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THE CONSERVATIVE CASE FOR EXPANDED ACCESS TO ABSENTEE BALLOTS

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INTRODUCTION

Absentee ballot voting and voting by mail has become a highly salient issue in 2020.¹ The COVID-19 pandemic, which has disrupted state primaries and could hamper the autumn general elections, has forced policymakers to look for ways to conduct elections while many Americans are locked down and fearful of crowded places. The most obvious “Plan B” is to permit more citizens to receive their ballots by mail, and either to mail them back or to place them in local drop boxes. And, indeed, voting in this way is a tried-and-true method that has long been the predominant form of voting for members of the military.

Even pre-COVID-19, the public’s use of absentee ballots has been growing steadily. For example, as the U.S. Elections Commission reports:

The number of absentee ballots cast by absentee voters nearly doubled, from 14.7 million in 2004 to 24.8

million in 2016. Mail voting was tracked beginning in 2008, and the number showed a steady increase through 2016, more than tripling from 2.4 million in 2008 to 8.2 million in 2016.²

Unfortunately, public discussion of absentee voting—especially on the political right—has been clouded by confusion and groundless accusations about the practice. Most notoriously, President Donald J. Trump—who has voted by mail both as a Democrat and Republican—has claimed that expanded voting by mail will not “work out well for Republicans” and is ripe for fraud.³

However, such rhetoric is simply untrue, and conservatives should embrace the expansion of absentee voting. Voting absentee or by mail is a safe, trusted and age-old practice. Moreover, expanded access to absentee voting comports with conservative principles, which helps explain why a number of conservative state policymakers have advanced proposals to achieve it. Finally, and critically, policymakers should take note that polling data indicate very clearly that the public strongly favors expanded access to absentee voting and that its results are partisan-neutral.

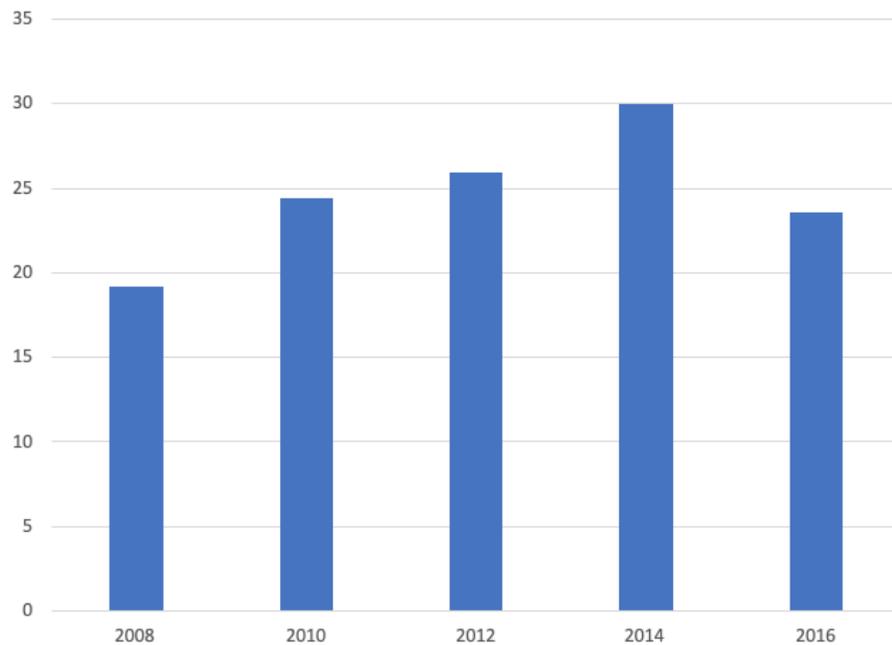
ABSENTEE VOTING IS AN AMERICAN TRADITION

Absentee voting has deep roots in American history and dates to the Civil War. As the internecine conflict ravaged the nation, many troops faced the specter of not being able to exercise their right to vote. During the early days of the war, the majority of the Confederate states ratified measures to permit their soldiers to vote in absentia.⁴ The Union soon followed suit. Indeed, to hold a legitimate election required it, as 2.5 million Americans served in the Union army—many of them in the field far away from their homes where they were unable to vote in-person.⁵

