



STATE OF MICHIGAN
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DEPARTMENT OF STATE
LANSING

To: County Clerks & Election Directors

From: Bureau of Elections

Date: March 11, 2026

Subject: Recommendations on using jury list questionnaires

The Bureau of Elections (BOE) is aware that some County Clerks are interested in using responses to Jury List Questionnaires to identify possible non-U.S. citizens on the Qualified Voter File (QVF). Unlike the case for individuals who have moved or died, neither the Michigan Election Law nor federal law include express provisions for identifying and cancelling registrations belonging to non-U.S. citizens. However, non-U.S. citizens are not eligible to vote in state or federal elections under state and federal law and registrations belonging to non-U.S. citizens should be cancelled following verification and notification to the registered voter.

This document includes information clerks should consider if they choose to review jury list questionnaires to identify possible non-citizens on QVF. It is strongly recommended that clerks utilize assistance from BOE in reviewing this information, which can prevent registrations belonging to U.S. citizens from being improperly cancelled.

BOE does not generate the jury lists that are sent to counties. These are generated from the driver file (CARS) administered by other areas within the Michigan Department of State (MDOS). Jury list data submitted to counties will include non-citizens, because pursuant to MCL 600.1375, MDOS sends to county clerks “a full, current and accurate copy of a list that combines driver’s license and personal identification cardholder lists pertaining to *people* residing in the county.” (emphasis added).

Non-citizens with lawful residency in Michigan can and do obtain driver’s licenses in large numbers. Additionally, at any given time there will be thousands of people who are *listed* in CARS as non-citizens, but are *actually* U.S. citizens. In Fiscal Year 2023, the most recent year for which federal data is published, approximately 17,000 Michigan residents became naturalized citizens.¹ People do not immediately update their citizenship status in the CARS file when they naturalize— frequently, they do it next time they renew their driver’s license, which may be years later. Were MDOS to attempt to omit all possible non-citizen

¹ [Profiles on Naturalized Citizens | OHSS](#)

license holders from the list, MDOS would also be omitting thousands of people who were non-citizens as of their last visit to an MDOS branch office (which may have been years ago), but have since naturalized and become U.S. citizens. Excluding these individuals from the driver's file list would result in a large number of Michigan citizens who are legally obligated to report for jury service being exempted from jury notices.

County clerks should consult with their legal counsel prior to comparing Jury List questionnaires to the QVF. There is no Michigan Election Law prohibition on using jury list information, but BOE cannot advise counties on the permitted or prohibited uses of jury list information that may be found in other statutes, regulations, or agreements.

If a jury response indicates that someone is not a U.S. citizen, and that person is in QVF, it is not conclusive evidence that a non-citizen is registered. Alternate explanations include:

- The person on the jury list has a similar name to a *different* person in QVF.
- The person was a non-citizen when they completed the response, has since become a U.S. citizen (roughly 17,000 naturalizations occur per year in Michigan).
- The questionnaire was sent to a U.S. citizen, but a *different* person at the same address who is not a U.S. citizen thought it was for them and returned it.
- A U.S. citizen accidentally indicated that they were not a U.S. citizen on the form.
- A U.S. citizen intentionally, falsely indicated that they were not a U.S. citizen on the form to avoid jury responsibilities (they may face other legal consequences, but they are not ineligible to vote and should not have their registration cancelled).

To minimize the possibility that a U.S. citizen's registration is wrongly cancelled, clerks who have identified possible non-citizens in QVF should share this information with BOE. If clerks have records, images or identifying numbers of immigration documents (e.g. green card, visa, foreign passport) for these individuals, these documents should be shared securely through BOE's SFTP site for further review of the records.

If, after a review of immigration and voter registration records, a person does still appear to be non-citizen and is registered to vote, BOE will mail that individual a notice. If the person does not respond confirming eligibility, the registration will be cancelled. BOE will contact the appropriate clerk(s) with updates on the notification and cancellation. Cases with apparent voting history will be referred to law enforcement for further investigation.

Additional review and notification are both important. MDOS has conducted additional review and found U.S. citizens that were initially incorrectly identified as non-citizens based on inaccurate or out of date information. MDOS has access to Systematic Alien Verification for Entitlements (SAVE), which sometimes verifies that a person is in fact a U.S. citizen.

Regardless of whether or not SAVE is used, notification serves the additional purpose of allowing a person to correct data errors. As is typically the case with online verification services, Michigan and other states have found that SAVE is not 100% accurate. For example, when reviewing possible non-citizens who appeared to vote in the 2024 election, MDOS found that roughly half of people flagged as possible non-citizens in SAVE were actually citizens when the voter was notified. If this check was not done, U.S. citizens could have been referred for prosecution in addition to the 15 records identified.²

It is critical that election officials proceed carefully before cancelling or changing voters' status in QVF to ensure that U.S. citizens have the opportunity to confirm their eligibility, that they do not have their registrations cancelled, and they are not otherwise accused of improper conduct or subject to undue criminal investigation.

Thank you, and please contact BOE with any further questions about this process.

² [Michigan Department of State review confirms instances of noncitizen voting are extremely rare.](#)