

---

**From:** Riordan, Maureen (CRT) <(b)(6)>  
(b)(6)  
**Sent:** 5/13/2025 12:48:16 PM  
**To:** Warner, Mac (CRT) <(b)(6)>  
**Subject:** RE: [EXTERNAL] [Election Integrity Leaders:] SAVE System update

thx

---

**From:** Warner, Mac (CRT) <(b)(6)>  
**Sent:** Tuesday, May 13, 2025 8:48 AM  
**To:** Riordan, Maureen (CRT) <(b)(6)>  
**Subject:** RE: [EXTERNAL] [Election Integrity Leaders:] SAVE System update

Don't know.

---

**From:** Riordan, Maureen (CRT) <(b)(6)>  
**Sent:** Tuesday, May 13, 2025 8:36 AM  
**To:** Warner, Mac (CRT) <(b)(6)>  
**Subject:** RE: [EXTERNAL] [Election Integrity Leaders:] SAVE System update

Is there a timeline for us to get access?

---

**From:** Warner, Mac (CRT) <(b)(6)>  
**Sent:** Tuesday, May 13, 2025 7:33 AM  
**To:** Riordan, Maureen (CRT) <(b)(6)>  
**Cc:** Gates, Michael (CRT) <(b)(6)>  
**Subject:** FW: [EXTERNAL] [Election Integrity Leaders:] SAVE System update

**From:** Rosemary Jenks <(b)(6)>  
**Date:** April 22, 2025 at 12:10:01 PM EDT  
**To:** electionintegrityleaders <[electionintegrityleaders@conservativepartnership.org](mailto:electionintegrityleaders@conservativepartnership.org)>  
**Subject:** [Election Integrity Leaders:] SAVE System update

New announcement from DHS. This should make it much easier for state election officials to clean voter rolls of noncitizens.

--

You received this message because you are subscribed to the Google Groups "Election Integrity Leaders" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [electionintegrityleaders+unsubscribe@cpi.org](mailto:electionintegrityleaders+unsubscribe@cpi.org).

To view this discussion visit

<https://groups.google.com/a/cpi.org/d/msgid/electionintegrityleaders/425A1F5B-6FC3-4950-8E69-438B49EEAAA5%40iaproject.org>.

## DHS, USCIS, DOGE Overhaul Systematic Alien Verification for Entitlements Database

WASHINGTON – Homeland Security Secretary Kristi Noem, alongside USCIS and the Department of Government Efficiency (DOGE), announced a comprehensive optimization of the Systematic Alien Verification for Entitlements (SAVE) database to ensure a single, reliable source for verifying non-citizen status nationwide.

This overhaul eliminates fees for database searches, breaks down silos for accurate results, streamlines mass status checks, and integrates criminal records, immigration timelines, and addresses. Automatic status updates and a user-friendly interface will empower federal, state, local, territorial, and tribal agencies to prevent non-citizens from exploiting taxpayer benefits or voting illegally.

*“Illegal aliens have exploited outdated systems to defraud Americans and taint our elections,” said a spokesperson for DHS. “Under Secretary Noem’s leadership, this revamped SAVE system will ensure government officials can swiftly verify legal status, halting entitlements and voter fraud.”*

DHS will provide ongoing updates to stakeholders as the SAVE Optimization Plan progresses.

# # #

Rosemary Jenks  
Policy Director  
Immigration Accountability Project  
Cell: (b)(6)

LEGAL NOTICE: The information in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

--

You received this message because you are subscribed to the Google Groups "Election Integrity Leaders" group.

To unsubscribe from this group and stop receiving emails from it, send an email to

[electionintegrityleaders+unsubscribe@cpio.org](mailto:electionintegrityleaders+unsubscribe@cpio.org).

To view this discussion visit

<https://groups.google.com/a/cpio.org/d/msgid/electionintegrityleaders/425A1F5B-6FC3-4950-8E69-438B49EEAAA5%40iaproject.org>.

**DUPLICATE.**

**F000455**

**From:** (b)(6) (b)(6)  
**Sent:** 6/5/2025 5:37:33 PM  
**To:** Gates, Michael (CRT) (b)(6)  
**Subject:** Re: Request for access to DHS data base.

Ok  
Maureen Riordan  
Senior Counsel  
Acting Chief, Voting Section, Civil Rights Division  
Maureen.riordan2@usdoj.gov

(b)(6)

On Jun 5, 2025, at 1:26 PM, Gates, Michael (CRT) <(b)(6)> wrote:

As expected, need a fully-developed ask. Send when you can.

**Michael E. Gates**

Deputy Assistant Attorney General  
U.S. Department of Justice, Civil Rights Division

---

**From:** Dhillon, Harmeet K. (CRT) <(b)(6)>  
**Sent:** Thursday, June 5, 2025 1:24 PM  
**To:** Gates, Michael (CRT) <(b)(6)>  
**Cc:** Zandi, Matt (CRT) <(b)(6)>  
**Subject:** Re: Request for access to DHS data base.

Write it up for me in a paragraph including any statutory restrictions on its sharing and I'll ask high up.

Matt can you find out who the GC is and what their contact info is ?

**Harmeet K. Dhillon**

Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice

(b)(6)  
Cell: (b)(6)  
Desk: (b)(6)

On Jun 5, 2025, at 11:01 AM, Gates, Michael (CRT) <(b)(6)>  
wrote:

Harmeet, we would like to contact DHS to see if we can get access to the SAVE database. We look to you for your recommendation on how to go about this.

**Michael E. Gates**  
Deputy Assistant Attorney General  
U.S. Department of Justice, Civil Rights Division

---

**From:** Riordan, Maureen (CRT) <(b)(6)>  
**Sent:** Thursday, June 5, 2025 10:59 AM  
**To:** Gates, Michael (CRT) <(b)(6)>  
**Subject:** Request for access to DHS data base.

According to the DHS website, the SAVE database has been updated and integrated to optimize stakeholders to determine the citizenship of voters and federal program recipients.

The Voting Section at CRT would like access to this database. Additionally, we should advise states of its availability and inform them that their voter lists should be run against the database when available to them as part of their list maintenance responsibilities under the NVRA and HAVA

Maureen S. Riordan  
Senior Counsel  
Acting Chief Voting Section Civil Rights Division

(b)(6)  
(b)(6)

---

**From:** Zandi, Matt (CRT) [(b)(6)]  
**Sent:** 6/5/2025 5:26:56 PM  
**To:** Dhillon, Harmeet K. (CRT) [(b)(6)]  
**CC:** Gates, Michael (CRT) [(b)(6)]  
**Subject:** Re: Request for access to DHS data base.

Will do  
Sent from my iPhone

**duplicate in**

**CREW v. DOJ - CRT - 000751-000752**

**duplicate in**

**CREW v. DOJ - CRT - 000751-000752**

---

**From:** Riordan, Maureen (CRT) [(b)(6)]  
[(b)(6)]  
**Sent:** 6/5/2025 3:43:05 PM  
**To:** Gates, Michael (CRT) [(b)(6)]  
**Subject:** FW: Request for access to DHS data base.

I meant to add this below.

[DHS, USCIS, DOGE Overhaul Systematic Alien Verification for Entitlements Database | Homeland Security](#)

---

**From:** Riordan, Maureen (CRT)  
**Sent:** Thursday, June 5, 2025 10:59 AM  
**To:** Gates, Michael (CRT) <[(b)(6)]>  
**Subject:** Request for access to DHS data base.

According to the DHS website, the SAVE database has been updated and integrated to optimize stakeholders to determine the citizenship of voters and federal program recipients. The Voting Section at CRT would like access to this database. Additionally, we should advise states of its availability and inform them that their voter lists should be run against the database when available to them as part of their list maintenance responsibilities under the NVRA and HAVA

Maureen S. Riordan  
Senior Counsel  
Acting Chief Voting Section Civil Rights Division

[(b)(6)]  
[(b)(6)]

---

**From:** Dhillon, Harmeet K. (CRT) <[REDACTED]>  
**Sent:** 6/16/2025 2:58:37 PM  
**To:** Osete, Jesus (CRT) <[REDACTED]>  
**Subject:** FW: Access to the SAVE database as requested

**Harmeet K. Dhillon**  
Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice

**Email:** [REDACTED]  
**Cell:** [REDACTED]  
**Desk:** [REDACTED]

---

**From:** Gates, Michael (CRT) <[REDACTED]>  
**Sent:** Monday, June 16, 2025 10:43 AM  
**To:** Dhillon, Harmeet K. (CRT) <[REDACTED]>  
**Cc:** Riordan, Maureen (CRT) <[REDACTED]>  
**Subject:** FW: Access to the SAVE database as requested

Harmeet, this is our request of DHS...

**We are requesting of DHS to give us (CRT/VOT) access to the SAVE database.** The Systematic Alien Verification for Entitlements (SAVE) database is an alien database. SAVE ensures a single, reliable source for verifying non-citizen status nationwide; the SAVE breaks down silos for accurate results, streamlines mass status checks, and integrates criminal records, immigration timelines, and addresses. This will be helpful to us because it will allow us to compare this SAVE database against states' voter rolls, which we will get directly from states under the NVRA. [REDACTED]

**(b)(5)**

**Michael E. Gates**  
Deputy Assistant Attorney General  
Civil Rights Division, U.S. Department of Justice  
**Cell:** [REDACTED]

---

**From:** Riordan, Maureen (CRT) <[REDACTED]>  
**Sent:** Monday, June 16, 2025 10:32 AM  
**To:** Gates, Michael (CRT) <[REDACTED]>  
**Subject:** Access to the SAVE database as requested

Homeland Security Secretary Kristi Noem, alongside USCIS and the Department of Government Efficiency (DOGE), have completed a comprehensive optimization of the Systematic Alien Verification for Entitlements (SAVE) database to ensure a single, reliable source for verifying non-citizen status nationwide. This overhaul eliminates fees for database searches, breaks down silos for accurate results, streamlines mass status checks, and integrates criminal records, immigration timelines, and addresses. Automatic status

updates and a user-friendly interface will empower federal, state, local, territorial, and tribal agencies to prevent non-citizens from exploiting taxpayer benefits or voting illegally.

Access to the new database is available to all states. My understanding is only Texas has utilized the new database. There is nothing in wither the NVRA or HAVA that requires states to specifically remove noncitizens from their voter rolls. But, they are required to remove non eligible voters, which obviously, noncitizens are non-eligible.

There are specific states that we intend to request their statewide voter rolls after the release of the EAC data on list maintenance. If we had access to this database, we could run their voter rolls against the database and notify them of noncitizens who appear to be improperly listed as eligible voters.

**(b)(5)**

---

**From:** Mellett, Timothy F (CRT) <[REDACTED]>  
**Sent:** 6/24/2025 8:46:01 PM  
**To:** Lott, Jasmin (CRT) <[REDACTED]>  
**Subject:** RE: HAVA Letters

Thanks!

---

**From:** Lott, Jasmin (CRT) <[REDACTED]>  
**Sent:** Tuesday, June 24, 2025 4:40 PM  
**To:** Mellett, Timothy F (CRT) <[REDACTED]>  
**Subject:** RE: HAVA Letters

Updated draft attached, adding language about secure transmission methods.

(b)(5)

Jasmin

---

**From:** Lott, Jasmin (CRT)  
**Sent:** Tuesday, June 24, 2025 1:59 PM  
**To:** Mellett, Timothy F (CRT) <[REDACTED]>  
**Subject:** RE: HAVA Letters

Thanks, Tim. [REDACTED]

(b)(5)

(b)(5)

Jasmin

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Tuesday, June 24, 2025 1:50 PM  
**To:** Rameres, Jewel (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>  
**Cc:** Wake, Brittany (CRT) <(b)(6)>  
**Subject:** RE: HAVA Letters

I have attached the revised letter.

---

**From:** Rameres, Jewel (CRT) <(b)(6)>  
**Sent:** Tuesday, June 24, 2025 1:33 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>  
**Cc:** Wake, Brittany (CRT) <(b)(6)>  
**Subject:** RE: HAVA Letters

Noted, thanks!

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Tuesday, June 24, 2025 1:32 PM  
**To:** Lott, Jasmin (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>  
**Cc:** Wake, Brittany (CRT) <(b)(6)>  
**Subject:** RE: HAVA Letters

Stop printing letters if you are. Maureen has a change. Back to you shortly.

---

**From:** Mellett, Timothy F (CRT)  
**Sent:** Tuesday, June 24, 2025 12:25 PM  
**To:** Lott, Jasmin (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>  
**Cc:** Wake, Brittany (CRT) <(b)(6)>  
**Subject:** HAVA Letters

All,

I have attached the draft HAVA letter that Maureen just approved. Please assemble the letter for the following states to go out today:

Idaho  
Minnesota  
Nevada  
New Hampshire  
New York  
Wyoming

Please let me know if you have any questions. Thanks,

Tim



## Agency Registration Checklist

Please provide the information requested below so we may determine your agency’s eligibility to participate in SAVE. If your agency is eligible to register for SAVE, this information will be used to draft a Memorandum of Agreement (MOA) between SAVE and your agency. Instructions for completing this checklist are available at the end of this document.

### Step 1: Agency Point of Contact (POC)

Provide information for the point of contact SAVE can reach out to regarding your registration request.

Agency Information	
Date of Submission:	
Agency Name:	Department of Justice
Agency Website:	DOJ.gov
Agency Point of Contact Information	
Name:	Michael E. Gates
Position / Title:	DAAG Civil Rights Division
Mailing Address – Line 1:	950 Pennsylvania Avenue
Mailing Address – Line 2:	
City, State, Zip Code:	District of Columbia
Phone Number:	(b)(6)
E-mail Address:	(b)(6)

### Step 2: Is Your Agency Already Registered with SAVE?

If you are unsure, check the SAVE Agency Search Tool to see if your agency is already registered.

- Yes, my agency is already registered. *Proceed to Step 3.*
- No, my agency is not already registered. *Proceed to Step 4.*

### Step 3: Is Your Agency Requesting to Use SAVE for a Reason Not Previously Authorized?

- Yes, requesting SAVE for use that was not previously authorized. *Proceed to Step 4.*
- No, agency already registered for the same use. *Stop, new registration not required.*  
(Contact SAVE Registration if you have questions about your agency’s registration.)

### Step 4: Immigration Enumerators Your Agency Collects from Benefit Applicants

Registered agencies must be able to provide at least one Department of Homeland Security (DHS)-issued immigration enumerator to submit a SAVE case. Please select all the enumerators your agency collects.

