



October 20, 2026

VIA EMAIL

Dear Iowa Election Administrators:

Campaign Legal Center (CLC) writes to provide you with information regarding how Iowa county auditors and other officials can properly adjudicate frivolous challenges to voter eligibility under Iowa Code §§ 48A.14 and 49.79 to minimize the burden on election administration and protect the rights of voters, including important guidance on limitations imposed by federal law.¹

In particular, this letter explains that voter registration challenges under Iowa Code § 48A.14 that are based on information from the National Change of Address database should *not* be processed by your offices. Under Iowa law, such challenges are not a valid basis to cancel a voter's registration and the only action your office should take is to notify the challenger about the invalidity. Under federal law, these challenges violate the National Voter Registration Act's limitations on removals based on a change of address. In addition, such challenges constitute systematic list maintenance under the NVRA, which cannot be carried out within 90 days of a federal election. If your office receives or has already received challenges of this nature on or after August 5, 2026, your office should notify the challenger that the challenge is not valid consistent with § 48A.15(2), cancel any hearings noticed under § 48A.15(3), and send a corrective notice to any voter who received a notice for a hearing. If any voter's registration has been cancelled based on a challenge of this nature, your office should reinstate their registration and send that voter a notice of their reinstatement.

This document compiles available information from existing state and federal laws and directives on voter eligibility and the challenge process. It is intended to serve as an accessible, nonpartisan resource for election officials and their counsel throughout the election process.

CLC is a nonpartisan, nonprofit organization working to protect and strengthen the U.S. democratic process across all levels of government through litigation, policy analysis, and public education. Consistent with that mission, we have worked with election officials across the nation to improve their administrative policies, protect the

¹ This letter is not legal advice; it is intended to present a summary of relevant Iowa and federal law.



freedom to vote of citizens within their jurisdictions and strengthen the democratic process.

To that end, CLC is concerned about the potential for frivolous mass eligibility challenges during the upcoming election, which have become increasingly common throughout the country.² In recent election cycles, partisan actors have relied on faulty databases to bring hundreds of thousands of challenges to voter eligibility across the nation.³ These databases attempt to match voter registration records with publicly available information, but that information is almost always incomplete or out of date, making the database matches unreliable.⁴ They also often improperly flag registered voters with the same name as ineligible individuals, voters who are temporarily staying in another place but remain qualified at the address at which they are registered, and households where some but not all residents have moved.⁵ As a result, mass challenge lists almost always include significant numbers of eligible voters who should not be removed from the rolls.⁶

Mass eligibility challenges organized by partisan challengers and submitted with insufficient evidence risk disenfranchising eligible voters and causing unnecessary disruption to the orderly administration of the 2026 elections. We recognize that many election offices have lost their most experienced officials because of threats and volatility over the past several election cycles. We hope this letter will assist you as you provide guidance to your staff and volunteers regarding the rules for voter challenges and their responsibilities in dismissing challenges without cause, allowing your office to ensure a fair and orderly election, safeguard voters from intimidation, and minimize administrative disruption.

In the current election cycle, CLC is also concerned about the federal government's role in supplying unreliable, inaccurate data to fuel mass eligibility challenges. In

² See, e.g., Nick Corasaniti & Alexandra Berzon, *Trump's Allies Ramp Up Campaign Targeting Voter Rolls*, N.Y. Times (Mar. 3, 2024), <https://www.nytimes.com/2024/03/03/us/politics/trump-voter-rolls.html> (noting the recent wave of voter eligibility challenges in states such as Georgia, Michigan, and Nevada); David Gilbert, *Election Deniers are Ramping Up Efforts to Disenfranchise Voters*, Wired (Jul. 31, 2024), <https://www.wired.com/story/election-deniers-efforts-disenfranchise-voters>; see also *ELLY and Psephos: How Eagle AI Rebranded—and Continues to Fuel Error-Prone Voter Challenges*, Campaign Legal Center (Aug. 4, 2026), <https://campaignlegal.org/document/elly-and-psephos-how-eagle-ai-rebranded-and-continues-fuel-error-prone-voter-challenges>.

