

Congress of the United States

Washington, DC 20515

October 20, 2025

Office of the General Counsel
U.S. Election Assistance Commission
633 3rd St NW
Suite 200
Washington, DC 20001

Dear Commissioners,

As Members of the House of Representatives, we submit this comment to strongly oppose any changes to the national voter registration application that would add documentary proof of citizenship (DPOC) or “show your papers” requirements.¹ The recent petition calling for DPOC, submitted by America First Legal Foundation (AFL), mirrors President Trump’s repeatedly enjoined Executive Order 14248² and the stalled SAVE Act.³ The petition asks the U.S. Election Assistance Commission (EAC) to unconstitutionally burden Americans’ fundamental right to vote – especially for senior citizens, women, rural, low-income, minority, and disabled citizens. We fiercely advocate for open, fair, and accessible elections and denounce this latest attempt to erode our democracy and electoral systems.

Every citizen, whether born in this country or naturalized, possesses the right to vote. It is guaranteed and protected in the U.S. Constitution.⁴ DPOC policies would discard this foundational American right by forcing Americans to pay significant financial, administrative, and personal costs simply to participate in democratic elections, creating a modern day poll tax.⁵ When our voting process becomes more complicated, people are less inclined to vote, even if they have the proper credentials.⁶

AFL concedes their petition is a ploy to circumvent court orders that block other DPOC schemes.⁷ Multiple courts and agencies have found DPOC laws and policies unlawful in scope or execution, including the EAC.⁸ Furthermore, Executive Order 14248’s DPOC provisions – which AFL based its petition on – were

¹ Jasleen Singh, [The Trump Administration’s Campaign to Undermine the Next Election](#), Brennan Ctr for Justice, Aug. 3, 2025.

² Exec. Order No. 14248, Preserving and Protecting the Integrity of American Elections (2025). Staff, [Another Federal Court Blocks Trump Elections Executive Order as Dozens of States Reject Burdensome Proof of Citizenship to Vote Mandates](#), Voting Rights Lab (June 13, 2025); Press Release, [Federal Judge Blocks Key Provisions of President Trump’s Voter Registration Executive Order](#), Elias Group (Apr. 24, 2025).

³ H.R. 22, [Safeguard American Voter Eligibility Act](#), 119th Cong. (2025).

⁴ U.S. Const. amend. XIV (equal protection & due process), XV (prohibits racial discrimination), XVII (direct election of Senators), XIX (prohibits sex discrimination), XXIII (grants DC residents the right to vote in presidential elections), XXIV (prohibits poll taxes in federal elections), and XXVI (prohibits age-based discrimination).

⁵ See generally Valencia Richardson, [Voting While Poor: Reviving the 24th Amendment and Eliminating the Modern-Day Poll Tax](#), 27 Georgetown J. Law & Pub. Pol’y 451 (2020).

⁶ Jessica Colarossi, [How Could the SAVE Act Impact Young Voters and Married People Who’ve Changed Their Name?](#), THE BRINK (Apr. 18, 2025).

⁷ AFL petition at 10-11.

⁸ *Mi Familia Vota v. Fontes*, 129 F.4th 691 (9th Cir. 2025); *League of Women Voters v. Harrington*, 560 F.Supp. 3d 177 (D.D.C. Sept. 6, 2021); *Fish v. Schwab*, No. 2:16-cv-02105-JAR-JPO (D.C. Kan. 2016), *aff’d*, *Fish v. Kobach*, No. 16-3147 (10th Cir. Oct. 2016).

preliminarily enjoined by several courts.⁹ Therefore the EAC should deny AFL’s petition for suggesting policies that violate established democratic norms and federal laws like the National Voter Registration Act (NVRA).