- |   |  |
|---|--|
| <input type="checkbox"/> Alien Number (A-number) / USCIS Number           | <input type="checkbox"/> SEVIS ID                                |
| <input type="checkbox"/> Card Number                                      | <input checked="" type="checkbox"/> Other (please specify below) |
| <input type="checkbox"/> Citizenship or Naturalization Certificate Number | Voter registration of non citizens                               |
| <input type="checkbox"/> I-94, Arrival-Departure Record Number            | <input type="checkbox"/> N/A or None (not eligible to use SAVE)  |
| <input type="checkbox"/> Receipt Number (on I-797, Notice of Action)      |  |



## Agency Registration Checklist

### Step 5: Legal Authorities

For each benefit, license, or authorized activity that your agency plans to verify through SAVE, please provide the information requested in Parts A, B and C below. Please consult with your organization’s legal counsel for questions about your agency’s legal authorities. Please add additional pages as needed.

- Cite the specific section of the legal authority and provide extracts of the text of the authority. Only include finalized legislation or rules. SAVE cannot authorize use based upon pending/proposed legislation.
- If eligible to register, these citations will be included in your agency’s MOA with SAVE.

### Part A - Benefit, License or Activity Type with Legal Authority

*Insert: For each benefit/license your agency is requesting SAVE use, list (1) benefit/license type, (2) legal authority to issue the benefit/license, and (3) extract of the legal authority.*

**Example:** (1) Issuing Asbestos Abatement License pursuant to (2) Oklahoma Statute Title, 40, § 452, License required - Fee – Exemptions: (3) “The Commissioner shall issue an asbestos abatement license to a qualified contractor upon proper application, as determined by the Commissioner.”

**Agency Response:**

### Part B - Legal Authority for the Verification of Citizenship / Immigration Status

*Insert: For each benefit/license your agency is requesting SAVE use, list (1) the legal authority authorizing verification of citizenship/immigration status for issuance, and (2) extract of the legal authority.*

**Example:** (1) Oklahoma Statute Title, 56, § 71, (2) “Oklahoma Statute Title, 56, § 71, “Verification of lawful presence of applicants for public benefits – Exceptions – Affidavit - Fraudulent representations - Annual report.” “A. Except as provided in subsection C of this section or where exempted by federal law, every agency or a political subdivision of this state shall verify the lawful presence in the United States of any natural person fourteen (14) years of age or older who has applied for state or local public benefits, as defined in 8 U.S.C., Section 1621, or for federal public benefits, as defined in 8 U.S.C., Section 1611, that is administered by an agency or a political subdivision of this state.”

**Agency Response:** The Dept of Justice, Civil Rights Division has the authority to ensure that every state is conducting list maintenance under the National Voter Registration Act and the Help America Vote Act. Removal of non-citizens is essential to ensure as both statutes require, that only eligible voters are on the statewide voter registration lists.



### Agency Registration Checklist

#### Part C – Immigration Categories Requested

*Insert the categories of immigration status/citizenship that an individual must have to be eligible for the issuance of the benefit(s), license(s) or other activity, that your agency is authorized to verify.*

**Example 1:** Individuals lawfully present in the U.S.

**Example 2:** Asylees, refugees, lawful permanent residents (LPRs), and U.S. citizens.

**Agency Response: Individual must be a US citizen**

#### Step 6: Agency Point of Contact to be Listed in MOA

Please include the information of the individual who should be listed in the MOA as the agency’s point of contact. This person will be set up as the Agency’s Super User and will receive a SAVE login.

Agency Point of Contact Information	
Name:	Michael E. Gates
Position / Title:	DAAG, Civil Rights Division
Mailing Address – Line 1:	950 Pennsylvania Avenue
Mailing Address – Line 2:	
City, State, Zip Code:	Washington, D.C.
Phone Number:	(b)(6)
E-mail Address:	

#### Step 7: Agency Authorized Signatory for SAVE MOA

Please include the information for the individual who is authorized to sign the MOA on behalf of your agency. This individual may be the same as the MOA POC.

Agency Authorized Signatory Information	
Agency Name:	Department of Justice
Signatory Name:	Michael E. Gates
Position / Title:	DAAG Civil Rights Division
Phone Number:	(b)(6)
E-mail Address:	

#### Step 8: Agency Billing / Accounts Payable Information

If your agency enters into a Memorandum of Agreement with SAVE, the information below will be used for billing purposes.

Agency Billing Information	
Tax Identification Number (TIN):	(b)(6)
Agency Name:	Department of Justice
Billing Point of Contact Name:	Michael E. Gates
Phone Number:	(b)(6)



### Agency Registration Checklist

E-mail Address:	(b)(6)
Address:	950 Pennsylvania Avenue
Address (2nd line):	
City, State, Zip Code	Washington, DC

#### Step 9: Copies of Legal Authorities and Other Supporting Documents

Provide an electronic copy of all legal authorities you cited in the Step 5 of the checklist either as a direct hyperlink to the source or as an attached PDF. If your agency has additional guidance that explains your legal authorities to issue a benefit/license and to verify citizenship/immigration status (e.g., webpage, fact sheet, brochure or program guide) please also include it in support of your request.

#### Step 10: Submit Completed Checklist, Legal Authorities, and Other Supporting Documents

Send this completed checklist and a copy/link of all legal authorities you cited and any additional supporting documentation to [SAVEregistration@uscis.dhs.gov](mailto:SAVEregistration@uscis.dhs.gov).

<b>For SAVE Use Only - Review of Completed Checklist</b>
<p><i>For SAVE Staff: Using the space below, provide a summary of whether the legal authorities above establish eligibility for use of SAVE and for which benefit type. Please note any legal authorities listed above that do not appear to apply and provide an explanation. If the entity requesting SAVE access is not the entity authorized to issue the benefit (e.g., administering the benefit including determination of eligibility for the benefit is contracted to a third party), then have the requester provide evidence of the relationship.</i></p>



## Agency Registration Checklist

### Background About SAVE

#### **What is SAVE?**

SAVE is an online service that supports federal, state, territorial, tribal and local benefit-granting and licensing agencies with verifying immigration status and naturalized/acquired U.S. citizenship. SAVE verifies the status of nonimmigrants, immigrants and certain naturalized and acquired U.S. Citizens for approved purposes. SAVE charges user agencies based on their use. Visit our website for more information on transaction charges.

#### **How does SAVE verify immigration status and naturalized/acquired U.S. citizenship?**

SAVE uses U.S. Department of Homeland Security (DHS)-issued immigration identifiers to search certain government records and return a response showing an immigration status or U.S. citizenship. SAVE verifies naturalized or acquired U.S. citizenship only if found in DHS records.

#### **What does SAVE not do?**

SAVE does not verify citizenship of U.S.-born citizens. SAVE cannot verify U.S. citizenship using a social security number, driver's license number, U.S. passport number, Consular Report of Birth Abroad (CRBA), or other non-DHS documents. SAVE does not determine an applicant's eligibility for any specific benefit or license.

#### **How Does SAVE Use the Responses in the Agency Registration Checklist?**

SAVE uses the Agency Registration Checklist to determine if a prospective agency is eligible to register for SAVE. If eligible, the agency must complete a Memorandum of Agreement (MOA) with SAVE that identifies the legal authorities to issue the benefit(s)/license(s) and for the verification of immigration status or U.S. citizenship. The responses provided on the checklist are used to help draft the MOA.



## Agency Registration Checklist

### Instructions for Completing the SAVE Agency Registration Checklist

#### What is a legal authority?

A legal authority is the federal statute, federal code, state statute, state code, administrative law, county or city code, or county or city ordinance that allows certain actions to be taken.

Note: It is recommended that you consult your agency's legal counsel for assistance.

**What legal authorities do I need to include for SAVE?** You must indicate the legal authority that allows your agency to:

1. **Part A:** Administer specific benefit(s) or license(s). See examples below.
  - Federal Example: Issuing U.S. Merchant Mariner Credentials under 46 U.S.C. § 7302(a) & (b), "Issuing merchant mariners' documents and continuous discharge books" and 46 U.S.C. § 7101(b) & (c), "Issuing and classifying licenses and certificates of registry."
  - State Example: Issuing Asbestos Abatement License under Oklahoma Statute Title, 40, § 452, "License required - Fee – Exemptions"
  - Local Authority Example: Issuing Gaming Licenses under Arizona Tribal-State Gaming Compact 2003, Section 5 (b)(1), (2), & (3), "Background Investigation of Applicants."
2. **Part B:** Verify the citizenship or immigration status of applicants applying for the benefit or license. See examples below.
  - Federal Example: 46 U.S.C. § 8103 (a) & (b), Citizenship and Navy Reserve requirements.
  - State Example: Oklahoma Statute Title, 56, § 71, "Verification of lawful presence of applicants for public benefits – Exceptions – Affidavit - Fraudulent representations - Annual report."
  - Local Authority Example: Issuing Gaming Licenses under Arizona Tribal-State Gaming Compact 2003, Section 5 (b)(1), (2), & (3), "Background Investigation of Applicants."

#### Part C – What is an immigration category?

The category of applicant refers to the immigration/naturalization status or category of individuals to which your agency is authorized to administer benefits, licenses, or other activities and/or verify the citizenship or immigration status. List all that apply. Examples include, but are not limited to:

- nonimmigrants,
- U.S. citizens,
- lawful permanent residents,
- asylees,
- refugees.

**DUPLICATE.**  
**F0001859.0001**

**DUPLICATE.**

**F0001859.0002**

**DUPLICATE.**

**CREW v. DOJ - CRT - 000761-000766**

**DUPLICATE.**

**CREW v. DOJ - CRT - 000761-000766**

**DUPLICATE.**

**CREW v. DOJ - CRT - 000761-000766**



## Agency Registration Checklist

Please provide the information requested below so we may determine your agency’s eligibility to participate in SAVE. If your agency is eligible to register for SAVE, this information will be used to draft a Memorandum of Agreement (MOA) between SAVE and your agency. Instructions for completing this checklist are available at the end of this document.

### Step 1: Agency Point of Contact (POC)

Provide information for the point of contact SAVE can reach out to regarding your registration request.

Agency Information	
Date of Submission:	
Agency Name:	
Agency Website:	
Agency Point of Contact Information	
Name:	
Position / Title:	
Mailing Address – Line 1:	
Mailing Address – Line 2:	
City, State, Zip Code:	
Phone Number:	(XXX) XXX-XXXX
E-mail Address:	

### Step 2: Is Your Agency Already Registered with SAVE?

If you are unsure, check the SAVE Agency Search Tool to see if your agency is already registered.

- Yes, my agency is already registered. *Proceed to Step 3.*
- No, my agency is not already registered. *Proceed to Step 4.*

### Step 3: Is Your Agency Requesting to Use SAVE for a Reason Not Previously Authorized?

- Yes, requesting SAVE for use that was not previously authorized. *Proceed to Step 4.*
- No, agency already registered for the same use. *Stop, new registration not required.*  
(Contact SAVE Registration if you have questions about your agency’s registration.)

### Step 4: Immigration Enumerators Your Agency Collects from Benefit Applicants

Registered agencies must be able to provide at least one Department of Homeland Security (DHS)-issued immigration enumerator to submit a SAVE case. Please select all the enumerators your agency collects.

- |  |  |
|--|--|
| <input type="checkbox"/> Alien Number (A-number) / USCIS Number<br><input type="checkbox"/> Card Number<br><input type="checkbox"/> Citizenship or Naturalization Certificate Number<br><input type="checkbox"/> I-94, Arrival-Departure Record Number<br><input type="checkbox"/> Receipt Number (on I-797, Notice of Action) | <input type="checkbox"/> SEVIS ID<br><input type="checkbox"/> Other (please specify below)<br><i>Click or tap here to enter text.</i><br><input type="checkbox"/> N/A or None (not eligible to use SAVE) |
|--|--|



## Agency Registration Checklist

### Step 5: Legal Authorities

For each benefit, license, or authorized activity that your agency plans to verify through SAVE, please provide the information requested in Parts A, B and C below. Please consult with your organization’s legal counsel for questions about your agency’s legal authorities. Please add additional pages as needed.

- Cite the specific section of the legal authority and provide extracts of the text of the authority. Only include finalized legislation or rules. SAVE cannot authorize use based upon pending/proposed legislation.
- If eligible to register, these citations will be included in your agency’s MOA with SAVE.

### Part A - Benefit, License or Activity Type with Legal Authority

*Insert: For each benefit/license your agency is requesting SAVE use, list (1) benefit/license type, (2) legal authority to issue the benefit/license, and (3) extract of the legal authority.*

**Example:** (1) Issuing Asbestos Abatement License pursuant to (2) Oklahoma Statute Title, 40, § 452, License required - Fee – Exemptions: (3) “The Commissioner shall issue an asbestos abatement license to a qualified contractor upon proper application, as determined by the Commissioner.”

**Agency Response:**

### Part B - Legal Authority for the Verification of Citizenship / Immigration Status

*Insert: For each benefit/license your agency is requesting SAVE use, list (1) the legal authority authorizing verification of citizenship/immigration status for issuance, and (2) extract of the legal authority.*

**Example:** (1) Oklahoma Statute Title, 56, § 71, (2) “Oklahoma Statute Title, 56, § 71, “Verification of lawful presence of applicants for public benefits – Exceptions – Affidavit - Fraudulent representations - Annual report.” “A. Except as provided in subsection C of this section or where exempted by federal law, every agency or a political subdivision of this state shall verify the lawful presence in the United States of any natural person fourteen (14) years of age or older who has applied for state or local public benefits, as defined in 8 U.S.C., Section 1621, or for federal public benefits, as defined in 8 U.S.C., Section 1611, that is administered by an agency or a political subdivision of this state.”

**Agency Response:**

### Part C – Immigration Categories Requested



### Agency Registration Checklist

*Insert the categories of immigration status/citizenship that an individual must have to be eligible for the issuance of the benefit(s), license(s) or other activity, that your agency is authorized to verify.*

**Example 1:** Individuals lawfully present in the U.S.

**Example 2:** Asylees, refugees, lawful permanent residents (LPRs), and U.S. citizens.

**Agency Response:**

#### Step 6: Agency Point of Contact to be Listed in MOA

Please include the information of the individual who should be listed in the MOA as the agency’s point of contact. This person will be set up as the Agency’s Super User and will receive a SAVE login.

Agency Point of Contact Information	
Name:	
Position / Title:	
Mailing Address – Line 1:	
Mailing Address – Line 2:	
City, State, Zip Code:	
Phone Number:	(XXX) XXX-XXXX
E-mail Address:	

#### Step 7: Agency Authorized Signatory for SAVE MOA

Please include the information for the individual who is authorized to sign the MOA on behalf of your agency. This individual may be the same as the MOA POC.

