



CRB Literature Review on Voter Fraud in California, 2020-2024

Presented to the Senate Elections and
Constitutional Amendments Committee
Devin Lavelle | August 26, 2025



Overview

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Scope

- We were asked to conduct a review of evidence of voter fraud in California
- Review of literature, studies, reports, and other analysis from government, academic, and advocacy sources
- Focused on 2020 and subsequent elections
 - Voter's Choice Act (VCA) implemented statewide starting in 2020
 - In 2020 general and subsequent elections, vote-by-mail ranged from 81% to 91%, averaging 88%
 - In 2010-2016 (prior to VCA initial rollout) vote-by-mail ranged from 48% to 69%, averaging 58%

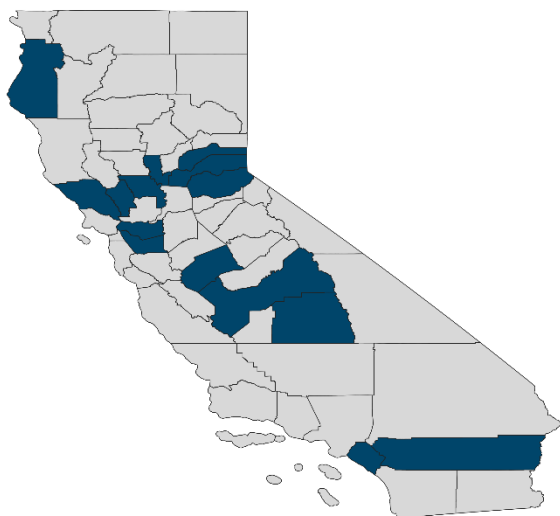
Literature Review

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Fourteen Counties with Recent Grand Jury Reviews Identified

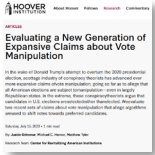
Map



Notes

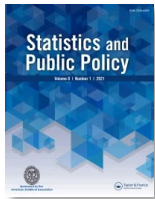
- We have identified fourteen counties where grand juries have issued reports on the risk of voter fraud focusing on the 2020-2024 elections:
 - Alameda ([2024 General](#) & [2020 General](#)) “The registrar of voters does an impressive job, but more transparency needed”
 - [El Dorado](#) (2024 General) “the County is doing an excellent job”
 - [Napa](#) (2024 General) “Election was safe, secure, and performed with integrity.”
 - [Orange](#) (2024 General) “The ROV upheld the highest standards of electoral integrity”
 - [Tulare](#) (2024 General) “checks and balances employed were found to minimize the chance of widespread fraud that would impact the results of an election and provide clear evidence to debunk many of the claims of election fraud”
 - [Placer](#) (2024 Primary) “every conceivable effort is being made ... to preserve the integrity of Placer County’s elections”
 - [Sonoma](#) (2024 Primary) “There are no material flaws or uncorrected defects”
 - [Sutter](#) (2024 Primary) “The Grand Jury found no evidence of voter fraud in Sutter County.”
 - [Contra Costa](#) (2022 General) “has implemented safeguards to prevent physical and cyber security breaches”
 - [Humboldt](#) (2022 General) “Elections procedure was secure”
 - [Fresno](#) (2021 Recall) “well trained to handle elections efficiently and securely”
 - [Nevada](#) (2020 General) “voters should have confidence in their election officials. They are competent, knowledgeable, and concerned about ensuring a smooth election.”
 - [Riverside](#) (2020 General) “no evidence of voter fraud.”
 - [Yolo](#) (2020 General) “no evidence of systemic or other significant fraud in our county elections since at least 2001”

Academic Research Disputes Allegations of Widespread Fraud and Focuses on Technical Challenges



[Grimmer, et al \(2024\)](#)

we provide extensive evidence that the tests that these individuals propose cannot possibly identify vote manipulation. Indeed, we show that supposedly anomalous patterns in election data highlighted by the Gilbert/Fritz contestants and by Douglas Frank are the result of poor research designs and confused analyses



[Grofman & Cervas \(2024\)](#)

Although the underlying data in each of the 13 claims we review are accurately described, our review reveals that the interpretations of the election data, which suggest massive fraud, are based on invalid statistical or illogical reasoning. In summary, the conclusions about fraud derived from these statistical analyses are categorically incorrect.