Congressional Intent Under the NVRA

Congress enacted the NVRA with a clear objective: to make voter registration more accessible while maintaining secure and accurate elections. In doing so, Congress struck a careful and deliberate balance, requiring applicants provide only the information “necessary” to establish eligibility to register.¹⁰ The statute specifically requires registrants to attest, under penalty of perjury, that they are U.S. citizens, a safeguard Congress determined sufficient to protect election integrity. Federal law already criminalizes false attestation and prohibits non-citizens from voting in federal elections.¹¹ Nothing exists in the NVRA that would authorize the EAC, or any state, to impose separate documentary proof requirements beyond what Congress has prescribed.

The Supreme Court reinforced this notion in *Arizona v. Inter Tribal Council of Arizona* (2013), holding that states cannot impose additional documentation requirements on top of the NVRA’s federal form.¹² Consistent with this authority, the EAC has repeatedly denied attempts to implement documentary proof requirements onto the federal form, recognizing both the statutory limits of the NVRA and the disenfranchising impact of such measures.¹³ AFL’s petition provides no new legal basis and no credible factual evidence to justify reversing that longstanding, bipartisan congressional interpretation.

The NVRA reflects Congress’s constitutional authority to regulate federal elections and safeguard access to the ballot. Any attempt to override that balance not only violates the law, it also undermines the integrity of our democracy. The EAC should reject this petition and reaffirm the supremacy of congressional intent and judicial precedent.

No Evidence Supports AFL’s Claim of Widespread Fraud

The central claim underlying AFL’s petition¹⁴—that existing safeguards are “inherently inadequate” and that non-citizens are voting in significant numbers—is a contrived myth.¹⁵ Federal and state audits, independent

⁹ See, Nick Corasanti, [Trump’s Attempt to Overhaul Election Law is Partly Blocked by a Judge](#), NYTimes (Apr. 24, 2025); *California v. Trump*, No. 25-CV-10810-DJC, 2025 WL 1667949, at *7 (D. Mass. June 13, 2025) and *LULAC v. Trump*, No. CV 25-0946 (CKK), 2025 WL 1187730, at *1 (D.D.C. Apr. 24, 2025). *LULAC* is a consolidation of three cases: *League of United Latin American Citizens v. Trump*, 1:25-cv-0946 (CKK) (D.D.C.); *Democratic National Committee v. Trump*, 1:25-cv-0952 (CKK) (D.D.C.); *League of Women Voters Education Fund v. Trump*, 1:25-cv-0955 (CKK) (D.D.C.).

¹⁰ See e.g. [National Voter Registration Act of 1993](#).

¹¹ Jimmy Balser, [Federal Criminal Laws Prohibiting Unlawful Voting](#), [Congress.gov](#) (August 2024); 18 U.S.C. §§ 911, 1001, 3571; 52 U.S.C. § 20511.

¹² Staff, [Arizona v. Inter Tribal Council of Ariz., Inc.](#), 570 U.S. 1 (2013)

¹³ Alice P. Miller, [Memorandum of Decision Concerning State Requests to Include Additional Proof of Citizenship Instruction on the National Mail Voter Registration Form](#) (January 2014)

¹⁴ James Rogers & Ryan Giannetti, [Petition to Issue Rule Requiring Documentary Proof of Citizenship on Federal Voter Registration Forms](#), America First Legal Foundation (July 2025)

¹⁵ Julie Carr Smyth, [The GOP stoked fears of noncitizens voting. Cases in Ohio show how rhetoric and reality diverge](#), Assoc. Press (Dec. 15, 2024); [State and Federal Law Ensures Only Citizens Can Vote in U.S. Elections](#), Voting Rights Lab (October 28, 2024);

studies, and election monitoring consistently demonstrate that non-citizen voting in federal elections is virtually nonexistent.¹⁶ Several states provide examples.

