



STATE OF MICHIGAN
BUREAU OF ELECTIONS
LANSING

June 12, 2026

Victoria Bishop, Antrim County Clerk
Via email: bishopv@antrimcountymi.gov

Dear Clerk Bishop,

I first contacted you on April 14, 2026, regarding changes to QVF records and mailed notices to voters that appeared to be in violation of the Michigan Election Law. That letter advised you on the requirements of the Michigan Election Law and requested that you provide information about your activities. On April 29, 2026, I sent a follow-up communication indicating you had not responded to my previous letter. You replied that you had in fact responded to my prior letter. However, your April 20, 2026 attempt to respond to the letter was sent to an incorrect e-mail address, so we did not receive it until May 1, 2026, after you re-sent it to a valid email address.

I appreciate your response to my prior letter. However, your response is both incomplete and inaccurate, and a review of your QVF activity and these mailings indicates that you are taking actions related to voter registration records that do not comply with the Michigan Election Law and fall outside the scope of your statutory authority.

First, your response did not include all of the information requested. The Bureau of Elections is still awaiting requested information on the following:

- Clarification on which voters received a **confirmation** notice or **cancellation** notice
- The specific reason a notice was issued for each voter
- The date each notice was sent
- If the mail was sent by forwardable mail
- A separate list, on an Excel spreadsheet, of all changes you made to voter status codes in QVF from April 2025 through June 2026 (previously April 2026) with the following information:
 - The voter's name
 - The specific change made
 - The voter's prior status or information before the change
 - A detailed explanation of the reason for the change
 - The date the change was made
 - For any voter who had a formal challenge, the signed affidavit from the registered elector challenging that voter's qualifications to vote.

Second, although your response stated that you did **not** change any records in QVF, a review of QVF activity indicates that you **did** in fact make changes to voter records outside of your

statutory authority. These types of status changes occurred between July 24, 2025 and June 3, 2026:

- Verify – Address Unclear
- Challenge – Residency-Formal
- Challenge – Residency-Confirm
- Active – Error Correction
- Active – Voter Confirmed Residency
- Cancel – Residency
- Cancel – Citizenship
- Cancel – Deceased
- Cancel – Moved out of State
- Reject – No Signature

Additionally, your response included a copy of blank postcard templates, for both a notice of change of address and a notice of cancellation, that were apparently created by a third-party vendor. It appears you sent voters blank copies of both notices at the same time without first receiving reliable information of a change of residency.

The changes you made to QVF records were done in violation of the Michigan Election Law and are outside your statutory authority. As I explained in my previous letter, you do not have authority to alter QVF records except in certain situations:

- Deceased voters, which you can flag for municipal clerk review
- Records for which municipal clerks have authorized you to make changes on their behalf.

As explained in my April 14, 2026 letter, under the Michigan Election Law, clerk responsibilities for updating voter registration records rest with the **city or township** clerk. Among the sections of the Michigan Election Law that describe this requirement are MCL 168.496, 168.497, 168.500b, 168.500e, 168.503, and 168.507 (collectively, “MCL 168.496 et seq.”). The Election Officials’ Manual (“the Manual”), Chapter 1, further delineates these responsibilities. Page 7 outlines the duties of the county clerk and does **not** include voter registration maintenance. Page 8 expressly states that “*City and township clerks* maintain the voter registration records for their respective jurisdictions and are responsible for administering all federal, state, county, city, township, and village elections.” (Emphasis added).

This includes assigning all of the following status changes listed above. These status changes are to be made by the city or township clerk (or in some cases as provided by the Michigan Election Law and administrative rules, the Bureau of Elections). County clerks do not make these status changes unless they are doing so on behalf of a city or township clerk at the city or township clerk’s request. The changes you made to QVF records recently are especially concerning, because I notified you on April 14, 2026, that these changes are outside your statutory authority and because you informed BOE that you had not made any changes.

The Michigan Election Law does provide for one instance in which **county** clerks make changes to QVF records. Specifically, MCL 168.510(2) provides, “not later than the second business day of each month, each county clerk shall update the qualified voter file to **initiate** the cancellation of the voter registration of all individuals over 17-1/2 years of age who have died in the county.” (emphasis added). However, even in this instance it is the city or township clerk that actually completes the cancellation in QVF: “the **city or township** clerk shall compare the electronic notification with the voter registration records in that city or township and complete the

cancellation of the voter registration of each deceased elector in that city or township.” MCL 168.510(4) (emphasis added). This process is further described in the Manual (Chapter 4, page 13) which states the county clerk will mark these voters as Challenged-Deceased in QVF in order to flag the records for municipal clerk review. This is the only status change in QVF permitted for a county clerk unless acting on a municipal clerk’s behalf at their request.

A review of your QVF activity indicates that you were not identifying deceased individuals for city/township clerk review as authorized by MCL 168.510, but rather making other changes to QVF records that county clerks are not authorized to complete except at the request of the city or township clerk.

The same is true of the notices you sent to voters. Confirmation and cancellation notices are sent by city or township clerks, unless they request that the county clerk send them on their behalf. As part of this process, clerks send notices to voters only after receiving reliable information that a registered elector has moved, and only after making the appropriate change in QVF. MCL 158.509aa. All changes made to a voter's status are captured in QVF, as explained in Chapter 4 of the Manual, and are done before the notice is sent.