Union Republicans of the 1860s championed absentee voting access for American troops. However, many Democrats doggedly resisted calls to allow soldiers to submit ballots by mail, and assailed the proposed voting model as being rife for fraud and a crafty ploy to help Republicans tighten their grip on power.⁶ A host of states codified the practice in advance of the presidential election of 1864, when roughly 150,000 to 230,000 Union soldiers cast absentee ballots from the battlefield.⁷

After the war, many military absentee voting laws fell into disuse for decades before being revived. As American power surged and military bases were installed on foreign soil in the mid-twentieth century, members of the military and civilians serving various governmental posts found themselves

FIGURE 1: PERCENTAGE OF ABSENTEE OR BY-MAIL BALLOTS, 2008-2016



SOURCE: Data compiled from U.S. Elections Assistance Commission. <https://www.eac.gov/documents/2017/10/17/eavs-deep-dive-early-absentee-and-mail-voting-data-statutory-overview>.

far from domestic polling locations. As such, absentee voting once again became viewed as a necessity.

In fact, in 1986, Republican President Ronald Reagan signed into law the Uniformed and Overseas Citizens Absentee Voting Act, which required that “states and territories allow certain groups of citizens to register and vote absentee in elections for Federal offices.”⁸ These groups included military service members, their families, merchant marines and any American citizens living outside the United States.⁹

Since then, absentee voting laws have continued to expand and have proven incredibly popular, causing demand for the option to increase. To date, every single state permits some form of absentee voting for its civilian population, and 34 states do not even require voters to provide a reason for needing to perform their civic duty from home. Five of these states—including conservative Utah—have even gone one step further by moving to a predominantly all-absentee voter system in which voters automatically receive absentee ballots.¹⁰ Indeed, in 1998, Oregon became the first state to adopt this voting model when nearly 70 percent of Oregonian voters supported Measure 60.¹¹

In recent years, voting absentee has comprised between approximately one-fifth and one-third of all votes cast (Figure 1).

EXPANDED ABSENTEE VOTING COMPORTS WITH CONSERVATIVE PRINCIPLES

Conservatives tend to view themselves as people of principles.¹² While members of the political right do differ, for the most part, they can reject unprincipled policymaking and social engineering that justifies government action on the basis of anticipated utility. In light of this, expanding access to absentee balloting is a policy that comports with at least the following five conservative principles.

Fairness—Even though states have repeatedly demonstrated the efficacy of their security measures, there are some elected officials who resist any form of expanded absentee voting. However, such opposition often is not based on legitimate policy concerns, but rather on political ones. Or as President Trump put it, if America moved to all-mail

elections, “[Y]ou’d never have a Republican elected in this country again.”¹³ Thus, the chief fear is that casting ballots by mail greatly favors those who vote for Democrats. There is no merit to this claim.

In fact, various conservative-leaning states, including Utah, Arizona and Montana, have expanded mail-in balloting. In fact, Nearly 70 percent of voters in Arizona and Montana cast ballots that way.¹⁴ And, while voting reforms should not center around partisan concerns, it is important to address the critique that the president and other conservatives are making. On that account, Republicans’ successful use of absentee ballots in red States is admittedly anecdotal, but the academic evidence confirms that absentee voting is partisan-neutral. For example, a recent study from the Stanford Institute for Economic Policy Research found that: “(1) vote-by-mail does not appear to affect either party’s share of turnout; (2) vote-by-mail does not appear to increase either party’s vote share; and (3) vote-by-mail modestly increases overall average turnout rates, in line with previous estimates.”¹⁵ The study also noted that its findings “contradict many popular claims in the media.”¹⁶

Furthermore, there is bipartisan support for absentee voting, as President Trump’s own pollster recently reported that 76 percent of Americans, including Republicans and Democrats, want the freedom to vote in absentia.¹⁷ Moreover, that vote-by-mail necessarily gives Democrats an advantage may also be a myth. For example, after deep-blue Oregon switched to

an all-mail-in system, Oregonians elected Republican U.S. Senator, Gordon Smith.¹⁸ After Colorado adopted the model, they too elected a Republican U.S. Senator, Cory Gardner.¹⁹ Just this year, California's special election for the state's 25th Congressional District was held largely by mail, and although the seat had been previously held by a Democrat, Republican Mike Garcia was elected.²⁰ These are just a sampling of Republicans who won major elections in solidly blue states that largely relied on voting by mail. Indeed, as with in-person elections, the key to victory is turnout. Hence in Florida, for example, a higher percentage of Republicans return absentee ballots than Democrats.²¹

Again, even if mail-in voting naturally benefited one party over the other, it would not be a valid reason to oppose it, but the history of such balloting should set GOP minds at ease in this regard. And, frankly speaking, if Republicans have become concerned that their platform and brand is so unpalatable that voter suppression is the only way to secure elections, then party officials should focus on improving the underlying problem, rather than on attempts to make legal voting more difficult for all Americans. In any event, the bottom line is that it is demonstrably false that voting in absentee hands elections to Democrats.