- *Alabama*: Just before the 2024 general election, the state started purging 3,251 alleged non-citizens from state voting rolls, only for a federal judge to order Alabama to stop immediately because it purged thousands of U.S. citizens instead.¹⁷
- *Georgia*: In 2024, the Georgia Secretary of State audited the state's rolls of 8.2 million registered voters and identified only 20 non-citizens on the rolls, none of whom had cast a ballot in the 2024 general election.¹⁸
- *Kansas*: A 2011 “show me your papers” law sought to curb non-existent non-citizen voting and instead blocked more than 31,000 U.S. citizens instead, many of whom were military veterans, and born in the U.S.¹⁹ State records confirmed that 99% of voters Kansas blocked were U.S. citizens.²⁰
- *Louisiana*: This year Louisiana's Secretary of State audited more than four decades of election records to find solely 79 suspected non-citizens voted over the decades. The results are preliminary, no one was charged, and the Secretary admitted the possibility that some findings “could be attributed to errors or outdated information.”²¹
- *Ohio*: Since 2023, the Ohio Secretary of State has alleged more than 600 cases of noncitizen voting fraud amidst the state's 8 million voters, but state authorities secured only one indictment for voting fraud. In the past 10 years Ohio has managed just 9 indictments against noncitizens who voted.²²
- *Texas*: The state's proclaimed 1,930 non-citizen voters from 2024 melted into just over 100 investigations covering different election cycles.²³
- *Virginia*: In August 2024 the governor issued an executive order to purge suspected non-citizen voters that resulted in lawful voters being incorrectly purged and flagged for voter fraud prosecution.²⁴

Walter Olson, *Shedding Light on the Incidence of Illegal Non-citizen Voting*, Cato Inst. (May 22, 2024).

¹⁶ Sean Morales-Doyle, *Noncitizen Voting Isn't Affecting State or Federal Elections—Here's Why*, Brennan Center For Justice (April 12, 2024).

¹⁷ Safiyah Riddle, *A federal judge halts an Alabama program that purged thousands of legal voters*, Assoc. Press (Oct. 16, 2024).

¹⁸ Staff, *Georgia citizenship audit finds few noncitizens on voters rolls*, Assoc. Press (Oct. 23, 2024).

¹⁹ John Hanna, *Kansas once required voters to prove citizenship. That didn't work out so well*, Assoc. Press (Dec. 29, 2024).

²⁰ Staff, *The SAVE Act: How a Proof of Citizenship Requirement Would Impact Elections*, Institute for Responsive Government (January 30, 2025)

²¹ Wesley Muller, *Louisiana election investigation finds 79 noncitizens have voted since 1980s*, Louisiana Illuminator (Sept. 4, 2025).

²² Marty Schladen, *Noncitizen voting is very rare in Ohio and America. Not having proof of citizenship isn't*, Ohio Cap. J. (Mar. 26, 2025); Smyth, *supra*. note 16; Nick Evans, *Ohio Sec. of State LaRose flagged more than 520 cases of noncitizen voter fraud. Only one was legit*, Ohio Cap. J. (Sept. 27, 2023).

²³ Miles Parks, *Despite Grand Claims, a new report shows noncitizen voting hasn't materialized*, NPR (July 30, 2025);

²⁴ Press Release, *Preliminary Injunction Entered in Justice Department Suit to Stop Virginia's Systematic Removal of Voters from Registration Rolls*, U.S. Dep't of Justice, Oct. 25, 2024; *Virginia Coalition for Immigrant Rights v. Beals*, League of Women Voters (Aug. 12, 2025).

Furthermore, an analysis of the Heritage Foundation’s voting fraud database found only 68 instances of non-citizens voting between 1999 and 2023.²⁵ And the Cato Institute asserts the percentage of non-citizens registering to vote and voting is nearer to zero.²⁶ Kansas Secretary of State Scott Schwab, who championed his state’s failed DPOC law, admits the folly of these policies. “Kansas did that 10 years ago,” he said. “It didn’t work out so well.”²⁷

The existing system works as Congress intended: registrants must swear under penalty of perjury that they are U.S. citizens, and false claims of citizenship are subject to severe criminal penalties. If states are laboratories for democracy, then their results consistently and repeatedly show that DPOC policies are failed experiments. The EAC should not inflict bad policies on a nation of 189.5 million voters.

