

Wis. Stat. § 5.061
HAVA Administrative Complaint
Exhibit 1

1. The University of Wisconsin-Parkside has violated and is violating the Help America Vote Act (HAVA) by engaging in university-sponsored student get-out-the-vote and voter registration drives.

2. Alternatively, if the University of Wisconsin-Parkside is legally authorized to engage in university-sponsored student get-out-the-vote and voter registration drives, then, the university's student get-out-the-vote and voter registration drives have failed and are failing to comply with HAVA's legal requirements.

Parties

3. _____ Ronald Heuer is President of Wisconsin Voter Alliance.

4. _____ Wisconsin Voter Alliance is a non-profit corporation with a mission to improve Wisconsin's election administration.

5. _____ University of Wisconsin-Parkside is a state agency of the State of Wisconsin.

6. _____ The non-party Tufts University, Jonathan M. Tisch College of Civic Life, National Study of Learning, Voting and Engagement (NSLVE) is located in Massachusetts.

HAVA has an express preemption clause.

7. 52 U.S. Code § 21084, accurately quoted here, preempts states from having election "technology and administration requirements" which are "inconsistent" with federal law:

The requirements established by this subchapter are minimum requirements and nothing in this subchapter shall be construed to prevent a State from establishing election technology and administration requirements that are more strict than the requirements established under this subchapter so long as such State requirements are not inconsistent with the Federal requirements under this subchapter or any law described in section 21145 of this title.

Pub. L. 107–252, title III, § 304, Oct. 29, 2002, 116 Stat. 1714. The statutory reference to the subchapter is to HAVA, including 52 U.S. Code § 21083(5)(B)(i). The statutory reference to § 21145 includes descriptions of other federal laws: (1) National Voter Registration Act of 1993 (42 U.S.C. 1973gg et seq.) [now 52 U.S.C. 20501 et seq.]; (2) The Voting Rights Act of 1965 (42 U.S.C. 1973 et seq.) [now 52 U.S.C. 10301 et seq.]; (3) The Voting Accessibility for the Elderly and Handicapped Act (42 U.S.C. 1973ee et seq.) [now 52 U.S.C. 20101 et seq.]; (4) The Uniformed and Overseas Citizens Absentee Voting Act (42 U.S.C. 1973ff et seq.) [now 52 U.S.C. 20301 et seq.]; (5) The National Voter Registration Act of 1993 (42 U.S.C. 1973gg et seq.) [now 52 U.S.C. 20501 et seq.]; (6) The Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.); and (7) The Rehabilitation Act of 1973 (29 U.S.C. 701 et seq.).

8. Therefore, any state election “technology” or “administration” requirement which is “more strict” than the subchapter’s requirements and is “inconsistent” with these federal laws is preempted—i.e., prohibited.

HAVA preempts university-sponsored student get-out-the-vote and voter registration drives.

9. HAVA, 52 U.S. Code § 21084, preempts government-sponsored get-out-the-vote drives and voter registration drives.

10. In determining whether an “inconsistent” “election technology and administration requirement” exists under 52 U.S. Code § 21084, it is important to note that

the U.S. Election Assistance Commission has already opined that use of HAVA funds for government-sponsored get-out-the-vote drives and voter registration drives are inconsistent with HAVA.

11. In 2008, the U.S. Election Assistance Commission issued an advisory opinion that election officials are prohibited from using federal funds to conduct “voter registration drives” and “get out the vote efforts” because they are inconsistent with HAVA:

3. Neither Section 101 nor 251 funds may be used to conduct voter registration drives or get out the vote efforts; including advertising for the event, setting up booths, and paying salaries of employees who register new voters.
4. HAVA authorizes the use of Section 101 funds to educate voters about registering to vote. However, as note in response to question 2, neither Section 101 nor 251 funds can be used for “get out the vote” activities.

U.S. Election Assistance Commission Funding Advisory Opinion FAO-08-005.

