



Board for Registration of Voters

Tuesday, September 2, 2025, 6:00 PM,

City Hall, 1st Floor, 149 Church Street, Burlington, VT, 05401 OR remotely via Zoom.

Join Zoom Meeting

<https://zoom.us/j/93712437108>

Meeting ID: 937 1243 7108

1. Call Meeting to Order

2. Agenda

2.1. Motion to amend/adopt agenda

3. Announcements

4. Meeting Length

4.1. Set Meeting Length

5. Adopt Minutes

5.1. Motion to adopt previous meeting's minutes

File Attachments

1. August BRV Minutes

August BRV Minutes.pdf

6. Public Forum

7. Clerk's Report

8. Approval of Voter Challenges

9. State District Boundary Audit

9.1. Discussion about Draft State District Boundary Audit Report

File Attachments

1. DRAFT Boundary Audit Report

DRAFT Boundary Audit Report.pdf

10. Board Member Expectations

10.1. Rules and Procedures for the Board for Registration of Voters

File Attachments

1. Rules and Procedures of the Board for the
Registration of Voters

Rules and Procedures of the Board for the
Registration of Voters .pdf

11. Voter Checklist Protections

11.1. Discussion about Voter Checklist Protections

File Attachments

1. Voter Registration Public Records Request
Procedure

Voter Registration Public Records Request
Procedure.pdf

12. New Business

13. Adjournment

13.1. Motion to Adjourn



**BURLINGTON BOARD FOR REGISTRATION OF VOTERS
CITY HALL, 1ST FLOOR CONFERENCE ROOM, 149 CHURCH STREET, BURLINGTON, VT,
05401 OR REMOTELY VIA ZOOM.**

**MINUTES OF MEETING
August 5, 2025**

1. Call Meeting to Order

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Meeting called to order by Chair Grace Grundhauser at 6:05pm

Members Present: Alison Harte, Adam Franz, Lauren Ebersol, Lesley Gendron, Grace Grundhauser, Kevin Lewis, Annie Schneider, Colleen Montgomery, Jeanne Schwartz, Karen Rowell

Members Absent: Michelle Lefkowitz, Youth member Will Cunningham

Others Present: Sarah Montgomery, Assistant City Clerk

2. Agenda

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2.1. Motion to amend/adopt agenda

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Kevin Lewis made a motion to approve the agenda. 2nd by Jeanne Keller. Approved unanimously.

3. Meeting Length

3. Meeting Length

3.1. Set Meeting Length

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The meeting was set to end at 7:00 pm.

4. Adopt Minutes

4. Adopt Minutes

4.1. Motion to adopt previous meeting's minutes

File Attachments
1. Minutes 07012025
Minutes 07012025.pdf

4.1. Motion to adopt previous meeting's minutes

Karen Rowell made a motion to approve the minutes. Seconded by Lesley Gendron.

Alison Harte asked about the discussion that occurred during new business. She noted that she had to leave at 7:00pm, which was the time the meeting was set to end, and substantive discussion took place after that.

She asked if the more substantive items could be discussed earlier in the meeting or that the board could discuss whether they needed more than an hour for meetings.

Minutes approved unanimously.

5. Public Forum

5. Public Forum

No members of the public were present.

6. Clerk's Report

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Sarah Montgomery reported that there are currently 29,100 registered voters. Out of those, 4,955 are challenged. 128 of the total voters are All Legal Resident Voters and 9 of the total challenged voters are All Legal Resident Voters. In July: 146 voters were newly registered, 83 voters were transferred from Burlington to other Vermont towns, and 74 voters were removed from the checklist.

Sarah Montgomery announced that the remainder (2 years) of Mike McGarghan's term is currently open for applications. Applications will be accepted until 8/20 at 4:30pm and appointments will occur at the 8/25 City Council with Mayor Presiding meeting. Grace Grundhauser reminded members that it is a good idea for applicants to attend the appointment meeting. Alison Harte shared that she would be advertising the vacant position on Front Porch Forum, and asked other members to share other places where it could be advertised. Karen Rowell said she would send her information about an additional place to advertise.

