

**IN THE STATE OF MICHIGAN
COURT OF CLAIMS**

PRIORITIES USA and RISE, INC.,

Plaintiffs,

v.

JOCELYN BENSON, in her official capacity as
the Michigan Secretary of State,

Defendant.

Civil Action No. 19-000191-MZ

HON. CHRISTOPHER M. MURRAY

**A CIVIL ACTION BETWEEN OTHER PARTIES ARISING OUT OF THE
TRANSACTION OR OCCURRENCE ALLEGED IN THE VERIFIED AMENDED
COMPLAINT HAS BEEN PREVIOUSLY FILED IN THIS COURT, WHERE IT WAS
GIVEN CASE NUMBER 20-000002-MZ AND WAS ASSIGNED TO CHIEF JUDGE
MURRAY. THE ACTION REMAINS PENDING.**

**VERIFIED AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE
RELIEF**

Plaintiffs PRIORITIES USA and RISE, INC. file this Verified Amended Complaint for Declaratory and Injunctive Relief against Defendant JOCELYN BENSON, in her official capacity as the Michigan Secretary of State, and allege as follows:

NATURE OF THE CASE

1. Michigan voters expressed an unequivocal desire to expand voting access for all citizens when they passed Proposal 3 by a supermajority in 2018. Proposal 3 enshrined in the State Constitution new self-executing voting rights. These rights include, among others, the right to register to vote in the weeks before and on Election Day, so long as a voter does so in-person and provides "proof of residency," and the right to be automatically registered to vote when applying for or updating a driver's license or state identification card with the Secretary of State's Office. See Mich. Const., art. II, § 4. Yet, Michigan has enacted a statute and implemented a policy that

unduly burden and curtail these new constitutional rights—especially for young voters. The new statute does so by imposing onerous restrictions on what can constitute “proof of residency” for individuals registering to vote in the 14 days before and on Election Day that many cannot meet and, even for those who can, requiring individuals who lack a Michigan driver’s license or state identification card with their current address to cast a challenged ballot, which is treated differently than a regular or absent voter ballot, Mich. Comp. Laws § 168.497(2)-(5) (the “Documentation Requirement”). And the new automatic registration policy adopted by the Secretary of State’s Office curtails Michiganders’ new rights by excluding persons who conduct business with the Secretary of State to obtain a license or state identification card prior to turning 17.5 from being automatically registered when they turn 17.5, *see* Mich. Comp. Laws § 168.492. THE OFFICE OF SECRETARY OF STATE JOCELYN BENSON, *Secretary Benson Announces Modernized Voter Registration on National Voter Registration Day*, <https://www.michigan.gov/sos/0,4670,7-127-93094-508246--,00.html> (last visited Jan. 19, 2020) (the “Automatic Registration Policy,” together, with the Documentation Requirement, the “Challenged Provisions”). Instead, these prospective voters must either separately register to vote or further conduct business with the Secretary of State’s Office after turning 17.5, when they will be eligible to vote.

2. These Challenged Provisions restrict the opportunity of Michiganders—especially young Michiganders—to register to vote, treat voters’ ballots differently without a legitimate reason, and unduly burden voters’ new rights under the State Constitution.

3. *First*, the Documentation Requirement permits only those prospective voters who have a limited subset of documents—which many young voters, including out-of-state students at private colleges and universities in Michigan, do not have—to register to vote in the 14 days before and on Election Day. If a prospective voter does not have a Michigan driver’s license or state

identification card with a current address, that voter must produce *both* a prescribed form of identification—for example, a student ID—or an affidavit *and*: (1) a current utility bill; (2) a current bank statement; (3) a current paycheck; (4) a government check; or (5) some undefined “other government document,” all of which must include the prospective voter’s name and current residence. Mich. Comp. Laws § 168.497(2)-(5). Even then, voters who register using documents ~~other than a Michigan driver’s license or state identification card with a current address~~ can only cast a challenged ballot, not a regular or absent voter ballot. *Id.* § 168.497(5). The Documentation Requirement does not apply to those who register to vote 15 days or more before Election Day.

4. The Documentation Requirement will have a disproportionate and negative impact on young Michiganders because they are more likely to be first-time registrants and to register to vote on Election Day or close in time to that day. These voters are less likely to have acceptable proof of residency, as, for example, many young voters do not meet the narrow list prescribed because they either do not have such proof of residency or do not have their current address listed on their driver’s license or state identification card. Nor do they have a utility bill, a paycheck, or a bank statement with their current residence. And out-of-state private college and university students cannot use their student identification cards as an “other government document.” Young voters are also more likely to have documents that do not reflect their current residence because they are less likely to have access to stable housing and more likely to have recently moved, to move frequently, or to seek to maintain two addresses for different purposes.¹ These voters are

¹ Many young college student voters in Michigan maintain two addresses: (1) the address where they attend school for most of the year (but which regularly changes at least once a year, and in many cases more frequently); and (2) their address at their family’s home. Only one address is their residence. *See* Mich. Comp. Laws § 168.11(1) (defining “residence . . . for registration and voting purposes” as “that place at which a person habitually sleeps, keeps his or her personal effects, and has a regular place of lodging,” and “[i]f a person has more than 1 residence, or if a person has a residence separate from that of his or her spouse, that place at which the person resides

also more likely to be confused by what is required for proof of residency, due to their lack of information about the voting process and limited to no experience navigating election processes. Further, they are less likely to have access to reliable transportation to obtain new documents to meet the Documentation Requirement. And, if they do register to vote with documents other than a Michigan driver's license or identification card with their current address, they must cast a "challenged ballot," which is counted "unless determined otherwise by a court of law." *Id.* Unlike a regular or absent voter ballot, the challenged ballot can, under certain circumstances, be retrieved and identified as the ballot of a particular voter based on the voter's number in the poll book. *See id.* §§ 168.727, 168.745, 168.746. The confusion about document requirements, combined with the less certain status of the challenged ballots cast, is likely to have a chilling effect on these voters' attempts at voter registration in the 14 days before and on Election Day. Students are forced to navigate this unnecessarily complex electoral process amid high annual residential turn-over and demanding course schedules. Thus, young voters face unique difficulties in acquiring proof of their residence, which will hamper their ability to register to vote and vote on equal footing with other Michiganders.

5. There are no legitimate, much less compelling, state interests to justify the Documentation Requirement. To the extent that the State claims that the Documentation Requirement guards against voter fraud, there is no evidence of systemic voter fraud in Michigan, let alone evidence of prospective voters proclaiming the wrong residency. There are also already sufficient safeguards in place to verify an individual's residency, including an affirmation that all voter registration applicants must sign, under penalty of perjury, confirming their address. *See* MICH. SEC'Y OF STATE, *State of Michigan Voter Registration Application*,

the greater part of the time shall be his or her official residence for the purposes of this act").

https://www.michigan.gov/documents/MIVoterRegistration_97046_7.pdf (last visited Jan. 19, 2020); *see also* Mich. Comp. Laws § 168.933.

6. *Second*, the Automatic Registration Policy discriminates against Michigan's youngest potential voters by not automatically registering them to vote when they have previously interacted with the Secretary of State's Office regarding a driver's license or state identification card before turning 17.5 years old, upon turning that age. These voters are thus denied their newly created constitutional right to be automatically registered to vote.

7. The Challenged Provisions make it significantly more difficult for eligible young voters to exercise their right to vote in Michigan. The result is the complete exclusion of many young individuals from registering to vote on Election Day or the 14 days prior. Again, many young Michiganders do not have any of the limited documents required to prove their residency. And even those who do are treated differently if they register to vote using a document other than a Michigan driver's license or state identification card containing their current address, as the ballots that they cast are neither secret nor certain to be counted. Moreover, individuals who are under 17.5 years old when they interact with the Secretary of State's Office to get a driver's license or state identification card will be deprived of their right to be automatically registered. Thus, young voters in Michigan will face unequal and consequential barriers in registering to vote and having their vote counted and may even be denied the right to vote entirely for reasons that have nothing to do with their qualification or eligibility to participate in Michigan elections.

8. The Challenged Provisions unduly burden or curtail the new rights granted to voters under Article II, Section 4 of the Michigan Constitution. The Documentation Requirement also violates Article I, Section 2 of the Michigan Constitution by imposing an undue burden on the right to vote and denying equal protection.

9. If the Challenged Provisions are not enjoined, Michigan's young voters, who are among the most vulnerable to restrictive voting laws, will continue to be deterred and prevented from exercising their constitutional right to register to vote and to vote during the 14 days before and on Election Day.

JURISDICTION AND VENUE

10. Plaintiffs bring this action under Article II, Section 4 and Article I, Section 2 of the Michigan Constitution.

11. This Court has jurisdiction over the subject matter of this action pursuant to Michigan Compiled Laws § 600.6419.

12. This Court has personal jurisdiction over the Defendant Secretary of State Jocelyn Benson, who is sued in her official capacity only.

13. Venue is proper in the Court of Claims pursuant to Michigan Compiled Laws § 600.6419, because this is a constitutional claim against the Secretary of State.

14. This Court has the authority to enter a declaratory judgment pursuant to Michigan Court Rule 2.605. It has authority to enter an injunction under the Michigan Constitution. *Sharp v. City of Lansing*, 464 Mich. 792 (2001).

PARTIES

15. Plaintiff PRIORITIES USA ("Priorities") is a 501(c)(4) nonprofit, voter-centric progressive advocacy organization. Priorities' mission is to build a permanent infrastructure to engage Americans by persuading and mobilizing citizens around issues and elections that affect their lives. To further this purpose, Priorities spends resources to register to vote young individuals across the country, including in Michigan. In 2020, Priorities expects to make contributions and expenditures in the millions of dollars to persuade and mobilize voters in state and federal elections around the country, including in Michigan's elections. Michigan is one of four states in which

Priorities has committed to invest \$150 million in voter engagement efforts, and in anticipation of the upcoming Michigan state and federal elections, Priorities has already spent over \$1,000,000 on advertising and voter education. Priorities has also deployed a team to work in Michigan with local organizations on voter engagement for the November 2020 election. The Challenged Provisions directly harm Priorities by frustrating its mission of and efforts to engage young voters in the political process by making it more difficult to register and thus to turn out young voters.