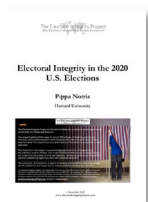
[Ciao, et al \(2022\)](#)

This paper argues that monitoring statewide voter databases is an under-emphasized and under-utilized tool in discussions of election reforms. ... The number of anomalies seems to be positively correlated with the average cost of elections per registered voter, hinting that there may be systematic inefficiencies that cause both a high cost and a greater number of anomalies.



[Eggers, et al \(2021\)](#)

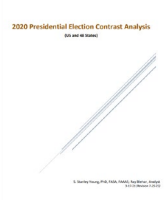
Although the claims are diverse, our conclusion is consistent: For each claim, we find that what is purported to be an anomalous fact about the election result is either not a fact or not anomalous. ... Rebuilding trust in American elections requires that we fairly evaluate claims about their failures and communicate those claims to a skeptical public



[Norris \(2020\)](#)

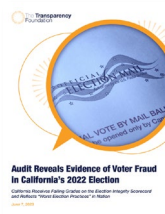
The results suggest that election experts overwhelmingly rejected claims of widespread fraud occurring during the 2020 elections. ... This evidence therefore highlights several stages where we should be genuinely concerned about the integrity of American elections – especially the roles of money and media during the campaign.

Several Conservative-linked Analyses Claim Massive Voter Fraud



[Young & Blehar \(2023\)](#)

In other words, in California, Biden beat Trump by 5± million votes (2020), whereas Clinton beat Trump by 4± million (2016). Doing the arithmetic, the contrast is 833,843 votes. (Statisticians call this the Difference of the Differences, or DoD.) Note that Trump increased his California vote total by 1.5± million votes. However, Biden increased the Democrat candidate's vote total by 2.3± million. Where did California find 3.8± million more votes in 2020 than in 2016? Easy, you say: California's population has increased. That's a good thought, but between 2016 and 2020, the Census Bureau says that the population of California increased by less than 700,000 people. (Note that this includes children not old enough to vote, non-citizens, non-registered citizens, etc.). However, as mentioned above, the 2020 vote total for the Democrat candidate increased by 2.3± million votes. On the face of it, that significant vote increase does not appear to be logically explainable.



[The Transparency Foundation \(2023\)](#)

Our investigators pulled lists of "uncured" ballots where the voter failed to respond to attempts to get them to verify their signature. Our investigators spent months calling and texting these individuals. The audit conducted by our investigators shows that 14.17% (n:55) of audited "uncured" ballots rejected for a missing or an invalid signature during the 2022 California November Election were likely fraudulently cast – as the voters for those ballots vehemently denied ever voting in the election.



[Election Integrity Project California \(2021\)](#)

This analysis exposed over 7,700 registrants each of whom have two votes credited to their Registration ID number in the November 2020 election and almost 124,000 more votes counted than voters with histories for that election. There are also more than 1.8 million ineligible registrants in the state. Finally, EIPCa identified over 108,000 who have had their out-of-country or out-of-state birthplaces inexplicably changed to California or United States by the on-line or DMV voter registration systems



[Keshel](#)

Although California trended Democrat in registrations by 2%, Trump pushed it slightly right even in certified totals. This is only done with winning low-propensity voters, registered Democrats, independents, especially working class Hispanics in Southern California. Trump gained 1,520,000 votes, 580k more than record Republican gain, but Democrats have DOUBLED their vote total since 2000, with Biden nearly 3 million over Obama in 2008. ... Proportionally, Los Angeles, Orange, Riverside, San Bernardino, and San Diego absolutely dwarf other counties for new registered voters. Are these phantom factories? Est. 1,346,000 excess Biden votes, would put state at 23.3% margin if only excess votes considered. I believe California to be much tighter.

