

MEMORANDUM

The Georgia State Election Board's Formal Review of ELLY

June 3 – August 19, 2026

1. The Review

After a 30-minute presentation and 90-minute question period on ELLY at its June 3, 2026 meeting, the Georgia State Election Board instructed its two Investigators to conduct a formal review of ELLY — The Elector List™. After validating data sources, update policies and procedures, back-up procedures, security and capacity, and reviewing references from users in multiple states, their report on ELLY™ was given at the August 19, 2026 meeting.

One investigator said:

“It's a fantastic tool ... a fantastic program ...”

The other said:

“I was a skeptic, I am no longer a skeptic.”

Georgia SEB Executive Director James Mills said:

“It was recommended for election directors, election workers that want to use it and look at it.”

“We encourage you to use it.”

The ELLY™ link was added to the seb.ga.gov website at the end of the August 19, 2026 Georgia SEB meeting.

2. What the Investigators Examined

The Board assigned the review to its own investigative staff. Executive Director James Mills asked Larry Duckworth, the Board's senior private investigator, and Jason Frazier, its other investigator, to examine ELLY and report back. Both hold MBA degrees; Mr. Duckworth has owned two software companies.

The written verification framework agreed for the review covered the following.

#	Area	What was required
1	Data sources	A list of every database ingested, with an affidavit that these official databases are the only ones used.
2	Data integrity	An affidavit that no imported data content is altered, added or deleted.
3	Security	An affidavit covering the security structure, present and planned.
4	Capacity	Affidavits on database and internet packet capacity, and on user capacity, present and planned.
5	Back-up	An affidavit covering back-up procedures and capabilities.
6	Update policies	Update policies, procedures and schedule.

#	Area	What was required
7	Reports	Examples of report types.
8	References	Contacts who have been users for more than six months and will provide a written evaluation — name, organization, contact details, use period, how used and by whom, strengths, weaknesses, overall evaluation, and whether they would recommend county use.
9	Commercial terms	Subscription agreement template: there is no subscription agreement. Competitive comparisons: none known. Pricing: ELLY is offered at no charge.
10	Ownership	ELLY intellectual-property ownership documentation, including third-party licensed software.

Table 1 · Verification framework, July 1, 2026.

2.1 Data ingested by ELLY

The complete list of sources disclosed to the investigators, with an affidavit that these are the only ones used.

Source	What it supplies
BCC Software — USPS NCOA®	National Change of Address: move records. BCC Software is the vendor currently used by ERIC.
BCC Software — USPS CASS®	Address validation (Coding Accuracy Support System®).
BCC Software — PCOA	Proprietary Change of Address, similar to NCOA®.
County tax records	Property class identification, sales, land use, homestead exemption. An NDA is in place with the vendor.
Secretary of State voter rolls	Sourced directly from Georgia and most states plus DC — 46 states plus DC in the system at the time of the report, with a small number of further states in process.
Secretary of State voter history files	Sourced directly from most states plus DC. Some states in process at the time of review.
Obituaries, funeral homes and newspapers	Death identification. An NDA is in place with the vendor.

Table 2 · Data ingested by ELLY, as disclosed to the investigators, with an affidavit that these official databases are the only ones used.

2.2 The seven sworn affidavits

The investigators required the representations in writing and under oath. Seven notarized sworn affidavits were required and seven were received, each signed by the company's chief executive before a notary. Copies were lodged with the Board's staff and offered to Board members.

#	Sworn to	Substance
1	Sources and integrity	Only publicly available databases are used; there are no proprietary databases; data is not altered, added or deleted.
2	Update cadence	Databases are accessed and files are updated every Sunday.
3	Source refresh	How often the Postal Service and other upstream sources update their own databases.
4	Intellectual property	The EagleAI Network owns and retains the rights, so that no third party can assert a competing claim.
5	Security	Both user security and back-end security meet industry standards, operating from a data center with firewall and other protections in place.
6	Transfer of user rights	If there is ever a change of ownership, existing user rights transfer without change.

#	Sworn to	Substance
7	Capacity	The system can support 10,000 users, with 20 terabytes and 1 gigabit capacity, and more if needed.

Table 3 · The seven affidavits, as presented to the Board on August 19, 2026.

“So this is a legal commitment that we wanted to provide you intellectually for your final decision.”

— Larry Duckworth, Senior Investigator

3. What the Investigators Reported

3.1 The condition of the rolls

The investigators set out the condition of the voter rolls that county officials are required to maintain.

Finding reported to the Board	Source as presented
Almost 43,000 dead people in the voter rolls, as well as 2,500 non-citizens	A U.S. Department of Homeland Security memorandum, after Georgia ran its entire voter roll through the same database along with nine other states
Almost half the counties in Georgia have more people registered to vote than the citizen voting-age population	U.S. Election Assistance Commission
Over half a million Georgia registrations where a permanent change of address was filed but the voter is still registered at the original address	An ELLY module, shown to the Board
Almost 100,000 people who moved out of Georgia and are now registered in another state while still registered in Georgia	An ELLY module, shown to the Board
About 10% of Americans move every year	Presented as context for the scale of the task

Table 4 · Roll-condition findings presented at the August 19, 2026 meeting.

