b\)](#), Oct. 29, 2002, [116 Stat. 1726](#).)

Congress made a clear decision in the writing of this section to require applicants to attest to their citizenship, and not to require notarization or other formal authentication, and the Federal Election Commission, in consultation with state election officials, as required by the NVRA, complied with that decision in the making of the form. During the final votes on the conference report on the NVRA, a motion was made to recommit the bill to the conference committee, with instructions to include a provision that “nothing in this Act shall prevent a State from requiring presentation of documentation relating to citizenship of an applicant for voter registration.” The motion failed, 170-253 (Congress.gov). The EAC has on previous occasions denied states who wished to add DPOC to their instructions for the federal form.

To require an applicant to include documentary proof of citizenship with the federal voter registration form makes the form less useful for its intended purpose. T(he National Form can be used on college campuses, where students may be residents of different states, and desiring to

register in their home state. It can be made available in public agencies, in locations where people from different states may appear. It can be used by civic organizations offering voter registration to the public, in a shopping mall or on a street corner. In each of these situations, encouraging a potential registrant to fill out the form on site and drop it in a box for delivery or mailing to the board of elections is best practice. It allows the potential registrant to ask questions about anything that is unclear on the form, and it makes it less likely that someone will take a form, intending to fill it out and not do so. Requiring that DPOC be returned with the form makes all these activities impossible, as very few people carry proof of citizenship with them.

Providing documentary proof of citizenship means locating a birth certificate or passport or naturalization certificate, likely carefully filed away somewhere. Students on campus may have left such important documents home with their parents. A married woman may not still use the name on her birth certificate. Not everyone has a passport. And making a copy of the document, if one has it, to mail with the registration form, is another potential delay in getting registered.

## NON-CITIZEN VOTING IS RARE

In their petition, AFLF attempts to show that non-citizen voting is a major phenomenon in the United States. This is simply untrue. I will respond here to three types of evidence the AFLF offers: the Heritage Foundation Election Fraud Map, includes a research study, the flaws of which have been pointed out by other researchers, and descriptions of other recent allegations of non-citizen registration, not all of which are borne out by the facts.

### **The Heritage Foundation Election Fraud Database (Now called the Election Fraud Map)**

Many political scientists and election law experts have criticized the Heritage Foundation database, both for including many different kinds of charges, and for a failure to recognize how small the number of cases as a percentage of the number of votes cast.

The Heritage Foundation's own database provides the evidence that actually establishes that non-citizens voting only occurs very rarely. As of today, it shows 99 findings of alien voter registration between 2000 and 2025.

Several analyses of the Heritage Foundation database have focused on the fact that the cases reported constitute less than 0.0001% of the votes cast over the period covered. A 2017 analysis by Rudy Mehrbani for the Brennan Center noted that the database includes incidents dating back to the 1970s (and one incident from the 1940s) – meaning that, even if it the 749 cases involving 1100 individuals are substantiated, they occurred over a period of time in which 3 billion votes were cast. The database includes many types of illegal behavior, not all of which have to do with illegal registration or voting.

A 2024 analysis of the database “documented just 68 total cases of noncitizen voting going back to the earliest cases documented in the 1980s. That’s less than 5% of the cases in their database,

total. The remaining cases all involve U.S. citizens.” The author noted: “Even an organization engaged in a major effort to document voter fraud produced fewer than 70 proven cases of noncitizens who voted in elections in the last 40 years. Given that over one billion votes have been cast over that period in thousands of elections, the incidence of proven noncitizen voting is below 0.0001%.” (Reichlin-Melnick, 2024)

The Heritage Foundation has responded to this criticism by recasting its election fraud database, originally described as comprehensive, as a “sampling.”

### **Specific state examples from AFLF petition**

As I will note in detail below, allegations that large numbers of non-citizens have voted fall apart on closer examination, leaving a tiny number of non-citizens actually proven to have registered and/or voted, who often turn out to have registered accidentally.

We see a common pattern: A public official makes a public statement that a large number of non-citizen or fraudulent registrations or ballots have been identified, but later information shows the initial statement to be overblown. Such announcements are often based on a list match, and investigating the individual matches finds that some are not the same person, some are people who have recently become citizens and registered. When Kris Kobach, for example, as Kansas Secretary of State, he sponsored a multi-state voter list matching program called Crosscheck. He held press conferences to announce large numbers of duplicate voters. But the name matching was loosely done, so that Jose Garcia in NC and Jose Garcia in FL would be a match. And while voters who move from one state to another may notify the board of elections that they are leaving, and their new state of residence also should, they cannot control whether their former state removes their name from the rolls. If and when the matter was investigated further, the number of actual duplicates – people actually attempting to vote in two states – is tiny. Eventually, Crosscheck was suspended in response to lawsuits about data security failures (Hegemen, 2019)

