



PROTECTING OHIOANS FROM VOTER INTIMIDATION

This memo outlines the robust protections for voters against voter intimidation under both federal and Ohio law. **Voter intimidation is a crime and local election officials and law enforcement have a responsibility to protect Ohioans from voter intimidation of any kind.**

First, anyone who “intimidates, threatens, coerces, or attempts to intimidate, threaten, or coerce, any other person for the purpose of interfering with the right of such other person to vote”¹ in a federal election commits a federal crime.

Second, Ohio also has an extensive set of laws that protect Ohio voters from harassment, intimidation, and other interference with the right to vote, particularly in and around voting locations.²


Finally, election officials are *required* to maintain “peace and good order” at the polling places, including preserving uninhibited voter access to a polling place and preventing any attempts to obstruct, intimidate, or interfere with any voter.³



¹ 18 U.S.C. § 594.

² See, e.g., Ohio Rev. Code Ann. §§ 3501.90, 3599.01, 3599.24.

³ Ohio Rev. Code Ann. § 3501.33.



Ohioans Voting Rights:

“Persons must not intimidate, threaten or coerce any other person for doing the following: registering or voting or urging or aiding persons in registering or voting. Persons must not intimidate, threaten or coerce any other person for purposes of: interfering or influencing how a person chooses to vote or not vote; or preventing a person from voting.”⁴

I. Voter Intimidation

Federal Law

Federal law provides that “[w]hoever **intimidates, threatens, coerces, or attempts to intimidate, threaten, or coerce, any other person for the purpose of interfering with the right of such other person to vote** or to vote as he may choose, or of causing such other person to vote for, or not to vote for,” any candidate for federal office, shall be fined or imprisoned for not more than one year, or both.⁵

Such protection extends to **attempts** to intimidate, threaten, or coerce voters and any intimidation, threats, or coercion with respect not only to voting but also voter registration and assisting voters to register and/or vote.⁶ Thus, federal laws prohibit all persons from engaging in conduct that is intended to (regardless of its effect) intimidate voters.

A person found guilty of violating the federal voter intimidation law could be sentenced to up to five years in prison in addition to criminal fines.⁷ People who intimidate or attempt to intimidate voters – or interfere with the right to vote – are also subject to civil liability.⁸

⁴ *Voting Rights Information*, OHIO SEC’Y OF STATE, https://www.ohiosos.gov/globalassets/elections/eoresources/pol-loc-resources/votingrights_legal.pdf [hereinafter *Voting Rights Information*]. This poster must be hung inside every polling place in a location where voters can easily see it. *Election Official Manual*, OHIO SEC’Y OF STATE, 289 (Feb. 2, 2022), https://www.ohiosos.gov/globalassets/elections/directives/2022/eom/eom_fullversion_2022-02.pdf [hereinafter, *Election Official Manual*].

⁵ 18 U.S.C. § 594; *see also* 18 U.S.C. §§ 241, 242, 245(b)(1)(A), and 610 (other criminal provisions).

⁶ 52 U.S.C. § 20511.

⁷ *Id.*; *see also* 52 U.S.C. § 10308(a).

⁸ *See* 52 U.S.C. § 10307(b) (“No person, whether acting under color of law or otherwise, shall intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce any person for voting or attempting to vote, or intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce any person for urging or aiding any person to vote”); 52 U.S.C § 10101(b) (“No person, whether acting under color of law or otherwise, shall intimidate, threaten, coerce, or attempt to intimidate, threaten, or coerce any other person for the purpose of interfering with the right of such other person to vote or to vote as he may choose[.]”); *see also* 42 U.S.C. § 1985(3)(providing a private right of action where “two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States”).