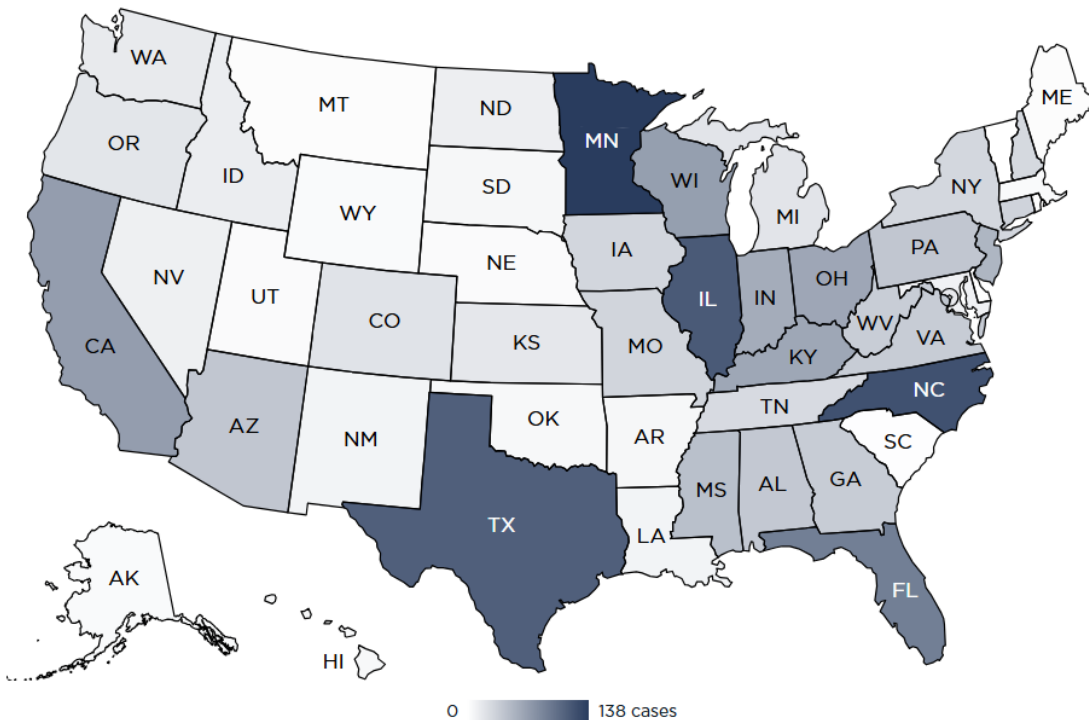
Legal Review

2



The Heritage Foundation Identified Six Examples of Voter Fraud in the 2020-24 elections

Heritage Foundation Database



Cases Identified

- [Marcus Raul Arevalo](#) & [Carlos Antonio De Bourbon Montenegro](#) (2020 election) fraudulently registered 8k homeless voters to seek to elect Montenegro. Both were convicted and no fraudulent votes were counted.
- [Alex Campbell](#) (2020) registered to vote and elected to office within a city he did not live. Plead guilty and resigned.
- [Compton City Council Race](#) ([Toni Morris](#), [Kimberly Chaouch](#) & [Barry Reed](#), 2021) four voters fraudulently registered in the district in a race decided by a single vote. The narrative indicates five individuals, including Galvan, the candidate, plead guilty or no contest but there are only four entries in the database.
- [Elizabeth Gale](#) (2021) voted on behalf of her deceased mother. Convicted and vote was rejected.
- [Shakir Kahn](#) (2020) registered 71 names at his address to support his candidacy to Lodi City Council. Plead no contest and the results were overturned.
- [William Eschenbach](#) (2022) deliberately voted both by mail and in-person. Plead guilty and second vote was rejected.

Four Additional Cases Were Identified Through CRB's Review

Defendant	Year	Summary	Outcome
Antonio Fernando Melara, Petitioner	2021	Immigration case. Petitioner was told by grandmother believed he was born in Puerto Rico but was actually born in El Salvador. As he believed he was a citizen, registered and voted.	Judge ruled he met the requirements of a naturalized citizen.
Randall Waltz	2022	Former Del Norte County Sheriff Randy Waltz registered to vote and to run for office at a short-term rental despite his permanent residence being outside the county.	Plead no contest and resigned.
Antonio Lopez	2022	While running for City Council, Antonio Lopez was accused of bribery and interfering for giving out tacos near a voting center.	Judge ruled in Lopez's favor, and he continues to serve.
Michelle Morrow	2025	Former County Supervisor Morrow registered to vote and to run for office in a district she did not live in.	Convicted.

Media Review

3



Each of the Cases Identified by The Heritage Foundation Showed Up in CRB's Media Review



Campbell resigns from council after pleading guilty

By David Rupkalvis The Triplicate Mar 13, 2021 Updated May 26, 2021

Alex Campbell's term on the Crescent City City Council came to a surprising end earlier this month when Campbell resigned after pleading guilty to one count of election fraud.