Specifically, the Challenged Provisions will require Priorities to expend additional resources to register voters who would otherwise be registered but for the Automatic Registration Policy and to expend additional resources assisting young persons to overcome the barriers created by the Documentation Requirement. Because of the Challenged Provisions, Priorities will be required to expend and divert additional funds and resources in voter registration and mobilization efforts in Michigan, at the expense of its other efforts in Michigan and in other states.

16. Plaintiff RISE, INC. ("Rise") is a student-led 501(c)(4) nonprofit organization that runs statewide advocacy and voter mobilization programs in Michigan and California, as well as on a number of campuses nationwide. Rise's mission is to fight for free public higher education and to increase voting access for college students. To further its goal of expanding students' access to the franchise in Michigan, Rise operates volunteer networks across the State at 13 university and community college campuses. In anticipation of the 2020 primary and general elections, Rise's student organizers and volunteers plan to engage in grassroots voter registration, education, and turnout activities, including on-campus get-out-the-vote drives and canvasses. The Challenged Provisions directly harm Rise by making it more difficult for students who have joined the Rise movement to register to vote and turn out to vote. Some of Rise's community members, many of whom are first-generation and low-income students, do not have access to permanent housing or

private transportation and thus do not have the requisite proof of residency documents. And some of the community members who do have proof of residency, but who register with a document other than a Michigan driver's license or state identification card with their current address, will be treated differently than other similarly situated voters by being required to cast a challenged ballot. Many of Rise's students who hold Michigan driver's licenses are between the ages of 18 and 21 and have no occasion to interact with the Secretary of State's Office until their licenses expire on their 21st birthdays, such that they have not been automatically registered to vote. The Challenged Provisions frustrate Rise's mission and force the organization to divert resources, as well as shift the focus of its day-to-day activities. Specifically, Rise and its student organizers are diverting resources and day-to-day attention from their free college advocacy programs in Michigan and elsewhere to implement effective voter education and mobilization efforts that accurately inform students of the Documentation Requirement and Automatic Registration Policy.

17. Defendant JOCELYN BENSON is the Secretary of State of Michigan and is sued in her official capacity. Secretary Benson is Michigan's chief elections officer and, as such, has "supervisory control over local election officials in the performance of their duties." Mich. Comp. Laws § 168.21. In that role, she is specifically responsible for "[a]dvis[ing] and direct[ing] local election officials as to the proper methods of conducting elections." *Id.* § 168.31(1)(b). Secretary Benson is also tasked with overseeing voter registration, *e.g.*, *id.* §§ 168.496, 168.509o, including the automatic registration of voters who conduct business with her office to obtain a driver's license or state identification card. *Id.* § 168.493a. She, personally and through the conduct of her employees, officers, agents, and servants, acted under color of State law at all times relevant to this action.

STATEMENT OF FACTS AND LAW

A. Amendments to the Michigan Constitution, Which Resulted From the Passage of Proposal 3, Greatly Expanded Access to Voting.

18. “Michigan ha[d] one of the most restrictive voting regimes in the country,” going into the 2018 election. *Mich. State A. Philip Randolph Inst. v. Johnson*, 326 F. Supp. 3d 532, 543 (E.D. Mich 2018). For example, Michiganders not only had to register 30 days before Election Day, but also had to be residents of the State for 30 days or more before they were eligible to register at all. Mich. Comp. Laws §§ 168.492, 168.497, 168.500d (2018).

19. To modernize this voting regime, a coalition of groups promoted Proposal 3’s placement on the 2018 general election ballot. Proposal 3 proposed sweeping changes to Michigan’s election laws to expand voting rights, including, but not limited to: (1) automatically registering citizens to vote unless they decline to register; (2) allowing citizens to register to vote at any time as long as they provide proof of residency and register in-person; (3) providing no-excuse absentee voting; (4) allowing straight ticket voting; (5) ensuring that military service members and overseas voters received their ballots in time to vote; and (6) allowing for election audits. *See* Yes on Prop 3, Promote the Vote, <https://promotethevotemi.com/faqs/> (last visited Jan. 19, 2020).

20. An overwhelming majority—almost 67 percent—of Michigan voters recognized the need to expand voting rights and voted for Proposal 3. As a result of Proposal 3’s passage, the Michigan Constitution now reflects greatly expanded voting rights, including the right to register to vote up to and on Election Day, as well as the right of automatic registration. *See* Mich. Const. Art. II, § 4(1)(d), (f). Under the amended Michigan Constitution, individuals may register to vote within the 14-day period before or on Election by appearing before the registrar in-person and presenting “proof of residency.” *Id.* at (1)(f).

21. These new constitutional provisions are “self-executing,” *id.* § 4(1), which means that Michigan law prohibits curtailing or imposing undue burdens on the rights they convey. *See Wolverine Golf Club v. Hare*, 384 Mich. 461, 466 (1971); *Soutar v. St. Clair Cty. Election Comm’n*, 334 Mich. 258, 265 (1952).

22. And the Michigan Constitution makes clear that these provisions “shall be liberally construed in favor of voters’ rights in order to effectuate [their] purposes.” Mich. Const., art. II, § 4(1).

B. The Lame Duck Michigan Legislature Rushed Through Legislation That Restricts Proposal 3’s Expansion of Access to the Franchise.

23. Shortly after Proposal 3 passed, the Michigan Legislature significantly diluted these newly-adopted constitutional guarantees. Indeed, the legislative changes “completely defeat[ed] the purpose of Proposal 3,” in the words of one of the drafters of Proposal 3. Riley Beggin, *Michigan Lame Duck: Ballot Rules May Tighten, Campaign Finance Stays with SOS*, BRIDGE (Dec. 20, 2018), <https://www.bridgemi.com/michigan-government/michigan-lame-duck-ballot-rules-may-tighten-campaign-finance-stays-sos>.

24. The Michigan Legislature also severely restricted what types of documents can meet the “proof of residency” requirement to allow an individual to register to vote within 14 days of or on Election Day. First, a prospective voter can register with a Michigan driver’s license or an official Michigan state identification card, if it contains that individual’s current residence. *Id.* at § 168.497(2). Both documents are considered an “identification for election purposes.” *Id.* at § 168.2(k).

25. Second, a prospective voter can also register with “any other form of identification for election purposes” and “an additional document proving residency.” Other forms of “identification for election purposes” include: student photo identification cards issued by

Michigan high schools, colleges, or universities; an out-of-state driver's license or photo identification; a federal passport or photo identification card; a military photo identification card; or a tribal photo identification card. *Id.* § 168.2. And an "additional document proving residency" must include the prospective voter's name and current residence and be either: (1) a current utility bill; (2) a current bank statement; (3) a current paycheck; (4) a government check; or (5) some "other government document." *Id.* at § 168.497(3). Third, a prospective voter may also register with a signed affidavit and "an additional document proving residency." *Id.* § 168.497(3).

26. The ballot of a voter registering without a Michigan driver's license or an official Michigan state identification card that contains that individual's current residence (i.e. a voter registering with either "any other form of identification for election purposes" or an affidavit and an alternative document proving residency) is deemed a challenged ballot. *Id.* § 168.497(5). A challenged ballot is subject to different treatment than a regular or absent voter ballot under Michigan law. Specifically, a challenged ballot is not a "secret ballot," Mich. Const., art. II, § 4(1)(a), because it is flagged for further scrutiny in the event of a contested election. Mich. Comp. Laws §§ 168.727, 168.745-748.

C. The Restrictive Proof of Residency Requirement Will Unduly Burden Young Voters' Right to Register to Vote During the 14 Days Before and On Election Day, and Also Burdens the Right to Vote.

27. If the Documentation Requirement is not enjoined, citizens who are lawfully qualified to vote during the 14 days before or on Election Day under the Michigan Constitution will have that right severely burdened or, in some cases, denied entirely because they do not possess the limited paperwork that the Michigan Legislature has deemed adequate to prove their residency. And even for some voters who do have sufficient proof of residency, if they register with a driver's license or state identification card that does not contain their current address, they

will be treated differently because their ballot will be a challenged one.

28. Many Michiganders who are otherwise qualified to vote either will not have these legislatively-mandated indicia of residency or will lack the means to provide them. Indeed, for those voters who lack a driver's license or state identification card containing their current address, compliance with the Documentation Requirement essentially depends on stable housing, income, or obtaining utility services. It is also contingent on one's ability to successfully complete complicated transactions, make complex arrangements, pay licensing fees, keep easily accessible and orderly personal records, make multiple trips to government offices, or coordinate with third parties in order to obtain new identification that meets the Documentation Requirement in time for Election Day.

29. Some of the documents accepted as proof of residency—such as a driver's licenses and state identification cards—will be insufficient if they do not contain a registrant's current address. *See Mich. Comp. Laws § 168.497(2)*

30. The Documentation Requirement does not make sense given that some of the documents that it does allow as "proof of residency"—such as utility bills—will sometimes list an address that does not reflect an individual's residence.

31. The Documentation Requirement will particularly restrict voter registration by young prospective voters in Michigan. Not only are these voters more likely to be first-time registrants and to register on or shortly before Election Day, but they are less likely to possess the documentation required to register to vote 14 days before or on Election Day.

32. The Michigan Collegiate Student Advisory Task Force (the "Task Force"), a nonpartisan advisory group that the Secretary of State commissioned and is made up of college students from across the State, issued a report (the "Report," attached as Exhibit A) on December

17, 2019, which recognized that the Documentation Requirement “may pose a barrier to young people broadly and college students specifically.” Report at 5.

33. Young voters are less likely to have a driver’s license. Indeed, unlike other age groups, the percentage of 20- to 24-year-olds possessing driver’s licenses has steadily decreased over the last 35 years, while the percentage for other age groups has remained significantly higher.

34. ~~And those young voters who have a driver’s license or other identification~~ document in their name are less likely to have it state their current address, because young people are also more likely to have recently moved, to move frequently, and to seek to maintain two addresses for different purposes. The Task Force explained that, “[w]hile at school, students often change addresses frequently, and may encounter difficulty obtaining address verification documents.” *Id.*

35. Young Michiganders are also less likely to have a paycheck or a utility bill in their name—especially those who live in a dormitory, with a roommate, or with their family. For example, the Task Force recognized that “students who live ‘off-campus’ in a residence where they aren’t listed on the lease and don’t have bills in their name” will often face difficulty in registering to vote in the 14 days before and on Election Day. *Id.*

36. Students attending private universities and colleges are also less likely to have access to an “other government document” to partially satisfy the Documentation Requirement, because any document, including a student identification card from their college or university, would not satisfy current requirements.