AFL Would Disenfranchise Eligible Citizens through Burdensome Requirements & Poll Taxes

The burdens of providing DPOC would fall hardest on those whom Congress sought to protect under the NVRA. Students, disabled, and elderly individuals, low-income and working-class Americans, and communities of color are far less likely to have ready access to passports or certified vital records.²⁸ Under AFL’s petition, voters could present a particular government-issued photo identification that proves citizenship. Alternatively, they could present two identification documents, one of which is an approved government-issued photo identification and the other a government-issued or government-approved record that identifies the registrant as a U.S. citizen. This tiered system will only invite confusion and frustration.

U.S. Passports

Approximately 146 million Americans, more than half the adult population, do not have a valid U.S. passport, which AFL identifies as a primary form of proof,²⁹ a number nearly matching the 153 million voters who cast ballots in the 2024 general election. Just one out of four Americans with a high school degree or less education possesses a passport. Furthermore, approximately 20% of working-class households with incomes below \$50,000 have passports. Notably, voters without passports tend to be working class, rural, conservative-leaning, and reside in a “red state.”³⁰ Under AFL’s petition, Americans that already struggle to make ends meet must then climb an administrative mountain to secure a passport for the standard \$165 fees plus the \$65 passport card fees and the \$60 expedited service fee, not to mention the associated costs for passport photos, birth certificates,

²⁵ Aaron Reichlin-Melnick, [Unpacking Myths About Noncitizen Voting – How Heritage Foundation’s Own Data Proves It’s Not a Problem](#), Amer. Imm. Council (Aug. 1, 2024).

²⁶ Walter Olson, [Shedding Light on the Incidence of Illegal Non-citizen Voting](#), Cato Inst. (May 22, 2024).

²⁷ John Hanna, [Kansas once required voters to prove citizenship. That didn’t work out so well](#), Assoc. Press (Dec. 29, 2024).

²⁸ Greta Bedekovis, et al., [The Save Act Would Disenfranchise Millions of Citizens](#), Center of American Progress (last updated Feb. 3, 2025); Jillian Andres Rothschild, et al., [Who Lacks ID in America Today? An Exploration of Voter ID Access, Barriers, and Knowledge](#), Fair Elections Center (June 2024)

²⁹ Greta Bedekovis, et al., [The Save Act Would Disenfranchise Millions of Citizens](#), Center of American Progress (last updated Feb. 3, 2025).

³⁰ Greta Bedekovis, et al., [The Save Act Would Disenfranchise Millions of Citizens](#), Center of American Progress (last updated Feb. 3, 2025).

and photocopies of all required application materials.³¹ Thus folks are paying \$165-\$290 minimum – veritable poll taxes – in order to vote.

Even satisfying the second DPOC method – with a U.S. birth certificate plus a state-issued REAL ID driver’s license/identification card – is burdensome.

Birth Certificates

Most Americans do not possess certified copies of their birth certificates. They can cost \$20-\$40 per order, independent of mailing and expedited service fees.³² Base costs aside, reliance on these documents for voter registration is highly problematic. First, Latino Americans often have multiple surnames, which are not always accurately inscribed on their birth records. They would pay additional costs to correct hospital and government errors. Second, approximately 69 million American women have surnames that differ from the surnames on their birth certificates because of legally changing their names for marriage, divorce, or gender transition.³³ Texas voters could incur additional fees to amend and reorder an amended birth certificate.³⁴ Georgia voters face upwards of \$100 to do the same.³⁵ Third, elderly citizens – sometimes born outside of hospitals because of lack of proximity or access, racial segregation, or finances – lack accurate, or even certifiable birth certificates. This means older, rural, poor, and citizens of color face a major administrative hurdle.³⁶ Finally, Americans born to U.S. citizens abroad may not be able to easily acquire their birth certificates.³⁷

Real IDs

Congress passed the REAL ID Act of 2005 to strengthen domestic security by requiring states to issue licenses with specialized information and decals.³⁸ The law requires applicants to prove citizenship or legal immigration status and strictly limits the supporting documents foreign-born citizens can use. Only U.S. passports are permitted; documents like foreign-issued IDs, or any other foreign-issued documents are unacceptable.³⁹ Nevertheless, AFL’s petition would create a situation where REAL ID cards are satisfactory identification for Americans to fly domestically– but not to secure their right to vote.