Southern California Woman Sentenced For Voter Fraud

By Wade Wheeler August 16, 2022

Madera, CA – The Madera County Registrar of Voters announced that last month, Elizabeth Gale, a resident of San Diego, pleaded guilty to committing voter fraud in the 2021 California Gubernatorial Recall Election.



Compton city councilman charged with fraud, bribery in election he won by 1 vote

By Rob Hayes Friday, August 13, 2021

COMPTON, Calif. (KABC) -- Compton City Councilman Isaac Galvan and five other people were charged Friday with conspiring to commit election fraud during a June runoff to ensure Galvan would retain his seat.



Sonoma County man, 77, sentenced for voter fraud 'experiment': DA

by: Hamza Fahmy Posted: Jun 12, 2024 / 03:27 PM PDT Updated: Jun 12, 2024 / 03:29 PM PDT

(KRON) – William Eschenbach, a 77-year-old Occidental man, was convicted and sentenced on Tuesday by a Sonoma County Superior Court Judge for voter fraud, the Sonoma County District Attorney said.



Former Lodi city council member Shakir Khan takes plea deal in election fraud case

By Daniel Macht Updated: 1:11 PM PST Jan 4, 2024

Former Lodi city council member Shakir Khan on Thursday entered a no contest plea as part of a deal to resolve his election fraud case in San Joaquin County, his lawyer said.



Would-be California mayoral candidate, another man charged with voter fraud

No votes were cast in the scheme, which allegedly involved a man trying to qualify to run for mayor of the city of Hawthorne.

Nov. 18, 2020, 6:57 PM PST
By Phil Helsel

Three of Four Cases Identified in CRB Legal Review Identified in Media Review

THE SACRAMENTO BEE

California sheriff charged with voter fraud, perjury in vacation rental address dispute

By Ryan Sabalow and Jason Pohl Updated March 11, 2022

Less than six months after he took the job, the sheriff of Del Norte County was charged Wednesday with felony voter fraud — the latest scandal for the small North Coast department whose previous sheriff resigned amid a flurry of staff departures and internal dysfunction.



Former East Palo Alto City Council candidate loses election contest lawsuit

Webster Lincoln sought to annul Antonio Lopez's win

by [Lloyd Lee](#) March 11, 2021 9:49 am Updated July 10, 2025 4:35 pm

A San Mateo County Superior Court judge on Wednesday ruled that East Palo Alto City Council member Antonio Lopez did not violate election laws during his campaign, further cementing his seat on the council after a narrow victory last fall.

THE TRIBUNE

Former SLO County supervisor candidate will serve jail time for election fraud

By Chloe Shrager and Chloe Jones
Updated April 7, 2025 2:37 PM

A former San Luis Obispo County Supervisor candidate found guilty of election fraud was sentenced to three months in jail on Monday morning.

Michelle Marie Morrow, 55, ran for the District 3 Board of Supervisors seat in the March 2024 primary, losing in a landslide to current sitting Supervisor Dawn Ortiz-Legg.

Later finding that she had actually lived in District 4 during her campaign, the District Attorney's Office filed charges against her for election and voter fraud in September.

The Media Review Identified Four Additional Specific Allegations that Were Investigated but Did Not Appear to Result in Charges

MERCED SUN-STAR

Merced County District Attorney, state investigating Livingston voter fraud allegations

By [Abbie Lauten-Scrivner](#)
Updated August 27, 2021 1:05 PM

The Merced County District Attorney's Office and California Secretary of State have launched an investigation into allegations of voter fraud in the City of Livingston. The investigation is the latest development in a city that's already been under public scrutiny after the arrest of two police officers this year. Plus, residents recently were outraged after a longtime city manager was abruptly dismissed.

FOX 5 KUSI NEWS

Thief grabs mail, ballots from North County neighborhood

by [Jacqueline Sarkissian](#) [FOX 5 Digital Team](#)
Posted: Oct 8, 2020 / 05:43 PM PDT
Updated: Oct 8, 2020 / 06:00 PM PDT

ESCONDIDO, Calif. — A mail thief moving through a North County neighborhood snatched up ballots along with the other contents of mailboxes lining the street, leaving residents concerned ahead of Election Day. David Sprouse's surveillance cameras captured the man stealing his mail, and several of his neighbors' as well, in the Summer Creek area of Escondido just before midnight Tuesday.