Ohio Law

Under Ohio law, it is a **felony** to attempt by “**intimidation, coercion, or other unlawful means**” to induce a voter to vote, or refrain from voting, for a particular person, question, or issue, or to register or refrain from registering to vote.⁹ The statute applies **before, during, or after** an election.¹⁰

Employers may not practice intimidation in order to induce or compel employees to vote, or refraining from voting, for or against any person, question, or issue, or threaten reprisal for exercising the right to vote.¹¹

Examples of Intimidation

Though there are many different kinds of voter intimidation, common examples of unlawful intimidation include:

- Verbal or physical confrontation of voters by persons dressed in official-looking uniforms;
- Physical intimidation, such as standing or hovering close to voters as they attempt to vote;
- Flyers threatening jail time or other punitive action against persons who vote;
- Direct confrontation or questioning of voters, or asking voters for documentation when none is required;
- Vandalism of polling places;
- Use of police officers to threaten or intimidate voters;
- Photographing or videotaping voters inside a polling place without their consent;
- Threats made by an employer to the job, wages, or benefits of an employee if he or she does not vote in a particular manner; and
- Occupying the parking lot of a polling place in such a way that voters might be hindered from entering.¹²

In addition, Ohio law specifically provides that no person may:

- **“Solicit or in any manner attempt to influence”** any voter in casting their vote during an election;¹³

⁹ Ohio Rev. Code Ann. § 3599.01. Felonies of the fourth degree, such as violations of this statute, are generally punishable by a prison term of between six and eighteen months, and a fine of up to \$5,000. See Ohio Rev. Code Ann. §§ 2929.14(A)(4), 2929.18(A)(3)(d).

¹⁰ *Id.*

¹¹ Ohio Rev. Code Ann. § 3599.06.

¹² These examples are provided by the Brennan Center for Justice: Wendy Weiser and Vishal Agraharkar, *Ballot Security and Voter Suppression: What It Is and What the Law Says*, Brennan Center for Justice, 7-8 (2012), <https://www.brennancenter.org/our-work/research-reports/ballot-security-and-voter-suppression>.

¹³ Ohio Rev. Code Ann. § 3501.35(A)(5).

- Hinder or delay a voter in reaching or leaving a polling place in any manner during an election;¹⁴
- Loiter in or around a polling place so as to “**hinder, delay, or interfere**” with the conduct of the election;¹⁵ or
- Attempt to intimidate an election officer or prevent an election officer from performing their duties.¹⁶

No election official, observer, or law enforcement officer may “[i]nfluence or attempt to influence” any voter in casting their ballot for or against any candidate or issue.¹⁷

A **precinct election official** is a resident of the county, appointed by the county board of elections, to staff each polling place. Typically, there are four precinct election officials divided evenly between the two major political parties at a polling place.¹⁸

Furthermore, **all precinct election officials must:**

- Maintain “**peace and good order**” at polling places;
- Keep access by voters to the polling place unobstructed;
- Prevent and stop “any improper practices or attempts tending to **obstruct, intimidate, or interfere**” with any voter from voting; and
- Prevent “riots, violence, tumult, or disorder;”¹⁹

Precinct election officials are directed to report any suspicious activity or damage of equipment to the Board of Elections immediately.²⁰ Additionally, Boards of Elections must report any kind of security event to the Secretary of State’s Office.²¹

Unless otherwise provided, violations of Ohio’s election code are misdemeanors of the first degree, generally punishable by a prison term of up to 180 days.²²

Demonstrating the seriousness with which Ohio regards voter intimidation, the Ohio legislature has also created a private cause of action for **harassment in violation of the election law**.²³ **This statute allows voters who have been harassed to bring lawsuits against the persons committing the harassment.**²⁴ **Those who violate this statute can be required to pay money damages, and organizations can face dissolution.**²⁵

¹⁴ Ohio Rev. Code Ann. § 3501.35(A)(2).

¹⁵ Ohio Rev. Code Ann. § 3599.24(A)(5).

¹⁶ Ohio Rev. Code Ann. § 3599.24(A)(4).

¹⁷ Ohio Rev. Code Ann. § 3599.38(A)(2).

¹⁸ Ohio Rev. Code Ann. § 3501.22.

¹⁹ Ohio Rev. Code Ann. § 3501.33.

²⁰ *Election Official Manual*, *supra* note 4 at 189.

²¹ *Id.* at 69-70.

²² See Ohio Rev. Code Ann. §§ 3599.40, 2929.24(A)(1)

²³ Ohio Rev. Code Ann. § 3501.90.