Compounding the snub, the petition conveniently ignores that many states delayed implementing the law for up to two decades, leaving millions of citizens still using legacy state-issued driver’s licenses and identification

³¹ [Apply for Your Adult Passport](#), Travel.State.Gov.

³² E.g. [Order a Birth and Death Certificate](#), Georgia.gov; [Costs and Fees](#), DSHS.Texas.gov.

³³ Caleb Smith & Greta Bedekovics, [The SAVE Act Could Keep Millions of Transgender Americans From Voting](#), CTR. FOR AMER. PROGRESS (Feb. 28, 2025); Greta Bedekovics & Sydney Bryant, [The SAVE Act Would Disenfranchise Millions of Citizens](#), CTR. FOR AMER. PROGRESS (Jan. 31, 2025).

³⁴ See [Costs and Fees](#), DSHS.Texas.gov.

³⁵ See [Amending a Birth Certificate](#), Emanuelco-go.gov.

³⁶ Kandis Edwards, [Black Woman Born Pre-Segregation Cannot Obtain Real ID](#), BLACK ENTERPRISE (May 7, 2025).

³⁷ Proano, p. 8.

³⁸ Martin Kaste, [Why the REAL ID law took so long to be enforced — and how it’ll affect travelers](#), NPR (May 5, 2025).

³⁹ Michele Waslin, [The REAL ID Act and the Latino Community](#), NAT’L COUNCIL OF LA RAZA (accessed May 11, 2025).

cards.⁴⁰ Recently, North Carolina implemented a two-year grace period for expired driver's licenses due to significant backlogs at the state's department of motor vehicles, which the legislature may extend to state voting identification laws.⁴¹ AFL's petition makes no accommodations for state-created hurdles.

Congress enacted the NVRA precisely to prevent these kinds of barriers. Any administrative body that attempts to resurrect a policy Congress rejected and the courts condemned would be acting in direct defiance of the law and of Congress's constitutional prerogative to regulate federal elections.

DPOC Requirements Harm the Majority of U.S. Voters

Whether possessing birthright or naturalized citizenship, the AFL's DPOC proposals would burden most American voters.

Women

Women, a pivotal voting demographic, comprise 50.4% of the U.S. population.⁴² But as many as 69 million women do not possess birth certificates matching their married names; 84% of U.S. women change their surname upon marriage.⁴³ AFL's petition does not mention whether a state-issued marriage certificate or name change document are acceptable. Nor does the petition accommodate women who divorce but keep their married names due to cost, legal hassle, or professional continuity. Nor do the proposed DPOC measures account for the millions of Latina women who culturally use two surnames and subsequently changed their names upon marriage; or the inconsistent spelling and recording of their names by officials across government agencies, schools, and healthcare centers.⁴⁴

Communities of Color

Black, Latino, Asian American, Indigenous, and Pacific Island voters would face daunting hurdles if the DPOC mandate were to succeed. People of color are significantly less likely to possess or have ready access to citizenship documents such as passports or certified birth certificates. Roughly 11% of Americans of color lack such documentation, compared to about 8% of White Americans⁴⁵—a disparity rooted in systemic inequities. These disparities are not incidental; they are the legacy of policies and structures that have long denied communities of color equal access to civil participation.

⁴⁰ Kandis Edwards, [Black Woman Born Pre-Segregation Cannot Obtain Real ID](#), BLACK ENTERPRISE (May 7, 2025).

⁴¹ Mark Bergin, [NC drivers get 2-year grace period for license renewals amid backlog](#), WRAL News (July 8, 2025); Ronni Butts, [You can drive with an expired NC license. But can you vote with it?](#), The News & Observer (July 15, 2025).

⁴² Rabeeta Abbas, [15 States with Highest Female to Male Ratio in the U.S.](#), Yahoo Finance (Mar. 29, 2024).

