



LEAGUE OF WOMEN VOTERS OF MAINE

PO Box 863
Augusta, ME 04332-0863
www.lwvme.org

(207) 622-0256
lwvme@gwi.net

July 3, 2017

LWVME Officers

Jill Ward
President
South Portland

Polly Ward
Vice President
South Freeport

Cathie Whittenburg
Secretary
Portland

Ann Luther
Treasurer
Trenton

Directors

Peg Balano
Falmouth

John Brautigam
Falmouth

Helen Hanlon
Winthrop

Barbara Kaufman
South Freeport

Linda Lord
Brooks

Barbara McDade
Bangor

Stephanie Philbrick
Bowdoin

Anne Schink
South Portland

Secretary of State Matt Dunlap
Office of the Secretary of State
148 State House Station
Augusta, Maine 04333-0148

Dear Secretary Dunlap:

This letter is regarding the request for voter registration data that you received from Kansas Secretary of State Kris Kobach on behalf of the Presidential Advisory Commission on Election Integrity, of which you are also a member. We urge you to refuse to comply with this request.

Maine state law may permit, though not require, you to share some of the requested data. As your official statement acknowledges, some of the more sensitive data requested is protected under Maine law.

Here are our concerns with sharing any of the data:

We do not believe the Commission is genuinely seeking to preserve and promote voter participation and election integrity but rather is unjustifiably and inappropriately collecting information about voters in order to suppress voter participation and to promote a false narrative about voter fraud. As outlined in the attached [blog post](#) from [Charles Stewart III](#), a member of the Caltech/MIT Voting Technology Project, a serious attempt to reconcile duplicate voter data would require a significant data analysis project, substantial expenditures, and sophisticated techniques. Nothing we have seen so far from the Commission indicates that such an enterprise is contemplated. Absent a commitment by the Commission to an articulated process of this scope and rigor, we lack confidence in the outcome.

Here in Maine, we know from the responsible efforts of your own office's investigation of duplicate registrations and incidents of double voting, that false positives are numerous and difficult to rationalize. Without this detailed-oriented effort, best conducted by the states and not at the federal level, pronouncements are likely to be misleading, inflammatory, and alarmist. As it stands now, this request represents an inappropriate and ill-conceived federal overreach into state sovereignty.

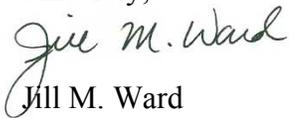
Since we already have evidence regarding the vulnerability to cyber-attacks of state and federal governments, the formation of a massive voter registration database at the federal level is most certainly ill-advised from a security perspective. Part of a sentence in the request: "...any documents that are submitted to the full Commission

will also be made available to the public...” gives specific cause for alarm in this regard. What protocols have been established to protect this data from incursion or hacking? We are concerned that the consolidation of voter registration information would not contribute to election integrity but rather would contribute to the vulnerability of sensitive voter registration and voter history data.

Finally, as you are aware, we have had, and continue to have reservations about your participation on this Commission generally, but we respected your decision and your stated reasons for becoming a member. We are now greatly concerned that acting to comply with this request may place you in a situation wherein the obligations of Commission membership directly conflict with your duty and commitment to protect Maine voters and the people of Maine. We have never doubted your commitment, and are proud of your history of public service. We urge you to act in such manner as to avoid appearing to have a conflict of interests in this regard. Rather, we ask that you leverage your considerable experience toward better identification of the issues and implementation of more effective strategies than this current approach.

As of this writing, sixteen states have stated publicly that they would not, or could not, comply with the request. We believe that Maine should be among them. We hope you will use the power of your office and the discretion granted under Maine law to decline this request.

Sincerely,



Jill M. Ward
President
League of Women Voters of Maine

cc: Attorney General Janet T. Mills