Security—For conservatives, one of the most hallowed civic activities is voting. For many, it is more than a right; it is a duty. Our votes serve to protect our rights and the American way of life, and guarantee the longevity and health of our republic. Our right to vote is so vital to the American ethos that myriad soldiers—dating back to the American Revolution—have been willing to risk their lives to secure and defend it. Given all of this and voting's critical importance to the continuance of the American form of government, conservatives naturally want to ensure the integrity of elections and prevent voter fraud. Yet, unlike their forebears, some contemporary Republicans have been reluctant to embrace expanded forms of absentee voting because, like the Democrats of the 1860s, they believe that the system is fertile soil for fraud to take root.

Unfortunately, however, such critics lose the moral high ground when they fail to make meaningful distinctions. While no form of voting is impervious to nefarious actors, voting by mail has proven exceptionally reliable, and the states of Oregon and Washington provide important case studies on the matter. Following Oregon's 1998 vote-by-mail referendum, the state enacted various policies to prevent voter abuse from influencing elections, which have proven successful.²² Since 2000, the state has primarily conducted its elections by mail, and over the past 20 years, Oregonians have cast around 50 million ballots.²³ During that time, there have only been two proven cases of "Fraudulent Use Of Absentee Ballots" and a total of 15 cases of any sort of

voter fraud.²⁴ This makes Oregon's absentee voter fraud rate around 0.000004 percent.²⁵

In 2011, Washington became the first state to follow Oregon's lead when lawmakers enacted a similar voting system, which was first used in the 2012 elections.²⁶ Since then, there have been zero proven cases of any kind of voter fraud in the Evergreen State.²⁷ This is to be expected because absentee voting is a tried and true form of voting, and states have the tools to safeguard against voter fraud. State governments can employ technologies to track ballots by barcode, match ballots to appropriate voters, and even verify signatures—all to great effect.

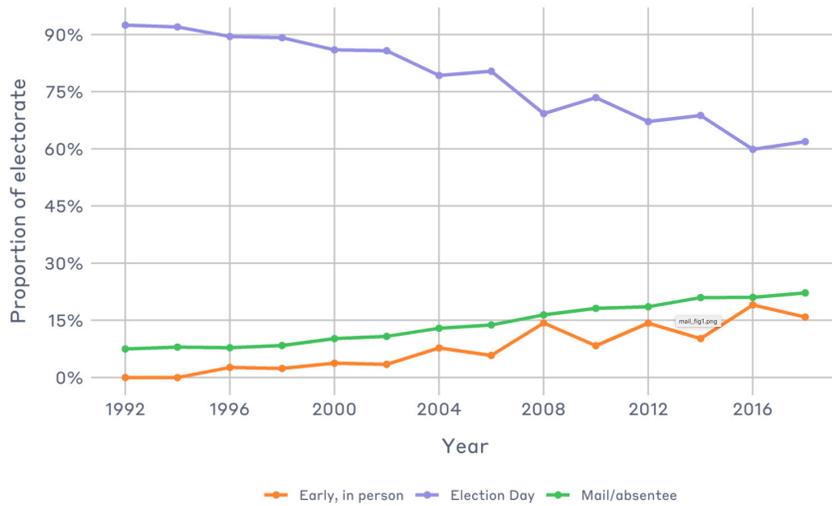
One widely publicized media claim has been that absentee voting leads to a massive number of missing ballots. For example, a *RealClearPolitics* op-ed recently reported that 28.3 million ballots were unaccounted for over a six-year period.²⁸ But that number simply counts the number of ballots that election officials sent to voters but were never returned. The ballots aren't "missing." They were simply sent to people who chose not to vote. This is no more of a concern than "missing" voters who never showed up at polling places and, indeed, even the article's author admitted there's no evidence the ballots were fraudulently used.

Conservatives rightly denounce "ballot-harvesting," whereby political parties, unions and activist groups collect people's ballots and turn them into elections offices. In 2016, California legalized that dubious practice, which gives interested parties a chance to exert influence over voters.²⁹ Thankfully, however, the absentee ballot practices of most states do not—and should not—authorize it.