³ See Robyn Sanders & Alice Clapman, *Protections Against Mass Challenges*, Brennan Ctr. for Just. (July 17, 2024), <https://www.brennancenter.org/our-work/research-reports/protections-against-mass-challenges-voter-eligibility>. One common database is Eagle AI, which experts have criticized for its frequent identification of eligible voters as ineligible. See Alice Clapman & Andrew Garber, *A New Antidemocracy Tool*, Brennan Ctr. for Justice (Sept. 5, 2023), <https://www.brennancenter.org/our-work/analysis-opinion/new-antidemocracy-tool>. The Eagle AI database has recently been rebranded as “ELLY” or “Psephos.” See Campaign Legal Center, “ELLY and Psepos: How Eagle AI Rebranded—and Continues to Fuel Error-Prone Voter Challenges,” available at: <https://campaignlegal.org/sites/default/files/2026-08/Elly%20Backgrounder%20%28Aug%204%2C%202026%29.pdf>.

⁴ See Sanders & Clapman, *supra* note 3.

⁵ See *id.*

⁶ See *id.*

recent months, federal officials have deployed questionable data matching practices and historically inaccurate databases and systems to compile lists of purportedly ineligible registered voters.⁷ Data supporting mass eligibility challenges is likely to come from the federal government's use of an immigration status verification tool called the Systematic Alien Verification for Entitlements (SAVE) program, or similarly unreliable data matching programs or practices.⁸ The federal government's repeated attempts to use SAVE or similar data matching tools to identify ineligible voters on state voter rolls have resulted in unreliable lists that misidentify eligible voters as non-U.S. citizens.⁹ The Department of Homeland Security's recent efforts to identify non-U.S. citizens on state voter rolls have spawned unsubstantiated claims and resulted in incomplete, unverified lists of voters.¹⁰ In fact, multiple federal courts have determined that the SAVE program is not a reliable source for verifying voters' current citizenship status or eligibility.¹¹ Given the federal government's insistence

⁷ Carter Walker, *Trump administration explains how it identified potential noncitizen voters, says it will provide list to Pennsylvania*, Votebeat (Sept. 16, 2026), <https://www.votebeat.org/pennsylvania/2026/09/16/noncitizen-voter-department-homeland-security-pennsylvania-methodology/>; Shannon Bond, Jenna McLaughlin, & Audrey Nguyen, *In primetime speech, Trump doesn't provide evidence for illegal voting*, NPR (July 16, 2026), <https://www.npr.org/2026/07/16/nx-s1-5896448/trump-election-address>; Jude Joffe-Block & Miles Parks, *DHS acknowledges the noncitizen numbers it touted on voter rolls were inflated*, NPR (Aug. 25, 2026), <https://www.npr.org/2026/08/25/nx-s1-5940807/noncitizen-voters-trump-nevada-call>; Nick Corasaniti & Hamed Aleaziz, *Whistle-Blower: Federal Agents May Have Broken State Laws in Search for Voter Fraud*, N.Y. Times (Sept. 14, 2026), <https://www.nytimes.com/2026/09/14/us/politics/homeland-security-voter-fraud-investigation.html?smid=nytcare-ios-share>; Nick Corasaniti, *From 16,000 to 185 to Zero: Trump's Claims of Illegal Voting in Nevada Fizzle.*, N.Y. Times (Sept. 24, 2026), <https://www.nytimes.com/2026/09/24/us/politics/nevada-voters-homeland-security-trump.html>.

⁸ *What Is the SAVE System?*, Campaign Legal Center (May 12, 2026), <https://campaignlegal.org/update/what-save-system>; Jude Joffe-Block & Miles Parks, *33 million voters have been run through a Trump administration citizenship check*, NPR (Sept. 11, 2025), <https://www.npr.org/2025/09/10/nx-s1-5477367/save-election-citizenship-data-trump>.

⁹ See, e.g., Jude Joffe-Block, *Trump's SAVE tool is looking for noncitizen voters. But it's flagging U.S. citizens too*, NPR (Dec. 10, 2025), <https://www.npr.org/2025/12/10/nx-s1-5588384/save-voting-data-us-citizens>; Jen Fifield & Zach Despart, *"Not Ready for Prime Time." A Federal Tool to Check Voter Citizenship Keeps Making Mistakes.*, ProPublica and The Texas Tribune (Feb. 13, 2026), <https://www.propublica.org/article/save-voter-citizenship-tool-mistakes-confusion>; Nicholas Kerr & Elise Spenner, *System that DHS is urging states to use to assess voter rolls known to return faulty results: reports*, ABC News (July 19, 2026), <https://abcnews.com/Politics/system-dhs-urging-states-assess-voter-rolls-return/story?id=134863557>.

