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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA

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13 Plaintiff,

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15 v.
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17 SHIRLEY WEBER, in her official
18 capacity as Secretary of State of the
19 State of California, and the STATE
20 OF CALIFORNIA,

21 Defendant(s).
22
23

CASE NO:

COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF

ACTION SEEKING STATEWIDE
RELIEF

1. VIOLATION OF CIVIL
RIGHTS ACT OF 1960, 52
U.S.C. § 20701, *et seq.*
2. VIOLATION OF SECTION
8(a)(4) and 8(i) OF THE NVRA,
52 U.S.C. § 20507(a)(4)
3. VIOLATION OF SECTION
303(a)(2)(B)(ii) of HAVA, 52
U.S.C. § 21083

24
25 **COMPLAINT**

26 As President Trump said earlier this year, “[f]ree, fair, and honest elections
27 unmarred by fraud, errors, or suspicion are fundamental to maintaining our
28 constitutional Republic.” Exec. Order No. 14248, 90 Fed. Reg. 14005 (Mar. 25,

2025). Indeed, “[t]he right of American citizens to have their votes properly counted and tabulated, without illegal dilution, is vital to determining the rightful winner of an election.” *Id.* Under our Constitution, States “must safeguard American elections in compliance with Federal laws that protect Americans’ voting rights and guard against dilution by illegal voting, discrimination, fraud, and other forms of malfeasance and error.” *Id.* Without such safeguards, “[v]oter fraud drives honest citizens out of the democratic process and breeds distrust of our government.” *Purcell v. Gonzalez*, 549 U.S. 1, 4 (2006). And “[v]oters who fear their legitimate votes will be outweighed by fraudulent ones will feel disenfranchised.” *Id.*

Plaintiff, the United States of America, brings this action against Shirley Weber, in her official capacity as the Secretary of State of the State of California, and alleges as follows:

I. INTRODUCTION

To prevent fraudulent votes from being cast, federal law requires that states conduct routine list maintenance procedures of their statewide voter registration databases. Accurate voter registration lists prevent the opportunity for fraud in federal elections. The Civil Rights Division of the Department of Justice is tasked by Congress with ensuring that states conduct voter registration list maintenance to prevent the inclusion of ineligible voters on any state’s voter registration list.

The United States brings this action to enforce provisions of the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20501 *et seq.*; the Help America Vote Act (“HAVA”), 52 U.S.C. § 20901 *et seq.*; and Title III of the Civil Rights Act of 1960 (“CRA”), 52 U.S.C. § 20701 *et seq.*

JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1345, and 2201(a); 52 U.S.C. §§ 20510(a) and 21111; and 52 U.S.C. § 20705.

2. Venue is proper in this District pursuant to 28 U.S.C. §§ 84, 1391(b) because a substantial part of the events or omissions giving rise to the United States' claims occurred in this District, and the Defendants are located in and conduct election administration activities in this District.

II. PARTIES

3. Plaintiff, United States of America, through the Attorney General, has authority to enforce the NVRA, 52 U.S.C. § 20510(a), and Sections 21081 through 83, and 21083a of HAVA, 52 U.S.C. § 21111. Both the NVRA and HAVA authorize the Attorney General to bring a civil action in an appropriate district court for such declaratory and injunctive relief as are necessary to carry out the relevant requirements under the statute. 52 U.S.C. §§ 20510(a) and 21111.

4. Pursuant to the CRA, 52 U.S.C. § 20705, the Attorney General may compel states to produce certain records and papers relating to the administration of federal elections.

5. Defendant State of California is a state of the United States of America and is subject to the requirements of the NVRA, HAVA, and the CRA. 52 U.S.C. §§ 20502(4), 20503, 20701, and 21141.

6. Defendant, Secretary of State Shirley Weber, is sued in her official capacity as chief state election official responsible for coordinating California's responsibilities under the NVRA. *See* 52 U.S.C. § 20509; Cal. Gov't Code § 12172.5.

7. Defendant, State of California, is a state of the United States of America and therefore is subject to the requirements of the NVRA, HAVA, and the CRA. 52 U.S.C. §§ 20502(4), 20503, 20701, and 21141.