Cost-effectiveness—One of the government's primary tasks is holding open and fair elections. Concerns about the costs of doing that job are secondary, but they are important nonetheless. And, here, the news with respect to increased voting by mail is good, as a 2016 study of Colorado's various voter reforms (including vote-by-mail) found that: "Costs decreased by an average of 40 percent in five election administration-related categories [...] The 46 (of 64) counties with data available spent about \$9.56 per vote in the 2014 general election, compared with nearly \$16 in 2008."³⁰ The National Conference of State Legislatures noted that the savings probably were because elections offices "no longer need to staff traditional polling places with poll workers and equip each polling place with voting machines."³¹ Thus, to increasingly rely on absentee voting is a cost-saving measure, once a community absorbs the start-up costs.³²

Freedom of choice—A perennial conservative criticism of government is that it frequently fails to follow the wishes of "we the people." Policymakers get co-opted or corrupted

FIGURE 2: HOW AMERICANS VOTE, 1992-2018



SOURCE: MIT Election Data and Science Lab. <https://electionlab.mit.edu/research/voting-mail-and-absentee-voting>.

by special interests or by paying excessive attention to ‘elite’ voices. On the issue of expanded access to absentee ballots, then, policymakers would be wise to listen to the public rather than the few conservative politicians and pundits who bash reform. The American voters want choices other than voting in person on election day. This is borne out not only by public-opinion polls, but by trends showing that the percentage of voters going to polls on election day has dropped from about 90 percent to around 60 percent (Figure 2).

Recent polling also demonstrates that the public wants expanded access to the use of absentee ballots. In fact, more than three-quarters of voters want the freedom to vote by mail,³³ and among voters nationwide:

- 76 percent believe all voters should be permitted to request an absentee ballot;
- 72 percent thought they should be able to request ballots through a government website;
- 64 percent want government to send every registered voter a ballot without voters having to request it;
- 76 percent think the government should provide postage-paid envelopes with the ballots so they can return them via mail; and
- 74 percent want voters to be permitted to submit their ballots in secure election drop boxes.³⁴

The survey also found that support for voting by absentee ballot has risen among Republican women over the past two

years, in particular, which is important to note as they are a critical demographic for GOP candidates. Another study has also found that Republicans living in states where absentee voting is common are very supportive of it.³⁵

Decency toward the elderly, infirm and physically disabled—State absentee ballot laws and regulations recognize that it is indecent to force elderly, infirm and physically disabled voters to trek to polling places. And, it is for this reason that voting by mail or absentee ballot is most popular among Americans age 65 and older.³⁶ In fact, in 2018, 30 percent of Americans in that age group cast their ballots in one of these ways.³⁷ Some of the most restrictive states, such as Texas, already allow absentee voting for people who are disabled or who are 65 or older, but taking advantage of this voting method requires

these voters to take the additional step of proving their disability or age to qualify for a ballot. Such a practice ultimately just creates an additional barrier for elderly or infirm people, as they already have trouble venturing out of their homes—to say nothing of whether they are able to locate, compile, copy, and deliver the documents necessary to prove their disability. An additional barrier is created by regulations that take a very limited view of what qualifies as a disability.³⁸ For instance, at the behest of Texas GOP officials, the Texas Supreme Court recently halted a plan that would have allowed registered voters who are susceptible to coronavirus to vote under those disability rules.³⁹ Such restrictions are paternalistic and do not comport with conservative notions of personal autonomy or limited government. If an adult voter deems that they are incapable of or uncomfortable going to polls, neither the government nor the court should have the power to overrule their own personal determinations as to their health or safety—or to deny them their vote because of such determinations.

In view of the foregoing, to support expanded voting by mail is an imperative of conservative ideals. And, for this reason, it is not surprising that even as pundits and special interests have spent recent months conjuring visions of electoral doom, conservative policymakers with actual governing responsibilities have moved forward with expanding access to absentee ballots:

- Nebraska Gov. Pete Ricketts noted that mail-in voting is “a great way for people to be able to vote” during the coronavirus shutdowns.⁴⁰ All Nebraska primary voters were sent a vote-by-mail application before the May 12 primary—and Ricketts actively encour-

aged the state's voters to take advantage of that opportunity.⁴¹

- Maryland Gov. Larry Hogan approved a largely vote-by-mail election for that state's June 2 primary, with 4 million ballots sent to voters and only a few in-person voting stations opened. As Hogan noted in support of his decision: "Free and fair elections are the very foundation of American democracy, and our ultimate goal must be to do everything possible to ensure the voice of every Marylander is heard in a safe and secure manner."⁴²
- Despite Missouri Gov. Mike Parson's public support for the president's comments about mail-in voting, he signed a law sent to him from the state's overwhelmingly Republican legislature that expands the reasons voters may use to request an absentee ballot.⁴³ This was backed by myriad GOP officials, including former U.S. Rep. Tom Coleman, who said: "At least in Missouri, for this year, people will not have to fear the virus by going to vote if they don't want to go vote in-person."⁴⁴
- Ohio Gov. Mike DeWine has publicly rebutted the president's concerns about mail-in voting.⁴⁵
- Alaska Lt. Gov. Kevin Meyer is encouraging voters to vote absentee, which they may do without providing a reason.⁴⁶
- Although he was initially resistant to the idea, New Hampshire Gov. Chris Sununu tweaked the state's absentee voting laws (which require an excuse to secure an absentee ballot), to allow no-excuse, mail-in voting if coronavirus remains a threat at the time of the general election.⁴⁷

Additionally, various Republican secretaries of state have also championed such voting. For example, Ohio Secretary of State Frank LaRose recently commented on his confidence in his state's vote-by-mail system: "We're fortunate that we've been doing vote by mail for a long time, [...] We know how to do it, and we know how to get it done securely."⁴⁸

CONCLUSION

Understandably, some individuals on the right worry that altering absentee ballot policies may increase the rate of election fraud. Yet, a preponderance of the evidence indicates that well-designed and well-implemented absentee voting is safe, secure and useful, particularly in times when factors beyond our citizens' control—whether war or pandemic—threaten to interfere with their right and duty to vote. Despite 'paper-selling' rhetoric to the contrary, allow-

ing more voters access to absentee ballots and the ability to cast them by mail or in drop boxes comports with conservative principles, and conservatives would therefore be wise to support the expansion of such policies.

To date, more than 100,000 Americans have already died from COVID-19, and the virus threatens to make a resurgence during the autumn election season.⁴⁹ Understandably, the public wants government to take steps to ensure they can vote without needlessly risking their health. Accordingly, both prudence and electoral calculations argue that conservatives should meet the public where they are on this issue and support expanded voting by mail.

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ENDNOTES

1. For the purpose of this paper, the terms "absentee voting" and "mail voting" will be used synonymously. Commonly, the practices are distinguished from one another, with "absentee voting" being associated with voters requesting a ballot be sent to them; whereas "mail voting" means that elections officials send every voter a ballot without voters requesting them.
2. "EAVS deep dive: Early, absentee and mail voting," U.S. Elections Assistance Commission, Oct. 17, 2017. https://www.eac.gov/sites/default/files/document_library/files/eavsdeepdive_earlyvoting_101717.pdf
3. Donald J. Trump, Twitter, April 8, 2020. <https://twitter.com/realDonaldTrump/status/1247861952736526336>.
4. "Absentee Voting in the Civil War: Ohio Cover," Smithsonian National Postal Museum, last accessed June 11, 2020. <https://postalmuseum.si.edu/collections/object-spotlight/absentee-voting-in-the-civil-war-ohio-cover>
5. "Civil War Facts," National Park Service, last accessed June 11, 2020. <https://www.nps.gov/civilwar/facts.htm>.
6. Alex Seitz-Wald, "How do you know voting by mail works? The U.S. military's done it since the Civil War," ABC News, April 19, 2020. <https://www.nbcnews.com/politics/2020-election/how-do-you-know-voting-mail-works-u-s-military-n1186926>.
7. See, e.g., Ibid; Oscar Osburn Winther, "The Soldier Vote in the Election of 1864," *New York History* 24:4 (October 1944), pp. 440-58. www.jstor.org/stable/23148753; and Josiah Henry Benton, "Voting in the Field: A Forgotten Chapter of the Civil War," privately printed, 1915, pp. 312-13.
8. "The Uniformed and Overseas Citizens Absentee Voting Act," U.S. Dept. of Justice, Feb. 18, 2020. <https://www.justice.gov/crt/uniformed-and-overseas-citizens-absentee-voting-act>.