12. This advisory opinion was based on 52 U.S.C. § 20901(b)(1)(C) limiting use of HAVA funds to educating voters, not for use of HAVA funds for government-sponsored get-out-the-vote and voter registration drives:

A State shall use the funds provided under a payment made under this section to carry out one or more of the following activities: ...

(C) Educating voters concerning voting procedures, voting rights, and voting technology.

Id.

13. Since fiscal year 2006, Office of Inspector General (OIG) audits of HAVA grants have resulted in 19 recommendations and just over \$1 million dollars in questioned costs related to government-sponsored get-out-the-vote drives and voter registration drives. Kaardal Decl., Ex. F.

14. The following cases are examples of the OIG concluding that the HAVA fund use for government-sponsored get-out-the-vote drives and voter registration drives was inconsistent with HAVA.

15. The Colorado Office of Secretary of State charged \$356,846 to its HAVA grant for contractual services associated with a “2012 Voter Registration Campaign,” which included only an incidental educational component. As a result, the charges were questioned. Ex. G. The OIG concluded in its January 2014 report that such spending on a government-sponsored voter registration drive was inconsistent with HAVA:

During the summer of 2012, the Office charged \$356,846 to an account entitled “Marketing—Public Relations”, for activities associated with an initiative described on the Office’s web site as the “2012 Voter Registration Campaign.” These costs included small payments to media outlets and \$348,480 of payments to three contractors, none of which were made pursuant to a contract or through competitive solicitation...[V]oter registration activities do not qualify for funding under the umbrella of improvements to the administration of elections for Federal office because the activities do not directly contribute to the administration of a Federal election.”

Ex. G at 13-14.

16. The Mississippi Office of Secretary of State expended HAVA funds for get-out-the-vote efforts and voter registration forms, which are not allowable under HAVA.

Ex. H. The OIG concluded in its August 2017 report that such spending on get-out-the-vote efforts and voter registration forms was inconsistent with HAVA:

The Office expended \$62,117 of HAVA funds for four transactions for advertising which would be considered get out the vote efforts. The Office expended \$4,761 of HAVA funds for one transaction which was for voter registration forms. These costs are not allowable under HAVA Section 101(b)(1)(B) or (C).

Ex. H at 11.

17. The Florida Office of Secretary of State charged salaries and benefits for poll workers serving at voter registration drives to HAVA grants, resulting in \$139,056 in questioned costs. Ex. I. The OIG concluded in its November 2008 report that such spending was inconsistent with HAVA:

6. Poll worker charges not appropriate for voter registration drives. Salaries and benefits for poll workers serving at voter registration drives in one of the counties visited were charged to the HAVA voter education grants, and the portion allocable to registration activity was not separately stated. Therefore, the total cost of poll workers for fiscal years 2004 through 2006 of \$139,056 are questioned.

Ex. I at 5.

18. Additionally, the OIG concluded in its April 2017 report that the South Dakota Office of Secretary of State expenditure of \$1,474 in HAVA for sample registration forms for K-12 students was inconsistent with HAVA. Ex. J at 12

19. To be sure, the use of HAVA funds for government-sponsored voter registration drives could be more restrictive than 52 U.S.C. § 21084's prohibition on university-sponsored student get-out-the-vote and voter registration drives. But, there is no evidence at all that university-sponsored student get-out-the-vote and voter registration drives are 'consistent' with HAVA. The only evidence that exists is that university-sponsored get-out-the-vote and voter registration drives are "inconsistent" with HAVA.

20. In summary, university-sponsored student get-out-the-vote and voter registration drives are expressly preempted under HAVA.

21. Consistently, federal campaign finance laws are premised on get-out-the-vote and voter registration drives being conducted by private parties, not the universities. *See* 11 C.F.R. § 100.133.

22. There is no provision in federal law legally authorizing universities to conduct university-sponsored student get-out-the vote and voter registration drives; instead, HAVA preempts university-sponsored get-out-the vote drives and voter registration drives.

HAVA authorizes and regulates sharing of some private driver data for private get-out-the-vote and voter registration drives, but not student data.