Pasadena Star-News

Why a Riverside County sheriff's voter fraud probe worries democracy watchdogs

Such an investigation "helps assure residents their election should be safe and secure," Sheriff Chad Bianco said

By [Jeff Horseman](#) | jhorseman@scng.com | The Press-Enterprise
UPDATED: November 29, 2023 at 4:29 PM PST

Sheriff Chad Bianco said investigating election malfeasance "helps assure residents their election should be safe and secure."

npr

California Eases Off Legal Threats Over GOP Unauthorized Ballot Drop Boxes

OCTOBER 16, 2020 5:30 PM ET
By [Barbara Spunt](#), [Scott Ridd](#), [Sam Grigas](#)

The state of California appears to be backing off legal threats against the California Republican Party over its use of unauthorized ballot drop boxes. On Monday, California's secretary of state and attorney general sent a [cease-and-desist order](#) to the California GOP and several county party offices, ordering they remove unauthorized boxes to collect ballots, some of which were labeled "official."

Many Stories Cover Complaints without Specific Accusations of Fraud



Republican victory in California special election undercuts Trump's unfounded claims about mail-in voting

By [Abby Phillip](#), CNN
6 min read Published 4:10 PM EDT, Thu May 14, 2020

(CNN) — As President [Donald Trump](#) held forth in the Cabinet Room on Wednesday railing against voting by mail, the Republican candidate in a hotly contested [special election in California](#) was being declared the winner after voting was conducted almost entirely by mail.

"So the problem with the mail-in ballots: It's subject to tremendous corruption. Tremendous corruption, cheating," Trump told reporters. "And so I'm against it."



California recall election: Larry Elder campaign pushes unfounded fraud claims

SACRAMENTO, Calif. -- As the California recall election nears the finish line, a website paid for by Larry Elder's campaign is pushing unsubstantiated claims of election fraud before results have even been released.

Elder's campaign website has a link to a "Stop CA Fraud" page where people can report suspicious voting activity or sign a petition demanding a special legislative session to investigate an election that isn't even over.

THE ORANGE COUNTY REGISTER

Conservative legal group lawsuit says California voter rolls are ripe for fraud

Judicial Watch litigation goes after state record keeping, but voting experts say the claim is off the mark.

By [Hanna Kang](#) | hkang@scng.com
UPDATED: December 4, 2024 at 5:04 PM PST

A lawsuit filed by a conservative legal group against California voting officials takes aim at the state's "make-it-easy" approach to voting.

In May, [Judicial Watch](#), on behalf of the [Libertarian Party of California](#), sued [California Secretary of State Shirley Weber](#) and the state itself — and listed 27 registrars, including Orange, Riverside and San Bernardino counties — claiming that officials violated federal law between 2020 and 2022 by not adequately purging voting rolls of so-called irregular voters. Specifically, Judicial Watch argues that officials haven't lived up to rules established by the National Voter Registration Act of 1993, the "motor voter" law aimed at making voter registration easier and voter rolls more accurate and up-to-date.