The examples from the states show that states have strategies for identifying and removing non-citizen registrants. In states where there is a concern that non-citizens may be accidentally registering at motor vehicle agencies, steps can be taken to make that part of the application clearer. These examples also show that non-citizen voting is a relatively small phenomenon, which does not require us to make registering harder for eligible citizens

- a. Texas: Both of the public announcements cited in the AFLF petition were later walked back. Shortly after announcing that there were 100,000 noncitizens on the rolls in Texas in 2019, the Secretary of State had to admit in court that their methodology was flawed, and that many people on the list were actually citizens (Gonzales, 2019). Governor Abbott, after originally announcing the removal of over a million names from the Texas

voter list, 6500 of which were believed to be non-citizens, and 1900 of whom would be referred to the Attorney General for possible prosecution. This was a routine list maintenance action, which Texas is required by the NVRA to do regularly.

The Secretary of State later revealed that the number of non-citizens on the list was at most 581 (Churchill, 2024). There is no sign on the Attorney General's website or the Texas news media that any prosecutions have commenced. KERA News, the NPR station for North Texas, noted "In its database, The Heritage Foundation has included only three instances of noncitizens casting ballots in Texas since 2012," none of which were derived from this list (Aguilar, 2024)

- b. In 2024, Ohio Secretary of State LaRose, announced they found 597 foreign citizens registered in routine list maintenance, 137 of whom appeared to have voted. But that 137 is only about .0017 out of the over 8 million registered voters in the state (Wilkinson, 2024). It seems likely that many of these people accidentally registered, or were misinformed about their eligibility. Some may have become citizens since last updating their motor vehicle registration (which is the source of LaRose's allegation that they are non-citizens). Not all of LaRose's allegations pan out; Since LaRose took over the secretary of state's office in 2019, it has referred 521 non-citizens for possible prosecution. Of those, only one was charged with voter fraud (Wilkinson, 2024).
- c. North Carolina: The AFLF somewhat exaggerates the findings of this report by the Public Interest Law Foundation. They found, not that 1454 registered North Carolinians were not citizens, but that in a hastily planned investigations of the voting rolls, the state was uncertain of their status, and determined that they should be questioned at the polls. Of the 89 who showed up at the polls, 24 were challenged, 13 of those were eligible to vote and 11 "had their challenge sustained or justified." Neither PILF or AFLF clarified how many of those who weren't challenged (65) were citizens or not, although it says that some acted quickly to cancel their registration.

In 2016, North Carolina again pursued non-citizen voters, and arrested 19 people, in a state where 4.5 million votes were cast. Most were legal permanent residents, and one was a man who had passed the citizenship test but had not yet been sworn in (Michael Wines, 2016)

- d. In early August 2024, Governor Youngkin of Virginia claimed that 6,303 non-citizens had registered to vote in the previous 18 months, and had them removed from the rolls. Because many eligible voters were found on the purge list, the removals were blocked by federal courts (Virginia Coalition for Immigrant Rights v Beal, 2024). States are required, under the NVRA, to complete programs of list maintenance 90 days before an election, and Youngkin may have gotten in right before the deadline. NBC News reported: "Local Virginia officials who spoke to NBC News attributed much of the presence of possible

noncitizens on the voter rolls to errors made when people fill out paper or online forms or when they respond to a question about citizenship on a touchpad device at the department of motor vehicles.” Voting rights advocates in Virginia requested more information, so they could make sure that citizens were not accidentally included in the purge, but were rebuffed, and sued.

Such mistakes have been made in the past. In October 2023, election officials under Youngkin removed nearly 3,400 legal Virginia voters from the rolls, after misclassifying probation violators as felons. Felons automatically lose their right to vote in Virginia (Gamboa, 2024). Radio IQ, the public radio station in Virginia, searched Virginia court records for prosecutions for non-citizen voting, and found none (Kutner, 2024).