⁴³ Greta Bedekovics & Sydney Bryant, [Fact Sheet: The SAVE Act: Overview and Facts](#), CTR. FOR AMER. PROGRESS (Jan. 31, 2025).

⁴⁴ See generally Message Board, "Spanish/Hispanic/Latino names and life in the USA," Visa Journey, Jan. 20, 2023 (user experiences with having their Latino surnames improperly recorded in U.S. data systems); R. Ruiz-Perez, E. Delgado Lopez-Cozar, & E. Jimenez-Contreras, Spanish personal name variations in national and international biomedical databases: implications for information retrieval and bibliometric studies, 90 J. Med. Lib. Assoc. 411-430 (2002).

⁴⁵ Press Release, Brennan Center for Justice, [21.3 Million American Citizens of Voting Age Don't Have Ready Access to Citizenship Documents](#) (June 11, 2024).

For Black voters, the harm would be particularly acute. Black Americans are more likely to experience economic and logistical barriers that make documents retrieval more inaccessible, expensive, and time consuming.⁴⁶ Many older Black voters born during the early to mid-20th century lack formal birth certificates due to racial discrimination in hospital access and state recordkeeping.⁴⁷ A DPOC requirement would thus function as a twenty-first century literacy test—an obstruction designed to suppress participation by those whose voices have historically been excluded from power.

The same is true for Latino voters, whose growing political power makes them a clear target for exclusionary schemes. Collectively, Latinos are the second fastest growing ethnic demographic of eligible U.S. voters.⁴⁸ Of the 65.2 million Latinos residing in the U.S., 81% can vote.⁴⁹ In a growing number of states, the number of Latino voters exceeded the margin of votes that decided the 2020 presidential election. And by 2029, if trends continue, Latinos will be the majority minority demographic amongst working class voters.⁵⁰ DPOC requirements threaten Latino voters' access to the ballot box. For example, Arizona's DPOC law, which bars "federal-only" voters from participating in state elections, disproportionately affects Latino voters. A 2024 Brennan Center analysis found that 37% of "federal-only voters" in Arizona were Latino, despite making up just 25% of all voters eligible for state elections.⁵¹ AFL's petition would spread this disorder to more heavily populated states like Florida, Georgia, North Carolina, Pennsylvania, and Texas.

Working Class Communities

Sixty-three percent of voting eligible citizens are working class Americans.⁵² These Americans may work in service, healthcare, or retail industries,⁵³ work multiple shifts, have multiple jobs,⁵⁴ and live paycheck-to-

⁴⁶ See Movement Advancement Project, [Identity Documents & Black Communities](#) (Nov. 29, 2022).

⁴⁷ See Kandis Edwards, [Black Woman Born Pre-Segregation Cannot Obtain Real ID](#), BLACK ENTERPRISE (May 7, 2025); Hansi Lo Wang, [1 in 10 eligible U.S. voters say they can't easily show proof of their citizenship](#), NPR (June 11, 2024).

⁴⁸ See Sandra Lilley, [Latinos make up half of growth in new eligible voters](#), NBC NEWS (Jan. 12, 2024); Jens M. Krogstad, Jeffrey S. Passel, Abby Buddiman, & Anusha Natarajan, [Key facts about Hispanic eligible voters in 2024](#), PEW RESEARCH CTR. (Jan. 10, 2024).

⁴⁹ Staff, [Hispanic Heritage Month: 2024](#), U.S. Census Bureau (Last revised Sept. 16, 2024); Staff, [American Elections Are Secure: Dangerous Anti-Immigrant Falsehoods Are Attempts to Suppress Votes by Millions of Latinos and Other Eligible Voters](#), UNIDOS US 1 (Aug. 8, 2024).

⁵⁰ These states are Arizona, Florida, Georgia, Michigan, Nevada, North Carolina, Pennsylvania, Texas, and Wisconsin. Staff, [American Elections Are Secure: Dangerous Anti-Immigrant Falsehoods Are Attempts to Suppress Votes by Millions of Latinos and Other Eligible Voters](#), UNIDOS US 2 (Aug. 8, 2024).

