

Senate Bill 153 Interested Party Testimony May 27, 2025

Noncitizen Review is Limited and Does Not Identify All Noncitizens

Chair Roegner and members of the Committee:

Thank you for the opportunity to submit testimony regarding Senate Bill 153 and its provision for a Noncitizen Review of Ohio's voter rolls. I submit this testimony as an interested party, deeply concerned with protecting the integrity and accuracy of Ohio's elections through proper citizenship verification of all registered voters.

While the intent behind the Noncitizen Review is commendable, the current structure of the review is limited and insufficient to ensure that only US citizens remain on Ohio's voter rolls. The bill fails to conduct a comprehensive review of all voters' citizenship status and introduces gaps that may allow noncitizens to remain registered and potentially vote in Ohio elections.

Key deficiencies include:

1. Exclusion of Entire Voter Groups:

- Voters who registered using the last four digits of their Social Security number (SSN4) are not included in the review. In 2024 alone, over 60,000 such registrations were submitted, with 39,000 showing integrity issues such as invalid or mismatched information. Since 2011, nearly 900,000 voters have registered via SSN4, none of whom have been verified for citizenship.
- Voters who registered using invalid driver's license or ID numbers are omitted.
- Voters who registered without providing any identification are not included. These categories present substantial risk and must be addressed.

2. Inadequate Verification of Citizenship Proof:

- SB153 does not re-evaluate those whose citizenship was "visually verified" through documents presented to temporary poll workers or board employees, which risks incorrectly accepting noncitizens.
- These documents are not verified against federal databases, such as those made accessible through Executive Order 14248.

3. Flawed Dependence on BMV and SAVE:

- The review depends exclusively on Bureau of Motor Vehicles (BMV) records to flag noncitizens, which are only reviewed when a voter updates their registration.
- BMV deputy registrar offices may inconsistently mark citizenship status
- The SAVE database, while useful, is limited in scope and was designed for entitlement verification, not electoral integrity. It is not comprehensive of all noncitizens.

These loopholes and omissions threaten the security and credibility of Ohio's elections and limit the efficacy of the Noncitizen Review.

Proposed Amendment: Implement a Comprehensive Citizenship Status Review

We respectfully urge the Committee to consider amending SB153 to replace the limited Noncitizen Review with a Comprehensive Citizenship Status Review. This enhanced review would:

- **Include all voters**—not just those with valid Ohio driver's licenses and state IDs - ensuring that no group is overlooked due to registration method or administrative error.
- **Utilize all available federal databases**, including those authorized through Executive Order 14248, to verify citizenship beyond state-level records.
- **Provide transparency and accountability** by requiring the Secretary of State to report review results to county Boards of Elections and publish redacted versions publicly.
- **Accurately categorize voter records** as citizen, noncitizen, or unverifiable, with follow-up actions on the latter two as currently indicated in SB153.
- **Correct erroneous determinations** made by visual inspection or incorrect BMV records.

- **Conduct reviews monthly**, and daily within 46 days of any election, to ensure the integrity of upcoming electoral processes.
- **Create exemptions** for verified citizens to prevent redundant review, unless new, credible information challenges their status.

Even if citizenship verification is later implemented as a prerequisite for voter registration, the Citizenship Status Review remains a vital safeguard. The risk of fraudulent or falsified documents, administrative errors, and mismatches between state and federal systems will persist. Only through continuous, systematic verification can Ohio ensure that its voter rolls reflect accurate, up-to-date citizenship data.

Ensuring that only U.S. citizens vote in Ohio elections is foundational to public confidence in our democratic process. A limited review that excludes large groups of potentially ineligible voters is insufficient. We urge the Committee to adopt a robust, transparent, and comprehensive Citizenship Status Review as an amendment to SB153.

Thank you for your consideration on this important issue.

Sincerely,

Charis Peterson
Butler County Ohio