Agency Authorized Signatory Information	
Agency Name:	
Signatory Name:	
Position / Title:	
Phone Number:	(XXX) XXX-XXXX
E-mail Address:	

#### Step 8: Agency Billing / Accounts Payable Information

If your agency enters into a Memorandum of Agreement with SAVE, the information below will be used for billing purposes.

Agency Billing Information	
Tax Identification Number (TIN):	
Agency Name:	
Billing Point of Contact Name:	
Phone Number:	(XXX) XXX-XXXX
E-mail Address:	
Address:	



### Agency Registration Checklist

Address (2nd line):	
City, State, Zip Code	

#### Step 9: Copies of Legal Authorities and Other Supporting Documents

Provide an electronic copy of all legal authorities you cited in the Step 5 of the checklist either as a direct hyperlink to the source or as an attached PDF. If your agency has additional guidance that explains your legal authorities to issue a benefit/license and to verify citizenship/immigration status (e.g., webpage, fact sheet, brochure or program guide) please also include it in support of your request.

#### Step 10: Submit Completed Checklist, Legal Authorities, and Other Supporting Documents

Send this completed checklist and a copy/link of all legal authorities you cited and any additional supporting documentation to [SAVEregistration@uscis.dhs.gov](mailto:SAVEregistration@uscis.dhs.gov).

<b>For SAVE Use Only - Review of Completed Checklist</b>
<p><i>For SAVE Staff: Using the space below, provide a summary of whether the legal authorities above establish eligibility for use of SAVE and for which benefit type. Please note any legal authorities listed above that do not appear to apply and provide an explanation. If the entity requesting SAVE access is not the entity authorized to issue the benefit (e.g., administering the benefit including determination of eligibility for the benefit is contracted to a third party), then have the requester provide evidence of the relationship.</i></p>



## Agency Registration Checklist

### Background About SAVE

#### **What is SAVE?**

SAVE is an online service that supports federal, state, territorial, tribal and local benefit-granting and licensing agencies with verifying immigration status and naturalized/acquired U.S. citizenship. SAVE verifies the status of nonimmigrants, immigrants and certain naturalized and acquired U.S. Citizens for approved purposes. SAVE charges user agencies based on their use. Visit our website for more information on transaction charges.

#### **How does SAVE verify immigration status and naturalized/acquired U.S. citizenship?**

SAVE uses U.S. Department of Homeland Security (DHS)-issued immigration identifiers to search certain government records and return a response showing an immigration status or U.S. citizenship. SAVE verifies naturalized or acquired U.S. citizenship only if found in DHS records.

#### **What does SAVE not do?**

SAVE does not verify citizenship of U.S.-born citizens. SAVE cannot verify U.S. citizenship using a social security number, driver's license number, U.S. passport number, Consular Report of Birth Abroad (CRBA), or other non-DHS documents. SAVE does not determine an applicant's eligibility for any specific benefit or license.

#### **How Does SAVE Use the Responses in the Agency Registration Checklist?**

SAVE uses the Agency Registration Checklist to determine if a prospective agency is eligible to register for SAVE. If eligible, the agency must complete a Memorandum of Agreement (MOA) with SAVE that identifies the legal authorities to issue the benefit(s)/license(s) and for the verification of immigration status or U.S. citizenship. The responses provided on the checklist are used to help draft the MOA.



## Agency Registration Checklist

### Instructions for Completing the SAVE Agency Registration Checklist

#### What is a legal authority?

A legal authority is the federal statute, federal code, state statute, state code, administrative law, county or city code, or county or city ordinance that allows certain actions to be taken.

Note: It is recommended that you consult your agency's legal counsel for assistance.

**What legal authorities do I need to include for SAVE?** You must indicate the legal authority that allows your agency to:

1. **Part A:** Administer specific benefit(s) or license(s). See examples below.
  - Federal Example: Issuing U.S. Merchant Mariner Credentials under 46 U.S.C. § 7302(a) & (b), "Issuing merchant mariners' documents and continuous discharge books" and 46 U.S.C. § 7101(b) & (c), "Issuing and classifying licenses and certificates of registry."
  - State Example: Issuing Asbestos Abatement License under Oklahoma Statute Title, 40, § 452, "License required - Fee – Exemptions"
  - Local Authority Example: Issuing Gaming Licenses under Arizona Tribal-State Gaming Compact 2003, Section 5 (b)(1), (2), & (3), "Background Investigation of Applicants."
2. **Part B:** Verify the citizenship or immigration status of applicants applying for the benefit or license. See examples below.
  - Federal Example: 46 U.S.C. § 8103 (a) & (b), Citizenship and Navy Reserve requirements.
  - State Example: Oklahoma Statute Title, 56, § 71, "Verification of lawful presence of applicants for public benefits – Exceptions – Affidavit - Fraudulent representations - Annual report."
  - Local Authority Example: Issuing Gaming Licenses under Arizona Tribal-State Gaming Compact 2003, Section 5 (b)(1), (2), & (3), "Background Investigation of Applicants."

#### Part C – What is an immigration category?

The category of applicant refers to the immigration/naturalization status or category of individuals to which your agency is authorized to administer benefits, licenses, or other activities and/or verify the citizenship or immigration status. List all that apply. Examples include, but are not limited to:

- nonimmigrants,
- U.S. citizens,
- lawful permanent residents,
- asylees,
- refugees.

---

**From:** Riordan, Maureen (CRT [redacted] (b)(6))  
[redacted] (b)(6)

**Sent:** 7/8/2025 1:35:26 PM

**To:** Gates, Michael (CRT [redacted] (b)(6))

**Subject:** Insert Agency Name - SAVE Agency Registration Checklist 07 08 2025

**Attachments:** Insert Agency Name - SAVE Agency Registration Checklist 07 08 2025.docx; SAVE-MOA-Voter-Reg--List-Maint-Template 7 8 25.pdf

**DUPLICATE.**

**CREW v. DOJ - CRT - 000761-000766**

---

**From:** Braniff, Andrew (CRT) [(b)(6)]  
**Sent:** 7/9/2025 5:04:34 PM  
**To:** Braniff, Andrew (CRT) [(b)(6)]  
**CC:** Riordan, Maureen (CRT) [(b)(6)]; Neff, Katie (CRT) [(b)(6)]; Gates, Michael (CRT) [(b)(6)]

**Subject:** Weekly Voting EO Updates  
**Location:** Microsoft Teams Meeting (I included MAureen Katie and Michael, but we only need one person)

**Start:** 7/16/2025 2:00:00 PM  
**End:** 7/16/2025 2:30:00 PM  
**Show Time As:** Tentative

**Recurrence:** Weekly  
every Wednesday from 10:00 AM to 10:30 AM

**Required Attendees:** Braniff, Andrew (CRT)

**Optional Attendees:** Riordan, Maureen (CRT); Neff, Katie (CRT); Gates, Michael (CRT)

- 1) Status of HAVA requests for state voter lists (including states requested, responses received, any pending legal action to compel release)
- 2) Status of NVRA requests for state voter lists (including states requested, responses received, any pending legal action to compel release)
- 3) States DOJ has informally asked for the voter registration list of (including any responses received)
- 4) Status of DOJ agreement with DHS to use SAVE system
- 5) Update on which state voter registration lists have been cross checked by DOJ against SAVE
- 6) Number (if any) of individuals on a state voter registration list identified as non-citizen or deceased (SAVE now has the SSA Death Master File incorporated)
- 7) Any pending litigation on EO 14248 – [(b)(5)]
- 8) Any cases filed (like the Orange County, CA case) and any updates on that litigation

---

## Microsoft Teams [Need help?](#)

### [Join the meeting now](#)

Meeting ID: [(b)(6)]

Passcode: [(b)(6)]

---

### Dial in by phone

[(b)(6)] [(b)(6)] United States, Washington

[Find a local number](#)

Phone conference ID: [(b)(6)]

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

---

**DUPLICATE.**

**CREW v. DOJ - CRT - 000780-000781**

**DUPLICATE.**

**CREW v. DOJ - CRT - 000780-000781**

**DUPLICATE.**

CREW v. DOJ - CRT - 000780-000781

**DUPLICATE.**

**CREW v. DOJ - CRT - 000780-000781**

**DUPLICATE.**

CREW v. DOJ - CRT - 000780-000781

---

**From:** Braniff, Andrew (CRT) [(b)(6)]  
**Sent:** 7/9/2025 5:04:35 PM  
**To:** Braniff, Andrew (CRT) [(b)(6)]  
**CC:** Riordan, Maureen (CRT) [(b)(6)]; Neff, Katie (CRT) [(b)(6)]; Gates, Michael (CRT) [(b)(6)]

**Subject:** Canceled: Weekly Voting EO Updates  
**Location:** Microsoft Teams Meeting (I included MAureen Katie and Michael, but we only need one person)

**Start:** 7/16/2025 2:00:00 PM  
**End:** 7/16/2025 2:30:00 PM  
**Show Time As:** Free

**Importance:** High

**Recurrence:** Weekly  
every Wednesday from 10:00 AM to 10:30 AM

**Optional Attendees:** Riordan, Maureen (CRT); Neff, Katie (CRT); Gates, Michael (CRT)

**duplicated in**

**CREW v. DOJ - CRT - 000780-000781**

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

---

**DUPLICATE.**

**CREW v. DOJ - CRT - 000780-000781**

**DUPLICATE.**

**CREW v. DOJ - CRT - 000780-000781**

**DUPLICATE.**

CREW v. DOJ - CRT - 000780-000781

**DUPLICATE.**

**CREW v. DOJ - CRT - 000780-000781**

---

**From:** Zandi, Matt (CRT) [(b)(6)]  
**Sent:** 7/16/2025 7:49:47 PM  
**To:** Buchko, John (CRT) [(b)(6)]; Osete, Jesus (CRT) [(b)(6)]; Gates, Michael (CRT) [(b)(6)]  
**Subject:** RE: [EXTERNAL] Link to register and MOA to sign

Let's press pause on this please. We are not paying 150k.  
We need to get ODAG or Associates office involved and maybe WH.

---

**From:** Buchko, John (CRT) [(b)(6)]  
**Sent:** Wednesday, July 16, 2025 3:44 PM  
**To:** Osete, Jesus (CRT) [(b)(6)]; Gates, Michael (CRT) [(b)(6)]; Zandi, Matt (CRT) [(b)(6)]  
**Subject:** RE: [EXTERNAL] Link to register and MOA to sign

By way of update, I just got off the phone with the DHS contact. The cost to us is going to be \$150K for unlimited use per year. His finance person is out until Monday but we can start working on the details then. I will loop in Gary to begin the process. We will need to know how we intend to use it, for how long, etc. I will circle back with Maureen.

---

**From:** Osete, Jesus (CRT) [(b)(6)]  
**Sent:** Tuesday, July 15, 2025 3:39 PM  
**To:** Gates, Michael (CRT) [(b)(6)]; Buchko, John (CRT) [(b)(6)]; Zandi, Matt (CRT) [(b)(6)]  
**Subject:** RE: [EXTERNAL] Link to register and MOA to sign

Let's get it right.



**Jesus A. Osete**  
Deputy Assistant Attorney General  
U.S. Department of Justice  
Civil Rights Division

---

**From:** Gates, Michael (CRT) [(b)(6)]  
**Sent:** Tuesday, July 15, 2025 3:37 PM  
**To:** Buchko, John (CRT) [(b)(6)]; Zandi, Matt (CRT) [(b)(6)]; Osete, Jesus (CRT) [(b)(6)]  
**Subject:** RE: [EXTERNAL] Link to register and MOA to sign

Please. Happy to follow your lead. This is something we want to close the loop on pretty quickly though.

**Michael E. Gates**  
Deputy Assistant Attorney General  
Civil Rights Division, U.S. Department of Justice  
Cell: [(b)(6)]

---

**From:** Buchko, John (CRT) [(b)(6)]  
**Sent:** Tuesday, July 15, 2025 3:09 PM  
**To:** Gates, Michael (CRT) [(b)(6)]; Zandi, Matt (CRT) [(b)(6)]; Osete, Jesus (CRT)

<(b)(6)>

**Subject:** RE: [EXTERNAL] Link to register and MOA to sign

Let me figure out some estimate of actual cost before we sign up. It is a little odd to be charged for sharing information between government agencies but this is uncharted territory for me. I can see how it would be a useful tool.

---

**From:** Gates, Michael (CRT) <(b)(6)>

**Sent:** Tuesday, July 15, 2025 11:25 AM

**To:** Zandi, Matt (CRT) <(b)(6)>; Osete, Jesus (CRT) <(b)(6)>; Buchko, John (CRT)

<(b)(6)>

**Subject:** FW: [EXTERNAL] Link to register and MOA to sign

Matt, not sure what the protocol is for executing an MOA, but we should sign on as soon as we can so we can work with DHS on their SAVE comparisons with our voter lists.

**Michael E. Gates**

Deputy Assistant Attorney General

Civil Rights Division, U.S. Department of Justice

Cell: (b)(6)

**duplicate in F0001435**

**duplicate in F0001435**

---

**From:** Osete, Jesus (CRT) [(b)(6)]  
[(b)(6)]  
**Sent:** 7/15/2025 7:20:36 PM  
**To:** Buchko, John (CRT) [(b)(6)]; Gates, Michael (CRT) [(b)(6)]; Zandi, Matt (CRT) [(b)(6)]  
**Subject:** RE: [EXTERNAL] Link to register and MOA to sign

Very strange indeed.



Jesus A. Osete  
Deputy Assistant Attorney General  
U.S. Department of Justice  
Civil Rights Division

**uplicated in**

**CREW v. DOJ - CRT - 000793-000795**

**duplicate** in

**CREW v. DOJ - CRT - 000793-000795**

---

**From:** Zandi, Matt (CRT) [redacted]  
**Sent:** 7/15/2025 4:03:56 PM  
**To:** Gates, Michael (CRT) [redacted]; Osete, Jesus (CRT) [redacted]; Buchko, John (CRT) [redacted]  
**Subject:** RE: [EXTERNAL] Link to register and MOA to sign

I defer to John.