8. Secretary Weber is sued in her official capacity only.

III. STATUTORY BACKGROUND

A. The Civil Rights Act of 1960

9. Congress empowered the Attorney General to request records

1 pursuant to Title III of the CRA, codified at 52 U.S.C. § 20701 *et seq.*

2 10. Section 301 of the CRA requires state and local officials to retain and
3 preserve records related to voter registration and other acts requisite to voting for
4 any federal office for a period of twenty-two months after any federal general,
5 special or primary election. *See* 52 U.S.C. § 20701.

6 11. Section 303 of the CRA provides, in pertinent part, “Any record or
7 paper required by Section 20701 of this title to be retained and preserved shall,
8 upon demand in writing by the Attorney General or his representative directed to
9 the person having custody, possession, or control of such record or paper, be made
10 available for inspection, reproduction, and copying at the principal office of such
11 custodian by the Attorney General or his representative....” 52 U.S.C. § 20703.

12 **B. The National Voter Registration Act (“NVRA”)**

13 12. The NVRA was enacted “to establish procedures that will increase the
14 number of eligible citizens who register to vote in Federal elections “while
15 “ensur[ing] that accurate and current voter registration rolls are maintained.” 52
16 U.S.C. § 20501(b)(1), (4).

17 13. Section 8 of the NVRA establishes requirements for the
18 administration of voter registration for elections for federal office in covered states,
19 including California. Section 8(a)(4) requires each state to “conduct a general
20 program that makes a reasonable effort to remove the names of ineligible voters
21 from the official lists of eligible voters by reason of” the death of the registrant, or
22 “a change in the residence of the registrant, in accordance with subsections (b), (c),
23 and (d)[.]” 52 U.S.C. §20507(a)(4)(A)-(B).

24 14. Subsections (b), (c), and (d) set forth procedures for the removal of
25 ineligible voters from official lists of voters as part of a state’s “program or activity
26 to protect the integrity of the electoral process by ensuring the maintenance of an
27 accurate and current voter registration roll for elections for Federal office[.]” *Id.* §
28 20507(b).

1 15. State voter list maintenance programs must be “uniform,
 2 nondiscriminatory, and in compliance with the Voting Rights Act of 1965 (42
 3 U.S.C. 1973, *et seq.*)[.]” 52 U.S.C. § 20507(b)(1); see also S. Rep. No. 103-6 at 31
 4 (Feb. 25, 1993) (“The term ‘uniform’ is intended to mean that any purge program
 5 or activity must be applied to an entire jurisdiction.”); accord H.R. Rep. No. 103-9
 6 at 15 (Feb. 2, 1993) (same).

7 16. Section 8(d) of the NVRA provides that a “[s]tate shall not remove the
 8 name of a registrant from the official list of eligible voters in elections for Federal
 9 office on the ground that the registrant has changed residence,” unless the
 10 registrant:

11 A. confirms in writing that the registrant has changed residence to
 12 a place outside the registrar’s jurisdiction in which the registrant is
 13 registered; or

14 B. has failed to respond to a [Confirmation Notice] and has not
 15 voted or appeared to vote . . . in an election during the period beginning on
 16 the date of the notice and ending on the day after the date of the second
 17 general election for Federal office that occurs after the date of the notice. 52
 18 U.S.C. § 20507(d)(1).

19 17. Section 8(d)(2) sets forth specific requirements for the Confirmation
 20 Notice to be sent to registrants, and Section 8(d)(3) provides that a “voting
 21 registrar shall correct an official list of eligible voters in elections for Federal office
 22 in accordance with change of residence information obtained in conformance with
 23 [subsection 8(d)].” *Id.* § 20507(d)(2)-(3).

24 18. Section 8 of the NVRA also provides an example of a voter list
 25 maintenance program that constitutes a reasonable effort to remove registrants who
 26 have become ineligible due to a change of residence. 52 U.S.C. § 20507(c)(1).
 27 Under this program, a state uses information from the United States Postal Service
 28 National Change of Address (“NCOA”) program to identify registrants who may

1 have changed residence. 52 U.S.C. § 20507(c)(1)(A). Where it appears from the
 2 NCOA information that a registrant has moved to a new address in the same
 3 jurisdiction, the registration record is updated to show the new address, and the
 4 registrant is sent a notice of the change by forwardable mail that includes a
 5 postage-prepaid, pre-addressed return form by which the registrant may verify or
 6 correct the address information. 52 U.S.C. § 20507(c)(1)(B)(i). Where it appears
 7 from the NCOA information that a registrant has moved to a new address in a
 8 different jurisdiction, the procedure set out in Section 8(d)(2), described above, is
 9 used to confirm the address change. 52 U.S.C. § 20507(c)(1)(B)(ii).