37. Young voters are also less likely to be able to acquire new documents that will satisfy the Documentation Requirement. For example, they are less likely to have access to reliable

transportation, information about the voting process, and experience navigating election processes. Thus, young voters face unique difficulties in acquiring proof of their residency.

38. The Documentation Requirement will also likely leave many potential young voters confused about what paperwork they need to bring with them to the local clerk's office to register to vote. These voters may not know or understand the new requirements, may think that some ~~paperwork is adequate, when it is not, may be too afraid to try, or, worse, may not even attempt to~~ register during the 14 days before and on Election Day because they do not possess acceptable documentation. For example, the Task Force found that "[t]here may be confusion surrounding which address (school or home) should be used when registering, and what documents are acceptable to provide address verification." *Id.* Thus, some young Michigan voters will not register at all during this time period because they will be confused about what they need to show to do so. See Eric Plutzer, *Becoming a Habitual Voter: Inertia, Resources, and Growth in Young Adulthood*, 96 AM. POL. SCI. REV. 41, 41-56 (2002) (noting that voter turnout rates increase with age due, in part, to barriers to entry that reduce once voting becomes a habit and gains "inertia").

39. The Documentation Requirement's mandate that all voters who register using documents other than a Michigan driver's license or identification card with their current address vote by challenged ballot is also likely to chill voter participation.

40. The Documentation Requirement was ostensibly put in place to protect against voter fraud—even though, as the Michigan Director of Elections has acknowledged, "Michigan does not have a culture of fraudulent elections."

41. Nor will the State's adoption of Election Day registration lead to a voter fraud problem. Lucas Maiman, *Critics Argue Proposal 3 Would Increase Likelihood of Voter Fraud—Studies Suggest Otherwise*, METRO TIMES (Oct. 30, 2018), <https://www.metrotimes.com/news->

hits/archives/2018/10/30/critics-argue-proposal-3-would-increase-likelihood-of-voter-fraud-studies-suggest-otherwise (“[s]tates with same-day voter registration . . . reported seeing an uptick in voters but no voter fraud.”).

42. Any potential concerns about voter fraud in the registration process stemming from a lack of residency in the place where an individual is registering to vote on Election Day or in the 14 days prior are already effectively addressed by other Michigan laws. For example, all individuals must sign an affirmation on their voter registration application, under penalty of perjury, that the “address where you live” listed on the application “is true.” See Mich. Sec’y of State, State of Michigan Voter Registration Application, https://www.michigan.gov/documents/MIVoterRegistration_97046_7.pdf; see also Mich. Comp. Laws § 168.933. This affirmation, signed under penalty of perjury, is deemed sufficient to prove residency when registering to vote 15 days or more *before* the election. Moreover, voters who register to vote within 14 days before and on Election Day also register to vote *in-person*, which serves as another check against potential residency fraud. See Mich. Const., art. II, § 4(1)(f).

D. The Failure to Automatically Register Voters Who Previously Interacted With the Secretary of State’s Office Before Reaching the Age of Eligibility Burdens Young Voters’ Right of Automatic Voter Registration.

43. As part of Proposal 3, the Michigan Constitution now guarantees every Michigan citizen the right to be automatically registered to vote when interacting with the Secretary of State’s Office regarding a driver’s license or state identification card. Mich. Const., art. II, § 4(1)(d).

44. But Secretary Benson has adopted an Automatic Registration Policy that restricts this right. In implementing automatic registration, “Secretary of State branch office staff [must] ensure that when Michigan citizens apply for or update their driver’s license or personal ID cards, they automatically are registered to vote *unless they are ineligible* or don’t want to be registered.”

Secretary Benson Announces Modernized Voter Registration on National Voter Registration Day, *supra* ¶ 1 (emphasis added). The State's policy is to automatically register only those individuals who meet all of Michigan's registration eligibility requirements at the time when they apply for or update their driver's license or state identification card. Michigan law allows individuals to register only if they are "a citizen of the United States; not less than 17- ½ years of age; a resident of this state; and a resident of the township or city [in which they seek to register]." Mich. Comp. Laws § 168.492. Upon information and belief, the State has adopted an Automatic Registration Policy to only automatically register individuals who interact with the Secretary of State's Office regarding driver's licenses and state identification cards *after* reaching the age of 17.5 years old.

45. The Automatic Registration Policy excludes many young Michiganders from their right to be automatically registered to vote when they turn 17.5 if they previously interacted with the Secretary of State's Office regarding a driver's license or state identification card.

46. The Automatic Registration Policy will impact the many individuals who interact with the Secretary of State's Office prior to turning 17.5. For example, those as young as 14 years and 9 months can obtain a learner's license, and individuals can obtain a full license at 17. Michigan's Graduated License System. In addition, 17-year-old Michiganders eligible for a full license do not need to return to a Secretary of State Office to obtain a full license or otherwise apply; rather, the license is mailed to them. MICHIGAN LEGAL HELP, *Getting a Standard Michigan Driver's License if You Are a Teenager*, <https://michiganlegalhelp.org/self-help-tools/crime-traffic-and-id/getting-standard-michigan-drivers-license-if-you-are-teenager> (last visited Jan. 19, 2020). Further, there is no minimum age to obtain a state identification. Accordingly, there are many registrants who will have conducted business with the Secretary of State when they were younger than 17.5.

47. Pursuant to this exclusionary policy, young Michiganders who interacted with the Secretary of State's Office before they turned 17.5 and are recently eligible to vote are denied their constitutional right to automatic voter registration.

48. The Task Force recognized the barriers to automatic registration that young voters face. It thus recommended that "[s]ixteen and seventeen-year-olds who obtain their driver's license at the Secretary of State [] be pre-registered to vote" when they are eligible to register to vote. Report at 13.

49. Given that the Secretary of State's Office maintains accurate records of the individuals with whom it interacts, even if those individuals were ineligible to vote at the time of the interaction, there is no reason why it cannot automatically register such individuals to vote when they become eligible due to age. For example, the Secretary of State's Office already has the relevant registration information for eligible voters, which it obtains during the voters' earlier interactions with the Secretary of State's Office. See THE OFFICE OF SEC'Y OF STATE JOCELYN BENSON, Documentation Requirements at the SOS Office, https://www.michigan.gov/sos/0,4670,7-127-1627_60169_60175_84273-269655--,00.html (last visited Jan. 19, 2020); *Getting a Standard Michigan Driver's License if You Are a Teenager*, *supra* ¶ 46. Moreover, the Secretary of State's Office maintains drivers' current addresses. See Mich. Comp. Laws § 257.315 (describing that a driver "who changes his or her residence before the expiration of a license granted under this chapter shall immediately notify the secretary of state of his or her new residence address").² Indeed, the Secretary of State's Office already automatically registers some Michiganders who are under 18 to vote. It is simply that the Secretary of State's

² In fact, "[a] person who fails to report a change of his or her residence address is responsible for a civil infraction" and "the secretary of state may immediately suspend or revoke his or her license" if the driver fails to respond to a mailed notice. *Id.*

Office has adopted this policy only for those who are 17.5 years old or older at the time of their interaction with the Secretary of State's Office.

CLAIMS FOR RELIEF

COUNT I

Michigan Const., Art. II, § 4
Undue Burden on the Right to Register to Vote During the 14 Days Before
and on Election Day
(Challenging the Documentation Requirement)

50. Plaintiffs reallege and incorporate by reference all prior and proceeding paragraphs, as though fully set forth herein.

51. Article II, Section 4(1)(f)(2) of the Michigan Constitution—which is a self-executing provision, *id.* § 4(1)—guarantees “[t]he right to register to vote for an election by. . . beginning on the fourteenth (14th) day before that election and continuing through the day of that election, appearing in person, submitting a completed voter registration application and providing proof of residency to an election official responsible for maintaining custody of the registration file where the person resides, or their deputies.” Upon registering “in accordance with subsection (1)(f),” individuals “shall be immediately eligible to receive a regular or absent voter ballot.” Mich. Const., art. II, § 4(1)(f)(2).

52. Because Article II, Section 4(1)(f)(2) is a self-executing provision, “[o]bligations other than those so imposed may not be added.” *See Soutar*, 334 Mich. at 265; *see also Wolverine Golf Club*, 384 Mich. at 466 (explaining that the legislature may not enact laws that undermine self-executing provisions: “the right guaranteed shall not be curtailed or any undue burdens placed thereon”) (citation omitted).

53. The Documentation Requirement adds multiple such obligations that curtail or unduly burden Michigan’s constitutional rights. First, the Documentation Requirement narrowly

defines “proof of residency,” which “shall be liberally construed in favor of voters’ right in order to effectuate its purposes,” Mich. Const., art. II, § 4(1)(h), by setting forth a limited set of documents that are acceptable. Second, the Documentation Requirement forces voters who register without a Michigan driver’s license or state identification that contains their current address to vote by challenged ballot, which is neither “a regular or absent voter ballot” nor a “secret ballot.” Mich. Const., art. II, §§ 4(1)(a) & 4(1)(f). In doing so, the Documentation Requirement unduly burdens voters’ right to register to vote within the 14 days before and on Election Day and to vote by regular or absent voter ballot.

54. Unless the Documentation Requirement is enjoined, many prospective voters—especially young voters—will be deterred or excluded from exercising their constitutional right to timely voter registration and voter participation. The result will be severe and irreparable harm to Plaintiffs.

COUNT II

Michigan Const., Art. I, § 2 Undue Burden on the Fundamental Right to Vote (Challenging the Documentation Requirement)

55. Plaintiffs reallege and incorporate by reference all prior and proceeding paragraphs, as though fully set forth herein.

56. The right to vote is a “fundamental political right . . . preservative of all rights,” *Reynolds v. Sims*, 377 U.S. 533, 562 (1964) (quoting *Yick Wo v. Hopkins*, 118 U.S. 356, 370 (1886)), that is protected by the Michigan Constitution. *In re Request for Advisory Op. Regarding Constitutionality of 2005 PA 71*, 479 Mich. 1, 35-36 (2007).

