

The High Cost of Voter ID Mandates

Briefing Paper - March 2011

A Review of the State of Minnesota's Fiscal Note on Voter ID Legislation

INTRODUCTION

The Minnesota House and Senate are considering legislation to mandate that every voter present a government issued photo identification before they are allowed to vote (referred to hereafter as “voter ID”). While at first glance it may seem like a simple mandate, the implementation of this mandate will require significant changes to the state’s election system. It would cost over \$84 million over 3 years for H.F. 210 and over \$25 million for H.F. 89. This comes at the same time that the legislature is struggling with a \$5 billion budget deficit.

Common Cause Minnesota and Citizens for Election Integrity Minnesota have conducted a review of the fiscal notes for H.F. 210¹ and H.F. 89². The constitutional mandates constraining such legislation and the fiscal estimates from other states suggest that the Minnesota fiscal notes underestimate some of the costs.

In these difficult economic times, Minnesotans deserve to know the full costs of legislation that many consider unnecessary.

1 http://www.mmb.state.mn.us/bis/fnts_leg/2011-12/H0210_1E.pdf

2 http://www.mmb.state.mn.us/bis/fnts_leg/2011-12/H0089_1E.pdf

VOTER ID COST

VOTER EDUCATION AND OUTREACH: \$19.48 Million

A voter ID law in Minnesota would require an extensive publicity effort to educate voters about the law changes and ensure that voters are not turned away at the polls. Courts in Georgia² have repeatedly ruled that inadequate public education efforts invalidate their voter ID law. However, the Minnesota fiscal note does not include all of the costs that would be incurred to adequately publicize such a significant change in state law. For example, the fiscal note does not take into account the costs of directly reaching out to communities that are least likely to possess a valid ID, such as the elderly, low income individuals, and students. The Minnesota fiscal notes need to include, as does Missouri's fiscal note³, the cost for a mobile voter processing system that would travel to senior residential facilities to provide them with voter IDs. Since H.F. 89 and H.F. 210 do not exempt these individuals from the voter ID requirement, the state must provide mobile outreach to ensure constitutionality and that senior citizens do not face an undue burden in obtaining an ID.

The Minnesota fiscal notes estimate that \$2.7 million would be needed to educate the public about the new ID requirement. However, this underestimates the true cost of the voter education effort because it does not account for any expenses in FY 2012 or FY 2014. In the year leading up to the election, public education must occur to start encouraging people to apply for the new ID cards. As a result of the long lead-time to obtain the documentation required to get a voter ID card, extensive public education must begin before the election year. Public education will also need to occur in FY 2014 because many local elections occur in these off years and new registrants will need to be notified of the requirement.

In 2010, **Missouri estimated it would cost \$17.4 million⁴** over three years for TV announcements and other outreach, such as direct mailings, to the state's 4.12 million eligible voters. Based on Missouri's cost of \$4.22 per eligible voter, **it could cost Minnesota \$17.68 million or more over three years to inform its 4.19 million eligible voters.⁵**

The fiscal note from the 2006 version of a proposed photo ID bill in Missouri also included a cost related to mobile licensing, and the related office equipment and staff, as part of their voter outreach. The fiscal note for H.F. 210 and H.F. 89 state that, "counties will need to provide the mobile units to travel to nursing homes and other healthcare facilities in each year in which elections occur in their area."⁶ Those costs projected in the 2006 Missouri note were \$1.78 million over four years. This is a cost that would be

2 Common Cause/Ga. v. Billups (Common Cause II), 439 F. Supp. 2d 1294, 1345-47 (N.D.Ga. 2006)

3 ⁴ <http://www.moga.mo.gov/oversight/over06/fishtm/4947-25t.org.htm>

4 2010 Missouri Committee on Legislative Research Oversight Division - Fiscal note:
<http://www.southernstudies.org/MO%202010%20Voter%20ID%20Fiscal%20Note.pdf>

5 See Appendix for breakdown

6 This is found in the "Local Government Costs" section of the Minnesota fiscal notes footnoted throughout this report

completely absorbed by the counties, adding an additional \$0.43 per eligible voter to the figures above. **For Minnesota, this would be an additional \$1.8 million, bringing the total for education and outreach to \$19.48 million.**

Voter education on the requirements of voting is costly because the state must focus on reaching everyone; these are very different than traditional political spending that electoral campaigns engage in. Public education must include:

- Mailings to all voting-age citizens informing them of new ID requirements and how to obtain a voter ID;
- Outreach staff who will engage hard to reach populations;
- Production of radio and television public service announcements;
- Purchase of airtime to broadcast these public service announcements;
- Purchase of space in newspapers to advertise new voter ID requirements; and
- Modifications of state, county, and local election officials' websites to publicize new voter ID requirements.