10 19. Section 8(i) of the NVRA provides that:

11 “Each State shall maintain for at least 2 years and shall make available
 12 for public inspection and, where available, photocopying at a
 13 reasonable cost, all records concerning the implementation of
 14 programs and activities conducted for the purpose of ensuring the
 15 accuracy and currency of official lists of eligible voters, except to the
 16 extent that such records relate to a declination to register to vote or to
 17 the identity of a voter registration agency through which any
 18 particular voter is registered.” 52 U.S.C. § 20507(i)(1).

19 20. Section 8(i)(2) further specifies:

20 “The records maintained pursuant to paragraph (1) shall include lists
 21 of the names and addresses of all persons to whom notices described
 22 in subsection (d)(2) are sent, and information concerning whether or
 23 not each such person has responded to the notice as of the date that
 24 inspection of the records is made.” 52 U.S.C. § 20507(i)(2).

25 21. Section 10 of the NVRA requires each state to “designate a State
 26 officer or employee as the chief State election official to be responsible for
 27 coordination of State responsibilities” under the NVRA. 52 U.S.C. § 20509.

28 **C. The Help America Vote Act (“HAVA”)**

1 22. The purpose of HAVA “can be stated very simply—it is to improve
2 our country’s election system.” H.R. Rep. 107-329(I) at 31 (2001). “Historically,
3 elections in this country have been administered at the state and local level[,]” but
4 Congress found that “the federal government can play a valuable [role] by assisting
5 state and local government in modernizing their election systems.” *Id.* at 31-32.

6 23. HAVA imposes “minimum requirements” for the conduct of federal
7 elections, which “allow the states to develop their own laws and procedures to
8 fulfill the requirements” to the extent that they are consistent with the standards set
9 by HAVA. *Id.* at 35.

10 24. HAVA requires all states to implement “in a uniform and
11 nondiscriminatory manner, a single, uniform, official, centralized, interactive
12 computerized statewide voter registration list defined, maintained, and
13 administered at the State level,” that contains “the name and registration
14 information of every legally registered voter in the State and assigns a unique
15 identifier to each legally registered voter in the State.” 52 U.S.C. § 21083(a)(1)(A).

16 25. The computerized list required by HAVA “shall be coordinated with
17 other agency databases within the State.” 52 U.S.C. § 21083(a)(1)(A)(iv).

18 26. HAVA further establishes “[m]inimum standard[s] for accuracy of
19 State voter registration records.” 52 U.S.C. § 21083(a)(4). Section 303 provides
20 that a state’s “election system shall include provisions to ensure that voter
21 registration records in the State are accurate and are updated regularly,” including
22 by use of a “system of file maintenance that makes a reasonable effort to remove
23 registrants who are ineligible to vote from the official list of eligible voters” and
24 “[s]afeguards to ensure that eligible voters are not removed in error from the
25 official list of eligible voters.” *Id.*

26 27. HAVA mandates that a state may not process a voter-registration
27 application without the applicant’s driver’s license number, where an applicant has
28 a current and valid driver’s license, or, for other applicants, the last four digits of

1 the applicant's Social Security number. *Id.* § 21083(a)(5)(A). For applicants who
 2 have neither a driver's license nor a social security number, a state must assign a
 3 unique identifying number for voter registration purposes. *Id.* § 21083(a)(5)(A)(ii).
 4 A state must then determine the validity of the information provided by the
 5 applicant. *Id.* § 21083(a)(5)(A)(iii).

6 28. HAVA applies to all fifty states, including California. 52 U.S.C. §
 7 21141.

8 29. Section 303 of HAVA incorporates by reference certain provisions of
 9 the NVRA. See 52 U.S.C. § 21083(a)(4)(A). These provisions, unless explicitly
 10 noted otherwise, apply to all states covered under HAVA. *Id.*

11 30. HAVA vests the Attorney General of the United States with sole
 12 authority to "bring a civil action against any State or jurisdiction in an appropriate
 13 United States District Court for such declaratory and injunctive relief . . . as may
 14 be necessary to carry out the uniform and nondiscriminatory election technology
 15 and administration requirements under sections 21081-83, and 21083a of
 16 [HAVA]." 52 U.S.C. § 21111.