**duplicated in**

**CREW v. DOJ - CRT - 000793-000795**

**duplicate in**

**CREW v. DOJ - CRT - 000793-000795**

**DUPLICATE.**

**F0001435**

**Sent:** 7/11/2025 6:07:00 PM  
**To:** Mellett, Timothy F (CRT) [(b)(6)]; Shikari, Roshni (CRT) [(b)(6)]  
**CC:** Rameres, Jewel (CRT) [(b)(6)]; Rosenberg, Mary E. (CRT) [(b)(6)]; Song, Harin C. (CRT) [(b)(6)]; Lott, Jasmin (CRT) [(b)(6)]; Reid, Arielle (CRT) [(b)(6)]; Muench, Kevin (CRT) [Kevin.N. (b)(6)]; Bonilla, German (CRT) [(b)(6)]; Hyatte, Joi (CRT) [(b)(6)]; Wake, Brittany (CRT) [(b)(6)]; Gupta, Kamran (CRT) [(b)(6)]; Bruzzone, Callie (CRT) [(b)(6)]  
**Subject:** FRE

**From:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Sent:** Thursday, July 10, 2025 5:46 PM  
**To:** Shikari, Roshni (CRT) <[(b)(6)]>  
**Cc:** Rameres, Jewel (CRT) <[(b)(6)]>; Rosenberg, Mary E. (CRT) [(b)(6)]; Song, Harin C. (CRT) [(b)(6)]; Lott, Jasmin (CRT) <[(b)(6)]>; Reid, Arielle (CRT) <[(b)(6)]>; Tucker, James T. (CRT) <[(b)(6)]>; Muench, Kevin (CRT) <[(b)(6)]>; Bonilla, German (CRT) <[(b)(6)]>; Hyatte, Joi (CRT) [(b)(6)]; Wake, Brittany (CRT) <[(b)(6)]>; Gupta, Kamran (CRT) <[(b)(6)]>; Bruzzone, Callie (CRT) <[(b)(6)]>  
**Subject:** RE: Questions about NVRA project

**CREW v. DOJ - CRT - 000807-000812**

**duplicated in**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**From:** Mellett, Timothy F (CRT) [(b)(6)]  
**Sent:** 7/10/2025 9:46:13 PM  
**To:** Shikari, Roshni (CRT) [(b)(6)]  
**CC:** Rameres, Jewel (CRT) [(b)(6)]; Rosenberg, Mary E. (CRT) [(b)(6)]; Song, Harin C. (CRT) [(b)(6)]; Lott, Jasmin (CRT) [(b)(6)]; Reid, Arielle (CRT) [(b)(6)]; Tucker, James T. (CRT) [(b)(6)]; Muench, Kevin (CRT) [(b)(6)]; Bonilla, German (CRT) [(b)(6)]; Hyatte, Joi (CRT) [(b)(6)]; Wake, Brittany (CRT) [(b)(6)]; Gupta, Kamran (CRT) [(b)(6)]; Bruzzone, Callie (CRT) [(b)(6)]  
**Subject:** RE: Questions about NVRA project  
**Attachments:** 7-10-25 California NVRA Final .docx

All,

I have attached the final Word copy of the California letter.

I also wanted to let you know that the information sharing agreement request between CRT and SAVE (Department of Homeland Security) is now with our Admin staff [(b)(5)]

[(b)(5)]

Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)  
**Sent:** Thursday, July 10, 2025 2:43 PM  
**To:** Shikari, Roshni (CRT) <[(b)(6)]>  
**Cc:** Rameres, Jewel (CRT) <[(b)(6)]>; Rosenberg, Mary E. (CRT) <[(b)(6)]>; Song, Harin C. (CRT) <[(b)(6)]>; Lott, Jasmin (CRT) <[(b)(6)]>; Reid, Arielle (CRT) <[(b)(6)]>; Tucker, James T. (CRT) <[(b)(6)]>; Muench, Kevin (CRT) <[(b)(6)]>; Bonilla, German (CRT) <[(b)(6)]>; Hyatte, Joi (CRT) <[(b)(6)]>; Wake, Brittany (CRT) <[(b)(6)]>; Gupta, Kamran (CRT) <[(b)(6)]>; Bruzzone, Callie (CRT) <[(b)(6)]>  
**Subject:** RE: Questions about NVRA project

Thanks, Roshni. [(b)(5)]

[(b)(5)]

I hope that is helpful. Thanks,

Tim

---

**From:** Shikari, Roshni (CRT) <[(b)(6)]>  
**Sent:** Thursday, July 10, 2025 1:54 PM  
**To:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Cc:** Rameres, Jewel (CRT) <[(b)(6)]>; Rosenberg, Mary E. (CRT) <[(b)(6)]>; Song, Harin C. (CRT) <[(b)(6)]>; Lott, Jasmin (CRT) <[(b)(6)]>; Reid, Arielle (CRT) <[(b)(6)]>; Tucker, James T. (CRT) <[(b)(6)]>; Muench, Kevin (CRT) <[(b)(6)]>; Bonilla, German (CRT) <[(b)(6)]>; Hyatte, Joi (CRT) <[(b)(6)]>

(b)(6) Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT)  
<(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>

**Subject:** RE: Questions about NVRA project

Thank you, Tim, that's helpful.

A few follow-up questions:

(b)(5)

Thank you.

Best,

Roshni

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>

**Sent:** Thursday, July 10, 2025 11:22 AM

**To:** Shikari, Roshni (CRT) <(b)(6)>

**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>;

Song, Harin C. (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT)

<(b)(6)>; Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT)

<(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT)

<(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT)

<(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>

**Subject:** RE: Questions about NVRA project

Hi Roshni,

(b)(5)

(b)(5) let me know if you

have any questions. Thanks,

Tim

---

**From:** Shikari, Roshni (CRT) <(b)(6)>

**Sent:** Thursday, July 10, 2025 10:22 AM

**To:** Mellett, Timothy F (CRT) <(b)(6)>

**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>;

Song, Harin C. (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT)

<(b)(6)>; Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT)

<(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT)

<(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT)

<(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>

**Subject:** RE: Questions about NVRA project

Tim,

(b)(5)

Can we meet to discuss?

(b)(5)

Best,

Roshni

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Thursday, July 10, 2025 7:04 AM  
**To:** Bruzzone, Callie (CRT) <(b)(6)>; Shikari, Roshni (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>;  
Song, Harin C. (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT)  
<(b)(6)>; Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT)  
<(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT)  
<(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT)  
<(b)(6)>  
**Subject:** RE: Questions about NVRA project

All,

I have attached the latest draft of the model letter. Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)  
**Sent:** Wednesday, July 9, 2025 5:33 PM  
**To:** Bruzzone, Callie (CRT) <(b)(6)>; Shikari, Roshni (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>;  
Song, Harin C. (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT)  
<(b)(6)>; Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT)  
<(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT)  
<(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT)  
<(b)(6)>  
**Subject:** RE: Questions about NVRA project

All,

We have been provided a list of the letters that need to be out Friday versus early next week.

(b)(5)

Please let me know if there is an issue with getting these letters out.

Everything else can go out next week. The goal is to have all the letters for the assigned jurisdictions sent by no later than Tuesday, July 15. (b)(5)

I will also be sending out a revised version of the model letter based on the feedback I have received. FYI, Callie is correct about (b)(5)

(b)(5)

(b)(5) Thanks,

Tim

**From:** Mellett, Timothy F (CRT)

**Sent:** Wednesday, July 9, 2025 10:26 AM

**To:** Bruzzone, Callie (CRT) <(b)(6)>; Shikari, Roshni (CRT) <(b)(6)>

**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>;

Song, Harin C. (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT)

<(b)(6)>; Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT)

<(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT)

<(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT)

<(b)(6)>

**Subject:** RE: Questions about NVRA project

Thanks, Callie. Let's discuss the timeframe at the meeting. My understanding from Michael Gates is that the meeting will be shorter than normal so we can discuss the NVRA issues after that.

**From:** Bruzzone, Callie (CRT) <(b)(6)>

**Sent:** Wednesday, July 9, 2025 10:23 AM

**To:** Mellett, Timothy F (CRT) <(b)(6)>; Shikari, Roshni (CRT) <(b)(6)>

**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>;

Song, Harin C. (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT)

<(b)(6)>; Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT)

<(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT)

<(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT)

<(b)(6)>

**Subject:** RE: Questions about NVRA project

Thanks, Tim! Quick question for you that we can discuss at the meeting if you prefer, but that I wanted to put on your radar. (b)(5)

(b)(5)

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Wednesday, July 9, 2025 7:17 AM  
**To:** Shikari, Roshni (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT) <(b)(6)>  
**Subject:** RE: Questions about NVRA project

All,

I have attached a model letter that will need to be tailored to your specific circumstances. As noted in the draft, we will be adding a paragraph about how we want to receive the data. Happy to discuss more at today's meeting. Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)  
**Sent:** Tuesday, July 8, 2025 5:37 PM  
**To:** Shikari, Roshni (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Gupta, Kamran (CRT) <(b)(6)>  
**Subject:** RE: Questions about NVRA project

Thanks, Roshni. I am hoping to be able to answer questions at the 11:45 meeting tomorrow, but we can also set up a separate time if we think that works better. I think the 11:45 meeting will be NVRA Project focused. I am attaching a spreadsheet that Kam did for the counties limited to the questions that we care about. Later tonight, I am going to send you a model letter and then have a couple of suggested paragraphs based on potential issues that I am seeing.

Thanks,

Tim

---

**From:** Shikari, Roshni (CRT) <(b)(6)>  
**Sent:** Tuesday, July 8, 2025 4:08 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>  
**Subject:** Questions about NVRA project

Hi Tim,

Jewel and I have started digging into the EAVS data for our assigned states, and I am realizing that I have a lot of questions. Some specific to our states, but a lot that are more broad about the overall process—so I am copying everyone in case it makes sense to meet as a bigger group.

To preview,

(b)(5)

**(b)(5)**

Could we meet to discuss sometime in the next few days?

Best,

Roshni Shikari  
Trial Attorney  
Housing and Civil Enforcement Section  
Civil Rights Division, U.S. Department of Justice

(b)(6)

(b)(6) (mobile)

**From:** Shikari, Roshni (CRT); (b)(6)  
(b)(6)  
**Sent:** 7/10/2025 5:55:44 PM  
**To:** Daniel, Tamica (CRT) [(b)(6)]  
**Subject:** FW: Questions about NVRA project

**From:** Shikari, Roshni (CRT)  
**Sent:** Thursday, July 10, 2025 1:54 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>;  
Song, Harin C. (CRT) [(b)(6)]; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT)  
(b)(6) Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT)  
<(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT)  
(b)(6) Wake, Brittany (CRT) [(b)(6)]; Gupta, Kamran (CRT)  
<(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>  
**Subject:** RE: Questions about NVRA project

**CREW v. DOJ - CRT - 000807-000812**

**duplicated in**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**From:** Shikari, Roshni (CRT) [(b)(6)]  
**Sent:** 7/10/2025 3:27:35 PM  
**To:** Mellett, Timothy F (CRT) [(b)(6)]  
**CC:** Rameres, Jewel (CRT) [(b)(6)]; Rosenberg, Mary E. (CRT) [(b)(6)]; Song, Harin C. (CRT) [(b)(6)]; Lott, Jasmin (CRT) [(b)(6)]; Reid, Arielle (CRT) [(b)(6)]; Tucker, James T. (CRT) [(b)(6)]; Muench, Kevin (CRT) [(b)(6)]; Bonilla, German (CRT) [(b)(6)]; Hyatte, Joi (CRT) [(b)(6)]; Wake, Brittany (CRT) [(b)(6)]; Gupta, Kamran (CRT) [(b)(6)]; Bruzzone, Callie (CRT) [(b)(6)]  
**Subject:** Re: Questions about NVRA project

Get [Outlook for iOS](#)

**duplicate in**

CREW v. DOJ - CRT - 000807-000812

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

**duplicate in**

**CREW v. DOJ - CRT - 000807-000812**

---

**From:** Riordan, Maureen (CRT); (b)(6)  
(b)(6)

**Sent:** 7/10/2025 8:52:26 PM

**To:** Mellett, Timothy F (CRT); (b)(6)

**Subject:** Insert Agency Name - SAVE Agency Registration Checklist MG 7 9 25

**Attachments:** Insert Agency Name - SAVE Agency Registration Checklist MG 7 9 25.docx; SAVE-MOA-Voter-Reg--List-Maint-Template 7 8 25.pdf

**DUPLICATE.**

**CREW v. DOJ - CRT - 000761-000766**

**(b)(5)**

**(b)(5)**

**EO 14248 Election Integrity:**

**1) Status of HAVA requests for state voter lists (including states requested, responses received, any pending legal action to compel release)**

- HAVA requests have been sent to 8 states: Colorado, Minnesota, Nevada, New Hampshire, New York, Pennsylvania, Wisconsin, and Wyoming. The states have been given 30 days to respond to the HAVA requests. DOJ will sue states that do not respond to compel release of the voter lists. The status of each request is summarized in the table below:

<b>State</b>	<b>Date of Request</b>	<b>Response Due</b>	<b>Response Status</b>
Colorado	May 25		<b>(b)(5)</b>

			<b>(b)(5)</b>
Minnesota	June 25	July 25	Awaiting response
Nevada	June 25	July 25	Awaiting Response
New Hampshire	June 25	July 25	Awaiting response
New York	June 30	July 30	Awaiting Response
Pennsylvania	June 23*	July 23	Awaiting Response
Wisconsin	June 17	Received	<b>(b)(5)</b>
Wyoming	June 25	July 25	

**(b)(5)**

**(b)(5)**

**4) Status of DOJ agreement with DHS to use SAVE system**

- On July 1, 2025, DOJ entered into an agreement with DHS to use SAVE. Pursuant to the agreement, DOJ will send its list to SAVE for review.

**(b)(5)**

(b)(5)

**8) Any cases filed (like the Orange County, CA case) and any updates on that litigation**

- On June 10, 2025, the United States filed a response in support of petitioner’s request for rehearing *en banc* in *Mi Familia v. Petersen*, (9th Cir. No. 24-3188). The brief argues that the State of Arizona did not violate the Voting Rights Act Materiality Provision when required birthplace information on its state voter registration form and the 9th Circuit erred when it found otherwise.
- On May 27, 2025, CRT filed a complaint against the North Carolina Board of Elections (E.D. N.C. No. 5:25-cv-00283) alleging violations of the Help America Vote Act (HAVA). HAVA requires that when registering voters for federal elections, the State first obtain the registrants Driver’s License number, if the registrant does not have a valid driver’s license the state must request the last four digits of the registrants Social Security number. Until recently, the State registered voters without this information. On June 2, 2025, the North Carolina Alliance for Retired Americans filed a motion to intervene.
- On June 6, 2025, CRT filed a statement of interest in *Judicial Watch, Inc., v. Read* (D. Ore. No. 24-cv-01783) arguing that Oregon has shirked its voter roll maintenance duties listed in Section 8(i) of the NVRA. Under the NVRA, the state holds responsibility for Section 8(i)’s requirements and cannot delegate its responsibility. Further, the NVRA requires Oregon to maintain and make available for public inspection certain records under Section 8(i). Oral argument on a motion to dismiss in the case is set for June 18, 2025.