57. A court considering a challenge to a State election law must carefully balance the character and magnitude of injury to the rights that the plaintiff seeks to vindicate against the

justifications put forward by the State for the burdens imposed by the rule. *See id.* (adopting the *Anderson-Burdick* standard). “However slight th[e] burden may appear, . . . it must be justified by relevant and legitimate state interests sufficiently weighty to justify the limitation.” *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181, 191 (2008) (Stevens, J., controlling op.) (internal quotation marks omitted).

58. Here, the Documentation Requirement burdens the right to vote by making it more difficult, and, in some cases, impossible, for some voters to register to vote 14 days before and on Election Day. *See League of Women Voters of Fla., Inc. v. Detzner*, 314 F. Supp. 3d 1205, 1216 (N.D. Fla. 2018) (holding directive that “categorically prohibited” college students “from on-campus early voting,” a right granted to them under Florida law, violated the right to vote).

59. The State does not have even a legitimate, much less a compelling, interest in the Documentation Requirement, especially since voters must affirm their residence under penalty of perjury on the voter registration form. *See Fish v. Kobach*, 309 F. Supp. 3d 1048 (D. Kan. 2018) (holding a state’s proof of citizenship requirement in registering to vote violated the right to vote, when voters already affirmed that they are citizens on the voter registration application); *Sloane v. Smith*, 351 F. Supp. 1299 (M.D. Pa. 1972) (holding proof of residency requirement violated the right to vote of college student voters, when they already had affirmed their residency under penalty of perjury on the voter registration application).

60. Absent relief, Plaintiffs will continue to be subject to an undue burden on the right to vote and will be irreparably harmed.

COUNT III

Michigan Const., Art. I, § 2 Denial of Equal Protection (Challenging the Documentation Requirement)

61. Plaintiffs reallege and incorporate by reference all prior and proceeding paragraphs, as though fully set forth herein.

62. The right to vote is a “fundamental political right . . . preservative of all rights,” *Reynolds*, 377 U.S. at 562 (quoting *Yick Wo*, 118 U.S. at 370), that is protected by the Michigan Constitution. *In re Request for Advisory Op. Regarding Constitutionality of 2005 PA 71*, 479 Mich. at 35-36.

63. Article I, § of the Michigan Constitution provides that “[n]o person shall be denied the equal protection of the laws.”

64. Having adopted a system by which voting by regular or absent voter ballot is available to voters who register in the 14 days before and on Election Day, Michigan may not “by later arbitrary and disparate treatment, value one person’s vote over that of another.” *Obama For Am. v. Husted*, 888 F. Supp. 2d 897, 910 (S.D. Ohio 2012), *aff’d*, 697 F.3d 423 (6th Cir. 2012); *Bush v. Gore*, 531 U.S. 98, 104–05 (2000) (holding Equal Protection Clause applies to “the manner of [the] exercise [of voting]” and “once granted the right to vote on equal terms, the State may not, by later arbitrary and disparate treatment, value one person’s vote over that of another”).

65. All Michigan voters who register to vote in the 14 days before and on Election Day are similarly situated and should have equal access to voting, which the Michigan Constitution provides. Yet, the Documentation Requirement treats some voters differently from others. It requires voters who have proof of residency that does not consist of a Michigan driver’s license or state identification card with their current address to cast a challenged ballot.

66. The State does not have even a legitimate, much less a compelling, interest in the

Documentation Requirement's disparate treatment of similarly situated voters. *See Obama for America*, 888 F. Supp. 3d 897, 910 (holding a state had no compelling interest in setting an in-person early voting deadline, which valued the rights of military voters over nonmilitary voters).

67. Absent relief, Michigan voters will be denied an equal opportunity to participate in Michigan's elections.

COUNT IV

**Michigan Const., Art. II, § 4
Undue Burden on the Right to Automatic Registration
(Challenging the Automatic Registration Policy)**

68. Plaintiffs reallege and incorporate by reference all prior and proceeding paragraphs, as though fully set forth herein.

69. Article II, Section 4 of the Michigan Constitution, which is a self-executing provision, *id.* § 4(1), guarantees each Michigander "[t]he right to be automatically registered to vote as a result of conducting business with the secretary of state regarding a driver's license or personal identification card, unless the person declines such registration."

70. Secretary Benson has adopted an Automatic Registration Policy that unduly burdens and curtails voters' Article II, Section 4 rights by automatically registering to vote only voters who are 17.5 or older when they conduct business with her office, excluding voters who were eligible to register to vote but conducted business with the Secretary of State's Office when they were under 17.5 years old.

71. Unless and until Secretary Benson adopts an Automatic Registration Policy that is inclusive of all prospective voters, including those who conduct business with her office before age 17.5, Plaintiffs will suffer irreparable harm.

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment:

- (a) declaring that the Challenged Provisions violate Article II, Section 4 of the Michigan Constitution;
- (b) declaring that the Documentation Requirement unduly burdens the right to vote and denies the equal protection of the laws, in violation of Article I, Section 2 of the Michigan Constitution;
- (c) ~~declaring that the Michigan Constitution Article I, Section 2 and Article II, Section 4 requires the State to accept an affidavit signed under penalty of perjury as proof of residency and to otherwise accept a broader range of documents as proof of residency;~~
- (d) preliminarily and permanently enjoining the Defendant, her respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them, from implementing, enforcing, or giving any effect to the Challenged Provisions;
- (e) granting Plaintiffs their fees and costs under Michigan Court Rules Sections 2.625 and 2.626; and
- (f) granting such other and further relief as the Court deems just and proper.

Dated this 21st day of January, 2020.

Respectfully submitted,

/s/ Sarah S. Prescott

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VERIFICATION

DISTRICT OF COLUMBIA

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I declare that the foregoing statements set forth in this Verified Amended Complaint are true to the best of my knowledge, information, and belief.



Patrick McHugh
Executive Director
Priorities USA

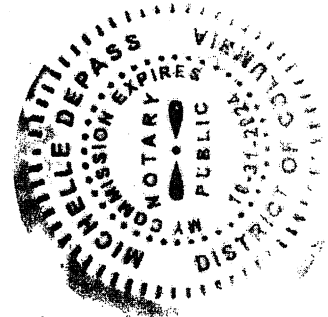
1/21/20
Date

Subscribed and sworn to before me this 21st day of January, 2020.



Notary Public

My commission expires 10/31/2024



VERIFICATION

I declare that the foregoing statements set forth in this Verified Amended Complaint are true to the best of my knowledge, information, and belief.



Maxwell Lubin
CEO
Rise, Inc.

1/21/2020
Date

CALIFORNIA

§

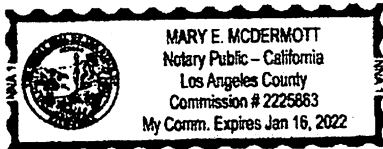
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COUNTY OF LOS ANGELES

§

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

Subscribed and sworn to (or affirmed) before me on this 21st day of January, 2020, by
Maxwell Lubin, proved to me on the basis of satisfactory evidence to be the person(s) who
appeared before me.



Mary E. McDermott
Signature

EXHIBIT A

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STATE OF MICHIGAN
JOCELYN BENSON, SECRETARY OF STATE
DEPARTMENT OF STATE
LANSING

Michigan Collegiate Student Advisory Task Force Report and Recommendations

*Delivered to Secretary of State Jocelyn Benson
December 17, 2019*

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Membership

Adam Abusalah of Dearborn – Central Michigan University
Stuart Baum of West Bloomfield – Wayne State University
Ian Berlin of Huntington Woods – Oakland University
Michaela Bishop of Davisburg – Oakland Community College
Tuhin Chakraborty of Troy – University of Michigan
Peter Damerow of Fowlerville – Lansing Community College

Demitria Dawson of Detroit – Henry Ford College
Jeron Dotson of Grand Blanc – University of Michigan-Flint
Brogan Eisler of DeWitt – Lansing Community College
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Eric-John Szczepaniak of Alpine Township – Grand Valley State University
William Thayer of Allendale – Grand Valley State University
Jessica Thompson of Davison Township – Macomb Community College
Kyle Vickery of Kalamazoo – Michigan State University

The recommendations included in this report are signed by all members listed above and delivered to Secretary of State Jocelyn Benson on December 17, 2019.

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I. Executive Summary

In this report, we, the Collegiate Student Advisory Task Force members, catalog numerous barriers impacting youth and student voters at state, local, university and individual levels. For each barrier, we recommend solutions. Suggested best practices and recommendations are included at the end of the report.

In our deliberations, the task force identified educational barriers as one of the most important to overcome. Everyone interested in engaging young people in our democracy should consider their potential role in educating students about both the mechanics of voting *and* the importance of their vote and voice in every election. Key areas for improvement in youth voter education include informing students about their rights, registration and voting options, and where to find additional resources.

While peer-to-peer education is the most effective method of voter education and motivation, young people need substantial support from election administrators, educators and educational institutions to disseminate accurate and consistent information on voting and its importance. Furthermore, these influential stakeholders are encouraged to take additional steps to provide voting access on campuses, like offering conveniently located satellite clerk offices and polling locations.

Beyond the essential, overarching importance of youth voter education, the most critical recommendations of the task force, in rank order, are listed as follows:

1. ***On-campus resources:*** Reaching students where they are, through the establishment of on-campus resources and voting access, is paramount to increasing student and youth voter turnout. On-campus resources may include satellite clerk offices, on-campus polling locations, and increased use of mobile Secretary of State branch offices.
2. ***Online absentee voter ballot application:*** Currently in Michigan, there is no online interface allowing voters to request an absentee voter ballot electronically. The convenience and flexibility of an online application with electronic submission directly to the voter's local clerk would facilitate a greater number of young voters applying to vote by mail.
3. ***Plain language ballot summaries:*** Confusing ballot language and election jargon can cause intimidation, misinformation and confusion for young voters. Easily understood ballot summary language and definitions will ensure student and young voters fully comprehend the issues on the ballot.
4. ***Innovations for easier return of absentee voter ballots:*** Pre-paid return postage and on-campus ballot drop-box locations would alleviate barriers students face in paying for and locating stamps or arranging for transportation leading up to and on Election Day.
5. ***Requiring permanent absentee voter list provision:*** Clerks' offices should be required to keep and maintain a permanent absentee voter application list allowing students to receive an absentee voter ballot application sent to them prior to each election, increasing the ease and convenience of voting.