⁵¹ Kevin Morris & Arlyss Herzig, [Arizona's Show-Your-Papers Requirement Hurts Voters](#), BRENNAN CTR. FOR JUSTICE (Feb. 19, 2025).

⁵² Ted Fertik, *Class and Worldview: A Report on the Multiracial Working Class, Working Families Power & HIT Strategies* 5 (Sept. 2024).

⁵³ Fertik, *supra*. note 55 at 11; William A. Galston, [What today's working class wants from political leaders](#), THE BROOKINGS INST. (Nov. 16, 2023).

⁵⁴ Galston, *supra*. note 56.

paycheck.⁵⁵ DPOC policies would imperil these voters. The requirement to present a passport or other restrictive identification record to vote poses a significant financial hurdle. Only one out of four Americans with a high school degree, and only 20% of households with income below \$50,000, has a passport.⁵⁶

Rural Communities

An estimated 60 million voters reside in rural communities.⁵⁷ The demographic is becoming more diverse, with an uptick in Latino residents.⁵⁸ And their votes proved decisive in battleground states for the 2020 election.⁵⁹ DPOC measures would require rural Americans to travel and incur significant financial burdens in order to obtain birth certificates, passports, or other DPOC records prior to casting a ballot.⁶⁰ The burden would hit “low touch” rural communities hardest, where people may be voting for the first time, navigating language barriers, or unfamiliar with bureaucratic hurdles. The measures would “become voter suppression by design, exploiting the absence of civic support to quietly disenfranchise” a pivotal segment of U.S. voters.⁶¹

Reversing Decades of Bipartisan Progress on Real Election Issues

In addition to disenfranchising voters, AFL’s DPOC proposal would impose untenable burdens on election administration, undermining the very infrastructure that Congress has worked decades to build. Requiring states to process, verify, and store citizenship documents for every federal registrant would divert scarce resources away from genuine election security needs and force election officials into the role of policing paperwork rather than facilitating access to the ballot.

This approach directly conflicts with Congress’s longstanding efforts to expand voter registration opportunities. Over the past three decades, Congress and state leaders from both parties have advanced reforms such as online voter registration, automatic voter registration, and same-day registration. Innovations that enhance security, improve accuracy, and expand access for all eligible Americans. AFL’s proposal would undo this bipartisan progress, effectively dismantling modern systems and replacing them with outdated, exclusionary, and error-prone obstacles to the ballot. The result would be not only disenfranchisement but also administrative disarray.

The Current Political Climate

⁵⁵ *Id.*

⁵⁶ Greta Bedekovics, et al., [The Save Act Would Disenfranchise Millions of Citizens](#), Center of American Progress (last updated Feb. 3, 2025).

⁵⁷ Greta Bedekovics & Sydney Bryant, [The SAVE Act Would Force Many Rural Americans to Drive Hours to Register to Vote](#), CTR. FOR AMER. PROGRESS (Feb. 28, 2025).

⁵⁸ Anthony F. Pipa & Zoe Swarzenski, [What everyone should know about rural America ahead of the 204 election](#), THE BROOKINGS INST. (Oct. 31, 2024).

⁵⁹ Dante Scala & Kenneth Johnson, [Modest Changes in Rural Voting Could Have Significant Changes in 2024](#), Carsey Research, Issue Brief 183, (October 23, 2024).

⁶⁰ See generally Greta Bedekovics & Sydney Bryant, [The SAVE Act Would Force Many Rural Americans to Drive Hours to Register to Vote](#), CTR. FOR AMER. PROGRESS (Feb. 28, 2025).

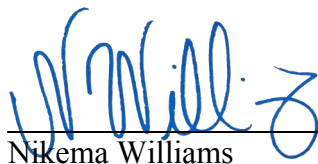
⁶¹ Proano, *supra*. note 6 at 12.