²⁴ *Id.*

²⁵ *Id.*

Harassment in violation of the election law under this statute includes:

- Obstructing access of a voter to a polling place;
- an improper practice tending to **obstruct, intimidate, or interfere** with a voter at a place of election
- interfering or otherwise engaging in violence against election observers performing their duties;
- Participating in a riot, violence, tumult, or disorder at a place of election; and
- unlawfully congregating or soliciting near polls.²⁶

II. Electioneering, “Hanging Around” Polling Places, and Protecting Voter Access to Polling Places

Loitering, congregating, and engaging in any kind of election campaigning is prohibited between the polling place and **100 feet** from the polling place entrance.²⁷ This distance is marked by two small U.S. flags placed by election officials at the start of Election Day.²⁸ In addition, if the line of voters extends past the 100- foot boundary, **loitering, congregating, and campaigning are likewise prohibited within 10 feet of any voter beyond the boundary.**²⁹

As the manual for Ohio election workers notes: Each polling location and its surrounding area is a “**neutral zone.**”³⁰ Campaigning, displaying campaign material or distributing food inside of the neutral zone is prohibited.³¹ Ohio election law explicitly requires that “precinct election officials and the police officer shall strictly enforce” this prohibition.³²



In addition, no person may:

- Hinder or delay a voter in reaching, or leaving, a polling place in any manner during an election;³³
- solicit or attempt to influence a voter in casting a ballot³⁴
- Loiter in or around a polling place so as to “hinder, delay, or interfere” with the conduct

²⁶ *Id.*; Ohio Rev. Code Ann. § 3501.35.

²⁷ Ohio Rev. Code Ann. § 3501.35.

²⁸ *Election Official Manual, supra* note 4 at 290.

²⁹ *Id.*

³⁰ *Id.*

³¹ *Id.* at 290-91.

³² Ohio Rev. Code Ann. § 3501.35.

³³ Ohio Rev. Code Ann. § 3501.35(A)(2).

³⁴ Ohio Rev. Code Ann. § 3501.35(A)(5).

of the election.³⁵

Employees are guaranteed a “**reasonable amount of time**” to vote on Election Day, and employers may not fire, or threaten to fire, an employee for taking such time to vote.³⁶

Only the following persons, and no others, are permitted to enter any polling place:³⁷

- Voters
- A person assisting another person in voting
- A voter’s child, who is not yet of voting age
- Election officials
- Employees
- Observers bearing a certificate of appointment (see section V below)
- Police officers
- Journalists
- Persons reviewing the official list of registered electors at 6:30 am, 11:00 am, or 4 pm, provided they do not engage in conduct that would constitute harassment in violation of the election law.³⁸

III. Conduct at the Polling Place

All precinct election officials **must**:³⁹

- Maintain “**peace and good order**” at polling places;
- Keep access of voters to the polling place unobstructed;
- Prevent and stop “any improper practices or attempts tending to **obstruct, intimidate, or interfere**” with any voter voting;
- Prevent “riots, violence, tumult, or disorder;” and
- Contact the county board of elections office or appropriate law enforcement official immediately if they experience a problem with the conduct of any person at a polling location.⁴⁰

It is a misdemeanor of the first degree for any precinct election official to fail to perform a duty imposed by law.⁴¹

³⁵ Ohio Rev. Code Ann. § 3599.24.

³⁶ Ohio Rev. Code Ann. § 3599.06.

³⁷ *Election Official Manual*, supra note 4 at 176.

³⁸ Ohio Rev. Code Ann. § 3503.23(C).

³⁹ Ohio Rev. Code Ann. § 3501.33.

⁴⁰ *Election Official Manual*, supra note 4 at 291.

⁴¹ Ohio Rev. Code Ann. § 3599.17.

No person may:

- Loiter in or around a polling place so as to “hinder, delay, or interfere” with the conduct of the election;⁴²
- By force, fraud, or other improper means, obtain or attempt to obtain possession of ballots, ballot boxes, or pollbooks;⁴³
- Recklessly destroy property used in elections;⁴⁴
- Attempt to intimidate an election officer, or prevent an election officer from performing their duties;⁴⁵
- Destroy, remove, or tear down registration lists or sample ballots;⁴⁶
- Remove supplies used to vote from a polling place;⁴⁷
- Hinder or delay a voter in reaching or leaving a polling place in any manner during an election;⁴⁸
- Tamper with ballots;⁴⁹ or
- Tamper with voting machines.⁵⁰