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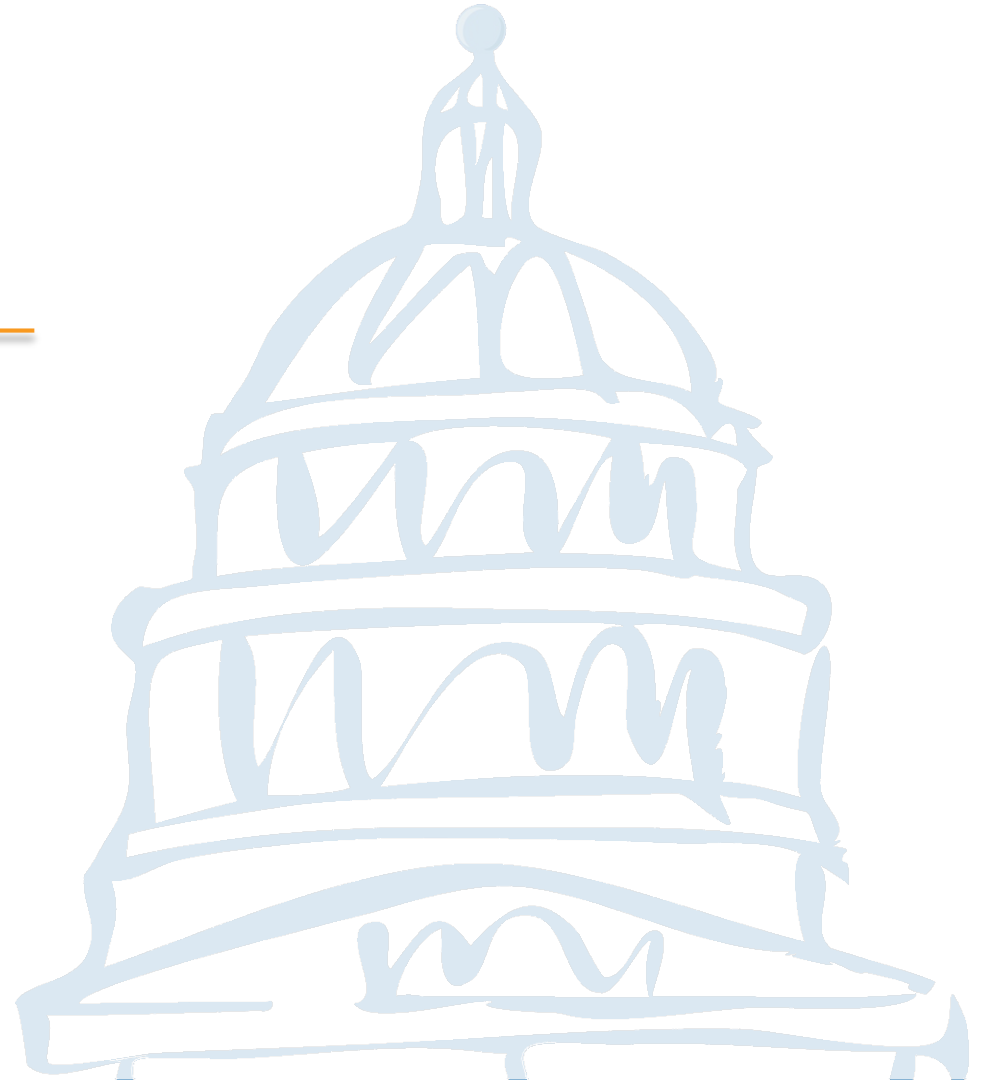


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Appendices

1. Literature Review
 - Methodology
2. Legal Review
 - Methodology
 - Relevant CA Election Code sections
3. Media Review
 - Methodology
4. Detailed Review Spreadsheet



Literature Review Appendix

Appendix 1



Literature Review Methodology

A search for academic and advocacy research pieces on voter fraud in California since the 2020 election cycle involved multiple search tools, including Google, Google Scholar, journal databases (such as those available on the California State Library's online resources webpage), university-adjacent research organizations (such as Harvard University's Electoral Integrity Project), all 58 counties' Grand Jury websites, and ChatGPT.

Searches utilized key terms, such as "election fraud," "voter fraud," or "election integrity," which were identified as common terms used in research relevant to this topic. Searches were filtered such that research on elections prior to 2020 were not included. Additionally, research that was topic-adjacent, but with no specific analysis or findings related to voter fraud (ex: a Grand Jury report talking about observations of the electoral process and commending county staff), was excluded.

Legal Review Appendix

Appendix 2



Legal Review Methodology

Conducted the following searches for California state and federal cases from 2020-2024 in Lexis+ and CourtLink for decided cases and pending cases:

- A. By subject: Using terms such as “voter,” “voting,” “fraud,” “multiple times” “registration” and “more than once” and “induce,” “promise,” “gift,” or “loan” in relation to voting/elections—with various combinations (terms based on statute language noted below).
- B. By California Election Code sections relevant to the issue of voter fraud, voter registration, voting multiple times or inducements to vote.
- C. By Shepardizing the CA Election Code sections listed above. [Shepardizing](#) means we use a legal citator tool to find court cases which involve a CA code section.