THE COST OF A FREE ID: \$3.9 Million

Studies have shown that around ten percent of citizens do not have a valid government issued photo identification card.⁷ The State Demographer's office numbers indicate that Minnesota's eligible voting population is 4.19 million. A new voter ID law would increase the demand for IDs at DVS offices (H.F. 210) or county auditor offices (H.F. 89) — as well as increase expenses to issue the cards for free as proposed by these bills. The fiscal note by the Minnesota Department of Public Safety⁸ estimates that it would cost \$385,000 over three years to provide a free voter ID card. However, estimating that 10% of Minnesota's eligible voting population will require free IDs puts the number above \$3.9 million⁹. The official fiscal notes' estimate is significantly lower than projections by election administrators in Minnesota, as well as other estimates in similar sized states. In 2009, Wisconsin projected a total \$2.8 million cost¹⁰ for licenses and processing alone; Missouri estimated \$2 million¹¹ over three years for processing and mailing. The state of Indiana, which this bill is modeled after, experienced a large demand for free ID's. From 2007-2010, Indiana Bureau of Motor Vehicles issued 771,017 free photo ID's. The state had to spend over \$10 million to provide the IDs, which is significantly more money than the state had budgeted for¹². This briefing paper considers these costs to be a more accurate budget and conservatively estimate \$3.9 million dollars for the state of Minnesota to provide a free ID to voters.

7 Policy Brief on Voter Identification, Brennan Center for Justice
http://www.brennancenter.org/content/resource/policy_brief_on_voter_identification/

8 http://www.mmb.state.mn.us/bis/fnts_leg/2011-12/H0210_1E.pdf

⁹ The DPS estimates the cost of IDs at \$9.85 each

10 <http://www.southernstudies.org/WI%202009%20Voter%20ID%20Fiscal%20Note.pdf>

11 <http://www.moga.mo.gov/Oversight/OVER06/fishtm/4947-25T.ORG.htm>

12 Pew Center on the States, Electionline e-newsletter, 3/17/11

The Minnesota fiscal notes underestimate the full cost of providing a free ID. To withstand legal challenges, Minnesota will also have to ensure that free voter IDs are readily accessible to voters who lack them. This can involve substantial costs — particularly for voters in areas without convenient DVS or County Auditor offices, public transportation to those offices, or where those offices are only open for limited hours. The costs associated with this will include¹³:

- Distributing voter ID-making equipment to a range of DVS offices or other ID centers — or programming driver’s licensing equipment to make new voter IDs;
- Ensuring DVS or other offices that issue IDs are open during convenient hours — like nights and weekends. In Minnesota today, many areas don’t have a DVS, or have DVS that are open only for limited days and hours during the week;
- Establishing (and outfitting and staffing) additional offices where voter IDs may be obtained, such as county election offices; and/or creating mobile ID-issuing centers that can travel to remote areas of the state where access to voter ID-issuing centers is limited.

These additional costs of extending hours of operation of DVS facilities and opening more convenient locations are not factored into the state of Minnesota’s fiscal notes. Unfortunately we do not have the ability to investigate how much these requirements would cost the state. State leaders should ask the DVS to provide an estimate to be included in the fiscal note.

In addition, according to the Brennan Center Report, “the Supreme Court’s decision on Indiana’s photo ID law suggests that states may be required to alleviate the burdens posed by photo ID laws through exemptions for individuals or groups who cannot reasonably obtain ID.”¹⁴ However, the voter ID legislation contains no such exemption for individuals that would have a difficult time obtaining an ID and should accordingly factor those costs into the financial impact of the legislation.

PROVISIONAL BALLOT VOTING COST

EQUIPMENT AND SUPPLIES: \$445,792

The Minnesota fiscal note contained no actual monetary cost projections for implementing provisional voting, it only speculated on the types of costs that may arise. This is mainly because provisional voting will not be paid for by the state. Local governments are expected to shoulder the costs associated with provisional ballots.

