



**To: Interested Parties**

**From: Robert F. Bauer, General Counsel, Obama for America and the Democratic National Committee**

**RE: Update on Voter Misinformation Activities and Efforts to Protect the Vote**

Reports that the Romney campaign has trained volunteers to disseminate misinformation to voters in both Wisconsin<sup>1</sup> and Iowa<sup>2</sup> should not surprise observers who have followed the Republican assault on voting rights. This is an assault with deep roots in the party's history and politics. While over the decades the tactics have changed, the overall strategy to impede or obstruct access to the polls by targeted populations of voters has remained the same. The Republican National Committee has led the way, aided by organizations closely associated with the party and its goals, such as True the Vote. The Romney for President campaign's plans to mislead voters have to be viewed in this context: not as extraordinary, but instead a sadly predictable contribution to the Republican Party's institutionalized policy and practice of vote suppression.

### **I. Introduction: The Next Phase in Republican Vote Suppression: From Changing the Rules to Breaking the Rules**

Over the last several years, the Republican Party has embarked on a nationwide and coordinated strategy of limiting access to the polls by enacting legislation to combat what it has claimed is the risk of "voter fraud." As part of this strategy, Republicans have pushed forward photo identification requirements, shortened early voting periods and hours, restrictions on voter registration, and other limitations to the vote. After successful legal challenges around the country, this attack on voting rights has been blunted and the right to vote this year for millions of Americans has been made more secure.

But, there is another aspect of the Republican Party assault on the franchise that is now back in focus. It is carried out on the ground rather than in the legislatures—not by casting votes for ID legislation, but through direct challenges to voters at the polling place. Either directly, through its vendors, or in close association with allied organizations, the Republicans are attempting to disrupt the electoral process and create obstacles to the fair and effective exercise of the right to vote. All of this done in the name of investigating and combating "fraud."

Attacking the right to vote has a long history within the Republican Party. The Republican National Committee is subject to a federally administered 1981 consent decree that prohibits the Party from conducting "ballot security" activities, which effectively "deter qualified voters from voting."<sup>3</sup> Tellingly, the RNC has unsuccessfully sued to escape the decree and is now appealing it to the Supreme Court of the United States.

The history of the Republican Party's institutional engagement in these kinds of voter challenge activities demonstrates the continuing need for these protections. Employed nationwide as early as the 1962 campaign cycle, the RNC's "Operation Eagle Eye" was the first nationwide strategy used to discourage voter fraud. Operation Eagle Eye focused on vote fraud in the thirty-six metropolitan areas where Democratic majorities recently overtook traditional Republican concentrations. And the focus then was as it is today, and as outlined

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<sup>1</sup> <http://thinkprogress.org/justice/2012/10/30/1106961/romney-wisconsin-poll-watchers/>.

<sup>2</sup> <http://thinkprogress.org/justice/2012/11/01/1123641/romney-iowa-poll-watchers/?mobile=nc>.

<sup>3</sup> [http://www.clcblog.org/assets/attachments/Complaint\\_in\\_Intervention.pdf](http://www.clcblog.org/assets/attachments/Complaint_in_Intervention.pdf)

in the Ballot Security Program prepared by the RNC many years ago: to target particular communities of high Democratic support and, in the name of fighting fraud, create an environment of intimidation and confusion.<sup>4</sup>

The names and tactics have changed, but the larger strategy remains the same. Importantly, the RNC remains at the center of this activity. Led by **Reince Priebus**, the RNC is conducting these activities by paying the now-notorious **Nathan Sproul** for activities shown to have improperly—and possibly criminally—disrupted the voter registration process. Another allied organization, **True the Vote**, is assisting the effort by purporting to train and deploy to polling places around the country “poll watchers” on the watch for “fraud”—but its activities also have come under scrutiny for questionable practices and possibly illegal intimidation tactics.

As in the case of the successful resistance to “ID” laws, there has been a strong response across the states to these attacks on voters and the voting process. State legislators have put law enforcement on alert, criminal investigations are underway, and two weeks ago, in Virginia, a party worker with past ties to Nathan Sproul was arrested and charged with criminal destruction of voter registration forms.

An additional and important contribution to the defense against this next phase in the Republican disenfranchisement program is the bright light of exposure—holding the GOP this year, as in the past, publicly, as well as legally, accountable for its actions.