IV. Voter Challenges

At the polling place, Ohio law only permits challenges to the qualifications of voters by precinct election officials, not by private citizens.⁵¹ However, another person qualified to vote can challenge the right of someone to register to vote or cast an absentee ballot as long as the challenge occurs 30 days or more before an election.⁵² To make the challenge, the private citizen must fill out a form from the Secretary of State’s Office.⁵³

If a voter is challenged by a precinct election official, Ohio law provides a detailed sequence of questions and procedures that must be followed.⁵⁴ A voter may be challenged **only** on the grounds that they are not a resident of Ohio or of the precinct, a U.S. citizen, or of legal voting age, but **may not** be challenged for any other reason.⁵⁵ If a challenged voter is unable or refuses to prove their eligibility to the satisfaction of a majority of precinct election officials, they **may still vote** with a provisional ballot⁵⁶, which requires them to provide required documentation

⁴² Ohio Rev. Code Ann. § 3599.24.

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ Ohio Rev. Code Ann. § 3501.35.

⁴⁹ Ohio Rev. Code Ann. § 3599.26.

⁵⁰ Ohio Rev. Code Ann. § 3599.27.

⁵¹ Ohio Rev. Code Ann. § 3505.20.

⁵² *Id.*

⁵³ *Election Official Manual, supra* note 4 at 129-30.

⁵⁴ Ohio Rev. Code Ann. § 3505.20.

⁵⁵ *Id.*

⁵⁶ *Id.*

to the board of elections within **four days** of the election for the ballot to count.⁵⁷

V. Observers

Political parties whose candidates are competing in the election, as well as groups of five or more candidates, may each appoint **one election observer for each precinct**, via notification to the board of elections no later than eleven days prior to the election.⁵⁸

Observers must be qualified electors, meaning they possess the qualifications under Ohio law to be entitled to vote.⁵⁹ In addition, observers **may not be**:

- A candidate;
- A **uniformed peace officer** (such as sheriffs, police, or other law enforcement), uniformed state highway trooper, uniformed member of a fire department, uniformed member of the armed services, or uniformed member of the organized militia;
- A person wearing **any other uniform**; or
- **A person carrying a firearm or other deadly weapon.**⁶⁰

Accredited observers are “permitted to move freely about the polling location or any area where ballots are being cast, processed, counted, or recounted at a board of elections office, as applicable, to the extent that they do not engage in any prohibited activity.”⁶¹ **However, observers are subject to strict limitations on behavior:**

- Upon arrival, a precinct election official must verify the observer’s certificate of appointment and administer an oath to the observer⁶²;
- Observers may not observe at precincts they are not appointed to⁶³;
- **Observers are not permitted to interfere with precinct election officials doing their jobs or otherwise slow down the operation of the polling location, or to interact with voters in a manner that interferes with or disrupts an election**⁶⁴;
- Observers may not use any electronic or communication device, or any audio/visual recording device, **if** such device would **impede, interfere with, or disrupt an election or in any way intimidate a voter or risk violating the secrecy of the ballot or voter privacy**⁶⁵;
- Observers using a cell phone or similar device to discuss the election, or a perceived

⁵⁷ Ohio Rev. Code Ann. § 3505.181.

⁵⁸ Ohio Rev. Code Ann. § 3505.21.

⁵⁹ *Id.*; Ohio Rev. Code Ann. § 3501.01(N). Note an observer need not be registered to vote in the particular county where they are observing. *Election Official Manual*, *supra* note 4 at 277.

⁶⁰ Ohio Rev. Code Ann. § 3505.21(B).

⁶¹ *Election Official Manual*, *supra* note 4 at 278.

⁶² *Id.* at 277 & 281.

⁶³ *Id.* at 281.

⁶⁴ *Id.* at 279-80.