On June 4, 2025, CRT sent a letter to the Wisconsin Elections Commission regarding its failure to provide a complaint process or hearing for Wisconsin voters, in violation of the HAVA. The letter states that the Wisconsin Elections Commission failed to meet HAVA’s requirement of a state-based administrative complaint procedure. Compliance with all federal elections laws is mandatory, and the receipt of federal funds under HAVA is conditioned on compliance with the Act. This will be a two step process for enforcement. DOJ CRT has referred the matter to EAC for review for an audit process.

- One July 2 CRT filed a Statement of Interest defending Wyoming’s legislation requiring DPOC for voter registration. Marc Elias filed a lawsuit requesting a PI against the Wyoming statute.
- On July 8, 2025, CRT filed a Statement of Interest in *Judicial Watch v. Illinois State Board of Elections* (N.D. Ill.). Defining what is required under Sec. 8 of the NVRA for a state to conduct a program that makes a reasonable effort to remove ineligible voters from the statewide voter registration list.

**Additional Questions:**

**(b)(5)**

**(b)(5)**

•

**(b)(5)**

**(b)(5)**

**(b)(5)**

- CIV has taken the lead from CRT in defending the President’s executive order from multiple challenges in federal court in *Lulac v. EOP* (D. D.C. No. 1:25-cv-00955). Answer was due by June 7, 2025; Meet & Confer Statement due by June 13, 2025; Initial Scheduling Conference set for June 18, 2025, before Judge Colleen Kollar-Kotelly. On April 24, 2025, the court entered an order in *Lulac v. EOP* granting the plaintiffs’ request in part and denying in part. The preliminary injunction was granted in part as to Executive Order Sections 2(a) and 2(d)), and denied in part as to EO Sections 2(b), 7(a), 7(b). (b)(5)

(b)(5) In *California v. Trump* (D. Mass. No: 1:25-cv-10810), the preliminary injunction was granted in part as to Executive Order Sections 2(a), 2(d), 3(d), 7(a) and 7(b).
- On June 10, 2025, the United States filed a response in support of petitioner’s request for rehearing *en banc* in *Mi Familia v. Petersen*, (9th Cir. No. 24-3188). The brief argues that the State of Arizona did not violate the Voting Rights Act Materiality Provision when required birthplace information on its state voter registration form and the 9th Circuit erred when it found otherwise.
- On May 27, 2025, CRT filed a complaint against the North Carolina Board of Elections (E.D. N.C. No. 5:25-cv-00283) alleging violations of the Help America Vote Act (HAVA). HAVA requires that when registering voters for federal elections, the State first obtain the registrants Driver’s License number, if the registrant does not have a valid driver’s license the state must request the last four digits of the registrants Social Security number. Until recently, the State registered voters without this information. On June 2, 2025, the North Carolina Alliance for Retired Americans filed a motion to intervene.
- On June 6, 2025, CRT filed a statement of interest in *Judicial Watch, Inc., v. Read* (D. Ore. No. 24-cv-01783) arguing that Oregon has shirked its voter roll maintenance duties listed in Section 8(i) of the NVRA. Under the NVRA, the state holds responsibility for Section 8(i)’s requirements and cannot delegate its responsibility. Further, the NVRA requires Oregon to maintain and make available for public inspection certain records under Section 8(i). Oral argument on a motion to dismiss in the case is set for June 18, 2025.
- On June 4, 2025, CRT sent a letter to the Wisconsin Elections Commission regarding its failure to provide a complaint process or hearing for Wisconsin voters, in violation of the HAVA. The letter states that the Wisconsin Elections Commission failed to meet HAVA’s requirement of a state-based administrative complaint procedure. Compliance with all federal elections laws is mandatory, and the receipt of federal funds under HAVA is conditioned on compliance with the Act.
- One July 2 CRT filed a Statement of Interest defending Wyoming’s legislation requiring DPOC for voter registration. Marc Elias filed a lawsuit requesting a PI against the Wyoming statute.
- On July 8, 2025, CRT filed a Statement of Interest in *Judicial Watch v. Illinois State Board of Elections* (N.D. Ill.). Defining what is required under Sec. 8 of the NVRA for a state to conduct a program that makes a reasonable effort to remove ineligible voters from the statewide voter registration list.

- Completed MOU requesting access to the SAVE database to facilitate comparing statewide voter rolls against the database for ineligible non-citizens.

**DUPLICATE.**

**CREW v. DOJ - CRT - 000832-000836**

**DOCUMENT WITHHELD IN FULL UNDER FOIA EXEMPTION B(6).**

**DUPLICATE.**

CREW v. DOJ - CRT - 000832-000836

**From:** Song, Harin C. (CRT) (b)(6)  
**Sent:** 7/30/2025 2:13:23 PM  
**To:** Bruzzone, Callie (CRT) (b)(6); Rosenberg, Mary E. (CRT) (b)(6); Lott, Jasmin (CRT) (b)(6); Shikari, Roshni (CRT) (b)(6); Reid, Arielle (CRT) (b)(6)  
**Subject:** RE: Virginia Letter Response

(b)(5)

(b)(5)

Thank you.

Best,  
Harin

---

**From:** Bruzzone, Callie (CRT) (b)(6) >  
**Sent:** Wednesday, July 30, 2025 10:06 AM  
**To:** Rosenberg, Mary E. (CRT) (b)(6); Song, Harin C. (CRT) (b)(6); Lott, Jasmin (CRT) (b)(6); Shikari, Roshni (CRT) (b)(6); Reid, Arielle (CRT) (b)(6)  
**Subject:** RE: Virginia Letter Response

I'd be curious to know if any of them have (b)(5)

---

**From:** Rosenberg, Mary E. (CRT) (b)(6) >  
**Sent:** Wednesday, July 30, 2025 9:45 AM  
**To:** Song, Harin C. (CRT) (b)(6); Lott, Jasmin (CRT) (b)(6); Shikari, Roshni (CRT) (b)(6); Reid, Arielle (CRT) (b)(6); Bruzzone, Callie (CRT) (b)(6)  
**Subject:** RE: Virginia Letter Response

I'm going to try to look at those cases today after our MG meeting.

---

**From:** Song, Harin C. (CRT) (b)(6) >  
**Sent:** Wednesday, July 30, 2025 9:43 AM  
**To:** Rosenberg, Mary E. (CRT) (b)(6); Lott, Jasmin (CRT) (b)(6); Shikari, Roshni (CRT) (b)(6); Reid, Arielle (CRT) (b)(6); Bruzzone, Callie (CRT) (b)(6)  
**Subject:** RE: Virginia Letter Response

Thank you, Mary.

Best,  
Harin

---

**From:** Rosenberg, Mary E. (CRT) (b)(6) >  
**Sent:** Wednesday, July 30, 2025 8:49 AM  
**To:** Lott, Jasmin (CRT) (b)(6); Shikari, Roshni (CRT) (b)(6); Reid, Arielle (CRT) (b)(6); Song, Harin C. (CRT) (b)(6); Bruzzone, Callie (CRT) (b)(6)

(b)(6)

**Subject:** Fw: Virginia Letter Response

FYI

Get [Outlook for iOS](#)

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>

**Sent:** Wednesday, July 30, 2025 8:11:35 AM

**To:** Rosenberg, Mary E. (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>

**Subject:** FW: Virginia Letter Response

FYI on Virginia's response date be extended to 8/8.

---

**From:** Gates, Michael (CRT) (b)(6)

**Sent:** Tuesday, July 29, 2025 7:34 PM

**To:** Mellett, Timothy F (CRT) <(b)(6)>; Riordan, Maureen (CRT) (b)(6)

**Subject:** Re: Virginia Letter Response

Boom! That's awesome! Thank you.

We should consider: (b)(5)

**Michael E. Gates**

Deputy Assistant Attorney General

Civil Rights Division, U.S. Department of Justice

Cell: (b)(6)

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>

**Sent:** Tuesday, July 29, 2025 5:32:07 PM

**To:** Gates, Michael (CRT) (b)(6); Riordan, Maureen (CRT) <(b)(6)>

**Subject:** RE: Virginia Letter Response

(b)(5)

(b)(5)

---

**From:** Gates, Michael (CRT) <(b)(6)>  
**Sent:** Tuesday, July 29, 2025 4:56 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>; Riordan, Maureen (CRT) (b)(6)  
**Subject:** FW: Virginia Letter Response

Tim, I granted them an extension to Aug 8<sup>th</sup> because they called and didn't understand how to overcome their state law that prohibits such a list sharing with the DOJ. I explained to them that under the NVRA's public disclosure requirement, list disclosure is required. They want to work with us and said if we can send the case law authority that has interpreted the NVRA's mandatory disclosure requirement to include the voter registration lists, that would be perfect for them.

We should probably have this handy anyway because I am sure more states are going to assert they do not have to disclose – not realizing the NVRA means list disclosure too.

Can you get me a blurb with authorities on this? I know Maureen knows this by memory. If she is available maybe she can help but I also know she is out until Monday. Thank you.

**Michael E. Gates**  
Deputy Assistant Attorney General  
Civil Rights Division, U.S. Department of Justice  
Cell: (b)(6)

---

**From:** Fisher, Lindsay (GOV) <(b)(6)>  
**Sent:** Tuesday, July 29, 2025 4:50 PM  
**To:** Gates, Michael (CRT) (b)(6)  
**Cc:** Cullen, Richard (GOV) (b)(6); Beals, Susan (ELECT) (b)(6)  
**Subject:** [EXTERNAL] Virginia Letter Response

Hello Michael,

Thank you for your time this afternoon. Per our discussion, on behalf of the Commonwealth of Virginia, we are requesting an extension to respond to your July 15 letter.

Sincerely,  
Lindsay

Deputy Chief of Staff and Director of Policy & Legislative Affairs  
Office of Governor Glenn Youngkin

(b)(6)

(b)(6)

[@governor.virginia.gov](mailto:____@governor.virginia.gov)

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** 8/11/2025 1:18:30 PM  
**To:** Tucker, James T. (CRT) <(b)(6)>  
**Subject:** FW: Records/Privacy Act  
**Attachments:** Civil Rights Division - Records and Information Management Handbook.pdf; Records policy - Records Requirements Guide - FINALIZED - 11-23-21.pdf

Please add a slide on Privacy Act and RIM. Thanks!

---

**From:** Mellett, Timothy F (CRT)  
**Sent:** Thursday, August 7, 2025 1:41 PM  
**To:** Percival, Allan (CRT) <(b)(6)>  
**Subject:** RE: Records/Privacy Act

Thanks, Allan. Much appreciated.

Tim

---

**From:** Percival, Allan (CRT) <(b)(6)>  
**Sent:** Thursday, August 7, 2025 11:30 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Subject:** RE: Records/Privacy Act

Hello Timothy,

There currently isn't really much more than what is listed in the documents attached. However, three things that I can pass on to you, to then pass onto others is:

- #1. keep your P Drive records' folders as neat and organized as possible.
- #2. Do not duplicate records. Since we are now in the age of electronic records, individuals may get tempted to copy and paste everything but that is discouraged. It is better for multiple individuals to work from one central folder.
- #3. Everything is not a record. Again, in the age of electronic records everything should not be kept at the conclusion of a case. Only substantive materials should be maintained at the end of the case. I can't tell you what is considered substantive. That is better left to your section's SME (subject matter experts).

Hope that helps...

Allan

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Tuesday, August 5, 2025 2:43 PM  
**To:** Percival, Allan (CRT) <(b)(6)>  
**Subject:** Records/Privacy Act

Hi Allan,

We are collecting voter registration list data from various states that contains PII. We have it locked down on the P Drive with Lit Support and the attorneys who are working with the data having access to those folders for their

investigations. I wanted to make sure that everyone knows their obligations in working with the data. I have the attached regarding Records obligations of which I am aware. Is there anything else I should be sharing with folks regarding their obligations? I'm also happy to chat about this. Thanks,

Tim Mellett

Deputy Chief, Voting Section

(b)(6)

**Civil Rights Division (CRT)  
Records and Information Management (RIM)  
Handbook**



Last Updated: 11/09/2021

CREW v. DOJ – CRT – 000846

# Table of Contents

- Introduction to Records and Information Management at CRT ..... 3
- Select Records Management Authorities..... 4
- The Basics of Records and Information Management (RIM) ..... 5
- Record Control (**retention**) Schedules (RCS) ..... 9
- General Records Schedules (GRS) ..... 10
- Record Holding Locations ..... 10
- Records and Information Management (RIM) Definitions ..... 12

## Introduction to Records and Information Management at CRT

Effective **Records and Information Management** (RIM) at the Department of Justice (DOJ) and its Civil Rights Division (CRT, Division, or Component) are the framework of our mission.

Ensuring that CRT has an effective RIM Program falls under the purview of the Division's **RIM Program Team**, as lead by CRT's **Records Manager** (RM or RIM Specialist). However, proper RIM is the responsibility of all CRT staff. As government employees, all personnel and each office, must adhere to DOJ's and CRT's established RIM policies and practices. To help you in this regard, this handbook provides information on the basics of RIM. It also highlights the responsibilities for government staff, CRT's RIM Program Team, and our federal contractors. **Please note** that these responsibilities are further elaborated upon, and documented, within [the Division's overarching RIM Policy](#), including its sub-policies. They are not extensively outlined or fully defined herein. These directives meet and/or exceed the minimum RIM requirements established by Federal law and or regulations.

This handbook will help you further understand those regulations by outlining the basics of RIM. Subjects covered in this handbook will include, but are not limited to:

- myriad RIM-specific topics, AND
- the 3 phases of **the Records Lifecycle** (e.g., receipt/creation, maintenance/use, and **disposition**), AND
- litigation holds and freezes, AND
- the differences between the **National Archives and Records Administration's** (NARA) [General Records Schedules](#) (GRS), versus the [Records Control \(retention\) Schedules](#) (RCS), which are specific to DOJ and our Component.

CRT government staff and contractors are mandated under Federal law to preserve **Federal Records** pursuant to [44 U.S.C. Chapter 31](#). Federal records (or **official records**) provide evidence of the business activities of our Component. As a result, CRT has myriad duties and obligations when it comes to RIM. For your awareness they include (but are not limited to) the preservation and proper documentation of CRT's functions, policies, decisions, procedures and **essential records** transactions. All of which are paramount towards ensuring our RIM Program is effective, and fully adheres to the **Federal Records Act**.