II. Introduction

In September 2019, Michigan Secretary of State Jocelyn Benson formed a first-of-its-kind nonpartisan Collegiate Student Advisory Task Force to improve youth voter engagement. Through a selection process involving local election administrators and Department of State staff, we were chosen to serve as liaisons between our campuses and the Department of State. Historically, students in Michigan faced significant barriers to voting and participated in elections at lower rates than other age groups. The task force was established to combat this historic participation gap.

Members of the task force include 32 students from 23 colleges, community colleges and universities throughout Michigan with hometowns across the state. We each come to the work of voter engagement from different backgrounds, campuses, personal experiences and political beliefs. We advise the Department of State on the unique challenges encountered by our peers, voters age 18-24, and have prepared recommendations that encompass administrative, programmatic and legislative changes or initiatives to encourage young people to vote.

Task force members met three times in person and several times via conference call between September and November 2019, with our final recommendations submitted to Secretary Benson in December 2019. In 2020, we will continue to work with the Secretary of State's Office as student engagement liaisons on our respective campuses. In this capacity, we will serve as educators, organizers and trusted sources of information for our peers, and the Secretary of State's Office will continue to contact us with updated voting information and tools.

Enclosed you will find our recommendations and solutions to the barriers identified in our discussions and our experiences on campuses and in communities throughout the state.

III. Barriers and Solutions

A. VOTER REGISTRATION

With the adoption of Proposal 18-3 just over a year ago, Michigan voters now have the right to register to vote up to and including Election Day. As of November 2019, Michigan voters can also now register to vote online.

To register in the 14 days immediately before and on Election Day, Michigan voters must provide address verification documents, like a driver's license or utility bill with their name and current address on it, to verify their residency. This address verification requirement in the 0-14 day window may pose a barrier to young people broadly and college students specifically. Students may have multiple addresses including a temporary school address and a permanent home address. There may be confusion surrounding which address (school or home) should be used when registering, and what documents are acceptable to provide address verification. While at school, students often change addresses frequently, and may encounter difficulty obtaining address verification documents. Further issues may stem from students who live "off-campus" in a residence where they aren't listed on the lease and don't have bills in their name. This type of living arrangement is common among students and can create barriers.

Recommended Solutions

- **State Administrative and Legislative Efforts**

Student accommodations for address verification documents: The task force recommends that the 0-14 day window residency requirement allow maximum flexibility and

accommodation of young voters. Online sign-in portals at colleges and universities often contain profile pages where a student's school address is listed. An electronic version of such a profile, or any other official university document displaying a student's address (presented on a smart device like a phone or tablet) should serve as an acceptable form of documentation for address verification. We recommend the Department of State and Michigan Bureau of Elections set standards and guidelines for acceptable paper and electronic documentation for students specifically and communicate those standards to both clerks and schools alike, and that clerks should be trained on acceptable forms of electronic documentation for students.

Student-specific clerk training: The task force recommends that the Department of State provide local clerks with training and standards on which documents are acceptable for college students to provide for address verification and identification. Clerks and universities alike should make the list of acceptable forms of identification easily available for students (i.e. on school websites, posted in locations around campus). The Department of State should provide support to individual clerks and higher education institutions around the state to troubleshoot campus-specific address verification solutions.

Mobile Secretary of State branch: The Secretary of State's Office should deploy mobile branch offices to college and university campuses. These mobile branches offer the full range of services available at a standard office. Students can register to vote and change their address, among other Secretary of State driver and vehicle services. In addition to the deployment of the mobile branch office, the Secretary of State should send Bureau of Elections staff in support of the unit to distribute absentee voter applications and voter outreach guidance. The office should also increase the number of mobile offices and their frequency of use.

Out-of-state online voter registration: Many students in Michigan possess out-of-state licenses. Currently, these students are not able to register to vote online. The Bureau of Elections should consider solutions that would allow individuals with non-Michigan licenses to register online. For example, perhaps those who do not hold a Michigan license could upload separate address verification and signature documentation to their online voter registration submission.

Clerk office additional hours: The task force recommends that legislation and funding be allocated to allow clerk's offices to increase office hours in the weekday evenings and on weekends, in advance of each Election Day. Increasing the hours for clerk offices will allow students seeking to register to vote greater access to resources, specifically during the 0-14 day window, which requires in-person registration.

- **University Efforts**

Encourage early (online) registration: In November 2018, the Michigan Legislature passed a law allowing online voter registration¹ and the Department of State launched an online voter registration portal in November 2019. Colleges and universities across Michigan should be heavily promoting the use of online voter registration months before Election Day. Students who register to vote prior to the 0-14 day window before elections will not be required to provide additional residency verification documentation.

Provide voter registration applications: While colleges and universities should predominantly refer students to online voter registration, physical forms should also be supplied for students without Michigan photo ID. Ideally, schools should incorporate voter registration into orientation, as this is one of the proven methods to increase voter registration and participation on campuses².

Provide residency verification documents: As mentioned in the state administrative efforts section above, colleges and universities should provide residency documentation for registration and voting purposes to both on-campus and off-campus students. Many universities and colleges already facilitate online portals specific to each student user. Schools should ensure that online student profiles list student school or home addresses so students may use this information as address verification. A print-off of a university document displaying a student's address may also be provided to students for this purpose. Universities should provide links to these printable documents on their websites.

Provide photo identification: Temporary student photo identification, which lists a student's address, may be issued by schools as a form of address verification for voter registration during the 0-14 day window prior to an election. Additionally, while photo identification is not required at the polls on Election Day in order to vote, without a photo ID to show at the polls, students must sign an affidavit swearing they are not in possession of a photo ID. Providing temporary IDs for use as photo identification may avoid potential confusion surrounding the signing of an affidavit, address verification and proof of identity when voting or registering in-person on Election Day.

CASE STUDY

UNIVERSITY OF IOWA

An example of the use of temporary photo identification comes from The University of Iowa in Iowa City, Iowa. During the 2018 mid-term elections, the university issued temporary student photo identification to students for the sole purpose of voting³.



B. ABSENTEE VOTING

Absentee voting in Michigan dramatically changed with the passage of Proposal 18-3. Now, Michigan is a no-reason absentee voting state, which means voters may request an absentee voter (AV) ballot without justification. Consequently, Michigan's "must vote in person" requirement – which posed a barrier for students who wanted vote absentee in their first election – is no longer enforceable.

Because students often encounter difficulties getting to polling locations on Election Day, many voting barriers students face could be resolved through absentee voter ballots. However, there are still barriers to obtaining and submitting an AV ballot, including the cost of return postage. Students need access to information on absentee voting procedure, deadlines and easy AV ballot return options.

Recommended Solutions

- **State Administrative and Legislative Efforts**

Online absentee voter ballot application: Voters should be able to request an AV ballot online. Currently, those wishing to receive an absentee ballot must submit the request in writing to their local clerk's office, in person or via mail, fax, or e-mail. Creating an online request submission for an absentee ballot would increase access for students.

Online redirect to absentee voting: Once an online AV ballot request form is created, the online voter registration page should automatically re-direct to the ballot request form. If an online ballot request form is not created, the online voter registration page should redirect to the Department of State webpage on [Absentee Voting](#), which allows visitors to download a copy of the absent voter ballot application. This automatic redirect could increase the use of

absentee ballot voting, creating a more convenient voting experience for students and young people.

Permanent absentee voter list: All clerks should be required to maintain a permanent absentee ballot application list. Requiring all clerks to keep and maintain a permanent absentee ballot application list would increase the ease with which all voters, including students, are able to vote. Many states already require the keeping of a permanent absentee ballot list, including Kansas, Connecticut and Tennessee⁴.

Pre-paid postage: The cost and inconvenience of return postage for AV ballots can create significant barriers to students and young people more broadly. We recommend appropriating funding to provide prepaid postage on AV ballot return envelopes to mitigate this barrier.

Absentee voter education materials: AV ballots should include plain language instructions on how to fill out an AV ballot and return it correctly.

Absentee voter ballot counting deadline extension: The task force recommends that all AV ballots received are counted, so long as (a) the ballot is received within 14 days of an election and (b) the ballot is postmarked on or before Election Day. Allowing clerks to count late-arriving AV ballots will help students ensure their votes are counted even if not received by 8 p.m. on Election Day.

Early tabulation of absentee voter ballots: It is likely that the state of Michigan will have a higher rate of absentee voting in the 2020 Election, based on recent changes in absentee voter requirements that reduced barriers to absentee voting, as well as the recommendation of the task force for increased student absentee voting. To ease the burden on clerk's offices processing a higher volume of AV ballots, we recommend that clerks and/or election committees be permitted to start tabulating AV ballots prior to Election Day.

Notice of absentee voter ballot receipt: Currently, absentee voters in Michigan may visit [Michigan.gov/vote](https://michigan.gov/vote) to check the status of their absentee ballot. The state should go one step further and incorporate an automated feature to notify absentee voters, via text or email, about their AV ballot status. Many student voters are concerned that their AV ballots may not be counted. By providing notice of receipt, students and young people may be more encouraged, and feel more secure, about voting absentee.

Absentee voter ballot and application modification: We recommend the following updates and changes to AV ballots and AV ballot application forms.

- ***Additional address line for AV ballot application:*** All AV ballot applications should include a third "address" line to accommodate school mailing addresses. A third line allows for the insertion of an institution mail center address for students with on-campus addresses.
- ***Include multiple elections on AV ballot application:*** To increase the ease with which students may request absentee voter ballots, AV ballot applications should include multiple elections in a given calendar year. Applicants may fill in a bubble to request AV ballots for each corresponding election date.
- ***Permanent list for AV ballot application:*** The check box to join the permanent absentee ballot application list is currently buried on the right side of Section 3 of the Michigan Absent Voter Ballot Application. The form should be amended to feature the request more prominently at the top of the application.

- **Clerk's Office Efforts**

Absentee voting ballot drop boxes: The cost of postage, locating stamps and arranging transportation can create barriers for students who must mail in their AV ballots. To combat these issues, schools and local clerks should designate secure absentee ballot drop boxes in central location(s) on campuses. Drop box locations and deadlines should be publicized by universities and colleges. Recognizing the logistical concerns of placing drop boxes on campuses – such as security concerns, ultimate cost of postage, timing – drop boxes could also be placed at on-campus satellite clerk offices.

