



# STATE OF UTAH

SPENCER J. COX  
GOVERNOR

OFFICE OF THE LIEUTENANT GOVERNOR  
SALT LAKE CITY, UTAH  
84114-2220

DEIDRE M. HENDERSON  
LIEUTENANT GOVERNOR

July 31, 2025

Michael E. Gates  
Deputy Assistant Attorney  
U.S. Department of Justice  
Civil Rights Division  
Pennsylvania Ave, NW – 4CON  
Washington, DC 20530

Dear Mr. Gates,

This is the response to your letter dated July 15, 2025.

The state of Utah is in compliance with federal election law including NVRA, and has implemented safe, secure, and timely safeguards and processes for maintaining voter registration lists. These safeguards and processes are outlined in the Utah Election Code at Utah Code [Title 20A Chapter 2](#).

Utah has a robust process for voter list maintenance and monthly certification from county clerks to ensure maintenance is being done. The Lieutenant Governor provides and maintains a statewide voter registration database that county clerks use to register voters and update existing voter registrations. Clean voter rolls are the foundation for secure elections and therefore need to be routinely and systematically updated. County clerks perform routine checks and list maintenance. Clerks certify list maintenance compliance to the Lieutenant Governor and to the public on a monthly basis. Among other things, the county clerks:

- Process voter registration forms (electronic and paper) within 7 days of receipt (excluding the period between a voter registration deadline and an election canvass)
- Verify the identity of each voter at the time of registration (Utah Code 20A-2-503(1))
- Perform checks for and remove duplicate voters and voters who are registered in another state (Utah Code 20A-2-503(4))
- Remove deceased voters within 5 days of receiving notice (Utah Code 20A-2-504(3))

- Send out voter information cards to voters who have recently registered or updated their registration (Utah Code 20A-2-101.1)
- Send confirmation cards to voters who have potentially moved or have not recently voted (Utah Code 20A-2-505)
- 90 days before each election county clerks certify that they have performed, or will perform, a National Change of Address (NCOA) check before mailing the main ballot extract (Utah Code 20A-2-505)
- 90 days before each election the Lieutenant Governor ensures that deceased voters have been removed from the rolls. (Utah Code 20A-2-505(7))
- Utah participates in ERIC. A list of monthly reports that is used to help maintain the voters rolls can be found starting on page 14 of the bylaws and membership agreement (<https://ericstates.org/wp-content/uploads/documents/ERIC-Bylaw-MA-FINAL.pdf>). Action is taken by the county clerks on each report in the same month in which the information is received from ERIC. Please note that Utah has an exemption from the A. - Eligible but Unregistered Report

County clerks must perform an annual processing each December. Annual processing is a cleanup tool that inactivates voters who have not voted in two consecutive regular general elections and mails them a confirmation card. Additionally, it allows for the removal of voters that have not updated their voter record and have not voted in two consecutive regular general elections after receiving instructions on how to update their registration to remain on the voter rolls.

For more information, and to view the monthly certification by county, please visit: <https://vote.utah.gov/voter-list-maintenance-requirements/>.

The information that was not entered into the EAVS report by our county clerks, as pointed out in your letter, is due to reporting limitations of our 25 year old legacy system. The actions behind the requested data is not available in any type of aggregated report, but is documented within each individual voter record. The Office of the Lieutenant Governor has spent considerable time over the past two weeks manually compiling the requested data. Utah is in the process of implementing a modern system with enhanced reporting capabilities that will be in place at the beginning of 2027.

Utah remains one of the most proactive states for maintaining current and accurate voter registration rolls. The reference to the EAVS report Question A12a and subsequent conclusion that “Utah has the lowest rate in the nation for voter registration records removed from the voter registration rolls” is based on incomplete data and therefore inaccurate. The statewide total of removed voters between December 1, 2022 and November 30, 2024 is 109,346. When the actual

number of removed voters is used, the percentage of removals changes from 0.08% to 5.4%. Please see “Table 1” below for these numbers broken down by county.

Table 1.

Voter Registration Removals by County								
County	Annual Processing	Citizenship	Deceased	Duplicate Registrant	Inactivity	Moved Out of County	Requested Removal	Unspecified Removed
Beaver	207	0	101	2	21	29	2	21
Box Elder	757	0	716	0	0	762	0	0
Cache	2688	0	1275	0	14	3962	15	517
Carbon	876	0	429	3	1	159	4	15
Daggett	16	0	19	0	0	33	0	1
Davis	5644	0	3355	1	1	1278	38	26
Duchesne	97	0	274	1	0	253	0	6
Emery	216	0	196	2	0	69	3	2
Garfield	15	0	98	1	4	52	2	31
Grand	153	0	130	0	0	289	5	15
Iron	886	0	655	0	0	286	4	12
Juab	283	0	147	2	0	72	1	1
Kane	112	0	136	0	0	97	3	0
Millard	160	0	170	3	0	144	3	1
Morgan	67	0	146	2	0	162	2	3
Piute	21	0	36	2	0	27	2	0
Rich	8	0	35	1	0	21	1	12
Salt Lake	15573	3	11143	12	272	5157	174	317
San Juan	559	0	192	7	0	237	2	32
Sanpete	397	0	437	0	0	210	10	3
Sevier	408	0	366	0	0	99	2	5

Voter Registration Removals by County								
Summit	1025	0	275	0	0	642	10	171
Tooele	1142	0	666	0	0	613	5	26
Uintah	875	0	466	0	0	247	2	6
Utah	10871	1	4943	1	1	3316	30	678
Wasatch	928	0	295	0	4	755	5	17
Washington	3063	0	2906	0	2	899	68	42
Wayne	69	0	60	0	0	71	13	17
Weber	5645	0	3136	5	1	1057	15	14
<b>Total</b>	<b>52761</b>	<b>4</b>	<b>32803</b>	<b>45</b>	<b>321</b>	<b>20998</b>	<b>421</b>	<b>1991</b>

The county clerks responded to A3d in the EAVS report with “Data not available” or “Does not apply,” both of which seem appropriate given the limitations of the legacy system as previously noted. Individuals with a valid drivers license can submit an unlimited number of changes to their voter registration online. The system allows the county clerk to process the most recent registration which then supersedes all the other submitted changes. The prior online changes submitted by the voter do not create or constitute a duplicate registration. This helps prevent individuals from having more than one registration record.