9. Ibid.
10. "VOPP: Table 1: States with No-Excuse Absentee Voting," National Conference of State Legislatures, May 1, 2020. <https://www.ncsl.org/research/elections-and-campaigns/vopp-table-1-states-with-no-excuse-absentee-voting.aspx>.
11. Bill Bradbury, "Vote by Mail," Oregon Secretary of State Elections Division, 2000. <https://sos.oregon.gov/elections/Documents/statistics/vote-by-mail-timeline.pdf>.
12. See, e.g., Russell Kirk, "Ten conservative principles," KirkCenter, last accessed June 11, 2020. <https://kirkcenter.org/conservatism/ten-conservative-principles>; and Kay C. James, "Defining the principles of conservatism," Heritage Foundation, April 14, 2019. <https://www.heritage.org/conservatism/commentary/defining-the-principles-conservatism>.
13. Reid J. Epstein and Stephanie Saul, "Trump says mail voting means Republicans would lose every election. Is that true? No." *Chicago Tribune*, April 10, 2020. <https://www.chicagotribune.com/nation-world/ct-nw-nyt-mail-voting-ballots-20200410-qf-nxhakiyce3ndpxz64lcsqzr4-story.html>.
14. Eli Lehrer, "Conservatives need to get behind vote-by-mail options in 2020 election," *The Washington Times*, March 24, 2020. <https://www.washingtontimes.com/news/2020/mar/24/conservatives-must-get-behind-vote-by-mail-options>.
15. Daniel M. Thompson et al., "The neutral partisan effects of vote-by-mail: Evidence from county-level roll-outs," Stanford Institute for Economic Policy Research, April 2020. <https://siepr.stanford.edu/research/publications/neutral-partisan-effects-vote-mail-evidence-county-level-roll-outs>.
16. Ibid.
17. Alayna Treene and Margaret Talev, "Exclusive: Trump pollster finds strong demand for expanded absentee voting," *Axios*, May 1, 2020. https://www.axios.com/absentee-voting-trump-pollster-fe3d77d7-4233-443c-8def-65c78dea5d20.html?utm_source=newsletter&utm_medium=email&utm_campaign=newsletter_axiosam&stream=top.
18. George F. Will, "How not to hold an election during a pandemic," *The Washington Post*, April 15, 2020. https://www.washingtonpost.com/opinions/how-not-to-hold-an-election-during-a-pandemic/2020/04/14/ea908ac0-7e79-11ea-9040-68981f488eed_story.html.
19. Saja Hindi, "The president says all-mail ballots benefit Democrats and lead to rampant voter fraud. Colorado says no," *Denver Post*, May 24, 2020. <https://www.denverpost.com/2020/05/24/mail-vote-ballots-colorado-coronavirus>.
20. Rob Stutzman, "Voting by mail helps the GOP. California's special election proved that," *The Washington Post*, May 15, 2020. <https://www.washingtonpost.com/opinions/2020/05/15/voting-by-mail-helps-gop-californias-special-election-proved-that>.
21. See, e.g., Lee Drutman, "There is no evidence that voting by mail gives one party an advantage," *FiveThirtyEight*, May 12, 2020. <https://fivethirtyeight.com/features/there-is-no-evidence-that-voting-by-mail-gives-one-party-an-advantage>; Allison Ross, "Vote by mail helps Florida Republicans. So why is Trump bashing it?" *Tampa Tribune*, May 28, 2020. <https://www.tampabay.com/news/health/2020/05/28/vote-by-mail-helps-florida-republicans-so-why-is-trump-bashing-it>.
22. Amber McReynolds and Charles Stewart III, "Let's put the vote-by-mail 'fraud' myth to rest," *The Hill*, April 28, 2020. <https://thehill.com/opinion/campaign/494189-lets-put-the-vote-by-mail-fraud-myth-to-rest>.
23. Ibid.
24. "Election Fraud Cases," Heritage Foundation, last accessed June 11, 2020. https://www.heritage.org/voterfraud/search?combine=&state=OR&year=&case_type=All&fraud_type=All.
25. McReynolds and Stewart. <https://thehill.com/opinion/campaign/494189-lets-put-the-vote-by-mail-fraud-myth-to-rest>.
26. Senate Bill 5124, Washington State Legislature, 2011. http://lawfilesex.leg.wa.gov/biennium/2011-12/Pdf/Bills/Session%20Laws/Senate/5124-S_SL.pdf.
27. "Election Fraud Cases." https://www.heritage.org/voterfraud/search?combine=&ate=WA&year=&case_type=All&fraud_type=All.