Forwarding of absent voter ballots: All AV ballots inadvertently mailed to the incorrect clerk office should be forwarded to the correct clerk office. If additional funding is required for this purpose, we recommend the Legislature appropriate funds for AV ballot forwarding.

- **University Efforts**

Promote absent voter ballots: Because no-reason absentee voting is a new right in Michigan, universities and colleges should heavily promote AV ballots. Whether students vote in their campus community or vote using their home address, an AV ballot allows students to vote with significantly less travel and time constraints. Students who have difficulties arranging transport to polling locations on Election Day may find absentee voting more convenient. Additionally, increased use of absentee voting may reduce lines at polling locations on Election Day.

C. VOTING LOGISTICS AND TRANSPORTATION

Students on college campuses may encounter barriers accessing transportation to clerk offices or polling locations. Convenience of registration and voting is often an issue for students. While the solutions to barriers listed in previous sections (absentee voting, online voter registration, etc.) will likely alleviate some of these barriers, many students will remain inconvenienced or in need of transportation on or before Election Day. Students should have convenient access to polling locations and clerk offices, and a schedule that accommodates voting.

Recommended Solutions

- **State Administrative Efforts**

Poll worker recruiting: The task force recommends the Secretary of State's Office, in partnership with local clerks, take action to improve poll worker recruitment, specifically recruitment targeted at college and university students for polling locations on college campuses. Direct advertisements catered to specific campuses should be created and circulated.

Public bus transport: Local transit services (with encouragement from the Secretary of State's Office and MDOT) should provide free public transportation to students to and from polling locations and clerk offices on Election Day.

Vote center study: Vote centers, already utilized in states like Colorado⁵, are polling places that allow voters to cast a ballot on Election Day, regardless of their residential address and assigned precinct. Recognizing the uniquely decentralized nature of Michigan's election system, we recommend authorizing a study to examine the feasibility of allowing municipalities/counties to establish vote centers.

LGBTQ+ voter ID: The Michigan Bureau of Elections should provide training for clerks and poll workers on how to handle situations where photo identification does not correspond to a

voter's gender identity. Clerks and poll workers should be trained on how to handle this situation with consideration and resolve correctly.

- **Clerk's Office Efforts**

Satellite clerk's office: For many campuses, campus satellite clerk offices should be prioritized in the days leading up to Election Day (specifically the 0-14 day window). Universities should work to support the local election official in this effort. Placing a satellite office on campus would reduce transportation concerns for students on Election Day, or the days immediately prior, when students will need register to vote in-person at clerk offices.

On-campus polling locations: For many campuses, local clerks should work with universities to create on-campus polling locations. This would create convenient access to voting for students on Election Day. This recommended approach would eliminate transport concerns for many student voters, and ease confusion about polling locations for first-time voters.

On-campus polls may also be open to neighboring non-student residents as well as students. In that case, on-campus parking lots should be reserved for non-campus voters like neighboring residents and off-campus students. Student volunteers may be utilized to assist in directing traffic.

Satellite clerk office or polling place student workers: An anticipated issue with satellite offices or on-campus polling location(s) may be the increased strain on clerks to provide sufficient staff. A suggested approach to alleviate this burden is to allow student workers, interns, fellows or volunteers to receive training from clerks to assist in the running of satellite offices. This would increase processing power at satellite offices while creating on-campus student experts in voting procedure.

- **University Efforts**

University transport: Many universities have bus lines that provide transportation to-and-from campus for off-campus or near-campus students. Adding a stop to these routes at local clerk offices and polling locations on Election Day would provide students easier access to voting and registration services. Students should be made aware of added stops to campus bus-routes, and the route changes should be highly publicized by the university. This service should be free.

Ride share transport: Ride-share companies like Lyft⁶ and Uber⁷ have offered free or discounted transport to polling locations on Election Day. Universities and colleges should advertise these services to students. Furthermore, colleges and universities should coordinate with local taxi-services to offer similarly discounted transportation to students.

Campus scheduling: Exams and large assignments scheduled during the week of an election may be a voting deterrent for students. Discouraging these scheduling conflicts will ensure that students have ample time to visit the polls and/or register to vote. If possible, the academic calendar should be modified to not hold classes on Election Day, or faculty should be instructed to make attendance optional.

For an example of a successful campus resolution supporting the establishment of this policy, see Appendix Exhibit C.

D. VOTER EDUCATION AND COMPREHENSION

In our deliberations, time and again we identified voter education as the most important issue and overarching barrier to address for students and young people across Michigan. We recommend a significant amount of time and resources focus on campus voter education, as well as education

efforts at the high school level. Misinformation, lack of information and confusion surrounding voting procedure is a huge barrier for young voters. Many students in the 2020 election will be first-time voters, and simply demystifying the voting process could increase voter turnout among this population segment. Additionally, recent changes in voting rights from Proposal 18-3 make it crucial that even students who were previously familiar with voting laws are informed about their rights.

Recommended Solutions

• State Administrative Efforts

Provide consistent messaging: We strongly recommend that the Department of State and Bureau of Elections take a proactive role in disseminating standardized language and materials about voting rights. ~~Messaging should be student-centric and distributed to universities and colleges and clerks, allowing higher education institutions across the state to provide students with verified and standardized information. This messaging can be circulated for display in clerk offices, universities and colleges, and additional public locations (e.g. libraries, community centers, town halls).~~

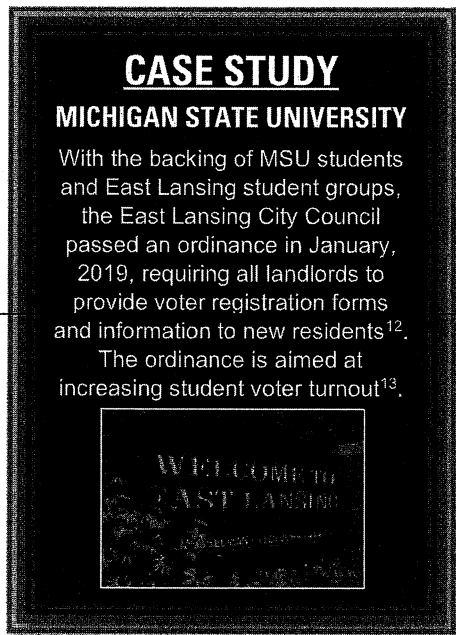
Online webpage: The Department of State should create a website specific to youth voting. This would be an effective way to circulate standardized information and clarify common misconceptions about voting as a student or first-time voter more broadly. Information may include frequently asked questions on registration (i.e. voter registration addresses and car insurance, school scholarships/aid, or health insurance), the voting process, absentee voting and other pertinent topics for students.

Text information service: The Department of State, in coordination with universities and colleges, should set up a text reminder and information service for student voters. This texting service may send text messages to students who subscribe, reminding them of approaching important dates, such as the 15-day deadline for voter registration without additional residency verification, the last day to submit AV ballot applications, and reminders up to and on Election Day to visit the polls. This service would also include a “text for further information” feature on voting procedures, like how to obtain an absentee voter ballot. Subscription methods for this service should include email sign-up and text-for-a-text options. Universities and colleges should promote this texting service on campus, online and in the community.

Returning citizen outreach: Returning citizens are members of youth and student populations and are eligible to fully participate in the democratic process. This population is negatively impacted by misinformation and confusion about their voting rights. The Secretary of State’s Office should coordinate with correctional facilities to ensure that returning citizens are equipped with proper identification, voter registration and absentee voting information upon release. The office should also promote public awareness surrounding the ability of returning citizens to check registration status, register and vote.

Language accessibility: Currently, in Michigan, ballots and Election Day materials are only provided in three languages, designated as protected languages by the Federal Government: English, Spanish and Bengali⁸. The population of Michigan is very diverse and many Michiganders do not speak or read English as a primary language. For example, Michigan is home to the second largest Arabic speaking population in the United States⁹, yet ballots are not currently made available to voters in Arabic. Available languages should be expanded, and non-English ballots and education materials should be provided upon request, regardless of geographic location. We recommend that the Legislature and Department of State work together to allocate sufficient resources and capacity to facilitate this service.

• Local Level Administrative and Legislative Efforts



Landlord obligations: College students living off-campus and young people more broadly are often renters. Municipalities should require landlords to distribute voter registration forms and voter information materials to tenants. Several municipalities across Michigan, including East Lansing¹⁰, currently require landlords to provide voter registration applications and information to all tenants¹¹.

Ballot summaries: Summary language should be included on the ballot to explain questions. Ballot questions can often be confusing and verbose. Information may also be missing, misleading or ambiguous, leaving student voters unsure and intimidated by the voting process. A standardized, plain language summary of ballot questions should be included in each ballot. Clear language on ballots would provide students with a clearer understanding of issues they are expected to decide. While some ballot language is determined by local level election officials, suggested plain language and definitions may be provided by the Secretary of State's Office.

• University Efforts

University "Get out the Vote" campaigns: The task force highly recommends that universities and colleges create robust efforts and "get out the vote" style promotional campaigns to engage and educate students on the voting process, with links to educational resources. University leadership should be heavily involved in these efforts. The Michigan Collegiate Voting Challenge presents an ideal opportunity for universities to both help educate students and participate in a friendly competition.

Online resources: Universities should create a resource page devoted to educating students on the voting process. It should be featured on the school website or within a student portal and provide information on how to register, how to obtain and return an absentee voter ballot, the locations of clerk offices and polling locations, the times and dates that Secretary of State mobile offices will be on campus, and the locations of drop boxes. Universities should take advantage of Michigan.gov/Vote and other state resources to ensure correct and consistent information. For examples of college and university webpages featuring online resources for students, see Appendix Exhibit D.

Outreach to uniquely impacted student populations: Certain segments of the student population and young people more broadly are uniquely impacted by current identification, registration and voting laws or misconceptions. These groups, including LGBTQ+ persons, returning citizens, persons with disabilities and out-of-state students, may experience additional barriers not encountered by the general population. Universities and colleges should reach out to these student populations, on an individual and student organization level, and offer additional support and resources.

