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VIA U.S. MAIL and EMAIL TO: MaureenRiordan2@usdoj.gov

October 27, 2025

Ms. Maureen Riordan
Voting Section, Civil Rights Division
U.S. Department of Justice
4 Constitution Square
150 M Street NE, Room 8.923
Washington D.C. 20530

**RE: USDOJ's June 17, 2025, Request for Information to the
Wisconsin Elections Commission Related to HAVA
Compliance**

Dear Ms. Riordan,

We am writing to supplement the information that was sent to you on August 14, 2025.

In your June 17, 2025, letter to the Wisconsin Elections Commission ("WEC"), your first question asked about coordination between WEC's computerized statewide voter registration list and other state databases. In response, WEC provided some information regarding its coordination with the Wisconsin Department of Transportation ("DOT") and other agencies. As part of its coordination with DOT, WEC explained as follows:

"Coordination with Wisconsin DOT occurs to compare voter registration information with DOT records. The online voter registration (OVR) process includes a real-time records check against DOT records. Wis. Stat. § 6.30(5). This OVR check verifies that a voter's name, date of birth, license number, and residency match DMV records. If the OVR DMV check does not match, the voter is not permitted to register online. The OVR process is only available to voters with a Wisconsin DOT product. **Registrations received on a paper application, either in person**

or by mail, are reviewed against DOT records in a separate process.” (Emphasis added).

According to this response, if someone registers to vote online, that voter’s registration information is matched against the DOT database, and if the voter’s information does not match the DOT information, the person is not allowed to register. However, “Registrations received on a paper application either in person or by mail, are reviewed against DOT records in a separate process.”

Despite your request to describe the relevant procedures, WEC has not described the “separate process” it uses for voter registration applications received in person or by mail. This is particularly important because, among other things, Wisconsin has same day voter registration, meaning that voters can both register and immediately vote in person on election day, and many do.

In our previous letter, we suggested some follow-up questions on this topic because we have been aware for several years that **there are thousands of active, registered voters in Wisconsin whose voter registration information does not match the information in their DOT records.** And WEC appears to be doing nothing about it.

WILL first documented this problem in a report entitled, “A Review of the 2020 Election,” which we issued after the 2020 election.¹ On page 39 of that report, we explained:

WILL obtained information from WEC pursuant to Wisconsin’s Open Records Law regarding mismatches between voter registration information and the DMV database. WILL learned that, as of the response (June 24, 2021), there were 95,150 such mismatches in the system, some of them going as far back as 2008.

And more specifically, just prior to the November 2020 election, the mismatches were as follows:

Name and DOB Do Not Match	274
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¹ Will Flanders, Kyle Koenen, Rick Esenberg, Noah Diekemper & Miranda Spindt, *A Review of the 2020 Election*, Wisconsin Institute for Law & Liberty, (Dec. 2021), available at <https://will-law.org/wp-content/uploads/2022/05/2021ReviewStudy.pdf>.

Name Does Not Match	15,260
DOB Does Not Match	1,061
No Record of DL Number	4,885
Invalid Data Submitted	66
No Matches Found	1,815

So, what does this mean? It means that 4,885 individuals were allowed to vote in the November 2020 General Election, even though the driver's license number in their voter registration information could not be matched to any driver's license number in the Wisconsin Department of Motor Vehicles records. In addition, 15,260 of the names on the voter registration list do not match a name in the DMV system, and for 272 registered voters, neither the name nor the date of birth matched. For 1,815 registered voters, *none of the information matched*.

Of course, it is possible that all of this is the product of innocuous error. Perhaps the driver's license number was recorded improperly, or the registrant's name was stated differently. While WILL wanted to determine the significance of the mismatches by examining the driver's license numbers, dates of birth, and name, WEC would not provide that information, saying it could not do so under state law.

Critically, WEC has not taken sufficient steps to remedy this situation. In fact, the issue has gotten worse. On October 7, 2025, WILL submitted another open records request for the current HAVA mismatch data. The information we received regarding current mismatches between the information on the voter registration list and the information in the DOT records was as follows (the numbers in red are the numbers from 2021):

Name and DOB Do Not Match	680 (274)
Name Does Not Match	24,733 (15,260)
DOB Does Not Match	3,110 (1,061)
No Record of DL Number	11,174 (4,885)
Invalid Data Submitted	18 (66)
No Matches Found	2,069 (1,815)

Some of these numbers are *twice as bad* as they were in 2021.

WILL understands that this data does not indicate the cause of the discrepancy. And while some of these errors might be minor, the large and

growing number of mismatches in the system underscores the need for a comprehensive audit of Wisconsin's voter registration list, which WEC refuses to perform in violation of its obligations under HAVA. Accordingly, we respectfully request that the U.S. Department of Justice takes this information into account as it investigates this issue and takes all necessary steps to remedy this significant problem.

Sincerely,

WISCONSIN INSTITUTE FOR LAW & LIBERTY INC.



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