17 31. HAVA contains no private right of action. See 52 U.S.C. §§ 20901 to
 18 21145.

19 **IV. FACTUAL ALLEGATIONS**

20 32. The U.S. Election Assistance Commission (EAC) was established by
 21 HAVA and "is an independent, bipartisan commission whose mission is to help
 22 election officials improve the administration of elections and help Americans
 23 participate in the voting process." EAC website, "About the EAC,"
 24 <https://www.eac.gov/about>. The EAC conducts a biennial Election Administration
 25 and Voting Survey ("EAVS"), "an analysis of state-by-state data that covers
 26 various topics related to the administration of federal elections[,]" including voter
 27 registration and list maintenance. *Id.*

28 33. The EAC's most recent report, "Election Administration and Voting

1 Survey 2024 Comprehensive Report: A Report from the U.S. Election Assistance
 2 Commission to the 119th Congress” (“2024 EAVS Report”), explains that as part
 3 of the 2024 EAVS, states “reported data on their efforts to keep voter registration
 4 lists current and accurate, known as list maintenance[,]” such as the number of
 5 confirmation notices states sent “to verify continued eligibility from registered
 6 voters[,]” and the number of voter registration records that state removed from
 7 their voter lists. EAC, 2024 EAVS Report,
 8 https://www.eac.gov/sites/default/files/2025-07/2024_EAVS_Report_508.pdf, at 7.

9 34. After reviewing California’s responses to the 2024 EAVS Survey, on
 10 July 10, 2025, the Attorney General requested the following information regarding
 11 specific answers it provided in the EAVS survey:

- 12 A. The current electronic copy of California’s computerized statewide
 13 voter registration list (“statewide voter registration list”) as required by
 14 Section 303(a) of the Help America Vote Act. Please include all fields
 15 contained within the list. Please produce each list in a .xls, .csv, or
 16 delimited-text file format.
- 17 B. California reported 2,178,551 duplicate registrations (15.6 percent of
 18 the total registered voters). However, seven counties failed to provide
 19 data regarding duplicate registrations. Please provide a list of all
 20 duplicate registration records in Imperial, Los Angeles, Napa, Nevada,
 21 San Bernardino, Siskiyou, and Stanislaus counties.
- 22 C. No data was listed in the EAVS survey regarding duplicate registrants
 23 who were removed from the statewide voter registration database.
 24 Please provide a list of all duplicate registrants who were removed from
 25 the statewide voter registration list including the date(s) of removal. If
 26 they were merged or linked with another record, please provide that
 27 information. Please explain California’s process for determining
 28 duplicates and what happens to the duplicate registrations.

1 D. California reported 378,349 voters (11.9 percent) were removed
2 because of death, which was well below the national average. Please
3 provide a list of all registrations that were cancelled because of death.
4 Please explain California's process for determining who is deceased
5 and removing them from the voter roll and when that occurs.

6 E. California's Confirmation Notice data required by Sec. 8(d)(2) of the
7 NVRA was missing in the EAVS survey for several counties in
8 California. Please provide the data for each county in California. In the
9 2022 EAVS report California reported 4,984,314 inactive voters, while
10 in 2024 California reported 2,883,995 inactive voters. Please explain
11 the reason for the change in the number of inactive registrations for
12 these years.

13 F. A list of all registrations, including date of birth, driver's license
14 number, and last four digits of Social Security Number, that were
15 cancelled due to non-citizenship of the registrant.

16 35. On July 22, 2025, Defendants responded to the Attorney General's
17 July 10, 2025, letter asking for more time.

18 36. The United States responded to Defendants' July 22nd letter and
19 advised that most of the requested information should be readily available.
20 Nonetheless, the United States agreed to give Defendants until August 29, 2025, to
21 respond to all other requests that may not have been readily accessible.

22 37. On August 8, 2025, Defendants sent a letter to the United States
23 expressing concerns about privacy protections of the voter registration list and
24 other requested information. Defendants further refused to cooperate by stating
25 "DOJ may inspect a copy of our redacted voter registration database during regular
26 business hours by making an appointment with my office. Public inspection
27 satisfies our legal obligations under the NVRA and ensures that this office
28 complies with legal protections for voter registration data under California law."

1 Defendants ended this letter with an obtuse “Please do not hesitate to contact my
2 office regarding when you plan to visit Sacramento to review the voter registration
3 information.”