Caveat: CourtLink, a Lexis product, which provides access to case dockets and document filings in California appellate and lower (Superior) courts—does not include criminal case filings at the lower court level. So, we could be missing out on any case filings in the lower courts that did not get appealed (appellate cases can be found in Lexis CA state and federal case files).

Relevant CA Election Code Sections

CA Election Code Topic

Text/Excerpt

[CA Election Code § 16100:](#) Contesting Elections

Any elector of a county, city, or of any political subdivision of either may contest any election held therein, for any of the following causes:

... (d) That illegal votes were cast.

[CA Election Code § 16101:](#) Contesting Elections

Any candidate at a primary election may contest the right of another candidate to nomination to the same office by filing an affidavit alleging any of the following grounds, that:

[CA Election Code § 18100:](#) Voter Registration

(a) Every person who willfully causes, procures, or allows himself or herself or any other person to be registered as a voter, knowing that he or she or that other person is not entitled to registration, is punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code for 16 months or two or three years, or in a county jail for not more than one year ...

[CA Election Code § 18101:](#) Voter Registration

Every person who knowingly and willfully completes, or causes or procures the completion of, in whole or in part, an affidavit of registration or a voter registration card, with the intent to cause the registration or reregistration as a voter of a fictitious person or of any person who has not requested registration or reregistration as a voter, is guilty of a crime punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code for 16 months or two or three years, or in a county jail for not more than one year.

[CA Election Code § 18500:](#) Fraud in relation to cast vote

Any person who commits fraud or attempts to commit fraud, and any person who aids or abets fraud or attempts to aid or abet fraud, in connection with any vote cast, to be cast, or attempted to be cast, is guilty of a felony, punishable by imprisonment for 16 months or two or three years.

[CA Election Code § 18520:](#) Corruption of Voters

A person shall not directly or through another person give, offer, or promise any office, place, or employment, or promise to procure or endeavor to procure any office, place, or employment to or for any voter, or to or for any other person, in order to induce that voter at any election to:

(a) Refrain from voting. (b) Vote for any particular person. (c) Refrain from voting for any particular person.

[CA Election Code § 18521:](#) Corruption of Voters

A person shall not directly or through any other person receive, agree, or contract for, before, during or after an election, any money, gift, loan, or other valuable consideration, office, place, or employment for himself or any other person because he or any other person:

(a) Voted, agreed to vote, refrained from voting, or agreed to refrain from voting for any particular person or measure.

[CA Election Code § 18522:](#) Corruption of Voters

Neither a person nor a controlled committee shall directly or through any other person or controlled committee pay, lend, or contribute, or offer or promise to pay, lend, or contribute, any money or other valuable consideration to or for any voter or to or for any other person to:

(a) Induce any voter to: (1) Refrain from voting at any election ...

[CA Election Code § 18523:](#) Corruption of Voters

A person shall not directly or through any other person advance or pay, or cause to be paid, any money or other valuable thing to or for the use of any other person, with the intent that it, or any part thereof, shall be used in bribery at any election, or knowingly pay or cause to be paid any money or other valuable thing to any person in discharge or repayment of any money, wholly or in part, expended in bribery at any election.