⁶⁵ *Id.* at 278-79.

problem with the administration of the election, cannot do so inside the polling place⁶⁶;

- Observers may only use communications or audio/video devices inside a polling place if they are on silent or vibrate mode; are not used to take photographs, videos, or record or transcribe any conversations inside the polling place; are not used for an audible conversation inside the polling place; and are not otherwise used in any manner that creates a **disruption or disturbance** inside the polling place⁶⁷;
- Observers may not **enforce the law or advocate on behalf of voters**⁶⁸;
- Observers are subject to all other limitations imposed by the Ohio election laws unless specifically exempted, and so may not campaign; hinder or delay a voter; impede, interfere with, or disrupt the election; intimidate, harass, or attempt to influence voters; or violate the secrecy of the ballot or the privacy of voters⁶⁹; and
- Ohio election law explicitly makes it a misdemeanor of the first degree for an observer to influence or attempt to influence any voter casting their vote.⁷⁰ In fact, the Ohio Election Official Manual explicitly notes that election officials' responsibility to permit election observers carries with it a "connected **right to remove observers**" for behavior inconsistent with Ohio law or Secretary of State directive, or that **interferes with, impedes, or disrupts an election**.⁷¹ Voting location managers, and county board directors or deputy directors, may remove observers from their posts, and law enforcement officers have a duty to remove observers at the direction of one of these officials.⁷²

If any observer acts inappropriately, election officials have the duty to remove that person in order to maintain order at the polling place and prevent voter intimidation.

VI. Firearms and Open Carry

While Ohio law does not explicitly prohibit carrying firearms into polling places, it is generally illegal to possess a firearm, or any other sort of weapon, in "school safety zones," which include school building and school premises,⁷³ and many school buildings serve as polling places.⁷⁴ It is also generally illegal to carry a concealed handgun, even with a concealed handgun license, into a public or private college or university, a place of worship, or a government facility, unless the site otherwise permits concealed handguns.⁷⁵ Together, these provisions mean it is functionally illegal to possess firearms, or at least concealed handguns, in many sites used as polling places.

Election observers are explicitly prohibited from carrying a firearm or other deadly weapon

⁶⁶ *Id.* at 278.

⁶⁷ *Id.* at 279.

⁶⁸ *Id.*

⁶⁹ *Id.*

⁷⁰ Ohio Rev. Code Ann. § 3599.38.

⁷¹ *Election Official Manual, supra* note 4 at 280.

⁷² *Id.*

⁷³ Ohio Rev. Code Ann. §§ 2923.122, 2901.01.

⁷⁴ *Election Official Manual, supra* note 4 at 161.

⁷⁵ Ohio Rev. Code Ann. § 2923.126.

in a polling place.⁷⁶

Finally, it is important to remember that even if carrying firearms into the polling place may be allowed, the use or handling of a firearm in a particular way may still be illegal under the statutes discussed above, if the particular behavior intimidates or threatens voters or otherwise interferes in the conduct of the election.⁷⁷

VII. Law Enforcement at Polling Locations

The **President does not have authority to order law enforcement to patrol polling places.**⁷⁸ Sheriff's deputies and police officers are commanded at the local level, and a federal statute makes it a felony for any federal official to send "armed men" to the vicinity of polling places.⁷⁹

Federal law prohibits U.S. military presence at the polls and members of the U.S. military from interfering with any qualified voter's right to vote.⁸⁰ This prohibition, of course, does not apply to members of the U.S. military who are at the polls to vote.⁸¹

Under Ohio law, precinct election officials may call upon law enforcement to aid them in enforcing the law, including in preserving order and preventing voter intimidation, and **all law enforcement** officers must immediately **obey and aid in the enforcement of any lawful order made by a precinct election official.**⁸² Likewise, police officers must "strictly enforce" the statutory provisions preventing loitering or campaigning around polling places, prohibiting hindering or delaying voters in reaching or leaving polling places, and limiting access to polling places to authorized categories of people.⁸³ The Secretary of State and board of elections may request the detailing of police officers to polling places.⁸⁴ Any law enforcement officer who fails to obey an order from the manager of a polling place, or fails to aid in enforcing a lawful order from the manager, against persons unlawfully loitering around a polling place, hindering or delaying a voter, influencing voters in casting their vote, or interfering with the casting or counting of ballots, is guilty of a misdemeanor of the first degree.⁸⁵

However, it is important to note that it is illegal for any law enforcement officer to "[i]nfluence or attempt to influence" any voter in casting their ballot for or against any candidate or issue.⁸⁶ Ohio election officials should be particularly vigilant of ensuring that

⁷⁶ Ohio Rev. Code Ann. § 3501.21.