4 38. In an August 13, 2025, letter, the Attorney General made a demand
5 for the current electronic copy of California’s computerized statewide voter
6 registration list (“SVRL”) with all fields, including each registrant’s full name,
7 date of birth, residential address, their state driver’s license number, and the last
8 four digits of their Social Security number as authorized by the CRA. 52 U.S.C. §
9 20703. The United States also requested original and completed voter registration
10 applications.

11 39. The United States explained in the August 13th letter that:

12 “Section 303 of the CRA provides, in pertinent part, ‘Any record or
13 paper required by section 20701 to be retained and preserved shall,
14 upon demand in writing by the Attorney General or his representative
15 directed to the person having custody, possession, or control of such
16 record or paper, be made available for inspection, reproduction, and
17 copying at the principal office of such custodian by the Attorney
18 General or his representative....’ 52 U.S.C. § 20703.”

19 40. The United States then explained in the letter that pursuant to Section
20 304 of the CRA:

21 “Unless otherwise ordered by a court of the United States, neither the
22 Attorney General nor any employee of the Department of Justice, nor
23 any other representative of the Attorney General, shall disclose any
24 record or paper produced pursuant to this chapter, or any reproduction
25 or copy, except to Congress and any committee thereof, governmental
26 agencies, and in the presentation of any case or proceeding before any
27 court or grand jury.”

28 41. The United States also advised Defendants that “HAVA specifies that

1 the ‘last 4 digits of a social security number . . . shall not be considered a social
 2 security number for purposes of section 7 of the Privacy Act of 1974’” (5 U.S.C. §
 3 522(a) note); 52 U.S.C. § 21083(c)). In addition, any prohibition of disclosure of a
 4 motor vehicle record contained in the Driver’s License Protection Act, codified at
 5 18 U.S.C. § 2721(b)(1), is exempted when the disclosure is for use by a
 6 government agency in carrying out the government agency’s function to
 7 accomplish its enforcement authority as the Justice Department is now doing.”

8 42. To further address the concerns of Defendants, the United States also
 9 responded that responsive information such as California’s voter registration list
 10 and original and completed voter registration applications may be sent by
 11 encrypted email or via the Department’s secure file-sharing system even though
 12 California privacy laws are preempted by applicable federal law.

13 43. On August 21, 2025, Defendants responded and refused to provide the
 14 requested information.

15 44. On August 29, 2025, and September 12, 2025, Defendants provided
 16 minimal responses to the inquiries regarding the EAVs responses but continued to
 17 refuse to fully comply with Plaintiff’s requests for information and records as
 18 described in its initial letter of July 10, 2025.

19 45. The United States has now been forced to bring the instant action to
 20 seek legal remedy for Defendants’ refusal to comply with lawful requests pursuant
 21 to federal law.

22 **V. CAUSES OF ACTION**

23 **COUNT ONE- CIVIL RIGHTS ACT OF 1960**

24 46. The United States restates and incorporates the preceding paragraphs
 25 as if fully restated herein.

26 47. On August 13, 2025, the Attorney General made a demand for the
 27 current electronic copy of California’s SVRL with all fields, including each
 28 registrant’s full name, date of birth, residential address, their state driver’s license

1 number, and the last four digits of their Social Security number as authorized by 52
 2 U.S.C. § 20703. The United States also made a demand for original and completed
 3 voter registration applications. *Id.*

4 48. On September 12, 2025, Defendants refused to provide the requested
 5 records in violation of the CRA. 52 U.S.C. §§ 20701-20706.

6 49. Unless and until ordered to do so by this Court, Defendants' refusal to
 7 provide these records as requested constitutes a continuing violation of federal law.

8 **COUNT TWO- VIOLATION OF THE NVRA**

9 50. The United States restates and incorporates the preceding paragraphs
 10 as if fully restated herein.

11 51. The Attorney General has enforcement authority to ensure compliance
 12 with the requirements of the NVRA. 52 U.S.C. § 20510(a).

13 52. The United States's July 10 and August 13 letters requested the
 14 information that California is required to disclose pursuant to 52 U.S.C. 20507(i).