23. HAVA, 52 U.S.C. § 21083(a)(5)(B), authorizes and regulates sharing some private driver data for private get-out-the-vote and voter registration drives.

24. But, HAVA does not authorize universities to use private student data for university-sponsored student get-out-the-vote and voter registration drives.

Additionally, HAVA imposes 14 voter registration system requirements on the State

25. 52 U.S.C. § 21083 states, "each State, acting through the chief State election official, shall implement, in a uniform and nondiscriminatory manner, a single, uniform, official, centralized, interactive computerized statewide voter registration list defined, maintained, and administered at the State level that contains the name and registration information of every legally registered voter in the State and assigns a unique identifier to each legally registered voter in the State (in this subsection referred to as the "computerized list"), and includes the following:

- (i) The computerized list shall serve as the single system for storing and managing the official list of registered voters throughout the State.
- (ii) The computerized list contains the name and registration information of every legally registered voter in the State.
- (iii) Under the computerized list, a unique identifier is assigned to each legally registered voter in the State.
- (iv) The computerized list shall be coordinated with other agency databases within the State.
- (v) Any election official in the State, including any local election official, may obtain immediate electronic access to the information contained in the computerized list.

- (vi) All voter registration information obtained by any local election official in the State shall be electronically entered into the computerized list on an expedited basis at the time the information is provided to the local official.
- (vii) The chief State election official shall provide such support as may be required so that local election officials are able to enter information as described in clause (vi).
- (viii) The computerized list shall serve as the official voter registration list for the conduct of all elections for Federal office in the State.

26. 52 U.S.C. § 21083 has fourteen legal requirements for a State's voter registration system:

- (1) the chief State election official implements the voter registration system
- (2) the implementation shall be in a uniform and nondiscriminatory manner
- (3) the voter registration system shall be a single, uniform, official, centralized, interactive statewide voter registration list
- (4) the statewide voter registration list shall be maintained and administrated at the State level
- (5) the statewide voter registration list shall contain the name and registered information of every legally registered voter in the State
- (6) the statewide voter registration system shall assign a unique identifier to each legally registered voter
- (7) the computerized list shall serve as the single system for storing and managing the official list of registered voters throughout the State.
- (8) the computerized list contains the name and registration information of every legally registered voter in the State.
- (9) Under the computerized list, a unique identifier is assigned to each legally registered voter in the State.
- (10) The computerized list shall be coordinated with other agency databases within the State.
- (11) Any election official in the State, including any local election official, may obtain immediate electronic access to the information contained in the computerized list.
- (12) All voter registration information obtained by any local election official in the State shall be electronically entered into the computerized list on an expedited basis at the time the information is provided to the local official.
- (13) The chief State election official shall provide such support as may be required so that local election officials are able to enter information as described in clause (vi).
- (14) The computerized list shall serve as the official voter registration list for the conduct of all elections for Federal office in the State.

Wisconsin Elections Commission's WisVote voter registration system generally meets the 14 HAVA requirements.

27. For the purposes of this administrative complaint, Wisconsin Elections Commission (WEC) maintains the WisVote database in general compliance with the 14 requirements of 52 U.S.C. § 21083 as follows.

28. First, the WEC Administrator is the chief State election official who implements the WisVote voter registration system.

29. Second, WEC implements WisVote in a uniform and nondiscriminatory manner

30. Third, WEC maintains WisVote voter registration system as a single, uniform, official, centralized, interactive statewide voter registration list

31. Fourth, WEC maintains and administers the WisVote statewide voter registration list at the State level

32. Fifth, WEC's WisVote statewide voter registration list contains the name and registered information of every legally registered voter in the State

33. Sixth, WEC's WisVote statewide voter registration system assigns a unique identifier for each legally registered voter

34. Seventh, WEC's WisVote computerized list serves as the single system for storing and managing the official list of registered voters throughout the State.

35. Eighth, WEC's WisVote computerized list contains the name and registration information of every legally registered voter in the State.

36. Ninth, under the WEC's WisVote computerized list, a unique identifier is assigned to each legally registered voter in the State.