In Minnesota, some of the smaller townships and precincts conduct their elections using mail balloting. Mail ballot precincts send out ballots 14 to 30 days before the election to all registered voters. The ballots are completed and mailed/delivered on or before

¹³ Agraharkar, Weiser, and Skaggs “The Cost of Voter ID Laws: What the Courts Say.” Brennan Center for Justice February 2011

¹⁴ http://brennan.3cdn.net/74978e15d83a92d20f_c3m6bhza7.pdf

Election Day to be counted. There are 3,235 polling places in Minnesota that *are not* mail ballot precincts and have fewer than 100 voters. All of these polling places must have the logistical capabilities to provide for provisional voting. It will be necessary to have a ballot box large enough to fit the provisional ballot and the two separate envelopes they are required to be sealed in. The box will also have to be metal and securely sealed to maintain appropriate chain of custody procedures. The average price for a suitable ballot box was \$100.00 each.¹⁵ That price multiplied by the 3,235 polling places projects \$323,500. Metal padlocks to secure these ballot boxes will cost another \$12,292.

Preparing polling places statewide to handle provisional voting will cost upwards of \$335,792.

Planning to have double the supplies needed for a provisional voting process should reasonably cover any underestimation of those casting ballots on Election Day. If an estimated 30,000 provisional voters were doubled, it's reasonable to conclude that the state needs enough supplies to handle 60,000 provisional voters.¹⁶ House File 210 requires the following:

- A separate provisional ballot roster
- A provisional ballot secrecy envelope
- A provisional ballot envelope distinguished in color from all other election envelopes, i.e. absentee, mail-in, etc.
- The provisional ballot envelope to be sealed
- An affidavit swearing eligibility to cast a provisional ballot

The cost of these was estimated using supply catalogs from Hart Intercivic and Election Source¹⁷, two different elections supply companies. The estimates were drawn from prices listed in the respective online catalogs. With the bill's considerations, Hart Intercivic prices project a total supply cost of \$112,230. Election Source prices projected a similar total of \$107,900. **This averages \$110,000 for each statewide election.**¹⁸

EMPLOYMENT AND TRAINING: \$1.6 MILLION

The administration of voter ID and provisional balloting complicates the voting process significantly for voters, election judges, and county auditors and their staff. Most counties across the state will need to hire at least two new election judges to handle the extra workload. Larger counties will presumably need more, while smaller counties may only need to add one. Of the 3,235 precincts to offer provisional voting, it serves our estimate to say that all will need to add two new election judges. **This will cost roughly \$970,500 a cost that is absorbed at the local level.**¹⁹

These costs take into account an average hourly wage of \$10.00 paid to election judges for 15 hours of service on Election Day. Ramsey County pays its election judges

¹⁵ Averaged prices of Metal Optical Scan boxes from Election Source

¹⁶ See Appendix, Provisional Population Estimate

¹⁷ <http://www.hartintercivic.com/pages/339> & <http://www.electionsource.com/>

¹⁸ See Appendix for population and cost estimate formulation

¹⁹ Polls are open for 15 hours - 2 election judges at \$10/hr multiplied by 15 hours and 3,235 precincts equals \$569,000

between \$8.00-\$12.00/hr. \$10.00/hr seems like a fair average estimate for new judges across the state. There will be an extra cost associated with training election judges on the new procedures necessary to deal with the changes in the election process. Current statutes require a 2-hour training course to become a certified election judge in Minnesota elections.²⁰ **Training the 6,470 new judges for two hours at \$10/hr will cost \$129,400.** Re-training the state's approximate 25,000 election judges at this rate **will cost an additional \$500,000.**²¹

VERIFICATION OF PROVISIONAL BALLOTS: Unknown

One cost that is difficult to estimate is the cost of the increased auditor's office staff time needed to verify or reject provisional ballots, reconcile the provisional ballot numbers, and send correspondence to provisional voters whose vote *was not* counted, a requirement of both H.F. 210 and H.F. 89.

ELECTRONIC ROSTERS: \$58.8 MILLION

The fiscal note for H.F. 210, 1st Engrossment, includes \$58.8 million of state costs attributable to the introduction of electronic rosters. The cost estimates submitted by the Minnesota Secretary of State's office for the electronic roster provisions overall are reasonable.

