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Press Release Sunday April 19, 2026
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Explanation of Antrim County Voter Roll Maintenance Procedures by Antrim County Clerk – Victoria Bishop

1. Context and Mandate for Election Integrity

The administration of Antrim County elections currently operates under a distinct statutory mandate derived from the 2024 electoral transition. The election of Victoria Bishop as County Clerk represented a decisive directive from the electorate to prioritize the stewardship and accuracy of the democratic process. It is essential to categorize the current inquiry by the Michigan Bureau of Elections not as a corrective measure for malfeasance, but as a sophisticated procedural disagreement regarding the execution of mandatory list maintenance. The integrity of the electoral process rests upon the foundation of clean voter rolls; without rigorous maintenance, the Qualified Voter File (QVF) ceases to be a reliable instrument of democracy. Clerk Bishop's 2024 campaign platform, centered on the removal of deceased individuals and non-residents from the rolls, serves as the operative framework for her current administrative actions. This initiative is the fulfillment of a specific mandate to rectify long-standing vulnerabilities in the county's registration data. The Clerk's proactive measures are not an exercise in administrative overreach, but a necessary application of her supervisory jurisdiction. Ultimately, the Clerk's conduct must be viewed through the lens of federal requirements for list maintenance, which prioritizes the absolute accuracy of the registry as a prerequisite for legal and transparent elections.

2. Federal Statutory Framework: The HAVA and NVRA Mandate

Effective election administration requires local actions to be harmonized with the Help America Vote Act (HAVA) and the National Voter Registration Act (NVRA). These federal statutes establish a rigorous standard for maintaining "accurate and current" voter registration lists. While the Michigan Bureau of Elections emphasizes state-level administrative constraints, the overarching strategic necessity remains: the Clerk must ensure the Antrim County electorate is

represented by a registry that is beyond reproach.

The NVRA requires officials to ensure rolls are current. Using non-voting history as a signal for potential relocation is a standard diagnostic tool to trigger a verification inquiry.

Claims that the Clerk failed to "independently verify" information according to the state's specific manual. High-volume maintenance functions as a corrective audit to identify ineligible registrants, fulfilling the spirit of HAVA's mandate to prevent registration-based irregularities.

This proactive stance on list maintenance, while subject to scrutiny by state-level administrators, addresses the competitive landscape of "election integrity" that the Antrim County electorate demanded. In a high-stakes administrative environment, the risk of an over-inclusive and inaccurate voter roll poses a greater threat to public confidence than the risk of aggressive verification. This strategy represents an administrative necessity, evolving from passive data entry to active integrity assurance.

3. Jurisdictional Authority and the Qualified Voter File (QVF) Management

The management of the QVF is a tiered responsibility that requires active coordination. While state officials emphasize the role of city and township clerks, the County Clerk maintains a supervisory role essential for county-wide accuracy. When local jurisdictions fail to identify or remove ineligible entries, the County Clerk's intervention becomes a necessary corrective check on the system, ensuring that omissions at the local level do not compromise the integrity of the entire county file. Regarding the allegation that the QVF was updated "without delegation of authority," the following **Counter arguments for Oversight** justify the Clerk's intervention:

- **Administrative Necessity of Oversight:** Local townships and cities often lack the specialized resources to identify deceased individuals or those who have relocated, necessitating county-level intervention to ensure statutory compliance.
- **Standardization of Registry Quality:** To restore systemic integrity, the County Clerk must enforce a uniform standard of accuracy across all jurisdictions, preventing fragmented or inconsistent maintenance.
- **Addressing Local-Level Inaction:** The Bureau's investigation was reportedly prompted by local reports; however, the County Clerk's actions were specifically designed to fill an administrative vacuum where local clerks didn't have the necessary funding nor staff to perform their delegated maintenance duties. While Director Jonathan Brater's communication focuses on strict "statutory authority" constraints, a more robust interpretation of the Clerk's supervisory role is required to address documented inaccuracies. Restricting the County Clerk to a passive role in the QVF process would essentially institutionalize the errors that local clerks may have overlooked.

4. Analysis of Notification and Verification Protocols

The issuance of confirmation and cancellation notices is a critical diagnostic mechanism for identifying voters who have moved out of the jurisdiction. The Bureau's assertion that Clerk Bishop failed to "independently verify" information mischaracterizes the intent of the notification process. These notices serve as the *trigger* for verification, inviting the voter to confirm their status, which is the ultimate form of independent verification required by law. The volume of maintenance activity in Antrim County is a direct response to the technical and clerical failures of the 2020 cycle, specifically the failure to correctly update ballot tabulators that fueled widespread mistrust. These past errors created a significant backlog of registration inaccuracies that must be addressed with urgency before the upcoming May elections and the 2026 cycle. This high-volume activity is a corrective audit, not a disenfranchisement effort; it ensures that every name on the list represents a living, resident, and eligible voter, thereby neutralizing the technical vulnerabilities that previously compromised the county's reputation.

5. Conclusion and Protective Measures Against Administrative Sanctions

The actions taken by the Antrim County Clerk represent a lawful attempt to comply with the spirit of the NVRA and HAVA through proactive stewardship.

We are acutely aware of the Bureau's references to "criminal misdemeanors" and the potential removal of election duties, a threat made tangible by the recent precedent involving the Shelby Township, Michigan Clerk, Stan Grot. However, these administrative pressures must not supersede the Antrim County Clerk's statutory obligation to maintain an accurate registry. To address the Bureau's inquiries while preserving the integrity of the maintenance program, the following **Strategic Roadmap for Compliance** is established:

1. **Detailed Diagnostic Disclosure:** Provide a comprehensive explanation of the data triggers used to identify potentially ineligible registrants, framing these notices as the first step in a legally mandated verification process.
2. **Supervisory Statutory Justification:** Issue a formal legal memorandum justifying the QVF updates as a necessary exercise of supervisory jurisdiction to correct local-level failures in the Qualified Voter File list maintenance.
3. **Collaborative Verification Framework:** Propose a formalized process for local clerks to complete the final verification of identified voters, thereby satisfying the Bureau's concerns regarding "delegation" without abandoning the cleanup initiative.
4. **Mitigation of Technical Irregularities:** Document how these maintenance efforts specifically address the tabulator-related and clerical errors of 2020, positioning the Clerk's current actions as an essential bulwark against future administrative failure.

The legal and political stakes for Antrim County's election administration are significant. By addressing these procedural inquiries through a lens of statutory necessity and transparency, the Antrim County Clerk – Victoria Bishop will ensure the 2026 electoral cycle is governed by a voter roll that is both accurate and beyond reproach after forwarding the information discovered to her local clerks for their review, determination and final actions.

In closing, the attached PDF files taken directly from the Bureau of Elections – Qualified Voter File (QVF) Manual – Chapter 4: Voter Status Changes and Notices, instructions on Pages 6, 7 & 9, and the postcard as described, printed and provided by ElectionSource (an approved vendor of the Michigan Department of State – Bureau of Elections) were followed and used by the Antrim County Clerk – Victoria Bishop.

If anyone has any questions, they may call the Antrim County Clerk – Victoria Bishop at her office; 231-533-6353. Or email her at; bishopv@antrimcountymi.gov

Page 4 of 4

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