37. Tenth, WEC's WisVote computerized list is coordinated with other agency databases within the State.

38. Eleventh, WEC ensures that any election official in the State, including any local election official, may obtain immediate electronic access to the information contained in the WisVote computerized list.

39. Twelfth, WEC ensures that all voter registration information obtained by any local election official in Wisconsin is electronically entered into the computerized list on an expedited basis at the time the information is provided to the local official.

40. Thirteenth, the WEC Administrator provides support as may be required so that local election officials are able to enter information into WisVote.

41. Fourteenth, the WEC ensures that the WisVote computerized list serves as the official voter registration list for the conduct of all elections for Federal office in the State.

The University of Wisconsin-Parkside engages in university-sponsored student get-out-the-vote and voter registration drives.

42. The University of Wisconsin-Parkside engages in university-sponsored student get-out-the-vote and voter registration drives.

43. Tufts University, Jonathan M. Tisch College of Civic Life, National Study of Learning, Voting and Engagement (NSLVE), and University of Wisconsin-Parkside engage in a public-private exchange of student private data to support University of Wisconsin-Parkside's engagement in government-sponsored student get-out-the-vote and voter registration drives.

44. University of Wisconsin-Parkside is a state agency of the State of Wisconsin and as such is subject to HAVA.

45. University of Wisconsin-Parkside has several reports, attached hereto as exhibits, documenting its engagement in student get-out-the-vote and voter registration drives:

- University of Wisconsin-Parkside 2022 Democratic Action Plan (Exhibit A)
- UW Parkside Action Plan Fall 2020 The Presidential Elections (Exhibit B)
- 2020 NSLVE Report: Student Voting Rates for University of Wisconsin-Parkside (Exhibit C)
- 2014 and 2018 NSLVE Report: Student Voting Rates for University of Wisconsin-Parkside (Exhibit D)
- 2012 and 2016 NSLVE Report: Student Voting Rates for University of Wisconsin-Parkside (Exhibit E)

46. University of Wisconsin-Parkside 2022 Democratic Action Plan (Exhibit A at p. 1) indicates that its goal is “increase the number of students who register and vote in the 2022 Midterm Election by 15% over the previous midterms.”

47. UW Parkside Action Plan Fall 2020 The Presidential Elections (Exhibit B at p. 5) shows its use of student voter registration data and NSLVE reports in its plan to increase student voter registration and student voting rates:

NSLVE

Student voting rates reported by the National Study of Learning Voting and Engagement (NSLVE) for 2014 indicate that, at a 60.8% voting rate, Parkside was 14% higher than the average for all other participating institutions (N=850) in the study, awarding our institution a bronze seal. However, in 2016, these numbers declined: the lesson we learned from this was that it is not enough to make one time or sporadic efforts at civic engagement. Consistent commitment is necessary. We interpreted our decline in voting to be strongly related to the registration rate, since registered students voted at nearly the same rate as 2012. Therefore, in 2018, our biggest push was in voter registration.

Results from 2018 demonstrate that we were able to increase our voter registration rate by 6% and our voting rate of these registered students improved by 23% over 2014.

48. The 2020 NSLVE Report: Student Voting Rates for University of Wisconsin-Parkside (Exhibit C at p. 2), published in October of 2021, indicates that NSLVE reports are intended to be used by University of Wisconsin-Parkside to increase student voter registration and student voting rates:

We are pleased to send you this tailored report containing your students' voting rates for 2020. This report contains three years of relevant topline data: 2016, 2018 and 2020. As always, we disaggregate this data so you can better identify and address gaps in participation.

College and university student participated in record-breaking numbers in the 2020 election. In 2016, the Average Institutional Voting Rate was 53%. This year, it jumped to 66%. We encourage you to review Democracy Counts 2020 our most recent national report.

49. The 2014 and 2018 NSLVE Report: Student Voting Rates for University of Wisconsin-Parkside (Exhibit D at p. 2) state that the University of Wisconsin-Parkside provides its student data to NSLVE to produce the student voter registration and voting rates found in the reports:

The voter registration and voting rates in this report reflect the percentage of your institution's students who were eligible to vote and who voted in the 2014 and 2018 elections. These results are based on enrollment records your institution submitted to the National Student Clearinghouse and publicly available voting files collected by Catalist. We exclude FERPA-blocked records.