## II. The Republican Party, Reince Priebus and Nathan Sproul.

The Republican Party has paid Nathan Sproul and his myriad of firms \$21.9 million since 2004 for voter registration activities, absentee ballot programs, get-out-the-vote operations, and consulting services.<sup>5</sup> And yet Sproul’s firms have a lengthy and substantial record of election-related misconduct including voter registration fraud, forging election forms, destroying voter registration forms, and repeated strategic misrepresentation.

There can be no question that Reince Priebus knows what he has been paying for. His relationship to Sproul dates back to 2008. That year Priebus, then-Chairman of the Republican Party of Wisconsin, paid Sproul’s Lincoln Strategy Group nearly \$300,000 to run the state’s absentee ballot program.<sup>6</sup> According to interviews with four of Sproul’s employees, paid canvassers were instructed to lie and misrepresent themselves as volunteers for Senator John McCain.<sup>7</sup> At least one employee submitted falsified absentee ballot applications.<sup>8</sup> Election officials that year also reported an unusual number of incorrectly completed absentee ballot applications from Democratic leaning areas.<sup>9</sup>

Moreover, Priebus’ decision to hire Sproul came four years after Sproul made his name with various kinds of voter intimidation that had come to the attention of the public—and to law enforcement authorities. In 2004:

- In Oregon and Nevada, state officials opened separate criminal investigations into Sproul & Associates for destroying Democratic voter registration forms.<sup>10</sup> Sproul’s employees told reporters that they witnessed their supervisors destroying “hundreds, if not thousands” of Democratic registration forms.<sup>11</sup>

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<sup>4</sup> [http://www.votelaw.com/blog/blogdocs/GOP\\_Ballot\\_Security\\_Programs.pdf](http://www.votelaw.com/blog/blogdocs/GOP_Ballot_Security_Programs.pdf)

<sup>5</sup> [http://www.washingtonpost.com/politics/decision2012/businessman-who-gop-cut-ties-with-at-center-of-voter-fraud-probe-in-florida/2012/10/01/28e27050-0bd1-11e2-bb5e-492c0d30bff6\\_story.html](http://www.washingtonpost.com/politics/decision2012/businessman-who-gop-cut-ties-with-at-center-of-voter-fraud-probe-in-florida/2012/10/01/28e27050-0bd1-11e2-bb5e-492c0d30bff6_story.html);

[http://tpmmuckraker.talkingpointsmemo.com/2012/10/strategic\\_allied\\_consulting\\_paid\\_gop\\_september.php](http://tpmmuckraker.talkingpointsmemo.com/2012/10/strategic_allied_consulting_paid_gop_september.php).

<sup>6</sup> <http://www.opensecrets.org/pacs/expendeddetail.php?cycle=2008&cmte=C00074450&name=Lincoln+Strategy+Group>

<sup>7</sup> [http://www.huffingtonpost.com/2008/11/03/paid-gop-workers-say-they\\_n\\_140743.html](http://www.huffingtonpost.com/2008/11/03/paid-gop-workers-say-they_n_140743.html)

<sup>8</sup> [http://www.huffingtonpost.com/2008/11/03/paid-gop-workers-say-they\\_n\\_140743.html](http://www.huffingtonpost.com/2008/11/03/paid-gop-workers-say-they_n_140743.html)

<sup>9</sup> [http://host.madison.com/news/local/govt-and-politics/election-mailings-show-pattern-of-errors/article\\_5addc418-10ec-11e2-b64e-001a4bcf887a.html](http://host.madison.com/news/local/govt-and-politics/election-mailings-show-pattern-of-errors/article_5addc418-10ec-11e2-b64e-001a4bcf887a.html)

<sup>10</sup> <http://www.cbsnews.com/stories/2004/10/14/politics/main649380.shtml>

<sup>11</sup> <http://www.cbsnews.com/stories/2004/10/14/politics/main649380.shtml>

- In Nevada, Democrats who registered with Sproul & Associates complained that they had been left off voter registration rolls.<sup>12</sup>
- In Minnesota, some Sproul employees were fired for trying to register Democratic voters, while others received cash bonuses for registering Republicans, undecided voters, or Ralph Nader voters.<sup>13</sup>
- In West Virginia, Sproul's employees were instructed to lie to potential registrants by claiming they were conducting a poll, and then register only those identifying as supporting President Bush.<sup>14</sup>

This record led the U.S. House Judiciary Committee to notify the Justice Department in 2008 that Sproul's companies "clearly suppress votes and violate the law."<sup>15</sup> But by 2012, Sproul was once again employed by the national Republican Party, chosen by Reince Priebus.