Unlike other provisions of the two bills, this cannot be crosschecked against the experience of other states, because the requirement for a statewide online electronic roster system serving individual precincts on Election Day is completely unprecedented. However, because the bulk of the estimated cost comes from the per-workstation costs multiplied by the large number of workstations, the estimate is credible, with the one exception explained in the following paragraphs.

The fiscal note omits from the state costs any consideration of the precincts' network connections; instead, it assigns these connection costs to the local governments. This cost assignment is at odds with the text of the bill, which indicates that the state shall pay "costs associated with maintaining the necessary secure data connections to the statewide voter registration system."²² In addition to misattributing these network connection costs to the local governments, the fiscal note provides only a lower bound for these costs rather than an actual estimate, saying that the cost "will be at least \$150 per precinct."²³

The fiscal note states the reasonable assumption that in order to achieve adequate reliability and security, the precinct network connections would need to be wired

20 M.S. 8240.1600 Subpart 1

21 It is conceivable that this training estimated would cover the complete training process, not just provisional ballot training

22 HF 210, 1st Engrossment, Article 3, Section 3, Subdivision 3, page 28, lines 2-3,
<https://www.revisor.mn.gov/bin/bldbill.php?bill=H0210.1.html&session=ls87#pl.28.2>

23 *ibid* p. 13

broadband connections left active year-round.²⁴ Such connections are ordinarily priced per month; assuming that the note's lower bound of \$150 was intended as an annual cost, it would translate to only \$12.50 per month, whereas the web sites of a couple telecommunication providers²⁵ suggest that \$25-\$40 per month would be a more reasonable range.

CONCLUSIONS

Our briefing estimates a cost of roughly \$25.42 million for Voter ID and provisional ballot implementation as outlined in H.F. 89. While the electronic roster provisions in H.F. 210 would cost an additional \$58.8 million for a total of \$84.23 million, it is important to note that most states underestimate the total cost of voter ID mandates.

A study by Facing South/Institute²⁶ examined the fiscal notes for voter ID measures in half a dozen states, and **“found lawmakers routinely failed to include at least one basic expense needed to implement a voter ID law in their cost estimates**, such as voter education, added administrative expenses and hiring and training new poll workers.”

Keeping that in mind, it seems unlikely that a voter ID mandate would cost less than the state's current fiscal note. Regardless of the final cost, this document has shown that both pieces of legislation would impose substantial costs on the state and local governments at a time when they can least afford it.

24 *ibid* pp. 8-9

25 hickorytech.com and qwest.com

26 <http://www.southernstudies.org/2011/01/voter-id-laws-carry-hefty-price-tag-for-cash-strapped-states.html>

APPENDIX A

An Estimate of the Number of People Affected by Provisional Ballots

The Office of the Secretary of State's analyses highlights a number of assumptions influencing the estimate. The three that are imperative to this analysis are:

1. 144,000 Minnesota residents eligible to vote do not currently have a valid photo ID to allow them to vote.
2. 10,000 of those 144,000 residents would apply for the subsidized ID immediately when it becomes available in June 2012
3. 50% or 67,000 of the remaining 134,000 residents would eventually apply for the ID as well.

These numbers leave 67,000 eligible voters who will presumably not have the proper ID that would allow them to legally cast a vote. In theory, all 67,000 of them could cast provisional ballots. While this is an unlikely scenario it is neither outrageous nor unprecedented. An Election Assistance Commission (EAC) study found that in 2008 204,651 provisional ballots were cast in Ohio. This represented 3.6% of the all those voting. 67,000 votes represents approximately 3.2% of votes cast in the 2010 general election in Minnesota.

In 2008, roughly 2,890,000 voters cast ballots that were counted. Operating on the assumption that on any given election year about 60% of the voting public in Minnesota turnout, it is very reasonable to say as many as 40,000 provisional ballots could be cast; roughly 60% of the 67,000 eligible voters without ID.

Furthermore in the same EAC report, using the provisional voting information from states with a similar number of polling places (between 2,000 and 4,600), and states with a similar number of voters showing up on Election Day (between 2-4 million), it was concluded that between 5 and 9 provisional ballots per polling place are cast. Estimating on the high side and taking 9 provisional multiplied by 3,309 precincts equals 29,781. That number is rounded up to 30,000 to make the calculations cleaner and is then doubled (as mentioned in the briefing) to 60,000 to ensure sufficient supplies at the polls.