15 53. Defendants have failed to provide sufficient responses to the United
 16 States's specific inquiries regarding its maintenance procedures, despite the
 17 Attorney General's enforcement authority of these requirements under both the
 18 NVRA and HAVA. This information is necessary for the Attorney General to
 19 determine if California is conducting "a general program that makes a reasonable
 20 effort to remove the names of ineligible voters from the official lists of eligible
 21 voters" as required by 52 U.S.C. § 20507(a)(4).

22 54. The NVRA requires Defendant's to provide "all records concerning
 23 the implementation of programs and activities conducted for the purpose of
 24 ensuring the accuracy and currency of official lists of eligible voters, except to the
 25 extent that such records relate to a declination to register to vote or to the identity
 26 of a voter registration agency through which any particular voter is registered." 52
 27 U.S.C. § 20507(i)(1).

28 55. The requested SVRL and registration application data are records

1 regarding California's list maintenance program and are required to be disclosed to
2 the United States.

3 56. Unless and until ordered to do so by this Court, Defendants' refusal to
4 provide these records prevents the Attorney General from determining Defendants'
5 compliance with the list maintenance requirements of the NVRA and represents an
6 ongoing violation of law.

7 **COUNT THREE- VIOLATION OF HAVA**

8 57. Plaintiff realleges the preceding paragraphs as if fully stated herein.

9 58. Pursuant to HAVA, Defendants are responsible for removing voters
10 who are "not eligible to vote." 52 U.S.C. § 21083(a)(2)(B)(ii)-(iii).

11 59. Defendants have failed to take the actions necessary for the State of
12 California to comply with Section 303 of HAVA.

13 60. Defendants' failure to provide sufficient information in response to
14 requests made by the Justice Department's Civil Rights Division in its July 10 and
15 August 13 demand letters prevent the Attorney General from evaluating
16 California's compliance with HAVA, pursuant to the Attorney General's statutory
17 enforcement authority under 52 U.S.C. § 21111.

18 61. Defendants' refusal to provide to the United States the current
19 electronic copy of California's computerized statewide voter registration list, with
20 all fields, including each registrant's full name, date of birth, residential address,
21 and either their state driver's license number or the last four digits of their Social
22 Security number prevents the Attorney General from determining California's
23 compliance with the list maintenance requirements of HAVA. 52 U.S.C. §
24 21083(a)(5)(A).

25 62. Defendants' failure to provide unredacted voter registration lists to
26 include non-citizen voter data constitutes a violation of HAVA. 52 U.S.C. §
27 21083(a)(2)(B)(ii)-(iii).

28 63. Unless and until ordered to do so by this Court, Defendants' refusal to

1 provide these records prevents the Attorney General from making a determination
 2 of Defendants' compliance with the list maintenance requirements of HAVA and
 3 represents an ongoing violation of law.

4 **VI. PRAYER FOR RELIEF**

5 WHEREFORE, the United States of America prays that this Court:

- 6 1. Declare that Defendants' refusal to provide registration records and
 7 California's electronic statewide voter registration list, with all fields,
 8 including each registrant's full name, date of birth, residential address,
 9 their state driver's license number, and the last four digits of their Social
 10 Security number, upon a demand by the Attorney General violates Title
 11 III of the CRA. 52 U.S.C. § 20703;
- 12 2. Declare that Defendants have failed to make available and provide to the
 13 United States "all records concerning the implementation of programs
 14 and activities conducted for the purpose of ensuring the accuracy and
 15 currency of official lists of eligible voters," in violation of the NVRA. 52
 16 U.S.C. § 20507(i)(1);
- 17 3. Declare that the Defendants' refusal to provide the requested records
 18 concerning the voter registration and list maintenance records prevents
 19 the Attorney General from enforcing HAVA's list maintenance
 20 requirements;
- 21 4. Declare that any state law that prohibits Defendants from providing the
 22 requested statewide voter registration list is preempted by federal law;
- 23 5. Order Defendants to provide to the United States the current electronic
 24 copy of California's computerized statewide voter registration list, with
 25 all fields, including each registrant's full name, date of birth, residential
 26 address, and either their state driver's license number, or the last four
 27 digits of their Social Security number and original and completed voter
 28 registration applications as required by the CRA, NVRA, and HAVA;

1 and

2 6. Order such additional relief as the interests of justice may require.

3
4 DATED: September 25, 2025

Respectfully submitted,

5
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7 Assistant Attorney General
8 Civil Rights Division

9 /s/ Michael E. Gates

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CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2025, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Brittany E. Bennett

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