### III. 2012: The Name May Change, the Rest is the Same

During the 2012 cycle, Sproul's company, Strategic Allied Consulting, has been paid over \$3.7 million dollars by the RNC. According to Sproul, the company was hired to for voter registration drives in Colorado, Florida, Virginia, North Carolina and Nevada, and is planning GOTV drives in Ohio and Wisconsin.<sup>16</sup>

Sproul's recent activities for the Republican Party are under criminal investigation in at least three states: Florida, Virginia and Colorado. These activities are nearly identical to electoral misconduct committed by his firms during previous elections while working for the RNC and other Republican candidates and committees.

In Florida, employees of Strategic Allied Consulting allegedly registered fake voters<sup>17</sup> and forged voter registration paperwork for actual voters, potentially preventing eligible voters from voting on Election Day.<sup>18</sup> A criminal investigation now underway has revealed more than one hundred potentially fraudulent forms in Palm Beach County alone.<sup>19</sup> The Florida Republican Party paid Strategic \$1.3 million for their registration drives and GOTV efforts.<sup>20</sup> In Colorado, Sproul's activities are currently under investigation by state officials.<sup>21</sup> There are allegations that Strategic workers did not register voters identifying as Democrats and a video emerged showing a Strategic Allied Consulting Worker identifying herself as a Romney supporter looking to "register voters for a particular party."<sup>22</sup> The Colorado state GOP has paid Strategic Allied Consulting \$466,643 to register people to vote.<sup>23</sup>

In Virginia, the Republican Party paid Strategic Allied Consulting nearly half a million dollars to coordinate a voter registration program.<sup>24</sup> Colin Small, originally employed by Sproul's Strategic Allied Consulting, was arrested in Virginia on October 18<sup>th</sup> on multiple charges relating to destroying voter registration forms.<sup>25</sup> On

<sup>12</sup> Reno Gazette-Journal, 10/29/04.

<sup>13</sup> [http://www.huffingtonpost.com/2008/10/20/mccain-employing-gop-oper\\_n\\_136254.html](http://www.huffingtonpost.com/2008/10/20/mccain-employing-gop-oper_n_136254.html)

<sup>14</sup> <http://www.salon.com/2004/10/21/sproul/>

<sup>15</sup> [http://www.huffingtonpost.com/2008/10/20/mccain-employing-gop-oper\\_n\\_136254.html](http://www.huffingtonpost.com/2008/10/20/mccain-employing-gop-oper_n_136254.html)

<sup>16</sup> <http://www.latimes.com/news/politics/la-pn-republicans-voter-fraud-florida-20120927,0,5472858.story>;

[http://tpmmuckraker.talkingpointsmemo.com/2012/10/strategic\\_allied\\_consulting\\_paid\\_gop\\_september.php](http://tpmmuckraker.talkingpointsmemo.com/2012/10/strategic_allied_consulting_paid_gop_september.php).

<sup>17</sup> <http://firstread.nbcnews.com/news/2012/09/27/14126789-rnc-cuts-ties-with-firm-over-voter-fraud-allegations?lite>

<sup>18</sup> <http://www.latimes.com/news/politics/la-pn-voter-registration-florida-republicans-20120928,0,7654954.story>

<sup>19</sup> [http://articles.chicagotribune.com/2012-10-03/business/sns-rt-us-usa-campaign-voterregistrationbre8921k8-20121003\\_1\\_voter-registration-nathan-sproul-criminal-probe](http://articles.chicagotribune.com/2012-10-03/business/sns-rt-us-usa-campaign-voterregistrationbre8921k8-20121003_1_voter-registration-nathan-sproul-criminal-probe)

<sup>20</sup> <http://abcnews.go.com/Politics/OTUS/voter-registration-fraud-gop-backed-firm-spreads/story?id=17370445#.UISAIPL3EmA>

<sup>21</sup> A spokeswoman for the 18<sup>th</sup> Judicial District Attorney's Office in Colorado has confirmed that they are investigating possible voter registration fraud, but would not speak more about an ongoing investigation. The Daily Sentinel, 10/5/12.