Colleen Montgomery asked if the new member being appointed would automatically be a republican, since Mike McGarghan was a republican. Grace Grundhauser explained that Burlington City Charter allows no more than 6 members from any major party to be on the board. She added that if there is no representation from a major party and there is an applicant from that party that is not appointed, that party can petition City Council to appoint a member from their party to the board. She also noted that people who declare themselves as independents are not affiliated with any party. Adam Franz asked how members with dual parties listed are counted toward the maximum of 6 representatives from that party. Grace Grundhauser said that this was discussed at the appointment committee meeting, but she has not seen a definitive determination come from the attorney's office. Sarah Montgomery will follow up with the attorney's office to get clarification.

7. Approval of Monthly Voter Challenges

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The board reviewed the list of proposed monthly challenges, which included 37 voters. Grace Grundhauser noted that there were voters across most wards reflected in the challenge list, with the largest representation of voters coming from ward 7, and the lowest from ward 8 (with 0 voters).

Jeanne Keller made a motion to approve the monthly challenges. Seconded by Lauren Ebersol. Passed unanimously.

8. Biennial Challenge (Approval)

8. Biennial Challenge (Approval)

The board reviewed the proposed list of voters to challenge as part of the biennial review. This proposed list included 203 voters after filtering out voters who were found to still be eligible to vote in Burlington, using the sources the board approved in July.

Lauren Ebersol asked about the "Blind Voter" that was listed on the spreadsheet. Sarah Montgomery answered that it indicates a voter who is in the address confidentiality program with the state. She did reach out to the state's election team to determine if they had any data that could indicate this voter's continued eligibility to be registered in Burlington, and they did not. Sarah also noted that a few voters had mailing addresses listed instead of legal addresses - this is due to them being overseas or military voters. These voters do have a legal address in Burlington in their voter registration, but it does not appear on the reports generated from the system.

Grace Grundhauser noted that there was representation from all wards on this spreadsheet.

Lesley Gendon made a motion to approve the proposed biennial challenges. Seconded by Annie Schneider. Passed unanimously.

9. State District Boundary Audit (Discussion)

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9.1. State District Boundary Audit Discussion

File Attachments

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|-------------------------------------|---------------------------------------|
| 1. State Boundary Audit Information | State Boundary Audit Information.docx |
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9.1. State District Boundary Audit Discussion

Sarah Montgomery shared that in the recent legislative session, in the elections bill, language was passed requiring municipalities with multiple state districts to audit their checklists to ensure that voters are assigned to the correct districts. Burlington's city boundaries contain two different state senate districts and six state representative districts, along with the eight city wards. Since these boundaries do not overlap, Burlington has 21 different state district and city ward combination assignments that voters can fall into. Sarah explained the process that the City went through in 2023, after the city redistricting, in order to assign street segments to the correct districts. She noted that the language in the bill requires the local board of civil authority (which, in Burlington, is the Board for Registration of Voters when it comes to the voter checklist) and the town clerk to complete this audit together, then the clerk's office is required to submit a report to the state. Sarah shared that the clerk's office is working with the IT department to do a comprehensive audit of the voter checklist data by utilizing city mapping data and the state's boundary mapping data, and asked the board how much they would like to be involved in the details of the process. Alison Harte said she does not feel like she needs to be involved in the details of the process. Karen Rowell asked Sarah if she needed help with the process. Sarah answered that it would be difficult for the board to help with the process, but if the board wanted to be involved with the details, she could provide them with some data to manually spot check. Jeanne Keller suggested that she would rather receive a report about the process, what challenges came up, and how they were resolved. Annie Schneider made a motion to request Sarah provide a report to the board in September, and have any necessary further discussion then. Seconded by Colleen Montgomery. Passed unanimously.

11. New Business

11. New Business

Lesley Gendron noted that she created a new voter registration election day process flowchart to reflect the new Election Management System. She will share with the board via email and would appreciate the board's feedback.

Jeanne Keller made a motion to add an agenda item to a future meeting to discuss voter checklist protections. Seconded by Colleen Montgomery. Discussion: Annie Schneider asked if further information could be brought to the discussion, including any discussions that the Clerk's office has already had with the attorney's office about privacy regarding the All Legal Resident checklist. Sarah Montgomery said she could share the voter registration public records request procedure with the board. Motion to add this item to a future agenda (either September or October) passed unanimously.