⁷⁷ See *supra* Part III.

⁷⁸ Sean Morales-Doyle, et al., *Voters Should Not Be Intimidated*, BRENNAN CENTER FOR JUSTICE (Oct. 7, 2020), <https://www.brennancenter.org/our-work/research-reports/voters-should-not-be-intimidated>.

⁷⁹ 18 U.S.C. § 592.

⁸⁰ 18 U.S.C. § 592; 18 U.S.C. § 593.

⁸¹ 18 U.S.C. § 593.

⁸² Ohio Rev. Code Ann. § 3501.33.

⁸³ Ohio Rev. Code Ann. § 3501.35.

⁸⁴ Ohio Rev. Code Ann. § 3501.34.

⁸⁵ Ohio Rev. Code Ann. § 3599.38.

⁸⁶ *Id.*

voters are not deterred from voting at polling locations by the presence of law enforcement.

VIII. Voter Misinformation

It is illegal for any person, not authorized by a county board of elections, to make any communication that purports to be from the board of elections, or which could be reasonably construed as being from the board of elections and was intended to be so construed.⁸⁷ In some cases, voter misinformation can be considered voter intimidation when it includes threats of legal consequences for voting.⁸⁸

IX. Who to Contact for Enforcement

Ohio's elections are administered primarily by the county boards of elections.⁸⁹ On a statewide level, the Secretary of State is the state's chief election officer, appoints members of the county boards, issues general rules and instructions for the conduct of elections, and compels observance of the election laws by county officials.⁹⁰ Both the Secretary of State and county boards have a duty to investigate irregularities or potential violations of election laws

and forward them to the appropriate officials for prosecution.⁹¹ Both the Attorney General and the elected local prosecuting attorneys are empowered to investigate and prosecute election law violations.⁹²

Persons who have been subject to, or witnessed, any efforts to commit any kind of fraud or corruption in the voting process, including voter intimidation, may report this to the Secretary of State or the Attorney General, using the information below.⁹³

<p>Ohio Secretary of State – Division of Elections 22 North Fourth Street, 15th Floor Columbus, OH 43215 Tel: (614) 466-2585 or 1-877-SOS-OHIO (767-6446) ext. 2 Email: election@OhioSoS.gov</p>	<p>Ohio Attorney General 30 E. Broad Street, 14th Floor Columbus, OH 43215-3428 Tel: (614) 466-4986 or 1-800-282-0515 Email: constituent.services@ohioattorneygeneral.gov</p>
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⁸⁷ Ohio Rev. Code Ann. § 3599.43.

⁸⁸ Two men pled guilty to telecommunications fraud in connection with robocalls containing misinformation meant to intimidate voters. Cory Shaffer, *Jacob Wohl, Jack Burkman must spend 500 hours registering voters as penance for phony robocalls targeting Black voters in Cleveland*, CLEVELAND.COM (Nov. 29, 2022), <https://www.cleveland.com/court-justice/2022/11/jacob-wohl-jack-burkman-must-spend-500-hours-registering-voters-as-penance-for-phony-robocalls-targeting-black-voters-in-cleveland.html>.


⁸⁹ See Ohio Rev. Code Ann. § 3501.11.

⁹⁰ Ohio Rev. Code Ann. §§ 3501.04, 3501.05.

⁹¹ Ohio Rev. Code Ann. §§ 3501.05(N)(1), 3501.11(J).

⁹² Ohio Rev. Code Ann. § 109.95.

⁹³ *Voting Rights Information*, supra note 4.



For violations of federal law, voters may file voting complaints with the Department of Justice’s Civil Rights Division by calling (800) 253-3931, emailing voting.section@usdoj.gov, or submitting an online form at <https://civilrights.justice.gov/report/>.

Voters may also seek advice on how to report intimidation by contacting the national, nonpartisan Election Protection coalition. The main number, **866-OUR-VOTE**, is administered by the Lawyers’ Committee for Civil Rights Under Law. The coalition also has lines available for Spanish-speaking ((888)-VE-Y-VOTA), Arabic-speaking ((844)-YALLA-US), and Asian-language-speaking ((888)-API-VOTE) voters.