- e. Louisiana is not mentioned in the AFLF petition, but it recently engaged in a serious investigation of possible non-citizen voting. Secretary of State Nancy Landry announced in September 2025 that they had found that over 40 years, 390 non-citizens appeared to be registered to vote, and 79 had likely voted. While announcing that she had removed or was in the process of removing them from the rolls, and investigating whether the 79 people had in fact cast a vote illegally, she assured the public that “I want to be clear: noncitizens illegally registering or voting is not a systemic problem in Louisiana. In fact, our voter list maintenance procedures are a key reason why Louisiana is ranked number three in the nation for election integrity.” (Louisiana Secretary of State, 2025)

### **Claim that 10-27% of Non-citizens are illegally registered to vote**

The petition also cites James Agresti’s web article, “Study: 10% to 27% of Non-Citizens Are Illegally Registered to Vote.” James Agresti is not a political scientist, but has been involved in public policy debates for a long time. His analysis is based his own reconsideration of an academic article published earlier, which similarly argued that a significant number of non-citizens voted, although their estimate was much smaller: 6.4% in 2008 and 2.2% in 2010 (Richman, Chattha and Earnest, 2014). Since his analysis is a modification of that paper, its flaws are relevant.

The original Richman, et. al., paper was much criticized. A Monkey Blog post by two of the authors publicizing their findings drew an unusual note from the editors:

*Note: The post occasioned three rebuttals ([here](#), [here](#), and [here](#)) as well as a [response from the authors](#). Subsequently, another [peer-reviewed](#)*

*article argued that the findings reported in this post (and affiliated article) were biased and that the authors' data do not provide evidence of non-citizen voting in U.S. elections.*

Much of the criticism was methodological, questioning the validity of analyzing a small number of respondents (339) from a very large study, the Cooperative Congressional Election Study (more than 32,000) and the likelihood that some respondents had incorrectly identified their citizenship status, or were mismatched to the voter list, or the broader usefulness of using a survey primarily about citizens to study the behavior of non-citizens. A peer-reviewed article addressing the methodological issues and concluded that the rate of non-citizen voting was more likely to be zero (Ansolobehere, et al, 2015)

Agresti's more recent article has faced the same critique (Alex Nowrasteh, 2020), which Agresti has responded to, but with somewhat more heat than light. Because he publishes short web articles about his findings instead of longer scholarly papers which detail their methodology, it is not clear how different his analysis is. But the core flaw of their paper – a reliance on the small number of non-citizens in the CCES – remains.

### THREE OTHER POINTS IN RESPONSE TO AFLF PETITION

In point 5 of their petition, AFLF states that “Although the form warns that providing false information may lead to legal consequences, including being “fined, imprisoned,” and, for aliens, “de-ported from or refused entry to the United States,” the credibility of this threat is undermined by its nearly non-existent enforcement.<sup>8</sup>”

They provide no evidence for this claim; the footnote is merely a link to the National Voter Registration Form. They report alleged instances of non-citizen voting in their report, which have been referred by prosecution. They provide no evidence for their belief that there are many other instances of non-citizen voting that have not been prosecuted.

In point 6, they say that the Help America Vote Act “exacerbates” this problem. In reality, it does nothing of the sort; it maintains and continues the decision made by Congress in 1995 to only require attestation of citizenship. Further, AFLF is dismissive of the attestation, saying that it is depending on the honesty of the applicants. They ignore the power of the threat of prosecution for perjury and illegal voting, which for non-citizens could also lead to deportation. The benefits of voting illegally are far smaller than the risk of prison time or deportation for doing so.

In point 10, AFLF suggests, improbably, that “the NVRA’s requirement that the states ‘accept and use’ the federal form implies that states must treat it as sufficient evidence of eligibility without additional documentation.” States verify the information on registration forms in a variety of ways; by doing mailings to registered voters, and by matching names with other state lists, primarily.

## REQUIRING DOCUMENTARY PROOF OF CITIZENSHIP WILL REDUCE CITIZEN ACCESS TO THE VOTE

It is clearly important that government – local, state and federal – be responsible for both ensuring that all eligible persons have access to the vote, and that the integrity of the election be protected.

AFLW presents a zero-sum argument: “28. Voter fraud of any amount should be of utmost concern for the United States government. Even one fraudulent vote cancels out a citizen’s vote, effectively denying a citizen the right to have a voice in government.”

This ignores the fact that restrictions placed on registration and/or voting with the stated goal of preventing non-citizen voting, or other types of fraud, may also deny a citizen the right to have a voice in government. Every change that we make to our voter registration system must be evaluated from the perspective of how much of an additional burden it places on eligible American citizens, thus reducing their access to the vote, in the light of what threat to the integrity of the election it is confronting.

The Federal form is most useful for registering voters in places where people of different states may appear; college campuses being one good example. Should college students doing non-partisan voter registration at a table in a campus dining hall be asking other students for copies of their passport or birth certificate? Do we want to make this time-honored way of building voter engagement among young people impossible?

Given the very limited incidence of non-citizen voting, and the fact that requiring voters to submit DPOC with their voter registration application adds a burden to legitimate citizens that may reduce the number who successfully register, I urge the EAC to reject this petition for rulemaking.

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