¹⁰ Nick Corasaniti, *Homeland Security Made a Big Claim About Noncitizen Voting. Now It Can't Prove It.*, N.Y. Times (Aug. 20, 2026), <https://www.nytimes.com/2026/08/20/us/politics/trump-nevada-voter-election-fraud.html>; Jude Joffe-Block & Miles Parks, *DHS acknowledges the noncitizen numbers it touted on voter rolls were inflated*, NPR (Aug. 25, 2026), <https://www.npr.org/2026/08/25/nx-s1-5940807/noncitizen-voters-trump-nevada-call>.

¹¹ *Mi Familia Vota v. Fontes*, 129 F.4th 691, 708-709 (9th Cir. 2025); *Arcia v. Fla. Sec'y of State*, 772 F.3d 1335, 1341 (11th Cir. 2014); *League of Women Voters v. U.S. Dep't of Homeland Security*, 835 F.Supp.3d 79, 113 (D.D.C. 2026); *Common Cause v. U.S. Dep't of Just.*, No. CV 26-1352 (SLS), 2026 WL 3033772, at *33 (D.D.C. Oct. 9, 2026).

on using unreliable systems and practices to compile lists of purportedly ineligible voters, state and local election officials should be prepared for this inaccurate data to form the basis for mass eligibility challenges or demands by the federal government to engage in unlawful voter list maintenance in advance of the 2026 midterm elections.

To mitigate the potential harms to both voters and election administrators caused by such baseless challenges, CLC provides the election law summary below to support your development of uniform processes for adjudicating voter eligibility challenges, in compliance with the following requirements under Iowa and federal law.

I. Voter Challenge Procedures in Iowa

As you know, Iowa law allows individuals and election officials to challenge the eligibility of registered voters to remain on the registration rolls under certain circumstances. When submitted without sufficient evidence and adherence to the requirements imposed by state law, challenges to voter eligibility can be weaponized by partisan actors to intimidate voters and impose significant burdens on election officials. Both Iowa law and federal law include several protections against baseless challenges, which we have detailed further below.

A. Written challenges by private parties

Iowa law also allows registered voters to provide written challenges to another voter's qualifications at any time.¹² However, county election officials cannot process such a challenge if it is received less than seventy days prior to the next regularly scheduled election, unless it concerns a voter who registered or changed their existing registration in the prior 20 days.

Only one registered voter can be challenged at a time.¹³ A written challenge must identify which qualification or qualifications the challenged voter allegedly lacks, and the challenger must affirm that the information contained in the written challenge is true.¹⁴

If a written challenge is received less than seventy days prior to the next regularly scheduled election, county auditors should take no actions until after that election.¹⁵ If a written challenge is received more than seventy days prior to the next regularly scheduled election—or, if the next regularly scheduled election has passed—county auditors should notify the challenged voter about the challenge and any scheduled

¹² *Id.* § 48A.14.

¹³ Our understanding is that recent guidance from the Iowa Secretary of State instructs that lists of voters submitted by individuals should not be considered valid challenges under Iowa Code § 48A.14 because of the limitation to challenge a single voter at a time. Instead, your offices should notify the challenger that the challenges are invalid because they challenge multiple voters at once. *See* Iowa Code § 48A.15(2).

¹⁴ *Id.*

¹⁵ *Id.* § 48A.14(4).

hearing within five business days.¹⁶ Any hearing to decide a written challenge must be scheduled between 20 and 30 days later.¹⁷

The challenged voter is entitled to appear at their hearing or have someone else appear on their behalf.¹⁸ The challenger is also entitled to appear and present documents or statements in support of the challenge. The commissioner of elections must decide the challenge, and that decision may be appealed to the district court of that county. A district court's decision on any appeal is final.¹⁹

B. In-person challenges at precincts

When an individual appears at a precinct vote, any other registered voter or precinct election official may challenge the voter's qualifications.²⁰ Election officials should challenge a voter whom the official "knows or suspects is not duly qualified."²¹ In no event should a challenged voter be turned away from the precinct; even if the challenge is sustained, the voter must be permitted to vote a provisional ballot.²²

Once a challenge is made, a precinct election official may examine the challenged voter under oath concerning the voter's qualifications to vote.²³ If the voter is challenged by another registered voter, the challenger may also present evidence or facts to the precinct election official. If the challenge is ultimately withdrawn, the voter may vote normally. However, if the challenge is sustained, the voter must be permitted to cast a provisional ballot. Such a voter will have until noon on the Monday following the election to provide proof of their qualifications in order to have their provisional ballot counted.²⁴

II. Legal Protections Concerning Challenges

As you know, both federal and Iowa law provide robust protection against erroneous removal from the voter rolls, voter intimidation, and other forms of infringement on the fundamental right to vote. The process for responding to voter challenges—especially those conducted in bulk—must therefore comply with all federal and state laws, as well as the U.S. Constitution. As such, all Iowa election officials have the responsibility to protect Iowa voters from baseless and discriminatory challenges and ensure that the adjudication of all voter challenges complies with both state and federal law.