50. 2012 and 2016 NSLVE Report: Student Voting Rates for University of Wisconsin-Parkside (Exhibit E at p. 2) state that the University of Wisconsin-Parkside provides its student data to NSLVE to produce the student voter registration and voting rates found in the reports:

The voter registration and voting rates in this report reflect the percentage of your institution's students who were eligible to vote and who voted in the 2012 and 2016 elections. These results are based on enrollment records your institution submitted to the National Student Clearinghouse (FERPA-blocked records excluded) and publicly available voting files collected by Catalist.

51. In addition to Catalist, L2, Inc., located in the State of Washington, has had or has a role in collecting publicly available voting records for NSLVE to use to produce its reports to the University of Wisconsin-Parkside.

52. The University of Wisconsin-Parkside continues to engage in HAVA-prohibited university-sponsored student get-out-the-vote and voter registration drives in the 2024 election and beyond.

Count

HAVA Violations

53. The above paragraphs are incorporated herein by reference.

54. The University of Wisconsin-Parkside has violated and is violating the Help America Vote Act, 52 U.S.C. § 21083, by engaging in university-sponsored student get-out-the-vote and voter registration drives.

55. HAVA, 52 U.S.C. § 21083 and 52 U.S.C. § 21084, preempt university-sponsored student get-out-the-vote and voter registration drives.

56. The University of Wisconsin-Parkside violates HAVA's prohibition by engaging in university-sponsored student get-out-the-vote and voter registration drives.

57. Alternatively, if the university-sponsored student get-out-the-vote and voter registration drives are legally authorized, then this purpose cannot be accomplished by University of Wisconsin-Parkside without complying with HAVA.

58. NSLVE's and University of Wisconsin-Parkside's student registration and voting data exchange have failed and are failing to comply with HAVA's legal requirements.

59. For the purposes of this administrative complaint, 52 U.S.C. § 21083 has 14 requirements that University of Wisconsin-Parkside, as a state agency, must follow in order to engage in university-sponsored student get-out-the-vote and voter registration drives.

60. University of Wisconsin-Parkside has violated and is violating HAVA's requirements.

61. First, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside to implement government-sponsored student get-out-the-vote and voter registration drives, without the prior, written approval of the WEC Administrator who is the chief State election official who implements Wisconsin's elections and the WisVote voter registration system.

62. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by not having its student get-out-the-vote and voter registration drives administered by the State's chief election official, the WEC Administrator.

63. Second, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside to implement government-sponsored student get-out-the-vote and voter registration drives because it interferes with WEC's implementation of a voter registration system which must have a uniform and nondiscriminatory manner.

64. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by targeting its get-out-the-vote and voter registration drives to students only, because HAVA requires the State to have a uniform and nondiscriminatory voter registration system.

65. The University of Wisconsin-Parkside's targeting of students for its get-out-the-vote and voter registration drives discriminates against non-students, violating HAVA.

66. Third, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives contradicts WEC maintaining the WisVote voter registration system as a single, uniform, official, centralized, interactive statewide voter registration list.

67. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by not having its students-only get-out-the-vote and voter registration drives contradicts with WEC's voter registration system which is, as required by HAVA, a single, uniform, official, centralized, interactive statewide voter registration list.

68. Fourth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives contradicts with WEC maintaining and administering the WisVote statewide voter registration list at the State level.

69. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by not having its students-only get-out-the-vote and voter registration drives integrated with WEC's voter registration system which, as required by HAVA, is maintained at the State level.

70. Fifth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives to partially duplicate WEC's WisVote statewide voter registration list containing the name and registered information of every legally registered voter in the State.

71. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives partially duplicate WEC's voter registration system which, as required by HAVA, is to be only statewide voter registration list containing the name and registered information of every legally registered voter in the State.