• Student Efforts

Civic engagement student groups: Peer-to-peer education is critical to the success of increasing voter turnout on campuses. Students and student organizations should engage in the creation of and promotion of voting and registration efforts. It is essential for coordination and cooperation to take place between students and their university or college leadership to launch successful civic engagement campaigns to increase student voter turnout. The task force highly recommends the formation of a non-partisan student organization on each campus, if one does not already exist, responsible for encouraging fellow students to engage in the civic process and coordinating with the administration. This student group should work with other student organizations and with faculty and administrators to educate and empower students to vote. Educational events and planning sessions should be hosted and promoted on campus.

For more ideas on student events and on peer-to-peer education efforts, see section IV: Recommended Best Practices.

E. STATEWIDE LAWS

Certain barriers faced by students are currently created by laws and policies in place across the state. The changing of these laws statewide will increase students' and young voters' ability to engage in the democratic process.

Recommended Solutions

• State Administrative and Legislative Efforts

CASE STUDY

The Impact of Preregistration

Researchers at Duke University studying the impact of preregistration on youth turnout rates found that preregistration laws may increase voter turnout by as much as 13%¹⁸.

Preregistration: Sixteen and seventeen-year-olds who obtain their driver's license at the Secretary of State should be pre-registered to vote. Their voter registration would then take effect when they turn eighteen. Several states currently allow preregistration for voters, including California,¹⁵ Florida¹⁶ and Louisiana¹⁷. Preregistration would eliminate some of the barriers previously discussed for students and young people, like same-day voter registration residency verification.

17-year-old primary voting: Legislation should be passed to allow 17-year-olds to vote in primary elections provided they will be 18 years of age by the general election. This is an additional step Michigan could take to engage young voters and encourage them to think that their vote matters.

Election Day state holiday: The task force recommends legislation designating Election Day as a state holiday. Election Day is a public holiday in several states, including West Virginia,¹⁹ New Jersey²⁰, and Delaware²¹. This action would give students, young people and all

CASE STUDY

RUTGERS UNIVERSITY



An example of effective use of student peer-to-peer education is from Rutgers University during the 2018 Midterm Election. Efforts at Rutgers, located in New Brunswick, New Jersey, featured a student-led coalition created to coordinate the organization of campus events, including a campus-wide civic engagement summit, a civic action plan, and several voter registration and get-out-the-vote efforts. Events included pre-Election Day absentee voter parties and "parties at the polls" on Election Day. These efforts contributed to a 12% increase in student-voter turnout at Rutgers, when compared to the 2014 Midterm Election¹⁵.

Michiganers more opportunity to visit the polls on Election Day, increasing student and overall voter turnout.

IV. Recommended Best Practices

Beyond eliminating voting barriers for students and young people, there are various steps that stakeholders can take to increase engagement in voting and democracy. This section details proposed best practices for universities, administrators, non-profit organizations, and students themselves, for spreading the word and helping to engage students.

A. COLLEGE AND UNIVERSITY BEST PRACTICES

Following task force recommendations, colleges and universities should create a campus-specific, student-centric promotional and educational campaign to promote civic engagement and increase student voter turnout. Below are further actions universities and colleges can take to educate and engage students through policies, outreach and promotions.

• Policy and Programming

Registration during orientation: Colleges and universities should integrate voter registration into new and transfer student orientation, as well as every semester “sign up” or “check in” facilitated by the university.

Syllabi: Class syllabus should include standard information on voter registration, including voting and poll worker recruitment information. See Appendix Exhibit B for example syllabus language.

Voting Challenge: Colleges and universities should participate in national and state level voting challenges such as the Michigan Collegiate Voting Challenge²⁴ which includes the national ALL IN Challenge²⁵. Framing voting as exciting, important and your chance to make your voice heard – and beat your rival in a competition - will energize and motivate students to engage in our democracy. Additionally, schools will receive recognition for their work in voter registration and turnout on their campus. Administrators and students can learn more at Michigan.gov/VotingChallenge.

Participation in the Michigan Collegiate Voting Challenge entails authorization of The National Study on Learning, Voting, and Engagement (NSLVE)²⁶ to collect data on voter engagement on campus. Campus voter and registration data will be shared with the campuses post-election and can be used to gauge the effectiveness of on-campus civic engagement efforts. There is no cost to universities or colleges to participate in NSLVE.

• Promotional Campaigns

Get Out the Vote media campaigns: Universities and colleges should engage student organizations to create multimedia campaign pieces, including videos, podcasts and social media posts. Universities and colleges should particularly focus outreach efforts on creative

CASE STUDY

NORTHWESTERN UNIVERSITY



Northwestern University, located in Evanston, Illinois, integrated voter registration into student orientation and onboarding. This process was implemented in 2011 by ²² an initiative aimed at raising student voter awareness, launched by students and faculty at the University's Center for Civic Engagement. Going into orientation, the student class of 2021 had a 39% voter registration rate. After orientation, the same student class had a voter registration rate of over 96%²³.

messaging and “meeting students where they are.” Suggested actions include engagement in social media platforms (Instagram, Twitter, TikTok, Snapchat, Facebook), and advertising at student social/athletic events. Student collaboration would be especially beneficial in generating creative messaging.

For example, videos of the university president or high-profile faculty and staff (professors, athletic coaches, deans), and alumni could be created to encourage participation and raise awareness. See Appendix Exhibit A for examples of student-created multimedia for campus voting campaigns.

Feature diversity: Universities, in coordination with students/student organizations, should make a concerted effort to feature a diverse array of students in promotional voting campaigns and materials to ensure outreach to different segments of the student population. Displays of student diversity should reflect the make-up of the student body, including demographic makeup, academic programs, and political beliefs.

• University and College Outreach

Specific outreach: While universities and colleges should devote resources to educating the entire student body, certain student population segments may require additional attention and resources. While these population segments may vary by campus, several populations and outreach suggestions are listed below:

- **First-time voters** should be given additional resources such as basic voter “How-To” guides. Suggested resources could also include student-made video walk-throughs on voting and registration procedure (e.g. “How to request an absentee ballot” and “How to register to vote”).
- **Out-of-state students** who hold a permanent address in another state, but attend school in Michigan, should be provided with additional information from universities and colleges regarding voter registration beyond online voter registration, including paper forms.
- **Returning citizens** are members of student populations and should be given additional resources from colleges and universities. Resources should specifically target common misconceptions surrounding registration and voting for those recently released from correctional facilities. Additionally, colleges and universities should provide outreach and information on voting rights and resources to students awaiting trial who have not yet been sentenced.
- **LGBTQ+ students**, specifically transgender student populations, may face difficulties or hesitations to vote because of photo ID requirements. Universities and colleges should provide additional resources to LGBTQ+ student populations advising on what may be used as identification at the polls. Information should also be distributed on recently revised policy in Michigan²⁷ for changing the sex-indicator on identification, as well as who to contact if they encounter issues at the polls (e.g. elections@michigan.gov).
- **Students with disabilities** should receive personalized outreach from universities and colleges regarding their rights as voters, ability to vote absentee, accessible registration facilities, as well as who to contact if they encounter issues (e.g. elections@michigan.gov).

B. STUDENT AND STUDENT ORGANIZATION BEST PRACTICES

Students should coordinate with universities or colleges to create campus-specific, peer-to-peer educational campaigns to increase campus voter turnout. Below are further actions students can take to educate and engage their peers.

- **Student Organization and University Coordination**

Campus events: Campus student civic engagement groups and/or other student organizations should host on-campus events to promote voter awareness. Suggested events include educational workshops, registration drives and voting “parties.” Student organizations sponsoring events could walk attendees through online voter registration, the voting process, provide information on what documentation is required to register and vote, which address to use when registering, and how to apply for an absentee ballot.

Working group: Students should coordinate with faculty and staff to promote student civic engagement and participation in democracy, in either formal or informal working groups. Such efforts could include bringing a satellite office or polling place to campus, participation in the planning of a campaign, creation of social media content, distributing materials to local businesses for display, and volunteering to run polls, clerk’s offices and mobile Secretary of State branches on campus.

- **Student State-Wide Coalition**

A coalition of students from institutions across Michigan should be formed to effectively lobby statewide or university and college leadership to make policy or programmatic changes. This coalition could also share best practices for increasing voter registration and voter turnout among students.

- **Volunteering on Election Day**

Students should contact their local clerk’s office to inquire about becoming a poll worker on Election Day. Student volunteer opportunities include running or participating in a voter registration drive, volunteering to work at a satellite clerk’s office on campus, and volunteering to work at the mobile Secretary of State’s Office on campus.

V. Conclusion

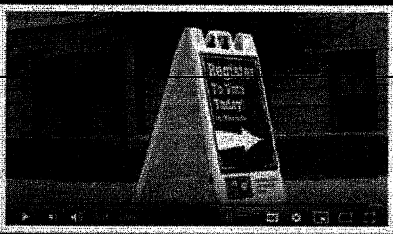
In conclusion, there are many opportunities for improvement of student and youth voting in Michigan. Interested stakeholders and partners should consider their role in alleviating barriers and implementing best practices for youth and student voting in Michigan and take action. We, members of the Collegiate Student Advisory Task Force, are committed to doing our part to advance these policies and programs both at our home campuses and across the state.

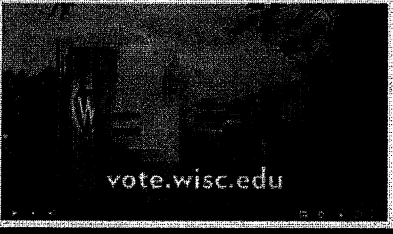
While all recommendations contained in this document are important, two areas of improvement are particularly noteworthy for election administrators, educators, and students alike. First, the imperative need for effective and relevant voter education. If young people and students do not know their rights and do not believe that their vote matters, any other reform, innovation, or program will be rendered meaningless. Second, every higher education institution and every clerk who serves a college or university should consider how to increase voting and voter registration through on-campus efforts, including on-campus polling locations, satellite clerk offices, and mobile Secretary of State branch offices for voter registration.