10. Board Member Expectations

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10.1. Rules and Procedures for the Board for Registration of Voters

File Attachments

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| 1. Rules and Procedures of the Board for the Registration of Voters | Rules and Procedures of the Board for the Registration of Voters .docx |
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10.1. Rules and Procedures for the Board for Registration of Voters

Jeanne Keller discussed her recommended additions to the procedures document, noting that the proposed addition would be an automatic trigger for board discussion, not an automatic trigger for recommendation for

removal by City Council. Alison Harte asked for a walk-through of the proposed changes so she could understand the intent behind the additions, beyond simply noting the number of absences that are acceptable. Jeanne Keller explained that the additions are being proposed due to a previous member being unable to attend several meetings and also missing an election. She noted that covering all the polling places when members are unavailable is challenging and that there is currently nothing specific in the board's procedures to address that. She wanted to ensure that meetings, trainings, and elections were all included in attendance requirements. Alison Harte agreed that meeting participation is important, but noted that missing an election should likely be weighted more heavily since coverage on election day is so important. Kevin Lewis asked if measuring by hours missed versus single events might be more effective to address this.

Grace Grundhauser said that while the board does have the authority to recommend removal to City Council, it is awkward to initiate and additional language in the procedure to remove that ambiguity would be helpful. She also noted that, since this is a community board of members that are volunteering their time, she thinks the language could be less detailed. Annie Schneider noted that trainings are not required, and she doesn't see that as necessary to count in the attendance. Annie also noted that there are other types of excused absences, like parental leave, that might come up and need to be considered. Jeanne Keller said that she sees election trainings as an integral part of the role, since implementing best practices for election days has been decided on at these trainings. Grace Grundhauser said that decisions should not be made at trainings, since they are not board meetings.

Grace Grundhauser will draft a shorter version for continued board discussion. Alison Harte recommended that policies of other public bodies could be referred to as references. Jeanne Keller noted that she did refer to the City Council and NPA steering committee procedures and tried to find something in the middle of those two extremes.

Annie Schneider noted that considering people's technology access and comfort levels should be considered when reviewing attendance expectations.

This item will be added as an agenda item at the next meeting for further discussion.

12. Adjournment

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12.1. Motion to Adjourn

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Kevin Lewis made a motion to adjourn. Seconded by Lesley Gendron. Passed unanimously. Meeting adjourned.



OFFICE OF THE CLERK TREASURER

City of Burlington

City Hall, 149 Church Street, Burlington, VT 05401

Voice (802) 865-7000

Fax (802) 865-7014

September **X**, 2025

Vermont Secretary of State
Attn: Election Division
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402

Re: Voter Checklist Boundary Audit

The City Clerk's office, in conjunction with the Board for Registration of Voters, conducted this checklist audit in August of 2025. We worked closely with our City IT department to follow the process outlined here.

Street Listing Creation

The original methodology used to create the street segment list was completed utilizing GIS.

- E911 address data was extracted from the State dataset (source VCGI).
- Because we are only interested in residential locations, we filtered out any points that were not some form of residential (i.e. kept only single family, multi-family, mixed commercial/residential, condos, etc.)
- Using a spatial join GIS tool, we allocated each ward, house, and senate boundary to the points in which they fell.
- The resulting data table was tabulated using a Summary Statistics tool, which creates a list of each street broken down by ward/house/senate districts, and the Min/Max street numbers for each of these streets.
- Using the data table, we were able to identify streets and addresses which fell within more than one boundary.
 - Streets that only contained addresses within one boundary (ward/house/senate) were final.
 - Streets with addresses that fell within 2 or more boundaries were analyzed one by one, and the correct address range per boundary was assigned.
 - The two lists were then combined to generate the final list of high/low addresses per streets and district.

Street Listing Audit

- We started by ensuring the House District boundaries we used align with the ones provided by the state ([VT Legislative District Lookup House](#)), then proceeded with a visual inspection of address points that fell along the borders of the Ward and House boundaries. These are the most likely addresses to contain errors due to the boundaries sometimes crossing over properties. All of these checked out during the visual inspection.