Fulfilling these responsibilities not only fosters an effective RIM Program, but it also reduces the likelihood of negative legal consequences for our Division, while saving fiscal dollars for CRT, and the American people. In turn, proper RIM provides better access to data when it's needed or required. Moreover, [as our Division has moved to fully-functional electronic records](#), proper RIM is critical to ensure the reliability, accessibility and validity of **electronic records governance/management** (ERM).

If you have any questions on this handbook and or any other RIM questions, please feel free to reach out to any member of our RIM Program Team. We would be happy to clarify this handbook or any other RIM topic for you.

## Select Records Management Authorities (not an exhaustive list)

CRT Policy on Creating, Maintaining, and Disposition of Official Records

CRT Records Requirements Guide for the Creation, Maintenance, and Disposition of Enforcement Records (RRG)

Disposal of Records (44 U.S.C. Chapter 33)

Freedom of Information Act (5 U.S.C.552)

M-19-21: Transition to Electronic Records

NARA: National Archives and Records Administration and the Act of 1984

The Privacy Act (5 U.S.C. 552a)

Recordkeeping for Litigation Case Files (DOJ Policy Statement 0801.06)

Records and Information Management (DOJ Order 0801)

Records Management (36 CFR Subchapter B)

Records Management by Federal Agencies (44 U.S.C. Chapter 31)

Record Schedule Requirements (36 CFR 1225.10)

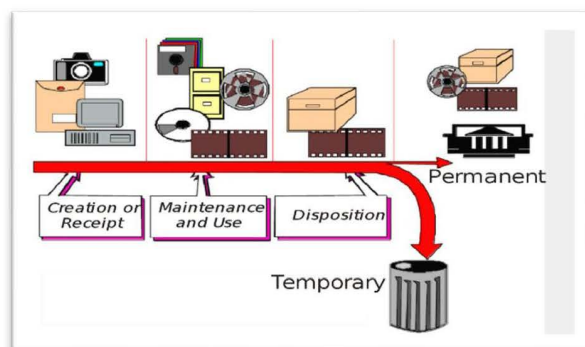
Removal of and Access to Department of Justice Information (DOJ Policy Statement 0801.02)

## The Basics of Records and Information Management (RIM)

### What is Records and Information Management (RIM)?

RIM is defined as the field of managing and the responsibilities for the systematic control of the receipt/creation, maintenance/use, and disposition of federal records. In short, the Records Lifecycle. The records lifecycle is the period of time that records are in the custody of federal agencies. As noted above, it consists of three stages:

- Creation or receipt
- Maintenance and use
- Disposition
  - **Temporary** Federal Records
  - **Permanent** Federal Records



### What is a record?

1. Is created or received in any medium by any agency of the U.S. Government, pursuant to law, or in the transaction of business.
2. Is preserved, or appropriate for preservation, because it provides evidence of an Agency's organization, functions, decisions, procedures and transactions. ([44 U.S.C. 3301](#))

For the statutory definition of a federal record see [44 U.S. Code § 3301](#).

### The Records Lifecycle elaborated.

1. Creation or Receipt: Any information created, received as evidence and/or information, by an organization or person, in pursuance of legal obligations, or in the transaction of business.
2. Maintenance and Use: Any activity involving the location of records of a federal agency. This includes the storage, retrieval, and handling of records kept at office locations within physical cabinets, digital repositories (*e.g.*, shared drives, cloud, etc.); the processing of mail; the selection and utilization of equipment; and supplies associated with records and copying.
3. Disposition: Legal actions regarding Federal records as defined by the governing retention schedules. Disposition only occurs **after** the time-frames outlined in the governing records schedules and secondarily when the federal records are no longer needed to conduct current agency business. For CRT's purposes Disposition actions include:

- Transfer of records to NARA's **Federal Records Center (FRC)**.
- **Accession** (*e.g.*, transfer) of **permanent** records directly to NARA's **Archives**.
- **Disposal** of temporary records no longer needed to conduct agency business, usually by destruction or deletion.

### **How do I identify the records of my office?**

Items and documentations that tell a story of the agency are likely Federal records. Future generations will look upon these records to understand the world we live in today. Examples below provide informative materials that tell the stories of CRT and provide good examples of federal records (*e.g.*, **file series**) that will require **file plans** as well as **record inventories**.

Examples of CRT documents that are likely to be records under the Federal Records Act:

- Business records: litigation case files, correspondence, agreements, studies
- Action records: FOIA requests, correspondence, invoices, formal responses to requests  
Records that document DOJ activities: calendars, meeting minutes, reports
- Records mandated by statutes or regulations: case files, decisions
- Records of financial or legal claims: litigation case files, contracts, personnel and payroll

### **What are Personal Records and Non-Records?**

Personal papers are documentary materials belonging to an individual that are not used to conduct CRT business. They relate solely to an individual's personal and private affairs or are used exclusively for that individual's convenience. They may refer to or comment on the subject matter of agency business, provided they are not used to conduct that business. In contrast to both records and **non-record** materials, personal papers are not Government-owned. Certain documentary materials are clearly personal and may readily be identified and claimed as such. Categories of personal papers include:

- Materials accumulated by an individual before joining Government service that are not later used to conduct Government business. Examples include previous work files, political materials, and reference files.
- Materials brought into or accumulated in the office that are not used to conduct agency business and that relate solely to an individual's family matters, outside business pursuits, professional activities, or private political associations. Examples include family and personal correspondence, volunteer and community service records, literature from professional organizations, and manuscripts and drafts of articles and books.
- Work-related materials, such as diaries, journals, notes, personal calendars, and appointment schedules, that are not prepared, received, or used in the process of transacting agency business.

Although these materials contain work-related information, they are personal papers if they are claimed as such and serve only the individual's own purpose (e.g., as reminders and personal observations about work-related and other topics). This category is the most difficult to distinguish from agency records because of its work-related content.

Non-record materials are US Government-owned documentary materials excluded from the legal definition of records ([44 U.S.C. 3301](#)), either by failing to meet the general conditions of record status already described or by falling under one of three specific categories:

- Extra copies of documents preserved only for convenience of reference.
- Stocks of publications and of processed documents. The DOJ needs, however, to create and maintain record sets of processed documents and of publications, including annual and special reports, special studies, brochures, pamphlets, books, handbooks, manuals, posters, and maps.
- Library and museum material made or acquired and preserved solely for reference or exhibition purposes.
- Information copies of correspondence, directives, forms, and other documents on which no administrative action is recorded or taken.
- Routing slips and transmittal sheets adding no information to that contained in the transmitted material.
- Tickler, follow up, or suspense copies of correspondence, provided they are extra copies of the originals.
- Duplicate copies of documents maintained in the same file.
- Extra copies of printed or processed materials for which complete record sets exist, such as current and superseded manuals maintained outside the office responsible for maintaining the record set.
- Catalogs, trade journals, and other publications that are received from other Government agencies, commercial firms, or private institutions and that require no action and are not part of a case on which action is taken.
- Physical exhibits, artifacts, and other material objects lacking evidential value.

### **What is the difference between a litigation holds and a frozen record?**

A **litigation hold** refers to a temporary freeze of destruction of certain record(s) due to a legal action involving the agency. The hold suspends the normal disposition cycle of the records mentioned in the hold notice to prevent their early/premature disposal.

A **frozen record** is a record temporarily suspended because of special circumstances that alter the administrative, legal, or fiscal value of the records.

### **Who is responsible for RIM?**

The National Archives and Records Administration (NARA) is an independent agency that oversees the management of all Federal records. Pursuant to the National Archives and Records Administration Act of 1984, both NARA and the General Services Administration provide overseeing authority to federal agencies by providing guidance on management and disposition of records to economic efficiencies of records management.

However, each federal agency is explicitly responsible for managing its records. Directors of each agency have specific legal requirements for their RIM Programs. An agency's responsibilities include:

- Making and preserving records that contain adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential records transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the Government and of persons directly affected by the agency's activities ([44 U.S.C. 3101](#))
- Establishing and maintaining an active, continuing program for the economical and efficient management of the records of the agency ([44 U.S.C. 3102](#))
- Establishing safeguards against the **removal** or loss of records and making requirements and penalties known to agency officials and employees ([44 U.S.C. 3105](#))
- Notifying the Archivist of any actual, impending, or threatened unlawful destruction of records and assisting in their recovery ([44 U.S.C. 3106](#))

### **Who else is responsible for RIM?**

YOU ARE. All Federal Employees (*e.g.*, government staff and contractors) also have a legal responsibility for RIM. Below are the basic obligations for all federal employees.

1. Create records, record decisions, and actions taken. Document activities for which you are responsible.
2. Preserve records and ensure directories and files and its materials are easily referenced and trackable. Ensure that records are stored in a safe and efficient way to retrieve information when necessary. Separate official records and non-records accordingly.
3. Maintain records according to CRT's RIM policies and procedures. Protect records from loss, damage, improper destruction, and unauthorized disclosure.
4. Carry out the disposition of records under your control in accordance with agency records schedules and Federal regulations.

## What are the benefits of managing my records?

Good records management:

- Increases efficiency and productivity in your office: accurate and complete documentation, timely responses and retrieval
- Protects records from inappropriate and unauthorized access and disclosure
- Safeguards essential records and provides continuity of operations in the event of a disaster
- Ensures compliance with statutory and regulatory requirements
- Protects the rights of the government and the citizens of the United States

## What are the risks of poor management of records?

- Increased difficulty or inability to complete your work and meet your responsibilities
- Difficulties in fulfilling FOIA or litigation requests
- Criminal or civil penalties, fines and/or imprisonment for:
  - The unlawful removal or destruction of federal records ([18 U.S.C. 2071](#))
  - The unlawful disclosure of national security information ([18 U.S.C. 793](#), [794](#), & [798](#))
  - The improper handling of records containing other information exempt under the Freedom of Information Act ([5 U.S.C.552](#)), the Privacy Act ([5 U.S.C. 552a](#)), and other information to which access is restricted by law.

## Record Control (retention) Schedules (RCS)

Record Control (or retention) Schedules (RCS) provide a systematic guide to instruct federal employees on how to legally dispose of temporary records or properly transfer permanent records to NARA. A records schedule establishes CRT's official policy for records and information retention and disposal. The schedule provides mandatory instructions on what to do with records and non-record documents when there is no longer a business need for them.

Each federal agency is required by statute ([36 CFR 1225.10](#)) to maintain a comprehensive records schedule. This comprehensive schedule is developed by combining NARA's **General Records Schedules** (containing disposal authority for records common to several or all agencies), with DOJ and CRT specific records retention items or record series.

RCS's are issued by the collaboration and approval of the Archivist, Departments Records Officer, Agency Records Officer, program managers and their respective teams. The average processing time for a newly formed RCS is 1 year. These types of schedules provide instructions

of disposition of mission-related records and/or agency-specific records that are unique to the agency.

## General Records Schedules (GRS)

General Records Schedules (GRS) are issued by the Archivist of the United States to provide disposition authorization for records common to several or all agencies of the Federal Government. They include records relating to civilian personnel, fiscal accounting, procurement, communications, printing, and other common functions, and certain non-textual records. They also include records relating to temporary commissions, boards, councils and committees. Such records are commonly referred to as administrative records that are common among all federal agencies. You may find the GRS authority by going to [this link](#).

## Record Holding Locations

### Active Records Unit (ARU)

The Active Records Unit (ARU), or file room, residing in your specific office area is one of several records units that are part of CRT's RIM Program. They are located amongst the offices of our staff, the ARU stores open litigation case files, **active records**, etc.

The ARU should serve as the central focus for most case file activities and concerns of the Division's litigating Sections. The ARU Technician responsible for the unit will create, shelve, and maintain the files; retrieve requested file; file properly identified documents into the appropriate case folders; enter all the needed location information into the automated tracking system; and receive, box, and ship closed case files, in cooperation with the RIM Program Team. Please contact your [Section's RIM POCs](#) (or **Records Liaisons/Custodians**) for additional information.

### Federal Record Centers (FRC)

The Federal Records Centers (FRC) are the current repository of federal records waiting for disposal (*i.e.*, temporary records), or accession to the Archives (*i.e.*, permanent records). All records follow their approved records retention schedules. Requests of records from the FRC should be coordinated through your Section's Primary RIM POC, and subsequently the RIM Program Team.

## Contact Information

Doug York  
Records Manager (RIM Specialist)  
Ph: 202-616-9397  
Cell: 202-598-3867  
[Douglas.York@usdoj.gov](mailto:Douglas.York@usdoj.gov)

Allan Percival  
RIM Program Team (Task Supervisor)  
Ph: 202-514-6428  
[Allan.Percival@usdoj.gov](mailto:Allan.Percival@usdoj.gov)

Martavious (Tay) Henderson  
RIM Program Team  
Ph: 202-305-2113  
[Martavious.Henderson@usdoj.gov](mailto:Martavious.Henderson@usdoj.gov)

Elsa Tesfamicael  
RIM Program Team  
Ph: 202-353-9330  
[Elsa.Tesfamicael@usdoj.gov](mailto:Elsa.Tesfamicael@usdoj.gov)

## Records and Information Management (RIM) Definitions

**Accession:** Accessioning is the process of transferring physical and legal custody of permanent records to the National Archives and Records Administration (NARA).

**Active Record:** An active record is a record needed to perform current operations, subject to frequent use, and usually located near the user.

**Archives:** NARA's Archives are the holding area for the permanent records of the Agency that are accessioned (transferred) to the National Archives and Records Administration (NARA).

**Disposal:** Disposal refers to the final actions taken regarding temporary records after they reach their Disposition Date. It normally means destruction of the records, either by deletion, recycling, or burning the records.

**Disposition Date:** Disposition Date, or Disposition, is the third and final stage of the records lifecycle. It means those actions taken regarding Federal records after they are no longer needed to conduct current agency business. Disposition includes destruction (temporary records) as well as other actions, such as the Accession or transfer of permanent records to NARA's Archives.

**Electronic Records Governance:** Electronic Records Governance, more commonly known as Electronic Records Management (ERM), establishes mechanisms to ensure coordination between CRT's Chief Information Officer (CIO), RIM Program Team, and Section RIM POCs, and regular coordination and collaboration between [Office of Records Management Policy](#) (ORMP), CRT's RIM Program Team, [Office of Information Technology and Cybersecurity](#) (OITC) leadership and Section RIM POCs (as needed). Within the Division, ERM also establishes cross-functional RIM Program Team/OITC working groups or teams. These teams collaboratively document and assess the legal and functional requirements for recordkeeping and work together to develop technical and policy approaches to meet those requirements. Any information that is recorded in a form that only a computer can process and that satisfies the definition of a record as defined in 44 USC 3301. For additional information on ERM, see [NARA's website](#).