Source: *2008 Election and Administration Survey* by the Election Assistance Commission

Cost Estimate of Election Supplies

Hart Intercivic

Envelope affidavit for provisional ballot: \$262.00/lot x 60 = \$15,720

Secrecy envelope: \$262/lot x 60 = \$15,720

List of provisional voters: \$0.35/each x (5 per polling place) x 3,309 = \$5,791

Different colored storage envelope: \$0.70/each x 60,000 = \$42,000

Envelope seal: \$0.55/each x 60,000 = \$33,000



Total: \$112,231

Election Source

Electronic poll book binder: \$6.95/each x 3,309 polling places = \$22,998

Provisional secrecy envelope: \$0.38/each x 60,000 = \$22,800

Provisional storage envelope: \$0.49/each x 60,000 = \$29,400

Affidavit: \$3.45/50 x (60,000/50) = \$4,140

Envelope seal: \$11.90 x (60,000/25) = \$28,560

Total: \$107,898

VOTER EDUCATION AND OUTREACH BREAKDOWN

Taken from Missouri Dept. of Revenue fiscal note for 2010 voter ID bill:

Extra staff and hours: \$567,614

Direct mailing: \$6,234,116

Cable TV ads: \$3,188,300

Newsprint ads: \$1,916,244

TV and radio ad through broadcast media: \$5,500,000

Total education and outreach: \$17,406,274

From the 2006 fiscal note:

Mobile licensing machines and processing: \$808,543

Office equipment and extra staff cost: \$979,498

Total mobile licensing and staff: \$1,788,041

Grand total: \$19,194,315

APPENDIX B

| | Missouri Voter ID Fiscal Note | | | Missouri Fiscal Note 2010 | | | Wisconsin AB7 | Minnesota H.F. 210 | | | | Minnesota H.F. 89 | | | | | | | |
|--------------------------------------|-------------------------------|---------|------------|---------------------------|-----------|------------|---------------|--------------------|-----------|-----------|-----------|-------------------|-----------|------------|-----------|--|--|--|-----------|
| | FY07 | FY08 | FY09 | FY11 | FY12 | FY13 | | FY12 | FY13 | FY14 | FY15 | FY12 | FY13 | FY14 | FY15 | | | | |
| Licensing | | | | | | | | | | | | | | | | | | | |
| Mobile Licensing Machines | 708,543 | | | | | | | | | | | | | | | | | | |
| Local Licensing System | | | | | | | | | | | | | | | | | | | |
| Programming | 100,000 | | | 21,252 | | | 612,000 | | | | | | | | | | | | 172,900 |
| Extra ID printers | | | | | | | 1,110,250 | | | | | | | | | | | | |
| Bidding | | | | | | | | | | | | | | | | | | | 4,000 |
| Licenses and Processing | 1,072,599 | 313,247 | 313,247 | | | | 2,798,012 | | | | | | | | | | | | 36,992 |
| Supplies | | | | | | | 18,038 | | | | | | | | | | | | 147,968 |
| Poll Books | | | | | | | | | | | | | | | | | | | |
| Computers | | | | | | | | | | 5,254,791 | | | | | | | | | |
| Dot Matrix Printers | | | | | | | | | | 630,575 | | | | | | | | | |
| Laser Printers | | | | | | | | | | 212,029 | | | | | | | | | |
| Card Readers | | | | | | | | | | 3,138,161 | | | | | | | | | |
| Extra Workstations | | | | | | | | | | 8,321,235 | | | | | | | | | |
| Programming | | | | | | | 582,900 | | | 669,000 | | | | | | | | | |
| Connectivity | | | | | | | | | | 272,291 | | | | | | | | | |
| Evaluation of Plan | | | | | | | | | | 105,120 | | | 105,120 | | | | | | |
| Broadband Service | | | | | | | | | | | | | 11,400 | 11,400 | | | | | 11,400 |
| Software Licensing | | | | | | | | | | | | | 1,341 | 1,341 | | | | | 1,341 |
| Application Maintenance | | | | | | | | | | | | | 100,350 | 107,040 | | | | | 113,730 |
| SVRS and WEBTS equip/training | | | | | | | 145,205 | | | | | | | | | | | | |
| Mobile Licensing | | | | | | | | | | | | | | | | | | | |
| Technician Training | 11,660 | | 11,660 | | | | | | | | | | | | | | | | |
| Travel | 104,940 | | 104,940 | | | | | | | | | | | | | | | | |
| Mail-in Systems | 25,800 | | 25,800 | | | | | | | | | | | | | | | | |
| Fax Machine | 2,500 | | 2,500 | | | | | | | | | | | | | | | | |
| Phones/Plans | 4,200 | | 4,200 | | | | | | | | | | | | | | | | |
| DOR/DMV/DPS | | | | | | | | | | | | | | | | | | | |
| Dedicated Internet Line | 7,352 | | 7,352 | | | | | | | | | | | | | | | | |
| Dedicated Phone Line | 30,117 | | 30,117 | | | | | | | | | | | | | | | | |
| Dedicated Fax | 5,000 | | 5,000 | | | | | | | | | | | | | | | | |
| Temp Employment | 98,560 | | 98,560 | | | | | | | | | | | | | | | | |
| Extra Staff and Hours | 199,620 | | 199,620 | | | | | | | | | | | | | | | | |
| Projected Loss of Revenue | | | | 145,580 | 207,898 | 214,136 | 395,160 | | | | | | | | | | | | |
| | | | | 1,483,470 | 914,538 | 914,538 | | | | | | | | | | | | | |
| Mailing | | | | | | | | | | | | | | | | | | | |
| Envelope and Postage | 2,679 | 2,679 | 2,679 | | | | | | | | | | | | | | | | |
| Licensing Material | 181,367 | 52,967 | 52,967 | 459,875 | 283,507 | 283,507 | | | | | | | | | | | | | |
| Affidavits | 2,282 | 556 | 556 | 1,236 | 762 | 762 | | | | | | | | | | | | | |
| Public Education | | | | | | | | | | | | | | | | | | | |
| Direct Mailing | 1,701,450 | | 1,701,450 | 2,037,750 | 2,037,750 | 2,158,616 | | | | | | 1,150,000 | | | | | | | 575,000 |
| TV | | | | 869,400 | 869,400 | 1,449,500 | | | | | | 750,000 | | | | | | | 375,000 |
| Radio | | | | 6,000 | 6,000 | 10,000 | | | | | | 350,000 | | | | | | | 175,000 |
| Print | 240,000 | | 240,000 | 522,612 | 522,612 | 871,020 | | | | | | 300,000 | | | | | | | 150,000 |
| Internet | | | | | | | | | | | | 150,000 | | | | | | | 75,000 |
| Un-Itemized (TV, Radio, Print, etc.) | 1,500,000 | | 1,500,000 | 1,500,000 | 1,500,000 | 2,500,000 | 650,000 | | | | | | | | | | | | |
| Elections Staff | | | | | | | | | | | | | | | | | | | |
| Added new poll workers | 576,880 | | 576,880 | | | | | | | | | | | | | | | | |
| Training current and new workers | 705,250 | | 705,250 | | | | | | | | | | | | | | | | |
| Training Materials | 50,000 | | 50,000 | | | | | | | | | | | | | | | | |
| Election Admin/Auditor Training | | | | | | | 250,331 | | | 5,500 | | | | | | | | | 5,500 |
| Training Video | | | | | | | | | | 25,000 | | | | | | | | | 25,000 |
| Updating/Revising Materials | | | | | | | 58,663 | | | | | | | | | | | | |
| PVC Develop, Program, Train | | | | | | | | | | | | | | | | | | | 9,600 |
| Provisional Develop, Program, Train | | | | | | | | | | | | | | | | | | | 84,000 |
| Advance Voting | | | | | | | | | | | | | | | | | | | |
| Legislation | | | | | | | | | | | | | | | | | | | |
| Rulemaking | | | | | 270,232 | 30,532 | | | | | | | | | | | | | |
| | | | | | | | | | | 515,700 | | | | | | | | | 83,959 |
| FY TOTALS | 7,330,799 | 369,449 | 5,632,778 | 7,047,175 | 6,612,699 | 8,432,611 | 6,620,559 | 19,149,402 | 2,813,091 | 224,901 | 1,476,471 | 421,951 | 2,847,968 | 36,992 | 1,497,968 | | | | |
| TOTAL | | | 13,333,026 | | | 22,092,485 | 6,620,559 | | | | | | | 23,663,865 | | | | | 4,804,879 |



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