Clerks run duplicate checks within the system as identified through ERIC reports on a monthly basis. These checks identify and allow the clerks to correct (merge) multiple registration records for the same voter. 4,683 records were merged during the period of 12/1/2022 - 11/30/2024. “Table 2” below has a breakdown of duplicate merged records by county:

Table 2.

Merged Records by County	
County	Merged Voter Count
Beaver	12
Box Elder	166
Cache	189

Merged Records by County	
Carbon	18
Daggett	7
Davis	461
Duchesne	50
Emery	28
Garfield	11
Grand	20
Iron	113
Juab	60
Kane	18
Millard	37
Morgan	8
Piute	9
Rich	4
Salt Lake	1304
San Juan	60
Sanpete	67
Sevier	37
Summit	167
Tooele	92
Uintah	104
Utah	905
Wasatch	175
Washington	284
Wayne	19
Weber	258

Merged Records by County	
<b>Total</b>	<b>4683</b>

In response to your inquiry regarding Questions A10b through A10f, 269,799 voters were sent a confirmation card from 12/1/2022 - 11/30/2024. Of these, 108,699 were marked by clerks as returned. The letter noted that Utah reported the number of voters removed due to returned confirmation cards was 263.7% of all the voters that were removed from the state registration list. The correct percentage is 45.4%. This discrepancy is due to the data being incomplete, rather than for the reason stated in the letter. "Table 3" below contains a breakdown of confirmation cards sent and returned by county.

Table 3.

Returned Confirmation Cards by County							
County	Correct address	Moved out of jurisdiction	Moved within jurisdiction	Other*	Post office change address	Undeliverable	Total
Beaver	27	14	60	0	2	11	<b>114</b>
Box Elder	241	447	800	25	0	1349	<b>2862</b>
Cache	894	1672	1283	601	131	4651	<b>9232</b>
Carbon	102	157	72	8	21	439	<b>799</b>
Daggett	16	20	15	5	1	20	<b>77</b>
Davis	3652	1647	3277	445	8	3156	<b>12185</b>
Duchesne	259	267	181	11	4	262	<b>984</b>
Emery	47	34	39	6	0	5	<b>131</b>
Garfield	34	15	15	13	1	0	<b>78</b>
Grand	43	201	158	128	2	241	<b>773</b>
Iron	240	368	1605	36	3	524	<b>2776</b>
Juab	197	124	86	18	2	141	<b>568</b>
Kane	54	74	100	5	13	176	<b>422</b>
Millard	126	64	105	20	1	192	<b>508</b>

Returned Confirmation Cards by County							
Morgan	0	36	313	10	5	1	<b>365</b>
Piute	2	2	0	0	0	0	<b>4</b>
Rich	15	8	5	8	0	46	<b>82</b>
Salt Lake	6165	6619	1967	3387	107	14569	<b>32814</b>
San Juan	246	86	50	17	31	221	<b>651</b>
Sanpete	18	77	255	20	1	49	<b>420</b>
Sevier	126	147	489	9	0	307	<b>1078</b>
Summit	348	489	320	479	1	292	<b>1929</b>
Tooele	523	606	1011	199	7	167	<b>2513</b>
Uintah	163	201	160	19	0	271	<b>814</b>
Utah	2079	2764	9075	637	29	5629	<b>20213</b>
Wasatch	178	99	238	33	0	0	<b>548</b>
Washington	4621	621	2410	94	20	151	<b>7917</b>
Wayne	10	8	5	2	0	2	<b>27</b>
Weber	505	1675	4744	225	6	660	<b>7815</b>
<b>Total</b>	<b>20931</b>	<b>18542</b>	<b>28838</b>	<b>6460</b>	<b>396</b>	<b>33532</b>	<b>108699</b>

\*Other includes all returned confirmation cards where the reason for the confirmation return was not recorded correctly.

As for your request for numbers of ineligible voters, the numbers for the period you request are as follows:

1. Non-citizen
  - a. Four voters were given a status of “removable” due to a change to a non-citizen status between 12/1/2022 - 11/30/2024.
2. Adjudicated incompetent
  - a. Zero voters have been removed from the voter rolls due to incompetence.
3. Felony conviction
  - a. The total number of voters who were made removable due to being incarcerated felons between 12/1/2022 - 11/30/2024 was 4,225.

As for your request for the statewide voter registration database, attached is the most current version of the public statewide voter registration list. The list contains two files. One file is the list of registered voters, the other contains vote history. The top row of each file are column identifiers.

A list of the 29 Utah county clerks can be found at:

<https://vote.utah.gov/contact-your-county-election-officials/>. The director of elections, Ryan Cowley, can address questions or concerns relating to maintenance of the statewide voter registration system that county clerks use.

Sincerely,

A handwritten signature in black ink, reading "Deidre M. Henderson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Deidre M. Henderson  
Lieutenant Governor  
State of Utah