**Essential Records:** Essential records (formerly known as vital records) are “[R]ecords an agency needs to meet operational responsibilities under national security emergencies or other emergency conditions (emergency operating records) or to protect the legal and financial rights of the Government and those affected by Government activities (legal and financial rights records).”

**Federal Records Center (FRC):** FRCs have safeguarded the nation's records since 1950. They are storage facilities that are fully compliant with regulations that protect records from fire, theft, pests, water damage, and natural disasters. For additional information on FRCs, see [NARA's website](#). For additional information on storage regulations, see [NARA's website](#).

**File Plans:** File plans are tools that CRT personnel can use to help manage records. They serve as tracking tools that list the different records maintained by a particular CRT office, where and how the records are stored, and how long they are to be kept. These RIM tools enable our staff

to identify different records categories, create directory/organizational structures, and prepare for future records dispositions. In addition, file plans must identify cut-off dates, essential records, file naming conventions, and implement other applicable RIM methods universal throughout the Division.

**File Series:** A file series is a group of records arranged together because they relate to a particular subject or function, they result from the same activity, they document a specific type of transaction, or they have some other type of relationship. File Series is sometimes referred to as a record series.

**Frozen Record:** Frozen records are records that are held temporarily for litigation, investigation, or audit purposes. They can only be destroyed or accessioned after the completion of a litigation, an investigation, or an audit (also known as a **Litigation Hold**).

**General Records Schedule (GRS):** The General Records Schedule (GRS) are created, updated, and issued by the Archivist of the United States. The GRS provides agencies with the disposition authorities that govern records that are common to several or all Federal Government agencies. For more information on the GRS, see [NARA's website](#).

**The National Archives and Records Administration (NARA):** NARA is the nation's record keeper. Of all documents and materials created in the course of business, conducted by the United States Federal government, only 1%-3% are important enough for legal or historical reasons that they are kept by NARA forever. For additional information see [NARA's website](#).

**Non-record:** Non-records are Federally-owned informational materials excluded from the legal definition of records or not meeting the requirements of the definition. Includes extra copies of documents kept only for convenience of reference, stocks of publications and of processed documents, and library or museum materials intended solely for reference or exhibition.

**Official Records:** Official Records (or **Federal Records**) are legally recognizable and judicially enforceable records, which establish some fact, policy, or institutional position or decision. They are subject to the records retention schedules (RCS) that govern them. Moreover, they are all documentary materials, regardless of physical form, that are made or received by an agency of the U.S. Government, under Federal law, or in connection with the transaction of public business. They must be preserved for an appropriate amount of time as evidence of agency activities, because of the value of the information they contain.

**Permanent Records:** Permanent Records are historically significant records that must be accessioned or transferred to NARA's Archives after expiration of the retention period. In general, any Federal record that has been determined by NARA to have sufficient value to warrant its preservation in the National Archives.

**Records and Information Management (RIM):** RIM is the planning, controlling, directing, organizing, training, promoting, and other records managerial activities related to the creation, maintenance, use, and disposition of records.

**Records Control/Retention Schedules (RCS):** RCSs are requests for disposition authority documents, via agency requests to NARA, submitted since 1973. Older items may have subsequently been superseded by more recent submissions. For DOJ and CRT specific RCSs, see [NARA's website](#).

**Records Inventory:** Complete and accurate survey of CRT's RIM Program that documents the records created, received, and used by a Section or Program office. It is the first step in creating a file plan.

**The Records Lifecycle:** The Records Lifecycle, or lifecycle, refers to the three-stage "life span" of a record. This encompasses creation/receipt, maintenance/use, and disposition (disposal, transfer, or accession).

**Records Manager (RIM Specialist):** CRT's Records Manager (RM) formulates RIM policies, performs strategic analysis and planning, conducts the RIM program's outreach, coordinates **training**, develops metrics, and ensures that sound RIM governance and accountability measures are in place. The RM also ensures compliance with Federal laws, regulations, and guidance (NARA and Departmental) and advises Division staff on any issues in this area. Additionally, the RM is familiar with CRT's goals, objectives, and priorities as a whole, and ensure that the RIM program supports the organization's mission and needs.

**Records Liaisons/Custodians (RIM POCs):** Records Liaisons/Custodians or RIM POCs are the first points of contact for each Section's or Branch's employees.

**Removal of and Access to DOJ Information:** DOJ Policy Statement 0801.02 (Removal of and Access to DOJ Information) establishes policy and procedures for removal of and access to Department of Justice records and information by transferring, departing, and former Department of Justice employees. For additional information see [ORMP's website](#).

**Retention:** Retention is the length of time a federal record must be kept (either in the office or at the FRC), because it is needed for ongoing business, in order to document an action, or for statutory reasons. It is often referred to as a retention period.

**Section RIM POCs:** Section RIM POCs (aka Records Liaisons or Records Custodians) are the Section personnel that have situational awareness and Section-level oversight of the Section's official records. Within their respective office they provide first-line RIM guidance for that particular office's personnel. They coordinate, or act as *liaisons* with the RIM Program Team, throughout the three stages of the Records Lifecycle, as well as with the Subject Matter Experts (SME) of the RCSs governing the Section's records. The most up-to-date list of RIM POCs, may always be found [here](#). For additional information and training on/for Records Liaisons, see [NARA's website](#).

**Temporary Records:** Temporary Records are records that are eligible for disposal/destruction after expiration of the retention period (i.e., three years after citizen correspondence is received).

**Training:** Training refers to RIM training that promotes awareness and compliance with federal recordkeeping requirements, as well as the Department's and Division's RIM policies and processes. RIM training must include annual basic training for all staff, and role-based RIM training for the RIM Program Team, Section RIM POCs, OITC staff, managers, and senior staff.



**CIVIL RIGHTS DIVISION**  
**Records Requirements Guide for the Creation, Maintenance, and**  
**Disposition of Enforcement Records**

---

*Issued November 23, 2021*

**I. Purpose and Scope**

This Records Requirements Guide for the Creation, Maintenance, and Disposition of Records (Guide or RRG) supplements and explains the Civil Rights Division’s (CRT or Division) Policy on the Creation, Maintenance, and Disposition of Enforcement Records. The RRG also explains the requirements of the Federal Records Act (FRA) and describes the records that must be included in the file of an enforcement<sup>1</sup> action to document the work of the Division. To support the Division’s transition to electronic records management as well as a “media neutral” records schedule, the RRG clarifies the Division’s commitment to managing enforcement-related information electronically, within standard folder and subfolder structures in each Section’s shared directory (S: drive), and Outlook email accounts. The RRG also provides guidance on the creation, maintenance, and disposition of records and replaces the Division’s former “print and retain” policy. The RRG complies with DOJ Policy Statement 0801.06 ([Recordkeeping For Litigation Case Files](#)) and applies to all CRT staff<sup>2</sup> who collectively share responsibility for CRT’s compliance with the FRA.

While an enforcement action is open, its accompanying files should contain all pertinent records. This includes paper documents, electronically stored information (ESI), and physical evidence needed by the staff working on the enforcement action. Additionally, this includes any records covered by independent preservation obligations, such as litigation holds, stipulations, Freedom of Information Act (FOIA) requests, and court orders. When an enforcement file is closed and any external preservation obligations have ended, the enforcement file should contain only official enforcement records, specifically, those records that demonstrate the substantive nature, course, or outcome of the enforcement action.<sup>3</sup> *See* Section IV, below.

CRT will, to the extent possible, manage all existing and future records electronically. Nothing in this RRG relieves CRT of its obligation to preserve documents, ESI, or physical items in their original format when litigation is reasonably foreseeable. *See* CRT [Litigation Hold Guidance](#), February 24, 2017, for additional information about CRT’s preservation obligations

---

<sup>1</sup> “Enforcement” refers to all cases and matters, as well as any project or initiative, to which the Division has issued a DJ Number. The RRG does not address administrative or non-enforcement files, or other records related to EEO, FOIA, Privacy Act, or litigation that is unrelated to CRT’s enforcement activities.

<sup>2</sup> “Staff” and “you” refer to all CRT personnel, including federal employees, contractors, student volunteers, litigative consultants, experts, and individuals working in the Division on a detail, fellowship, or other arrangement.

<sup>3</sup> *See* 44 U.S.C. § 3301, 36 C.F.R. § 1220.18 (providing statutory and regulatory definitions of “records”).

and litigation hold procedures. Indeed, Division staff are required to comply with all applicable litigation holds, stipulations, court orders, and statutes, such as *FOIA*, 5 U.S.C. § 552, the [Privacy Act](#), 5 U.S.C. 552a, the [Family Educational Rights and Privacy Act](#) (FERPA), 20 U.S.C. § 1232g & 34 C.F.R. Part 99, and the [Health Insurance Portability and Accountability Act](#) (HIPAA), 42 U.S.C. § 1320d.

## II. Federal Records Act

The FRA requires all federal agencies to create and maintain records that:

- Document the persons, places, things, or matters dealt with by the agency.
- Facilitate action by agency officials and their successors in office.
- Make possible a proper scrutiny by the Congress or other duly authorized agencies of the Government.
- Protect the financial, legal, and other rights of the Government and of persons directly affected by the Government's actions.
- Document the formulation and execution of basic policies and decisions and the taking of necessary actions, including all substantive decisions and commitments reached orally (person-to-person, by telecommunications, or in conference), or electronically. and
- Document important board, committee, or staff meetings.

*See* 36 C.F.R. § 1222.22

The FRA, applicable regulations, and Department policies classify every document you use in your day-to-day work by both the type of record and how long we are required to preserve it. For example, “transitory” documents (*e.g.*, calendars containing filing deadlines) are not considered official enforcement records. Assuming no independent preservation obligation exists other than the FRA, staff should dispose of transitory documents when they are no longer needed for any business purposes. By contrast, a complaint filed in a civil action is an official enforcement record and must be preserved in the enforcement file for a pre-determined period of time (*e.g.*, 3 years, 10 years, 25 years, or permanently) after the enforcement action ends based on the retention period established by the applicable record retention schedule approved by the National Archives and Records Administration (NARA). Division staff must comply with the applicable retention schedule. The DJ classification number (DJ Number) assigned to each enforcement action indicates the applicable record retention schedule for disposition of closed enforcement files. Some enforcement actions have a permanent retention, meaning the custody of the official enforcement file will eventually be transferred to NARA for permanent preservation because of its historical significance. The Division is authorized to destroy official enforcement files that are not designated as permanent only after the retention period expires. *See* Sections V.B., below.

### **III. Types of Documents and Records in CRT’s Open Enforcement Files**

An enforcement file is a compilation of data and documents related to a particular case or matter. An open enforcement file often consists of various documents, including: internal emails, external correspondence, notes, analyses, memoranda, pleadings, orders, witness statements, expert reports, and transcripts, as well as certain administrative records, such as expert contracts. The file also contains evidence obtained during the investigation or discovery, including paper and ESI obtained from complainants, charging parties, victims, witnesses, experts, defendants, third parties, or other government agencies. [See DOJ Policy Statement 0801.06](#) (Recordkeeping For Litigation Case Files), section IV (Case File Contents), subsection B (Documentation).

While the enforcement action is open, and assuming no independent preservation obligation exists other than the FRA, the enforcement file will often contain a combination of transitory and/or non-record material. As noted above, transitory documents are needed only for a short time (less than 180 days from the date of creation), and should be properly disposed of when they are no longer needed. This rule applies to all transitory documents, unless CRT is required to retain the document due to independent preservation obligations, such as litigation holds, stipulations, pending FOIA requests, or court orders. At the conclusion of an enforcement action, but prior to closing the DJ Number, the lead attorney working with the other assigned staff is responsible for reviewing and culling the documents within the enforcement file, to ensure the closed file contains only official enforcement records. This process can be expedited by keeping the file organized and labeling, identifying, and isolating official enforcement records throughout the lifecycle of the enforcement action.

### **IV. Closed Enforcement File - Federal Record Material**

#### **A. Official Enforcement Records**

Official enforcement records include all papers, electronic materials, and other documents (*i.e.*, maps, photographs, video, etc.) made or used in connection with an enforcement action that document the Division’s legal and administrative decisions, as well as the Division’s actions. In turn, they demonstrate the substantive nature, course, and outcome of the enforcement action. Examples of official enforcement records include:

- Complaints of discrimination that prompt the opening of the case or matter.
- Internal memoranda or communications, including emails and voicemail messages,<sup>4</sup> that recommend or direct actions such as opening, closing, or settling an enforcement action.

---

<sup>4</sup> All CRT Voice over Internet Protocol (VoIP) phones transfer incoming voicemail messages electronically as a .wav file to the recipient’s email. When information contained in a voicemail is pertinent to an enforcement action, the recipient should preserve the message by saving the email with the .wav file attached in the proper email folder in Outlook. *See* Section V.A.4., below.

- Correspondence with external parties documenting the Division’s legal and administrative decisions, as well as the significant actions taken by the Division. This includes, for example, emails or letters notifying a potential defendant that an investigation has been initiated, requesting information or discovery, retaining experts, announcing the Division’s findings, articulating the Division’s legal positions, or proffering a settlement offer.
- Voluntary resolution plans and out-of-court settlement agreements.
- Documents filed with the court and entered onto the ECF docket, including complaints, answers, motions and related exhibits, orders, stipulations, consent decrees, compliance reports, and appeals.
- Disclosures sent to a party pursuant to a court order or the Federal Rules of Civil Procedure, such as witness and exhibit lists and related objections.
- Statements authored or signed by a witness, affidavits, and deposition or hearing transcripts.
- Other working files or drafts that contain unique enforcement-related information and are necessary to demonstrate the substantive nature, course, or outcome of the enforcement action.

Many documents go through several drafts and multiple levels of review before being approved by the Section Chief, the Office of the Assistant Attorney General (OAAG), and/or the Department’s senior leadership. Furthermore, parties to an enforcement action may exchange many draft documents and agreements in an effort to resolve a case or matter. However, most preliminary drafts do not contain the types of substantive edits necessary to explain the Division’s final recommendation, decision, or action. As such, they are not official enforcement records. Moreover, draft documents that are not submitted to a Section Chief for review or approval are unlikely to be official enforcement records, reflecting the Division’s recommendations, decisions, or actions because most substantial enforcement decisions must be approved by a Section Chief or someone delegated with the authority to direct actions by the Department. Thus, the closed enforcement file should contain only a limited number of draft documents, such as an initial settlement offer, the final agreement, and those intervening drafts that memorialize the Division’s substantive positions and decisions or draft documents that were submitted to the Section Chief for review and approval.