¹⁶ *Id.* § 48A.15.

¹⁷ *Id.*

¹⁸ *Id.* § 48A.16.

¹⁹ *Id.*

²⁰ Iowa Code § 49.79(1).

²¹ *Id.*

²² *Id.* §§ 49.80, 49.81.

²³ *Id.* § 49.80.

²⁴ *Id.* § 49.81

A. Removals Based on Change of Address

Both Iowa and federal law regulate the use of the National Change of Address database for removing registered voters from the rolls. In particular, the NVRA strictly regulates the process for removing a registered voter from the voter registration rolls based on suspected change of address, including when removals are triggered by mass voter eligibility challenges.²⁵ Election officials may only remove a voter from the list of registered voters based on change in residence when: (1) the voter confirms in writing that they have moved outside of the jurisdiction; or (2) election officials have satisfied the process outlined in Section 8(d)(2) of the NVRA.²⁶ The United States Department of Justice has cautioned that “[a] third-party submission—such as a submission of another individual’s information via an online portal or a challenge based solely on public database information—is not confirmation by the registrant of a change of address.”²⁷ Consequently, **removing individuals from the list of registered voters due to suspected change of address on the basis of mass voter eligibility challenges alone likely violates the NVRA.**²⁸

Similarly, information from the NCOA database is not a valid basis for a challenge under Iowa Code § 48A.14. The Iowa Attorney General construed the predecessor statute to § 48A.14 and determined that a registration may be challenged “only upon allegation of a reason or reasons sufficient, under law, to invalidate the registration.”²⁹ Such challenges should not “proceed to an evidentiary hearing” if the allegations presented are insufficient to invalidate the registration.³⁰ For an alleged reason to be sufficient, it must be consistent with the bases available to cancel a voter’s registration under Iowa law.³¹

However, Iowa law expressly limits the use of the NCOA database for cancellation purposes. If information provided by the NCOA database indicate that a voter has moved out of the county where they are registered, election commissioners may only designate the registration record as “inactive” and send a notice of inactive status to the voter.³² From there, a voter’s registration may only be cancelled if they remain inactive for two successive general elections.³³ Moreover, because voters may live elsewhere temporarily while maintaining residence in Iowa, the Iowa Attorney General has held that mere allegations of a change in address are not sufficient to support a valid challenge to a voter’s registration.³⁴

²⁵ See 52 U.S.C. § 20507(b); DOJ Guidance at 4-6.

²⁶ See 52 U.S.C. § 20507(b)-(d); DOJ Guidance at 4. The DOJ Guidance also provides detailed information on the requirements of Section 8(d)(2). Election officials may only remove a voter under Section 8(d)(2) of the NVRA if that voter: (1) does not vote in any election between the date the notice was sent and the second general election following the notice; and (2) does not respond to the notice. 52 U.S.C. § 20507(d)(2).

²⁷ DOJ Guidance at 4.

²⁸ *Id.* at 4-5.

²⁹ See 1982 Iowa Op. Att’y Gen. 550.

³⁰ *Id.*

³¹ *Id.*

³² Iowa Code § 48A.27(4)(b).

³³ *Id.* § 48A.30(g).

³⁴ 1982 Iowa Op. Att’y Gen. 550.

Similarly, information concerning whether a voter has registered to vote in another jurisdiction cannot support a challenge to a voter's registration under § 48A.14. Iowa law only permits cancelling a voter's registration based on their registration in another jurisdiction *if* that information is received by an election official from that other jurisdiction.³⁵ This is a critically important limitation because election officials have access to unique, non-public identifying information that can differentiate individuals who have the same name.³⁶ Allegations from private parties concerning whether an Iowa voter has registered in another jurisdiction is not a valid basis for a challenge under § 48A.14 because it does not come from another election official, as required by Iowa law.