<sup>22</sup> [http://www.youtube.com/watch?feature=player\\_embedded&v=Rdk55dLsFhc](http://www.youtube.com/watch?feature=player_embedded&v=Rdk55dLsFhc)

<sup>23</sup> <http://myfox8.com/2012/09/29/girl-registering-only-romney-voters-tied-to-firm-dumped-by-rnc-over-fraud/>

<sup>24</sup> <http://wtvr.com/2012/09/27/virginia-republicans-fire-voter-registration-group/>

<sup>25</sup> <http://www.latimes.com/news/politics/la-pn-voter-registration-gop-arrest-20121018,0,5352175.story>

October 15, Small, who describes himself on his LinkedIn profile as a “Grassroots Field Director at Republican National Committee,” was seen throwing out an envelope full of completed voter registration forms into a dumpster behind a local store,<sup>26</sup> hours before the registration deadline.<sup>27</sup>

Immediately following the scandals breaking in the name of Strategic Allied Consulting, the RNC publicly asked all state Republican parties to sever ties with the company.<sup>28</sup> This did not mean an end to the ties with Sproul or to the Republican Party’s sponsorship of this variety of voter fraud and suppression. After the Florida allegations were made public Sproul told the Los Angeles Times, “[i]n order to be able to do the job that the state parties were hiring us to do, the [RNC] asked us to do it with a different company’s name, so as to not be a distraction from the false information put out in the Internet.”<sup>29</sup> In other words, the RNC worked to conceal its continued use of Sproul’s discredited services. Sproul and his associates have operated through several companies including: Lincoln Strategy Group (formerly employed by the RNC under that name), Issue Advocacy Partners, Grassroots Mobilization LLC, and Grassroots Outreach LLC entities.

Virginia, where criminal charges are pending, is a good example of how the shell game works. After the RNC encouraged state parties to fire Strategic Allied Consulting, those previously hired by the Sproul’s company fell under the direction and supervision of state party officials, including in Virginia.<sup>30</sup> Small was hired through a temporary employment agency called Pinpoint Staffing.<sup>31</sup> And, by no coincidence, Issue Advocacy Partners, the successor company to Strategic Alliance, uses Pinpoint Staffing for their staffing needs.<sup>32</sup>

#### **IV. True the Vote**

Since the 2010-midterm elections, Texas-based True the Vote (TTV) has been an outspoken member of the voter fraud community and is the social group focused on ending “vote fraud.” It is the first group since the Karl Rove inspired<sup>33</sup> American Center for Voting Rights was discovered to be a Republican front in 2007.<sup>34</sup>

True the Vote describes itself as “an initiative developed by citizens for citizens, meant to inspire and equip volunteers for involvement at every stage of our electoral process.... [That] promotes ideas that actively protect the rights of legitimate voters, regardless of their political party affiliation.”<sup>35</sup> Yet, one of the group’s leaders told the national True the Vote summit in Florida that the poll watchers’ job is to make voters feel like they’re “driving and seeing the police following you.”<sup>36</sup> In other words, the very purpose of the organization is to intimidate voters—to make them feel watched and followed as if by the “police”, when they have done nothing more and nothing less than take steps to exercise their right to vote.

It is clear that True the Vote and the Republican Party are closely associated in carrying out this “citizens initiative.” Their association goes back to the origins of TTV. Earlier this year, a court found that the King Street Patriots, the organization out of which TTV grew, was an “unregistered political action committee that illegally aided the Republican Party through its poll-watching efforts during the 2010 elections.”<sup>37</sup>

During the Wisconsin recall election, a Republican Party official spoke at a True the Vote training in Racine, Wisconsin. The official, Lou D’Abbraccio, told TTV volunteers that he would place them at polling locations where there was significant trouble in the past. He offered that these areas may be seen as problematic

<sup>26</sup> <http://www.latimes.com/news/politics/la-pn-voter-registration-gop-arrest-20121018,0,5352175.story>

<sup>27</sup> <http://www.nytimes.com/2012/10/20/us/politics/man-aiding-gop-voter-registration-drive-is-charged.html>

<sup>28</sup> <http://firstread.nbcnews.com/news/2012/09/27/14126789-rnc-cuts-ties-with-firm-over-voter-fraud-allegations?lite>

<sup>29</sup> <http://www.latimes.com/news/nationworld/nation/la-na-voter-fraud-allegations-20120928,0,4284007.story>