VI. Appendix

Exhibit A: Examples of student created multimedia in collaboration with university voting campaigns^{28,29,30,31}


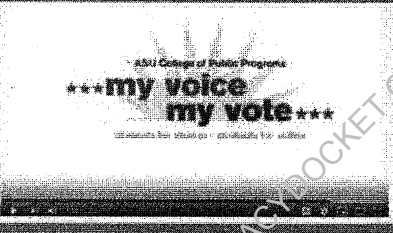
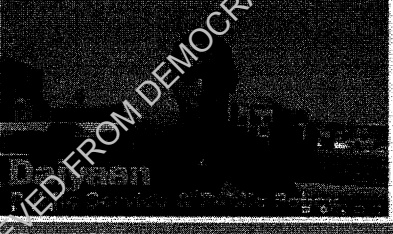
Students on the Street | Are you Voting?
University of Wisconsin – Madison







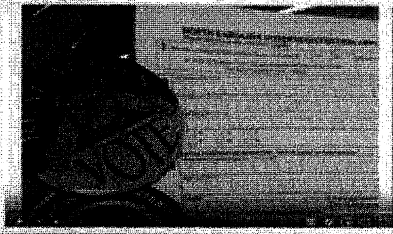
<https://www.youtube.com/watch?v=MrVn4Gtf0g4>

ASU students explain why they vote
Arizona State University
LINK




<https://www.youtube.com/watch?v=K9GAmR6in>

National Voter Registration at NC A&T SU
North Carolina A&T State University

<https://www.youtube.com/watch?v=p-005zHLQY0>

MSU VS. UMich Midterm Voting Challenge - Michigan State University

<https://www.youtube.com/watch?v=p-D05zHLQY0>

Exhibit B: Example of class syllabus language on voter registration and voting procedure information

Voting in Michigan

Register: Did you know you can register to vote and check your voter registration status at www.Michigan.gov/Vote?

Vote: In Michigan, you can vote absentee – or vote from home – in any election. You can request your absentee ballot at Michigan.gov/Vote (select “Absentee Voting” on the navigation page).

Make a Difference: Sign up to work the polls on election day by contacting your local city clerk office (find your clerk at <https://mvlc.sos.state.mi.us/Clerk>).

For more information on registration and voting procedure, visit your campus resource page at [insert university voting information website] or www.Michigan.gov/Vote

RETRIEVED FROM DEMOCRACYDOCKET.COM

Exhibit C: Campus resolution encouraging the allowance of excused absences for students who are voting and the suspension of exams, presentations and major in-class projects on election day

A Resolution to Support a Statement Encouraging Excused Absences for Students who are Voting and the Suspension of Exams, Presentations and Major In-Class Projects on Election Day

Drafted by: Campus Vote Project Coalition (see back of resolution for list of members) and REVCMU

Sponsored by: SGA President, SGA Vice-President, African Student Association, Makeup Geeks, Christ Central Choir, CMU Mindfulness Club, Club Pompon, Art History Club, Wesley@cmu, Alpha Sigma Tau Sorority, Civil Discourse Society, Phi Alpha Delta Pre-Law, CMU Student Affiliation of School Psychologists (SASP), Rotaract, Statistics Club, Humane Animal Treatment Society (HATS), Zeta Theta Pi Service Sorority, Student Advocates for the Medical and Responsible Use of Cannabis, Student Advocates for Prison Reform and the Incarcerated, College Republicans, Refugee Outreach Collective, Student Environmental Alliance, Take Back the Tap, The Organization of Women Leaders, United Nations Association at CMU, Voices for Planned Parenthood, Museum Studies Club, On The Box, A Cappella, American Institute of Professional Geologists Student Chapter, Eta Sigma Gamma Health Education Honorary

Background: Central Michigan University encourages students to be active citizens, but many have classes on election day that have attendance policies, exams, presentations or other major in-class assignments that deter them from voting due to time constraints.

WHEREAS, students can be registered to vote in their hometown rather than in Mt. Pleasant because the State of Michigan only allows one principal address,¹

WHEREAS, the Secretary of State's website states, "a person who registers to vote by mail must vote in person in the first election in which he or she participates"²

WHEREAS, many Central Michigan University students may have never voted before and will have their first opportunity to vote as citizens of legal voting age during their time at Central Michigan University,

WHEREAS, students may not be able to travel to the location where they are registered to vote on Election Day; and some students may have class schedules on Election Day that make it difficult to find time to vote,

WHEREAS, long lines at the polls can require a longer period of time for voting,³

WHEREAS, nationwide students have stated that classes on Election Day can prevent them from voting,⁴

WHEREAS, Central Michigan University's Mission Statement includes, "fostering personal and intellectual growth to prepare students for productive careers, meaningful lives, and responsible citizenship in a global society,"⁵

WHEREAS, students should be encouraged at Central Michigan University to exercise their right of citizenship without being penalized academically,

THEREFORE, BE IT RESOLVED; that the Campus Vote Project Coalition supports the establishment of a statement that encourages the suspension of student exams, presentations and major in-class projects

¹ http://www.michigan.gov/sos/0,1607,7-127-1633_8716_8726_47669-175879--,00.html

² http://www.mi.gov/sos/0,4670,7-127-1633_8716_8728-21037--,00.html

³ <http://www.npr.org/sections/itsallpolitics/2013/02/12/171513524/fixing-long-lines-at-the-polls-may-be-harder-than-you-think>

⁴ <http://www.cbsnews.com/news/su-students-classes-limit-voting-on-election-day/>

⁵ https://www.cmich.edu/about/Pages/university_goals.aspx

Exhibit C continued


on Election Day (limited to the Michigan Primary and the National Election Day, held the first Tuesday after the first Monday in November) and excused absences for students who miss class to vote.

Campus Vote Project Coalition Members:

| | |
|----------------------|--|
| Kathleen Gardner | Director of Residence Life |
| Cherie Strachan | Assistant Dean CHSBS |
| Dan Gaken | Director of Leadership Institute |
| Phanua Camarena | Director of Honors Program |
| Candice Sobczak | Student- FR |
| Alysa Lucas | Communication and Dramatic Arts Faculty |
| Udana Khmyshyn | Director of Diversity Education |
| Sham Holtgreave | Executive Director of Student Affairs |
| Jake Henricks | SGA President |
| Lyndi Rose | SGA Vice President |
| Theresa Turner | League of Women Voters |
| Lara Raisanan | League of Women Voters |
| Jennifer Drexon | Assistant Director of Volunteer Center |
| Anna Whitman | Student- FR |
| Ian Callison | Grad Assistant, REV CMU Advisor |
| Anna Dean | Democracy Fellow |
| Winni Walsh | Democracy Fellow |
| Norma Bailey | CVP Coalition Co-chair, Professor Emeritus |
| Jodi Brookins-Fisher | CVP Coalition Co-chair, Professor, HSC |

Exhibit D: Examples of college and university online voting and registration resource webpages^{32,33,34,35}

Northwestern University: NUVotes





NUVotes

Northwestern's comprehensive 50-state voter-registration hub

VOTING IS A CORNERSTONE
of civic engagement.

That's why NU Votes exists to help students get registered, get educated, and get to the polls. We're cultivating a commitment to active citizenship, one student at a time.

 Register in Person
(recommended)

 Use Online Tools

✓ check your registration status

✓ register or update your registration

✓ request an absentee ballot

Find out if you are registered.

Can't remember if or where you are registered to vote? Start here.

CHECK STATUS

Register or update your registration.

Use this form to update your registration or to register to vote for the first time.

REGISTER NOW


Request an absentee ballot.

You will not be able to vote in person at your designated polling place, you may want to request an absentee ballot.

REQUEST BALLOT

www.nuvotes.org/

University of Wisconsin - Madison: Voter Information



VOTER INFORMATION

In collaboration with the Associated Students of Madison

ELECTIONS IN 2020

There are no remaining elections in 2019. The next elections are:

Spring Primary Election: Feb 18, 2020

Spring Election & Presidential Primary: April 7, 2020

Fall Primary: Aug. 11, 2020

Presidential Election: Nov. 3, 2020

In election days, polls will be open from 7 a.m. to 8 p.m. You can register at the polls on election day. To find out where you vote, click [here](#)


BE PREPARED TO VOTE.
HERE'S WHAT YOU NEED TO KNOW.

- + Eligibility
- + What IDs are acceptable to vote?
- + Obtaining a voter-compliant ID card
- + Registration
- + Where do I vote?
- + Voting early
- + When are elections?


<https://vote.wisc.edu/>

Duke University – Duke Votes


Duke Votes




Voting in
North Carolina




Request NC
Voter ID Card




Voting in Your
Home State



Explore Your
Ballot



Verify Your
Registration



Important
Dates

- + What is my campus residential address?
- + What is my on campus mailing address?
- + What are the requirements for registering?
- + What do I need to vote?
- + Where do I cast my ballot on Election Day?
- + How can I contact the North Carolina Board of Elections?

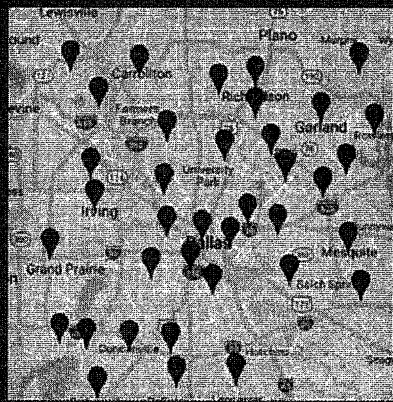
<https://sites.duke.edu/dukevotes/ambassadors>

Richland College – Ready, Set, Vote!

(Dallas County Community College District)

Ready, Set, Vote!







Richland College

DALLAS COUNTY COMMUNITY COLLEGE DISTRICT

Helpful Voting Links

Like Options? Vote Early
Head to the Polls

<https://www.richlandcollege.edu/services/online>

Notes

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**IN THE STATE OF MICHIGAN
COURT OF CLAIMS**

PRIORITIES USA,

Plaintiff,

v.

JOCELYN BENSON, in her official capacity as
the Michigan Secretary of State,

Defendant.

Civil Action No. 19-000191-MZ

HON. CHRISTOPHER M. MURRAY

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PROOF OF SERVICE

Jessica E. Bluhm certifies that on the 21st day of January, 2020, she served a copy of Plaintiff's Verified Amended Complaint for Declaratory and Injunctive Relief in this matter on all counsel of record and parties *in pro per* at their last known addresses via email and via first class mail by depositing same in a United States Post Office depository in Northville, Michigan with first class postage fully paid.

/s/ Jessica E. Bluhm

Jessica E. Bluhm, Legal Secretary