This petition must also be understood in the context of today's political climate. AFL is not a neutral actor; it is a partisan organization founded by senior officials from the Trump administration, including Stephen Miller, who architected some of the most draconian immigration policies of the last decade. The petition is part of a broader campaign, exemplified by Executive Order 14248 and the so-called SAVE Act, to manufacture disinformation about non-citizen voting as a pretext for shrinking the electorate.

Adopting this petition would not only disenfranchise millions of eligible voters but would also weaponize the EAC, an institution dedicated to strengthening election access and integrity, into a partisan tool for voter suppression. Congress cannot allow an administrative petition to reverse its explicit statutory design or erase decades of bipartisan advancement in making voter registration more secure, efficient, and inclusive. The Election Assistance Commission must reject this attempt to substitute political ideology for sound election policy.

Undoubtedly, our election system needs strengthening. To that end we have introduced several reform bills like the John Lewis Voting Rights Act, the Expanding the Vote Act, the election Mail Act, and the People over Long Lines (POLL) Act. These measures would keep elections secure, accessible, efficient, and fair. AFL's DPOC proposal would do the opposite. For these reasons, we strongly urge the EAC to reject this voter suppression petition.

Sincerely,



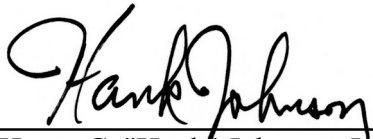
Nikema Williams
Member of Congress



Terri A. Sewell
Member of Congress



Robert C. "Bobby" Scott
Member of Congress



Henry C. "Hank" Johnson, Jr.
Member of Congress



Eleanor Holmes Norton
Member of Congress



Rashida Tlaib
Member of Congress



Jasmine Crockett
Member of Congress



Kevin Mullin
Member of Congress



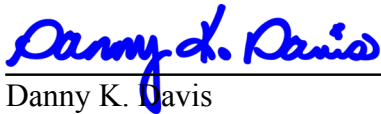
Andre Carson
Member of Congress



Lloyd Doggett
Member of Congress



Delia C. Ramirez
Member of Congress



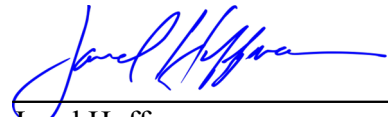
Danny K. Davis
Member of Congress



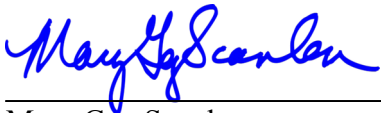
Dan Goldman
Member of Congress



Paul D. Tonko
Member of Congress



Jared Huffman
Member of Congress



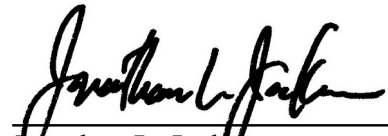
Mary Gay Scanlon
Member of Congress



Shontel M. Brown
Member of Congress



Raja Krishnamoorthi
Member of Congress



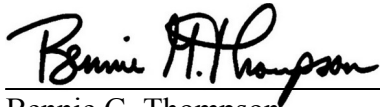
Jonathan L. Jackson
Member of Congress



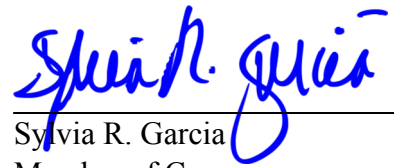
Seth Moulton
Member of Congress



Troy A. Carter, Sr.
Member of Congress



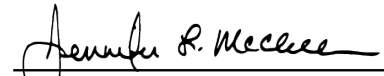
Bennie G. Thompson
Member of Congress



Sylvia R. Garcia
Member of Congress



Frederica S. Wilson
Member of Congress



Jennifer L. McClellan
Member of Congress



Lucy McBath
Member of Congress



Maxine Waters
Member of Congress



Joyce Beatty
Member of Congress



Summer L. Lee
Member of Congress



Dwight Evans
Member of Congress



Julie Johnson
Member of Congress



Julia Brownley
Member of Congress