B. Challenges on the Eve of an Election

Both Iowa and federal law regulate when voters may be challenged or otherwise removed from voter registration lists. Under Iowa law, county auditors cannot take any steps to process a written challenge that is received less than seventy days prior to the next regularly scheduled election.³⁷ Because of the upcoming November 3, 2026 election, **county auditors cannot process any challenge received after August 25, 2026.** If a written challenge is received after August 25, 2026, county auditors should not evaluate the validity of the challenge, notify the challenged voter, or schedule a hearing to evaluate the challenge until the November 3, 2026 election has passed.

The NVRA further mandates that election officials may not “systematically remove” ineligible voters from voter registration rolls within 90 days preceding an election for federal office.³⁸ This restriction “applies to list maintenance programs based on third-party challenges derived from any large, computerized data-matching process.”³⁹ Any “mass computerized data-matching process” is systematic “where the inclusion of a person's name on a list electronically compared to other agency databases is enough for removal from the voter rolls.”⁴⁰ This includes programs even where individual notice is provided to the voter.⁴¹

For that reason, **sustaining mass challenges to voters' registration would likely violate the NVRA's prohibition on the “systematic” removal of voters from the rolls within 90 days of a federal election.**⁴² According to the U.S.

³⁵ Iowa Code § 48A.30(b).

³⁶ See, e.g., 52 U.S.C. § 21083(a)(5).

³⁷ Iowa Code § 48A.14(4).

³⁸ 52 U.S.C. § 20507(b)(1).

³⁹ DOJ Guidance at 4.

⁴⁰ *Va. Coal for Immigrant Rts. v. Beals*, No. 24-2071, 2024 WL 4601052, at *1 (4th Cir. Oct. 27, 2024).

⁴¹ See *Mi Familia Vota v. Fontes*, 129 F.4th 691 (9th Cir. 2025); *Arcia v. Fla. Sec'y of State*, 772 F.3d 1335 (11th Cir. 2014).

⁴² 52 U.S.C. § 20507(c)(2)(A).

Supreme Court, this “moratorium” is currently in effect and applies to programs that rely on data generated using the federal government’s SAVE system.⁴³

C. Uniform and Nondiscriminatory Standards

The U.S. Constitution and federal law require that each state and political subdivision use uniform, nondiscriminatory standards and processes for evaluating voter eligibility challenges.⁴⁴ Under the U.S. Constitution, counties in the same state are prohibited from “us[ing] varying standards to determine what [i]s a legal vote” when processing ballots in presidential elections.⁴⁵ Similarly, the National Voter Registration Act (NVRA) mandates that any voter registration list maintenance activity be “uniform, nondiscriminatory, and in compliance with the Voting Rights Act[.]”⁴⁶ including “any list maintenance activity based on third party submissions.”⁴⁷ The U.S. Department of Justice has advised that numerous list maintenance methods commonly used in mass voter eligibility challenges might violate the NVRA, including “comparing voter files to outdated or inaccurate records or databases, taking action that erroneously affects a particular class of voters (such as newly naturalized citizens), or matching records based solely on first name, last name, and date of birth.”⁴⁸

Even before the enactment of the NVRA, the Iowa Attorney General issued an opinion concerning the predecessor statute to Iowa Code §48A.14 that emphasized the importance of consistent, even-handed application of Iowa’s voter challenge laws. Specifically, the Iowa Attorney General highlighted the potential for county auditors’ handling of these challenges to “generate claims that the county commissioner of elections is discriminating among different classes of registered voters.”⁴⁹ County auditors, therefore, should work to eliminate any meaningful divergence among them in the standards and processes used to evaluate voter challenges in different municipalities and replace them with uniform standards and processes. By doing so, Iowa voter challenge processes can avoid the “arbitrary and disparate treatment” of challenged ballots that violates the U.S. Constitution.⁵⁰

D. Racially Discriminatory Challenges

Organized challengers frequently target voters from historically disenfranchised communities to intimidate or deter members of those communities from voting.⁵¹

⁴³ *League of Women Voters, et al. v. Dep’t of Homeland Security*, 26A308, Order on Application for Stay, 609 U.S. ____ (2026) (per curiam), available at https://www.supremecourt.gov/opinions/25pdf/26a308_pok0.pdf.

⁴⁴ *See Bush v. Gore*, 531 U.S. 98, 104 (2000) (finding that the lack of uniform standards across counties for when to count a ballot violates the Constitution’s Equal Protection Clause).

⁴⁵ *Id.* at 107.

⁴⁶ 52 U.S.C. § 20507(b).

⁴⁷ DOJ Guidance at 3.

⁴⁸ *Id.*

⁴⁹ 1982 Iowa Op. Att’y Gen. 550.