<sup>30</sup> <http://www.latimes.com/news/politics/la-pn-voter-registration-gop-arrest-20121018,0,5352175.story>

<sup>31</sup> <http://bluenc.com/strategic-allied-consulting-morphs-issue-advocacy-partners>

<sup>32</sup> <http://bluenc.com/strategic-allied-consulting-morphs-issue-advocacy-partners>

<sup>33</sup> <http://www.motherjones.com/mojo/2011/03/haley-barbour-new-hire-jim-dyke>

<sup>34</sup> [http://www.slate.com/articles/news\\_and\\_politics/jurisprudence/2007/05/the\\_fraudulent\\_fraud\\_squad.html](http://www.slate.com/articles/news_and_politics/jurisprudence/2007/05/the_fraudulent_fraud_squad.html)

<sup>35</sup> <http://www.truethevote.org/about/>

<sup>36</sup> <http://vimeo.com/42865480>

<sup>37</sup> <http://www.chron.com/news/houston-texas/article/Judge-rules-tea-party-group-a-PAC-not-a-nonprofit-3442532.php>

“because of the people that work at that particular polling location.... [or it] may be just because it’s a heavily skewed Democratic ward.”<sup>38</sup> Similarly, Colorado’s Republican Secretary of State, Scott Gessler, and Deputy Attorney General, Cynthia Coffman, served as featured speakers at True the Vote’s Colorado summit.<sup>39</sup>

Additionally, TTV volunteers in Ohio report being told that the group is “teaming up with Republican volunteers” and that TTV volunteers will participate in Republican and TTV activities simultaneously. The local coordinator for TTV’s Voter Integrity Project reminds volunteers that they will be “far outnumbered by Democratic poll workers and just having a presence there seems to be sending a positive message.” Moreover, the group leader told potential Ohio volunteers to look for a woman in a red Romney t-shirt to find out their days assignments.

Elected officials in many swing states are not waiting and taking their chances that True the Vote acts to disrupt the electoral process on November 6<sup>th</sup> or during the early voting period. In Wisconsin, the Government Accountability Board (G.A.B.) took swift action in the aftermath of TTV’s involvement in the June recall elections. The G.A.B. sent a letter to all third party poll observer organizations reinforcing the proper role of poll observers and produced a Guide to Voters Rights and Responsibilities that will likely provide important support for poll workers faced with TTV volunteers acting in a way that may intimidate voters. In Ohio, ten Democratic state senators sent a letter to Secretary of State Jon Husted alerting him to actions taken by TTV that suggest that the organization will act to intimidate voters in violation of Ohio law. Secretary Husted quickly responded to the letter, promising to act swiftly upon knowledge of voter intimidation in Ohio.<sup>40</sup>

In addition, state authorities have sought to address another tactic by which TTV has worked to disrupt the voting process and undermine individual voting rights. TTV has been found to systematically misstate the law in training its poll watchers. Already in one state, Colorado, the Secretary of State’s office has agreed to contact True the Vote about discrepancies between Colorado election law and information in the organization’s training manuals. Officials also agreed to “alert the counties that watchers may only seek to enforce Colorado law” and that action to the contrary “is grounds for ejection.” The importance of vigilant official action to address misinformation directed against voters was underscored by the discovery this week that the Romney Presidential campaign has been engaging in this same misconduct in both Wisconsin and Iowa. In Wisconsin, that campaign was reported to have “trained” its poll watchers in erroneous information that could only result in unfounded challenges to eligible voters, or in the denial of assistance to which these voters are entitled by law.<sup>41</sup> In fact, just this week, the G.A.B. stated publicly that Romney for President’s instructions that poll workers not disclose their affiliation to the campaign runs contrary to Wisconsin guidance and that the board would contact the campaign about it and several other discrepancies in its training manuals.<sup>42</sup> Similarly, in a Romney for President training video for Iowa, poll watchers are told to notify the campaign’s legal hotline “if an election worker is not checking photo ID.”<sup>43</sup> Iowa has not implemented a photo identification requirement.

## **V. The Question of Republican Accountability for Vote Suppression**

The Republican National Committee remains subject to a federal consent decree barring it from engaging in voter intimidation. This has not dissuaded Reince Priebus from devoting party resources to Nathan Sproul’s activities, despite years of serious questions about the propriety and legality of his actions. This connection implicates Priebus and Republicans at all levels—including Mitt Romney’s Presidential campaign.

