



18 Low Avenue  
Concord NH 03301  
(603) 224-5591  
[aclu-nh.org](http://aclu-nh.org)

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

October 20, 2025

Re: Docket number EAC-2025-0236  
Submitted Via Federal eRulemaking Portal at [www.regulations.gov](http://www.regulations.gov)

Dear General Counsel Kelliher:

On behalf of the American Civil Liberties Union of New Hampshire, we write in response to the petition filed by the America First Legal Foundation (AFL) requesting that the Election Assistance Commission start a ruling making process to consider adding a requirement of documentary proof of citizenship (DPOC) to the federal voter registration form.

Currently, the ACLU of New Hampshire is involved in litigation about HB 1569, an unnecessary new law in New Hampshire that would, for example, require documentary proof of citizenship for voter registration. *Coalition for Open Democracy, et al. v. David Scanlan, et al.*, Case No. 24-cv-312-SE. We are submitting this comment to provide a copy of the attached report from Lorraine C. Minnite, Ph.D., which has been produced in that matter. We are providing this report to refute the claim in AFL's petition that there is evidence of significant harms in the current voter registration system because there are many instances of foreign citizens registering and voting in our elections.

Sincerely,

/s/ Henry Klementowicz  
Deputy Legal Director