Aside from the fact that these QVF status changes and mailings are to be completed by municipal, not county clerks, there are numerous other deficiencies in the mailing. First, notices are to be sent only when the clerk receives reliable information of a move. Based on the information you provided, you did not have reliable information that these voters had moved as defined by the Michigan Election Law and promulgated administrative rules. As explained in my prior letter, failing to vote in one or two elections is not reliable information that an individual has moved. You state in your response to me that you “[g]ot information of Change of Address USPCOA Work Book” and in emails to municipal clerks that names were on a “UCOA list *submitted to the clerk*” (emphasis added). It is not clear from these responses that you received this information from USPS as opposed to a private individual. Information submitted to the clerk from private individuals, even if they claim to have gotten this information from official sources, is not reliable information. Clerks must receive and review the reliable information through an official source, as described in law.

Second, when either a notice of confirmation or notice of cancellation is sent, the corresponding status change is made in QVF as noted above. That was not done consistently with respect to these mailings. If these mailings had been appropriate (which they were not), the QVF status of each voter should have been updated accordingly.

Third, the notices themselves are noncompliant. It is never appropriate to send voters a blank confirmation and cancellation notice at the same time. Each of these notices is sent in specific situations. Confirmation and cancellation notices have separate purposes. A confirmation notice is sent to a voter when the clerk receives reliable information that the voter has moved within the clerk’s jurisdiction as described in section 509aa of the Michigan Election Law), MCL 168.509aa. A cancellation notice is sent to a voter when the clerk receives reliable information that the voter has moved to a new jurisdiction or reliable information the voter has moved to an unknown address, as described in section 509(3) and (5) of the act, MCL 168.509aa.

In other words, a confirmation notice is sent when a voter has moved *within* a city or township (and does not trigger the cancellation countdown), whereas a notice of cancellation is sent when a voter has moved *outside* of the city or township (and does trigger the cancellation countdown). The notices themselves specify the type of move the clerk believes occurred, and the appropriate

postcard is filled out by the clerk, so the voter understands which notice they are receiving and why.

When both notices are sent blank and at the same time, the voter does not know why they are receiving the notice or how it should be returned, as appropriate. Because you insufficiently completed the postcards, voters do not know if they are receiving a confirmation notice or a cancellation notice, if there is a need to return the card, or if their voter registration will be cancelled.

These notices are also deficient in that the Michigan Election Law requires that a notice sent to a voter under subsection (2), (3), or (5) of MCL 168.509aa must contain a warning to the voter that any prior absent voter ballot application submitted by the elector for all future elections is rescinded and the voter will not be sent an absent voter ballot for any future elections unless the voter submits a new absent voter ballot application. The example provided by you does not contain this required warning to the voter.

Even if these notices were sent in a manner otherwise compliant with the Michigan Election Law (which they were not, for numerous reasons), it is the municipal clerk that sends these notices. Because municipal clerks did not authorize you to conduct list maintenance on their behalf, it was beyond your statutory authority to do so.¹

Based upon your actions, it appears there is a lack of understanding regarding your responsibilities and authority as it relates to voter registration, list maintenance, and use of QVF.

Under the Michigan Election Law, the Secretary of State is the Chief Election Officer of this State and “shall have supervisory control over local election officials in the performance of their duties under the provisions of this act.” MCL 168.21. The Secretary of State is required by law to “issue instructions” and “[a]dvise and direct local election officials as to the proper methods of conducting elections.” MCL 168.31. Clerks and other election officials are required to comply with the instructions given by the Secretary of State. See, e.g., *Secretary of State v Berrien Co Bd of Election Comm'rs*, 373 Mich 526, 530-531 (1964). And the failure to perform a legal duty or to obey a lawful instruction given by the Secretary may result in a criminal misdemeanor. MCL 168.931(1)(g). The Director of Elections is authorized to act at the Secretary's behest “with respect to the supervision and administration of the election laws.” MCL 168.32.

Accordingly, I am directing you to complete the following trainings, which will be assigned to you in the eLearning Center:

- County User – Complete QVF Access Training
- QVF Security Course
- Election Official Accreditation – Virtual Program, specifically; Section 2: Voter Registration
- QVF Manual Chapter 4 – Voter Status Changes and Notices

¹ You appear to be under the mistaken impression that voter list maintenance is not being conducted by clerks and the Bureau of Elections. In reality, since 2019, 2.1 million registrations have been cancelled or are in the process of being cancelled. [Secretary Benson announces over 2.1 million outdated voter registrations canceled or identified for cancellation since 2019.](#)

Your QVF access will be suspended, as of the date of this letter, until you do all of the following:

- (1) Complete the required training courses above.
- (2) Affirm that you have taken the trainings and will comply with the Michigan Election Law by making only those changes in QVF that you have authority to make and by refraining from sending voter notices in a manner that violates the Michigan Election Law.
- (3) Respond adequately to my previous request for the information described above, which was requested on April 14, 2026.

The response can be sent to MDOS-BOERegulatory@michigan.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Brater', with a stylized flourish at the end.

Jonathan Brater, Director
Bureau of Elections