The Romney Campaign hired Lincoln Strategy Group, a Sproul entity, during the primary campaign. On September 27<sup>th</sup>, it was reported Romney campaign spokeswoman Sarah Pompri said, “We used this vendor for

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<sup>38</sup> <http://www.theatlantic.com/magazine/archive/2012/10/the-ballot-cops/309085/>

<sup>39</sup> <http://www.truethevote.org/news/true-the-vote-colorado-state-summit>

<sup>40</sup> <http://dispatchpolitics.dispatch.com/content/blogs/the-daily-briefing/2012/10/17-october-2012---voter-intimidation.html>.

<sup>41</sup> <http://thinkprogress.org/justice/2012/10/30/1106961/romney-wisconsin-poll-watchers/>.

<sup>42</sup> [http://openchannel.nbcnews.com/\\_news/2012/10/30/14812255-wisconsin-objects-to-romney-training-manual-urging-incognito-poll-watchers?lite](http://openchannel.nbcnews.com/_news/2012/10/30/14812255-wisconsin-objects-to-romney-training-manual-urging-incognito-poll-watchers?lite).

<sup>43</sup> <http://thinkprogress.org/justice/2012/11/01/1123641/romney-iowa-poll-watchers/?mobile=nc>.

signature gathering services during the primary but have not used them since 2011.”<sup>44</sup> However, FEC filings show the Romney campaign paid Lincoln Consulting \$71,390.94 during the 2012 Republican Primaries.<sup>45</sup>

At the state level, the California Republican Party made \$430,840 in payments to “Grassroots Outreach, LLC” this cycle for voter registration and petition gathering.<sup>46</sup> Grassroots Outreach is one of the Sproul front groups set up by his longtime partner Meghan Cox. Between 2005 and 2008, records show, Cox set up a series of front companies for Lincoln Consulting in the key swing states: Ohio, Florida, Pennsylvania, and Nevada.

It seems clear that the Republican state parties are acting at the behest of, if not the direction of, the RNC in engaging these Sproul companies. Mike Grissom, executive director of the Florida Republican Party, said: “When we learned today about the instances of potential voter registration fraud that occurred in Palm Beach County, we immediately informed the Republican National Committee that we were terminating the contract with the voter registration vendor we hired at their request....”<sup>47</sup>

FEC filings also reveal a pattern of control by the RNC. On July 25<sup>th</sup>, the RNC transferred \$167,000 to the Nevada Republican Party—the next day the state party paid Strategic \$166,665. The national party transferred \$667,000 to the Florida party, the same day the local party paid Strategic \$667, 587.<sup>48</sup>

Without the Republican Party and its sponsorship, Nathan Sproul would not be on the political map. As one Strategic Alliance hire, William T. Hazard, told the LA Times, he became involved when responding to a Craigslist ad posted by Pinpoint Staffing, that required all applicants be active, registered Republican voters. Hazard said, “I thought I was dealing with the Republican Party.”<sup>49</sup> It is no surprise, then, that a North Carolina advertisement for Strategic Allied Consulting led with the title “Want to help Republicans win in NC?” The posting asked for people “Eager to help the Republican Party” and offered, “\$12 an hour and internship credit is available.”<sup>50</sup>

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<sup>44</sup> <http://firstread.nbcnews.com/news/2012/09/27/14126789-rnc-cuts-ties-with-firm-over-voter-fraud-allegations?lite>

<sup>45</sup> <http://query.nictusa.com/cgi-bin/dcdev/forms/C00431171/780128/sb/23>; <http://query.nictusa.com/cgi-bin/dcdev/forms/C00431171/809153/sb/23>

<sup>46</sup> <http://cal-access.ss.ca.gov/Campaign/Committees/Detail.aspx?id=1030435&session=2011&view=expenditures>

<sup>47</sup> <http://firstread.nbcnews.com/news/2012/09/27/14126789-rnc-cuts-ties-with-firm-over-voter-fraud-allegations?lite>

<sup>48</sup> <http://www.latimes.com/news/politics/la-pn-republicans-voter-fraud-florida-20120927,0,5472858.story>

<sup>49</sup> <http://articles.latimes.com/print/2012/sep/28/nation/la-na-voter-registration-20120929>

<sup>50</sup> <http://bluenc.com/republican-paid-voter-registration-operation-linked-fraud#ixzz29an1Y1v>