⁵⁰ *Bush*, 531 U.S. at 104-05.

⁵¹ *See, e.g.,* Nicolas Riley, *Voter Challenges*, Brennan Ctr. for Just. at 11-12 (2012), https://www.brennancenter.org/sites/default/files/legacy/publications/Voter_Challengers.pdf.

Sustaining such discriminatory challenges could violate the U.S. Constitution and federal law. Taken together, the Equal Protection Clause of the Fourteenth Amendment⁵² and Section 2 of the Voting Rights Act⁵³ prohibit the use of voting practices that result in citizens being denied equal access to the democratic process on account of “race, color, or membership in a language minority group.”⁵⁴ Because these are often the exact groups targeted by mass challenges, local election officials should consider carefully whether granting mass challenges brought before them would have the effect of unlawfully disadvantaging voters because of their race.

E. Voter Intimidation

Baseless mass challenges to voter eligibility could constitute voter intimidation, because such challenges are often made in bad faith to deter eligible citizens—including members of historically disenfranchised groups—from voting. Such voter intimidation is illegal under both federal and Iowa law.

Federal law provides that 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” in a federal election has committed a federal crime.⁵⁵ Additionally, several federal statutes impose civil liability for voter intimidation. Section 11(b) of the Voting Rights Act makes it unlawful to “intimidate, threaten, or coerce” another person, or attempt to do so, “for voting or attempting to vote” or “for urging or aiding any person to vote or attempt to vote.”⁵⁶ In 2016, a federal court determined that voter challenges that intentionally target geographic areas with a large percentage of racial or ethnic minorities and that had the purpose or effect of deterring qualified members of those minority groups from voting violated a court order in a case involving claims under Section 11(b).⁵⁷ Further, the U.S. Department of Justice has cautioned that challenges made with the intention of or that have the effect of intimidating a reasonable voter can violate Section 11(b).⁵⁸ And the Ku Klux Klan Act of 1871 makes it unlawful for “two or more persons to conspire to prevent by force, intimidation, or threat,” any voter from casting a ballot for the candidate of their choice.⁵⁹

Similarly, Iowa law criminalizes intimidating, threatening, or coercing a voter not to vote or register to vote.⁶⁰ Further, precinct officials are empowered to order the arrest

⁵² U.S. Const. amend. XIV.

⁵³ 52 U.S.C. § 10301.

⁵⁴ *See Guidance Under Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, for Redistricting and Methods of Electing Government Bodies*, U.S. Dept. of Justice (Sept. 1, 2021), <https://www.justice.gov/opa/press-release/file/1429486/download>.

⁵⁵ 18 U.S.C. § 594.

⁵⁶ 52 U.S.C. § 10307(b).

⁵⁷ *See Democratic Nat’l Comm. v. Republican Nat’l Comm.*, No. CV 81-03876, 2016 WL 6584915, at *2 (D.N.J. Nov. 5, 2016).

⁵⁸ *See Voter Registration List Maintenance: Guidance under Section 8 of the National Voter Registration Act, 52 U.S.C. § 20507*, U.S. Dept. of Justice at 3 (Sept. 2024) (see attachment) [hereinafter “DOJ Guidance”].

⁵⁹ 42 U.S.C. § 1985(3).

⁶⁰ Iowa Code § 39A.2(1)(c).

of anyone who behaves in a disorderly manner and disturbs the election.⁶¹ If such issues are anticipated, the commissioner or chairperson of the precinct board may assign a peace officer to be present at the polling place.⁶²

To that end, each precinct official and county auditor should review their duties and responsibilities to maintain a peaceful and orderly polling place and be prepared to remove any challengers who fail to abide by Iowa law. Precinct officials and county auditors should also not hesitate to refer incidents of voter intimidation, including repeated impermissible voter challenges orchestrated by partisan outside groups, to the appropriate local law enforcement agencies.

* * *

By ensuring compliance with the processes, requirements, and limitations of Iowa's voter challenge laws, you can mitigate the potential harm and disruption caused by frivolous voter eligibility challenges. Our hope is that this summary of the relevant law will help you to prepare proactively to develop written procedures and policies for adjudicating such challenges and train your staff, volunteers, and election inspectors on the requirements of Iowa and federal law applicable to voter eligibility challenges.

Please do not hesitate to reach out with any questions. We stand ready to assist you in upholding federal and state law and protecting Iowans' freedom to vote.

Sincerely,

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⁶¹ *Id.* § 49.105.

⁶² *Id.* § 49.104.