



October 14, 2025

Representative Kristin Robbins
Chair, Fraud Prevention and State Agency Oversight Policy
Minnesota House of Representatives

Re: Voter Registration Application Fraud Investigation and Convictions;

Chair Robbins, and Members of the Fraud Prevention and State Agency Oversight Policy Committee,

The Minnesota Association of County Officers (MACO) provides the following written comments for the October 14, 2025, Fraud Prevention and State Agency Oversight Policy Committee hearing on the investigation and convictions for fraudulent voter registration applications submitted in 2021 and 2022.

MACO is an association encompassing officials of all 87 counties including members who are county election administrators. County election administrators are tasked with the important responsibility of conducting elections, including voter registration. Election administrators pride themselves in ensuring every election is administered as securely, fairly, effectively, and efficiently as possible in accordance with state and federal law while ensuring their nonpartisan standing in the processes.

As part of election administration daily processes, election staff across the state receive, enter, review, and research (as needed) each Voter Registration Application (VRA) that is submitted. This work relies on the Statewide Voter Registration System (SVRS), a statewide system that manages voters' registrations. County election staff are involved throughout the entire voter registration entry and maintenance process, which includes, as a summary, the following steps:

1. When a VRA is submitted, it is routed to the county of residence for the applicant's residential address.
 - This step ensures the correct county is managing the record.
 - For VRAs missing information critical to the verification process (i.e. name, address, date of birth), the registration is considered deficient.
2. SVRS is searched.
 - If a voter record already exists for the applicant, the process continues to update that voter record.
 - If a voter record cannot be located, a new record is created.
 - This step ensures that only one record exists statewide for each voter.
3. The information provided on the VRA establishing the applicant's identity is verified.
 - This step includes system verification of the person through other governmental databases (i.e. Department of Public Safety and Social Security Administration).
 - In instances where clear matches are not found, county staff manually review the application and conduct necessary research.
 - For VRAs where the personal information cannot be verified, the registration is considered incomplete and the applicant is mailed notice of this status.

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4. Simultaneously, the address provided on the VRA is verified.
 - The address provided on the VRA must be for a house number, including unit number as necessary, and street name that exists in the county's address ranges – a comprehensive listing of possible residential addresses maintained in SVRS.
 - Each county is responsible for ensuring only residential addresses exist in this comprehensive listing.
 - For VRAs where an address does not fit in an existing address range, county staff review and research to verify if the address is a location where an individual can maintain a residence.
5. Postal Verification Cards (PVCs) are generated by SVRS when voter registration activities occur.
 - This includes when new records are created or when a voter registration is updated to a new address.
 - The PVC is mailed non-forwardable with return service requested, addressed to the name of the voter at the voter's address.
 - The US Postal Service (USPS) can only deliver the PVC to the address if it exists in their records and their records indicate the voter receives mail at that address.
 - In instances where this mailing cannot be completed by the USPS, the PVC is returned, and the county completes their review and research process and makes any necessary corrections before attempting a second PVC mailing.
 - In instances where the PVC process cannot verify an address, the voter's record is marked "Challenged" or "Inactive" as required by state and federal law and the voter must provide information to clear the challenge or complete registration steps before being allowed to vote.
6. SVRS voter records are maintained on an ongoing basis.
 - Voter records in SVRS are regularly compared to court and death records, change of address notifications, and voter record update exchanges with other states.
 - Internal SVRS reports are produced regularly to maintain record integrity (i.e. search for duplicate voter records, notifications of voter eligibility changes).
 - Annual list maintenance occurs to ensure voter records that have not had activity or where the voter has not voted in the last four years are marked "Inactive" and new registration activities must occur before that voter would be allowed to vote.
 - All these maintenance activities involve county election staff.

These robust and comprehensive statewide practices provide multiple layers of prevention on a registration-by-registration basis to ensure integrity of voter registration records. In the case before the committee today where fraud was more widespread, Minnesota's county election administrators worked cooperatively with the Office of the Secretary of State and local and federal law enforcement partners to identify questionable registrations and support the subsequent investigation. This outcome demonstrates that the system's checks and verifications worked as designed.

Thank you for the opportunity to provide comment to the Committee. County election administrators also thank the Office of the Secretary of State for its continued partnership in maintaining a robust and secure statewide voter registration system.



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