One investigator also described a deep dive into a single Georgia county some years earlier, which found over 10,000 people registered more than once, thousands of address errors, around 500 records with a placeholder date of birth of 1/1/1800 or 1/1/1900 — about 20% of which had voting history — and thousands of people registered at business addresses such as parcel stores, virtual mailboxes and self-storage centers. He reported that placeholder dates of birth were still present in a different county he examined the month before the meeting.

3.2 How they described the tool

The investigators described ELLY as a compilation of public records in one setting, operating on a principle Mr. Duckworth called management by exception.

“It's simply a management by exception database, because we have over 8 million registrations in the state of Georgia. This helps narrow the scope down to the ones that a county might want to look at first. They need to maintain their entire voter roll, but this helps them to know what to look at first.”

— Jason Frazier, Investigator

Both were explicit about where decision authority sits.

“And we're not saying it should be removed. The Board or us up here do not make any decisions. County officials only make the decisions. That's the way it has to be. We just need to give them the tools to do so.”

— Larry Duckworth, Senior Investigator

Mr. Duckworth closed his portion of the presentation as follows.

“I started out as a constructive skeptic of ELLY. I am no longer a skeptic. I am not here to recommend anything. I'm just no longer a skeptic of it. And intellectually, you need to know that.”

— Larry Duckworth, Senior Investigator

4. Statements Sent to the Georgia SEB Investigators

The investigators required a minimum of six written references from users of more than six months' standing. Seven were received; one arrived too late to be included in the presentation. The statements below are drawn from those references, and a single reference may be the source of more than one statement.

- IL** The economy of scale and extensive categories of cross-jurisdictional exchange of official data through one source make ELLY the only tool of its kind.
- IL** The completeness of data fields and frequency of updated/current information is essential to meaningful list maintenance through verified data to successfully fulfill the declarations in state and federal laws.
- IL** Volunteers relay that local election officials receiving the data, especially those seeing ELLY demonstrated, are generally pleasantly surprised to see the tool and appreciate its high value to their job.
- IL** In my experience as an attorney and former elected county clerk (20 years), ELLY is a practical, real solution for those who say, "It would be nice, but it can't be done."
- NM** I find it to be a highly valuable tool that effectively informs county clerks and voters on current issues with their voter rolls and the importance of maintaining accurate voter rolls.
- NM** The program has proven to be a robust and highly valuable tool for educating county clerks and voters alike. It provides reliable PCOA data that adds important validity to the analysis. I have successfully used the program to generate clear statistics that empower voters and officials to make informed decisions regarding voter roll integrity.
- NM** I strongly recommend using this program to assist county clerks in maintaining accurate voter rolls. Doing so not only fulfills a core statutory responsibility but also helps restore and strengthen voter confidence in our election system.
- NV** The program has proved to be invaluable in cross checking voter registration in the jurisdictions they have. They provide NCOA and PCOA data along with voter registration and history.

5. Statements to the Georgia Election Officials

- GA** ELLY's reports helped me spot a potential GARViS error in logging voter registration dates for voters transferred from other counties.
- GA** ELLY helped considerably in my research of previously flagged voters and addresses, in every case helping to confirm our previous decisions to a higher level of confidence in a shorter time than our past research for those cases took, both in decisions to deny and to uphold challenges.
- GA** Overall, I am impressed with ELLY's design and its accessibility of useful reports, and I am looking forward to how it grows.
- GA** This tool has so much potential and I wish to see that potential realized so that list maintenance nationwide can reach a higher standard.
- GA** Thank you for your time and access to this compilation of public data, which I hope to be able to cross-reference in the future to help more efficiently obtain supporting evidence during routine voter roll maintenance duties.
- GA** The county boards of registrars do not have access to Georgia voter rolls or voter history, which is often required to do our jobs. We have to personally buy the data from the SOS. Instead, many of us use ELLY — quick, easy, with all the information in one place.

6. Sources

- **Georgia State Election Board, June 3, 2026** — 30-minute presentation and 90-minute question period on ELLY. Video: youtube.com/watch?v=v86HPwdzODM.
- **ELLY verification framework, July 1, 2026** — the written scope, data-source list and affidavit areas agreed for the review. Source of Tables 1 and 2.
- **Georgia State Election Board, August 19, 2026** — the investigators' report, the reference statements and the Executive Director's remarks. Source of Tables 3 and 4 and the quotations throughout.

Two notes for anyone quoting this externally

Scope. The review covered data sources, update policies and procedures, back-up procedures, security, capacity and user references, and it took seven sworn affidavits. It did not include a SOC 2 audit, an independent penetration test or a measured accuracy rate, and no alternative product was examined alongside ELLY. A state that requires those should require them for itself.

Attribution. The quotations are taken from a transcript of the August 19 meeting that appears to have been machine-generated and renders some proper names and technical terms phonetically. Confirm speakers, titles and wording against the Board's official minutes and the meeting video before use in a public filing or procurement submission.

Prepared August 2026 by the developer of ELLY — The Elector List.