- Using a random number generator containing 100 numbers between 1-500, we pulled out a sample of approximately 20% of the streets from the address list to check.
- For each street, we verified the high/low addresses, whether it was even/odd/all, and verified the ward/house/senate district it was within.

Conclusions and Findings for Street Segment Review:

- On Adams Street there initially appeared to be one error, where a single address (78 Adams Street) appeared to be attributed to the wrong district, as Adams Street is split by multiple districts. Based on the other streets analyzed, this seems to be an isolated error and not widespread. Upon further review, we found that this address was listed inconsistently between State and City address data. We field verified that this address falls within House district Chi-14, and was actually assigned correctly.
- On several streets, the high address number appeared to extend to contain commercial buildings. These segments could be edited to remove commercial buildings, but doing so may cause unlabeled mix use (commercial/ residential) buildings to be excluded.
- All other streets from the 20% sampled were verified as correct.

Full Voter Checklist Audit

Utilizing GIS, we were also able to individually analyze all of Burlington voters' ward and district assignments. Using these GIS point locations, we added attributes to the voter list point data for Ward, Senate, and House district, using GIS operations to join this information based on where the points fall within the boundaries.

Comparing the House/Senate/Ward districts from the voter list to the results of the GIS analysis, we were able to identify any voter addresses with potential errors with their district assignments (ward, senate, or house). Out of Burlington's 29,008 voters, a total of 72 voters were flagged as having potential errors. Each of these voter's legal addresses were further inspected. The findings were:

- 16 voters had their legal addresses hidden from the voter checklist report that was examined, due to voter status. These included voters who were designated as Homeless, Safe at Home, UOCAVA, or Address Confidentiality. When inspecting these voters, those who had visible legal addresses shown in their individual voter registrations had legal addresses that correctly corresponded to their assigned districts. No changes were needed with these voters.
- 10 voters had legal addresses listed that were not valid legal addresses, but based on research showing where the address would fall, there was no question that that the assigned district would still be correct. This is a shortcoming of the election management system using street segments, rather than geocodes, to populate legal addresses. No changes were needed with these voters.
- 3 voters with a legal address of 270 South Willard Street did not have districts assigned to them due to an issue with a conflict within our street segment listings. The street segment was corrected and the voters were assigned.
- 8 voters did not have districts assigned to them. The reason is unknown, but could be due to a data transfer issue when the new election management system launched. These voters were assigned to their correct districts.
- 3 voters were registered at slightly incorrect addresses causing their addresses and/or district assignments to be flagged. These included:
 - 1 voter who had their legal address listed as 171 Intervale Road, when it should have been 171 Intervale Ave. 171 Intervale Ave is not a residential address, so we updated the voter's

legal address, which changed their assigned state house district from Chi-17 to Chi-16. We also updated the street listing to remove the non-residential addresses from Intervale Road to prevent this from happening again.

- 1 voter who had their legal address listed as 194 North Ave, when it should have been 194 North Street. 194 North Ave is not a valid legal address, so we updated the voter's legal address to 194 North Street, which changed their assigned state house district from Chi-17 to Chi-16.
- 1 voter who had their legal address listed as 315 North Ave, which is no longer a legal address. This parcel is now addressed as 35 Cambrian Way, which the voter's registration was updated to reflect. This did not change the voter's district assignments.
- 1 voter was found to be registered in Burlington at a South Burlington address. The voter was transferred to South Burlington and the Burlington street segment was updated to exclude that address to prevent this from happening again. This changed the voter's house district from Chi-13 to Chi-11.
- 22 voters, whose legal addresses are 226-280 Manhattan Drive, were determined to be assigned to the wrong house district due to an incorrectly assigned street segment. They were assigned to Chi-16, but should have been assigned to Chi-17. The street segment and voter assignments have been updated to correct this.
- 1 voter, whose legal address is 31 South Prospect Street, was determined to be in the wrong house district due to an incorrectly assigned street segment. They were assigned to Chi-14, but should have been assigned to Chi-15. The street segment and voter assignment have been updated to correct this.
- 8 voters, whose legal addresses are 75 Colchester Ave, were determined to be in the wrong city ward due to an incorrectly assigned street segment. They were found to be assigned to Ward 1, but should have been assigned to Ward 8. The street segment and voter assignments have been updated to correct this.