[CA Election Code § 18524:](#) Corruption of Voters

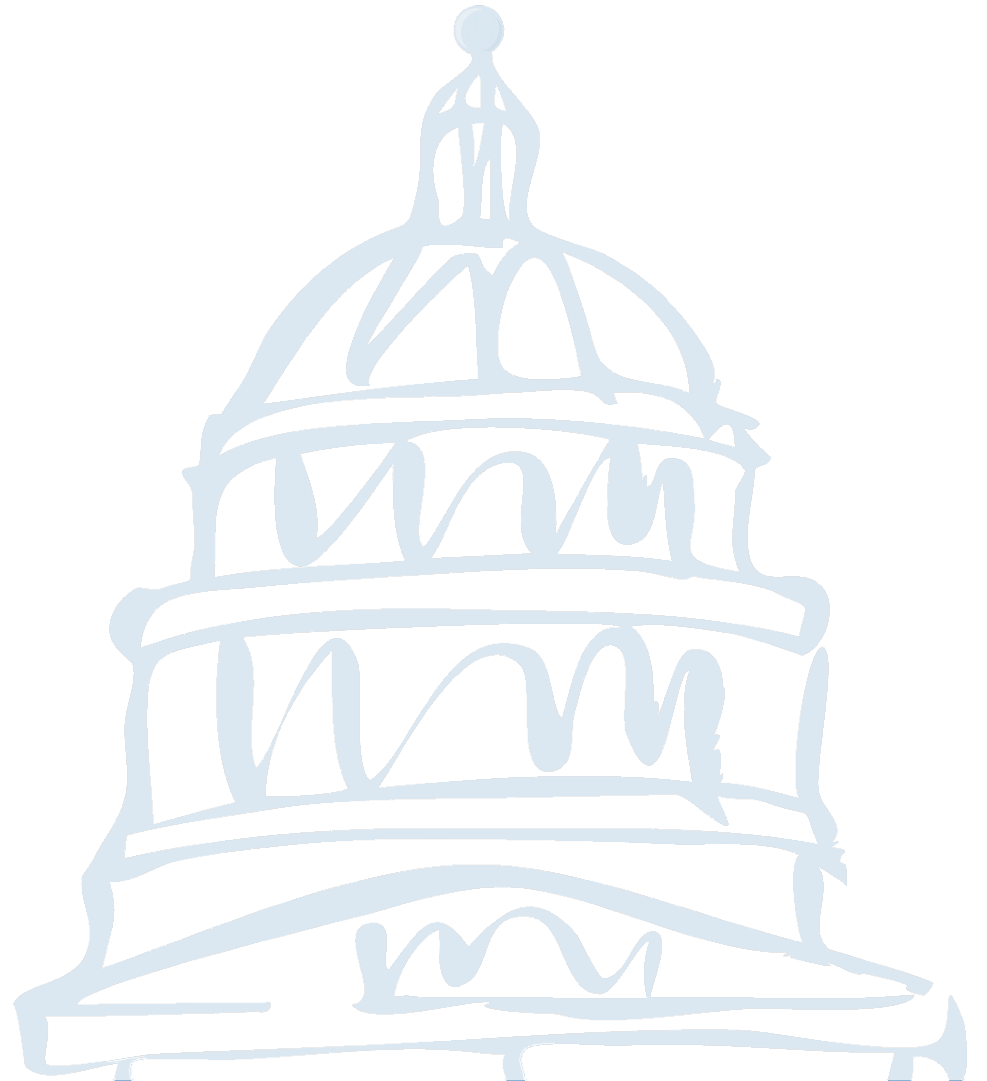
A person shall not directly or through any other person advance or pay, or cause to be paid, any money or other valuable thing to or for the use of any other person, with the intent that it, or any part thereof, will be used for boarding, lodging, or maintaining a person at any place or domicile in any election precinct, ward, or district, with intent to secure the vote of that person or to induce that person to vote for any particular person or measure ...

[CA Election Code § 18560:](#) Casting fraudulent vote

Every person is guilty of a crime punishable by imprisonment pursuant to subdivision (h) of Section 1170 of the Penal Code for 16 months or two or three years, or in a county jail not exceeding one year, who: (a) Not being entitled to vote at an election, fraudulently votes or fraudulently attempts to vote at that election. ...

Media Review Appendix

Appendix 3



Media Review Methodology

News media results regarding voter fraud were identified through [Lexis+](#). Iterative and overlapping searches were performed based on key words, such as "vot* fraud" (i.e., the results were inclusive of root word variants like voting, voter, voted, etc.), in conjunction with California-based news sources, stories, and other word combinations, such as "indict*" or "arrest*" or "court case." Searches were limited to the following source categories: "aggregated news sources," news," "news transcripts," "newspapers," and "newswires & press releases."

Because Lexis+ results do not provide live links to the original articles, separate Google searches were performed to identify a link to the source material. In some cases, the Lexis+ sources cited an original source from which the story came. When noted, we would look up the original source. Also, some news stories identified by Lexis+ could not be found online, but we were provided with sufficient details (names, locations, dates, etc.) to find an alternate news media source reporting the same story. In most cases, one single case or instance involving voter fraud could produce dozens of news stories because of both newswire services and because many of the stories were tracked by the media over time (e.g., when an accusation was made, when charges were filed, when a court case occurred, etc.).

The California Research Bureau assembled a list of distinct voting fraud instances/cases, meaning that we include only one news media citation for each instance of fraud.

Detailed Review Spreadsheet

Appendix 4

[Available for download here](#)