72. Sixth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives to contradict WEC's WisVote statewide voter registration system assigning a unique identifier for each legally registered voter.

73. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives contradict WEC's voter registration system which, as required by HAVA, is to be only statewide voter registration system assigning a unique identifier for each legally registered voter.

74. Seventh, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives contradicts with WEC's WisVote computerized list serving as the single system for storing and managing the official list of registered voters throughout the State.

75. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives be in addition to WEC's voter registration system which, as required by HAVA, is to be the single system for storing and managing the official list of registered voters throughout the State.

76. Eighth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives to contradict with WEC's WisVote computerized list containing the name and registration information of every legally registered voter in the State.

77. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by having its students-only get-out-the-vote and voter registration drives partially duplicate WEC's voter registration system which, as required by HAVA, is to be the only State computerized list containing the name and registration information of every legally registered voter in the State.

78. Ninth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives to contradict with the WEC's WisVote computerized list requirement of a unique identifier being assigned to each legally registered voter in the State.

79. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by having its computerized list contradict WEC's computerized list requirement which, as required by HAVA, is to be the only statewide voter list of a unique identifier being assigned to each legally registered voter in the State.

80. Tenth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives to not be coordinated with WEC's WisVote computerized list as other state agency databases within the State are.

81. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by not coordinating with WEC's WisVote computerized list as other state agencies within the state do.

82. Eleventh, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives, including student data, not to be integrated into WEC's WisVote database so that any election official in the State, including any local election official, may obtain immediate electronic access to the student information contained in the WisVote computerized list.

83. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by not integrating its students-only get-out-the-vote and voter registration drives, including its student data, into the WEC's WisVote database so that any election official in the State, including any local election official, may obtain immediate electronic access to the student information contained in the WisVote computerized list.

84. Twelfth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives, including student data, to not be integrated into WEC's WisVote database so that all student voter registration information obtained by any local election official in Wisconsin is electronically entered into the computerized list on an expedited basis at the time the student information is provided to the local official.

85. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by not integrating its students-only get-out-the-vote and voter registration drives, including student data, into the WEC's WisVote database so that all student voter registration information

obtained by any local election official in Wisconsin is electronically entered into the computerized list on an expedited basis at the time the student information is provided to the local official.

86. Thirteenth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives, including student data, to not be integrated with the WEC Administrator to provide support as may be required so that local election officials are able to enter the student information into WisVote.

87. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by not integrating its student data into the WEC's WisVote database so that the WEC Administrator may provide support as required so that local election officials are able to enter the student information into WisVote.

88. Fourteenth, it is a violation of 52 U.S.C. § 21083 for the University of Wisconsin-Parkside's students-only get-out-the-vote and voter registration drives to interfere with the WEC's assurance that the WisVote computerized list serves as the official voter registration list for the conduct of all elections for Federal office in the State.

89. The University of Wisconsin-Parkside has violated 52 U.S.C. § 21083 by not integrating its student data into the WEC's WisVote database so WEC can provide its assurance that the WisVote computerized list serves as the single, uniform, nondiscriminatory official voter registration list for the State's conduct of all elections for Federal office in the State.

Prayer for Relief

The complainants, pursuant to 52 U.S.C. § 21112, request the following relief.

1. The complainants request an independent administrative law judge be appointed to adjudicate this complaint.
2. The complainants request a hearing on the record.
3. The complainants request a declaration that University of Wisconsin-Parkside has violated HAVA in its engagement in government-sponsored student voter registration drives and in government-sponsored student get-out-the-vote drives.
4. The complainants request an injunction enjoining University of Wisconsin-Parkside from engaging in government-sponsored student voter registration drives and in government-sponsored student get-out-the-vote drives.
5. The complainants request a declaration that the University of Wisconsin-Parkside has violated HAVA's legal requirements.
6. The complainants request an injunction that the University of Wisconsin-Parkside is required to comply with HAVA's legal requirements.
7. The complainants request any other appropriate remedy or relief authorized by 52 U.S.C. § 21112.