Final Conclusions:

During our review process, we needed to update the district assignments for the following street segments in order to be fully aligned with the reapportionment descriptions:

1. 226-280 Manhattan Drive, EVEN. Changed from Chi-16 to Chi-17.
2. 31-85 South Prospect Street, ALL. Changed from Chi-14 to Chi-15.
3. Changed high number of 529-936 South Prospect Street, ALL to end at 926, excluding South Burlington addresses on that street.
4. 17-79 Colchester Ave, ALL. Changed from Ward 1 to Ward 8.

The voters who had their state or city district corrected as a result of this audit include:

1. 22 voters who were incorrectly registered in Chi-16 are now accurately assigned in Chi-17
2. 1 voter who was incorrectly registered in Chi-14 is now accurately assigned in Chi-15
3. 1 voter who was incorrectly registered in Chi-13 is now accurately assigned in Chi-11
4. 8 voters who were incorrectly registered in Ward 1 are now accurately assigned in Ward 8
5. 2 voters who were incorrectly registered in Chi-17 are now accurately assigned in Chi-16

Based on our GIS analysis, and comprehensive review of any outliers identified by the GIS analysis, we can be confident that our voters are now in the proper districts.

Rules and Procedures for the Board for the Registration of Voters

(Finalized 10-5-2021)

PURPOSE: The Board for Registration of Voters is committed to the enfranchisement of eligible residents through the voting process. Voting is a right and responsibility. The Board encourages voter registration and acknowledges the right of voters to freely participate in elections. The Board may actively initiate and participate in voter registration outreach.

The Board's legal responsibility is to maintain the voting checklist for the City of Burlington by upholding the Vermont Election Laws ([Title 17 of the Vermont Statutes Annotated](#)).

AUTHORITY AND RESPONSIBILITIES: The Board for Registration of Voters is responsible for and has authority for all duties with respect to preparing The City of Burlington's voter checklist pursuant to chapters [14](#), [15](#), [16](#) and [43](#) of the City's Charter, and [Title 17 of the Vermont Statutes Annotated](#). The Board shall comply with the [Vermont Open Meeting Law](#) and other laws covering public bodies.

In order to effectively and justly carry out its responsibilities all members will be expected to familiarize themselves with the Vermont Election Law in [Title 17 of the Vermont Statutes Annotated](#), along with pertinent sections of the Burlington City Charter. The Board will maintain an office in City Hall, wherein shall be kept available for public inspection the records of all legal voters. The Board shall advise any petitioner affected by an adverse decision of his or her statutory right to be included in the list of legal voters to seek judicial review of such decision.

MEMBERSHIP: As established by the City-Charter, the Board for Registration of Voters shall consist of 12 registered Voters of the City of Burlington, appointed by the City Council, with the Mayor presiding. Appointments to the Board for Registration of Voters shall be for five (5) years. Members may reapply and may be appointed for successive terms without limitation.

Members of the Board may be removed for incapacity, negligence, or bad conduct when a majority of the City Council, Mayor presiding vote to remove the member pursuant to [Chapter 129](#) of the Burlington City Charter. In addition and pursuant to this same section, when in the judgment of two-thirds of the City Council, on the initiative of the Mayor, a member is no longer effectively serving the city, that member may be removed from the Board.

Therefore because members are expected to actively participate in city elections, meetings and other Board activities, a member's continued non-participation in Board activities may result in the Board's recommendation to the City Council for removal from the Board. A two-third majority vote of the Board is required for such a recommendation to the City Council.

OFFICERS: At the first meeting of the Board, following the annual appointments, the Board shall elect a Chair by majority vote. A Vice Chair and Secretary may be elected at the discretion of the Board. Terms of office shall be one year.

QUORUM: A simple majority of the Board shall be considered a quorum

MEETINGS AND MINUTES: The Board for Registration of Voters shall hold meetings on the first Tuesday of each month unless otherwise determined by a majority vote of the Board. Additional meetings are scheduled to accommodate closing of the checklist prior to elections ([Vermont Statute Annotated, Title 17](#)). All meetings of the Board shall be open to the public except at such times when an executive session is in order. No action shall be taken at any meeting of the Board without a quorum present. No action shall be taken in executive session. (See [open meeting law](#))

Roberts Rules of Order revised shall govern proceedings of the Board for all cases which are not specifically covered by other laws, ordinances, by-laws, or regulations.