28. Mark Hemingway, "28 Million Mail-in Ballots Went Missing in Last Four Elections," *RealClearPolitics*, April 24, 2020. https://www.realclearpolitics.com/articles/2020/04/24/28_million_mail-in_ballots_went_missing_in_last_four_elections_143033.html.
29. Jeff Horseman, "Is ballot harvesting legal in California? Yes, and that worries some Republicans," *Riverside Press-Enterprise*, March 6, 2019. <https://www.pe.com/2019/03/06/is-ballot-harvesting-legal-in-california-yes-and-that-worries-some-republicans>.
30. "Colorado Voting Reforms: Early Results," Pew Charitable Trusts, March 22, 2016. <https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2016/03/colorado-voting-reforms-early-results>.
31. "All Mail Elections," National Conference of State Legislatures, March 24, 2020. <https://www.ncsl.org/research/elections-and-campaigns/all-mail-elections.aspx>.
32. For example, an elections office implementing expanded absentee ballot policies may wish to purchase a machine that can optically scan and read signatures on ballot envelopes.
33. "Memo: American Voters Want Choices to Safely Cast Ballots," Tony Fabrizio and David Lee, April 29, 2020. <https://www.documentcloud.org/documents/6880238-Fabrizio-Lee-National-Poll-Memo.html>.
34. Ibid. This poll's results track the public survey done by the Pew Charitable Trusts cited above.
35. Ibid., pp. 10-12.
36. U.S. Census. <https://www2.census.gov/programs-surveys/cps/tables/p20/583/table14.xlsx>.
37. Ibid.
38. Steven Greenhut, "Texas GOP shouldn't fear expanded absentee voting," *Dallas Morning News*, May 25, 2020. <https://www.dallasnews.com/opinion/commentary/2020/05/25/texas-gop-shouldnt-fear-expanded-absentee-voting>.
39. Alex Ura, "Texas Supreme Court puts expansion of voting by mail on hold," *The Texas Tribune*, May 15, 2020. <https://www.texastribune.org/2020/05/15/texas-voting-by-mail-coronavirus-blocked-supreme-court>.
40. Don Walton, "Ricketts encourages vote by mail, eyes gradual easing of COVID-19 restrictions possibly in May," *Lincoln Journal Star*, April 8, 2020. https://journalstar.com/news/state-and-regional/govt-and-politics/ricketts-encourages-vote-by-mail-eyes-gradual-easing-of-covid-19-restrictions-possibly-in-may/article_2770d931-fa51-591f-b04b-d5e516a72888.html.
41. Ibid.
42. Emily Opilo, "Maryland's June 2 primary will be conducted by mail with limited in-person voting, governor orders," *Baltimore Sun*, April 10, 2020. <https://www.baltimoresun.com/politics/elections/bs-md-pol-primary-hogan-decision-20200410-rvph-pqz4mifqdpnrhjrifyqxm-story.html>.
43. "Parsons signs law expanding mail-in, absentee voting," *News Tribune*, June 5, 2020. <https://www.newstribune.com/news/local/story/2020/jun/05/parson-signs-law-expanding-mail-in-absentee-voting/829810>.
44. Anabel Thorpe, "New Missouri law expands ability to vote from home," KOMU 8, June 5, 2020. <https://www.komu.com/news/new-missouri-law-expands-ability-to-vote-from-home>.
45. Andy Chow, "Responding to Trump's Comments, DeWine Says Ohio's Vote-by-Mail System is Safe," Statehouse News Bureau, April 8, 2020. <https://www.statenews.org/post/responding-trumps-comments-dewine-says-ohios-vote-mail-system-safe>.
46. Elizabeth Roman and Daniella Rivera, "State to promote absentee & early voting, will not move to vote-by-mail for August primary election," KTVA, May 15, 2020. <https://www.ktva.com/story/42137187/state-to-promote-absentee-and-early-voting-will-not-move-to-votebymail-for-august-primary-election>.
47. Dominique Erney and Wendy R. Weiser, "Bipartisan Support for Expanded Vote Mailing for 2020 Elections," The Brennan Center, April 15, 2020. <https://www.brennancenter.org/our-work/research-reports/bipartisan-support-expanded-mail-voting-2020-elections>.
48. Ibid.
49. "Cases in the U.S.," Centers for Disease Control, June 7, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/cases-updates/cases-in-us.html>.