Minutes shall be kept of all meetings. The minutes shall be available for public inspection according to open meeting laws.

WARNINGS OF MEETINGS: In accordance with [Vermont Open Meeting Law](#), the Board shall provide the Clerk / Treasurer's Office with notice of regular meetings on or before the Thursday before the week of the meeting. The Clerk / Treasurer's Office will warn the meeting. For special meetings, the Board shall publicly announce at least 24 hours before the meeting the time, place and purpose with appropriate media and post with the Clerk / Treasurer's office and two other public places. Emergency meetings may be held without public announcement, without posting notices and without 24 hours notices to members, provided some public notice is given as soon as possible before such meeting.

SPECIAL MEETINGS: Special meetings of the Board for Registration of Voters may be called by the Chair, when the Chair deems it expedient or upon the request of two (2) members of the Board for the purpose of transacting any business designated in the call. In accordance with [Vermont Open Meeting Law](#), Notice for a special meeting may be made by telephone or other appropriate technology at least twenty-four (24) hours prior to the date of such special meeting. At such special meeting no business shall be voted on other than that specified in the call.

ADOPTION OF RULES AND PROCEDURES: The Board may adopt rules and procedures as it may deem wise for the regulation of its work. Rules may be amended by a two-thirds majority provided that the proposed amendment(s) have been discussed at two meetings prior to the meeting at which the amendment(s) will be voted upon.

Public Records: Voter Registration

City Clerk Procedure

The Vermont Public Records Act (1 V.S.A. § 315-320) establishes the right of any person to inspect or copy public records maintained by public agencies, including voter registration information.

Exemptions from Public Record:

Per 1 V.S.A. § 317 (31), the following voter information found in a voter registration record is exempt from public inspection and copying and should never be shared:

- Month and day of birth
- Driver's license or nondriver identification number
- Telephone Number
- Email address
- Last four digits of social security number

Additionally, per 17 V.S.A § 2154 (b)(2), any officer, employee, agent, or independent contractor of the City shall not knowingly disclose a copy of the voter checklist to any foreign government or to a federal agency or commission or to a person acting on behalf of a foreign government or of such a federal entity for the purpose of:

- Registration of a voter based on his or her information maintained in the checklist;
- Publicly disclosing a voter's information maintained in the checklist; or
- Comparing a voter's information maintained in the checklist to personally identifying information contained in other federal or state databases.

Voter Checklist Requests:

Per 17 V.S.A § 2154 (c)(1), Individuals requesting a copy of the voter checklist must first swear or affirm, under penalty of perjury, that they will not:

- Use the checklist for commercial purposes; or
- Knowingly disclose the checklist to any foreign government or to a federal agency or commission or to a person acting on behalf of a foreign government or of such a federal entity in circumvention of the prohibited purposes for using the checklist set forth in subdivision 17 V.S.A § 2154 (b)(2)

All Legal Resident Voter and Citizen Voter checklists should be merged together when filling public record requests to protect voters' citizenship status. Sharing the entire voter checklist as a whole should be the default, but a portion of the checklist can be shared when the requestor is asking for a list of voters eligible to vote in a certain election.

Voter checklists may never be separated by citizenship status when filling public record requests. If a requestor specifically asks for a portion of the checklist divided by citizenship status, they should be referred to the Public Information Officer in the City Attorney's office.

Individual Voter Records Requests:

Individual voter records are also publicly available under the Public Records Act. With the exception of the exemptions previously listed, upon request, information related to an individual's voter registration and voting participation are public record and must be shared.

Requests for Data:

For informational and research purposes, total numbers pertaining to All Legal Resident Voter registration and participation may be shared. For example, sharing the total number of registered All Legal Resident Voters or the total number of All Legal Resident Voters who participated in a certain election is permissible. However, lists of the specific voters who make up these numbers shall not be shared, as it would divulge individuals' citizenship statuses.