## **B. Other Record Materials**

As noted above, an open enforcement file will typically include documents that are not official enforcement records, and should not be retained when the file is closed (including non-record material and transitory documents). [See DOJ Policy Statement 0801.06](#), section VII (Non-records and Submitted Material). Such documents are not needed to understand the

substantive nature, course, or outcome of the enforcement action, and must be removed from the closed enforcement file.

Examples of such documents that must be removed from the official enforcement file to prepare the file for closure include:

- Duplicate copies of records.
- Redundant files.

Some memoranda and correspondence may be drafted with sufficient clarity that it becomes unnecessary to rely on the accompanying record to understand the Division's rationale for making a certain decision or taking a specific action. For example, the text of a memorandum may include a chart summarizing several years' worth of data obtained from a defendant, the text of a letter may summarize an analyst's computations, or an email to a Section Chief may identify the important portions of an investigator's interviews of witnesses. Under these circumstances, it may not be necessary to include the voluminous underlying documents in the closed enforcement file.

- Email, voicemail, and other internal communications between team members and reviewers about the day-to-day conduct of the enforcement action that do not:
  - (1) Contain unique enforcement-related information or memorialize substantive enforcement decisions (*e.g.*, emails concerning motions for extensions of time, scheduling and deadlines, discovery disputes, logistical matters, and work assignments); and/or
  - (2) Document that a reviewer authorized some substantive decision (*i.e.*, an email from an attorney recommending settlement or enforcement actions or an email from a reviewer authorizing the filing of a motion differ from an email updating the reviewer about an investigative timeline.
- Responses to discovery or information requests, compliance reports, and other materials received by the Division that are not subsequently:
  - (1) Marked as a potential exhibit or filed in court.
  - (2) Attached to or specifically referenced in a memorandum sent to a Section Chief or someone delegated with the authority to direct some action by the Department; and/or

- (3) Attached to or referenced with specificity<sup>5</sup> in a substantive communication to another party to the enforcement (*e.g.*, a letter of findings, an issues letter, notice of objection, or a settlement proffer).

CRT collects and reviews a significant quantity of documents and data during investigations and discovery. However, only these enumerated documents, that the Division relied upon in making its final recommendation, decision, or action, are official enforcement records. Attorneys, for example, may collect and forward to expert witnesses a significant amount of data, but will probably rely on and cite the experts' subsequent reports, not the underlying documents, in their recommendation to the Section Chief. Thus, the expert report is the official enforcement record and the remaining documents should be disposed of at the conclusion of the enforcement action.

- Office of Litigation Support Services (OLSS) documents: Most of the data attorneys and staff provide to OLSS, including information contained in discovery databases, exhibits processed in preparation for a trial, or mapping data, are not official enforcement records. Thus, the lead attorney must consult with OLSS when culling the enforcement file in preparation for closure and coordinate the proper disposition of the of the GIS files, litigation support databases, related applications, and other ESI in their possession. OLSS will manage and subsequently delete / destroy any information not needed by the Section for the closed enforcement file.
- Notes, analyses, charts, calculations, and other “working files” that:
  - (1) Are prepared solely for the author’s own use and are not shared with a Section Chief, or someone delegated with the authority to direct some action by the Department (*e.g.*, to support an enforcement-related recommendation); and
  - (2) Do not contain unique enforcement-related information the Division relied on in reaching a substantive enforcement decision (*e.g.*, witness statements, meeting notes that document an attorney was authorized to take an action).

Most notes are limited in scope and not fully compiled or properly formulated, and typically the important information contained in the notes will be incorporated into an official enforcement record, such as a memorandum, correspondence, transcript, or pleading. For example, notes taken in preparation for a deposition are normally intended for an attorney’s own use, and the deposition transcript is the official enforcement record of what transpired during the depositions.

---

<sup>5</sup> General references to a large collection of documents (*e.g.*, “After reviewing the documents you provided to us on January 15, 2020 in response to our request for information, we...”) does not provide sufficient specificity to warrant retention of the entire production.

- As indicated above, drafts that are not submitted to a Section Chief, or someone delegated with the authority to direct some action by the Department, are unlikely to be official enforcement records reflecting the Division's recommendation, decision, or action. Similarly, draft settlement agreements should not be included in a closed enforcement file unless they contain substantive edits necessary to explain the Division's final recommendation, decision, or action.
- Files received from other Federal Agencies (*e.g.*, OCR, EEOC, HUD, FBI), should be returned to that Agency or, if the Agency confirms the files are copies, destroyed at the Agency's request.
- Administrative records, such as travel authorizations, expert witness contracts, invoices, and documents related to other litigation expenses that are maintained by CRT's Administrative Management Section (ADM). Although it may be appropriate to store copies of these records in an open enforcement file to ensure they are preserved when an enforcement action is likely to last longer than the administrative record retention schedule period (typically six years), the records should not be placed in the closed enforcement file.
- Calendar entries, notifications, and other scheduling records that concern work-related trips. Various meeting types, such as interviews, depositions, settlement conferences, settlement meetings, team meetings, staff meetings, or docket reviews also should be removed from the closed enforcement file.
- Files or task lists intended as a reminder that an action is required or expected on a given date. This includes actions and reminders used to track deadlines for production, or receipt of discovery documents, and court filing deadlines.
- Personal papers of a private or non-official nature that do not relate to an enforcement action. Such documents should be maintained separately from official enforcement files. If a document contains such personal information and information about an enforcement action, the document should be copied with the personal information deleted.
- Blank forms and library materials.
- Routing slips and transmittal sheets.

## **V. Procedures for Creating, Maintaining, and Closing CRT's Enforcement Files**

To comply with the requirements from the Office of Management and Budget, CRT has transitioned to electronic records management. As a result, CRT's official enforcement records will no longer be printed and retained in paper form and stored at the Federal Records Center (FRC). Instead, all enforcement records, including emails, word processing files, PDFs, spreadsheets, and video/audio files, will be stored electronically: (1) in the Sections' S: drive

folders or (2) users' Outlook email accounts.<sup>6</sup>

Consistent with best-practice rules, each Section will create protocols concerning: (1) scanning, uploading, authenticating, and maintaining documents that are needed while an enforcement action is open; (2) folder structures and naming conventions for S: drive documents and emails; (3) version control and document indexing and tracking; (4) record restriction, preservation, and deletion; and (5) file culling, transition, and storage of long-term records. Each Section also will establish mechanisms to ensure that staff comply with applicable policies and that all enforcement files are properly preserved, well-organized, and readily accessible to the appropriate staff. All staff on each enforcement action are required to comply with this RRG and seek guidance from Section management if you have any questions on how to implement these requirements.

To encourage consistent practices, the Division has developed an illustrative standard folder and subfolder structure for S: drive enforcement files. Section Managers may contact the Division's Records and Information Management (RIM) Program Team and the Office of Information Technology and Cybersecurity (OITC) through the CRT Help Desk for advice on preparing or revising their policies and assistance designing their folder structure. The RIM Program Team and OITC also are available to answer questions regarding, for example, scanning and uploading documents; storing records on thumb drives or other physical format; implementing preservation protocols and/or restricting access to folders; authenticating documents; creating discovery databases; and using collaboration programs and file sharing systems (e.g., JEFS); etc.<sup>7</sup>

## **A. Creating and Maintaining Enforcement Files**

### **1. DJ Numbers**

To organize and manage case files, CRT uses a classification system that assigns a specific three-part DJ Number to every matter, *see* [DOJ Policy Statement 0801.06](#), section II (Case File Numbering), subsection A (Assigning DJ Numbers). An example of a DJ Number is "169-33-72." The first part (169) identifies the subject matter or statute at issue in the matter or case. This also identifies the applicable record classification and record retention schedule for the enforcement files. The second part (33) corresponds to one of the 91 judicial districts where the case or matter arose. The third part (72), represents the sequence of matters/cases in that

---

<sup>6</sup> Section managers may authorize some open enforcement files to be stored on designated discovery databases, such as Relativity, especially documents received during discovery that are not likely to be included in the closed enforcement file. CRT also may authorize the use of certain collaboration software programs for enforcement purposes, and will establish policies for the use of such tools. However, you should consider the potential risks of using these programs and maintaining records in such locations, and ensure that all material that must be included in closed enforcement files are placed within an appropriately designated folder on the Section's S: drive or an email folder in Outlook at the conclusion of the enforcement action.

<sup>7</sup> Section staff also may confer with OLSS staff to discuss some of these topics as they arise in individual cases, and they are encouraged to consult with their Section's E-Discovery Office Coordinator(s) (EDOC) about the discovery implications of certain policies and practices.

jurisdiction. Assigning a DJ Number is the first step to creating an enforcement file. Each Section has an individual who has primary responsibility for assigning DJ Numbers (*e.g.*, case management specialist), and all staff are required to track and maintain all enforcement files using the applicable DJ Number and any other unique identifiers required by each Section’s protocol (*e.g.*, case name).

The Section that opens and assigns a DJ Number to an enforcement action is considered the custodian of the official enforcement file, and the same DJ Number should be used if multiple Sections work on the same enforcement action. When an enforcement action is open, the assigned staff should maintain their records in accordance with their Section’s policies. When the enforcement action closes, the assigned staff must coordinate to ensure the custodian Section’s closed enforcement file is complete.

## **2. Receipt and Scanning of Records**

CRT’s record policy requires you to obtain and maintain all records related to an open enforcement file electronically whenever feasible, consistent with applicable rules of evidence and preservation policies. All closed enforcement files must be maintained electronically unless they are specifically exempted from this RRG. *See* Section V.B.4., below.

Accordingly, you are encouraged to collect records and evidence as ESI, and, whenever feasible, witnesses and defendants should be instructed to produce documents and evidence electronically. Sections will develop policies concerning the scanning and storing of documents we receive in paper format, as well as the uploading of ESI received on data storage devices (*e.g.*, DVDs, thumb drives, etc.), maintaining data storage devices, and the downloading and authenticating of ESI we receive from file sharing systems.

All enforcement-related paper documents that can be accurately converted to ESI must be scanned upon receipt and the electronic copies should be placed on the S: drive.<sup>8</sup> Similarly, ESI that can be safely uploaded and stored on our network should be placed on the S: drive in a timely and proper manner. You should be familiar with the Department’s Cybersecurity and Privacy Rules of Behavior and you should consult OITC through the CRT Help Desk and OLSS to ensure you are familiar with the current protocol for receiving ESI from an external source. You should also take precautions when using file sharing software to exchange documents. Some file sharing software may not protect personally identifiable information (PII), may delete files after a certain period of time, and may have complex document quarantine protocols.<sup>9</sup>

---

<sup>8</sup> As noted above, some files may be stored in a litigation support database in lieu of the S: drive in accordance with the Sections’ policies.

<sup>9</sup> Sections are encouraged to consult with their EDOCs, OITC, and OLSS and develop guidance for the use of technologies, such as collaboration tools, that may impact how the Section conducts discovery. For example, you may need to take proactive steps to ensure documents received via file sharing software can be authenticated (*e.g.*, independently verify documents’ hash values) because such discovery exchanges may prevent us from having the “original” document or data storage device.

You are required to scan and upload all portions of files received from other Federal Agencies, including referral files (non-CRT Agency Records), that CRT needs to conduct enforcement actions.<sup>10</sup> You are also required to download to the S: drive all enforcement-related records created or collected using other devices, such as pictures on iPhones in a timely manner.<sup>11</sup>

Documents that cannot be accurately retained electronically and ESI that cannot be safely uploaded or properly stored on the S: drive, may be kept in their original format and should be stored in the Section's file room or some other organized and secure location. *See* Section V.A.5., below.

### **3. Creating and Maintaining Electronic Enforcement Files in the Section's Shared Drive**

When a Section opens and assigns a DJ Number to a new enforcement action, the case management specialist should create an enforcement folder within the Section's S: drive. The file name must include the DJ Number followed by any other unique identifiers required by Section policies.<sup>12</sup> The file also must include all subfolders and all overwrite/access restrictions required by Section policies.

After the appropriate enforcement folder is created on the S: drive, you must place and maintain all enforcement-related records in the designated S: drive folder in accordance with Section protocols, naming conventions, and best practices to ensure records are properly preserved, well-organized, and readily accessible to the appropriate staff. As noted above, each Section will institute measures to ensure files are organized in accordance with this RRG.

You should not create or save any enforcement-related files in your home directories (H: drives<sup>13</sup>). You may only use the H: drives for personal records, such as performance reviews, docket review memos, or other administrative material. After the Sections have migrated

---

<sup>10</sup> CRT's enforcement files should include only copies of non-CRT Agency Records that we need to perform our enforcement actions. *See* Section IV.B., above. After scanning such documents, you should preserve the original file in its "as-received" format until CRT closes the enforcement action to which the file relates. *See* Section V.A.5., below.

<sup>11</sup> You should confer with the OITC and OLSS if they have any questions about properly preserving ESI with the associated metadata that may be relevant to their case. You also may preserve the original versions of such records on their iPhones or other devices until they are no longer needed.

<sup>12</sup> Sections may use an automated script that allow individual users to create shortcuts in their files that they can re-name as they see fit, so long as the official file on the S: drive comports with CRT and Section naming conventions. This allows the Division's files to be organized in a uniform, easily searchable manner while facilitating assigned staff's easy access to the folder location because they will see only the enforcement files that work on and they will be able to readily identify them.

<sup>13</sup> The Division will move toward using OneDrive either in place of or in parallel with S: and H: drives.

enforcement records onto the S: drive, H: drives will have size limitations and will be accessible only to the individual user, a Section Chief or Principal Deputy Chief and, at the Section Chief's discretion, one or more Deputy Chiefs. You should also not create or save enforcement-related files on the C: drives of their laptops. Finally, as noted above, you should ensure that any enforcement-related records that you create or collect using other devices (*e.g.*, iPhone pictures) are transferred to the S: drive in a timely manner.

Consistent with Section policies, all staff should be familiar with basic knowledge management principals and adopt best practice techniques. For example, you should:

- Minimize the creation and use of duplicate records, which increases the burden and expense of preparing discovery and FOIA responses and makes it more difficult for the staff to cull and close enforcement files.
- Label folders/files in an organized and consistent fashion (*e.g.*, distinguish drafts from final versions, identify the record copies of documents that contain reviewers' PIV card authorizations, use dates in filenames, utilize existing file system like the ECF Docketing Numbers, and adopt uniform version control measures, etc.).
- Identify and isolate official enforcement records throughout the lifecycle of the enforcement action so records that must be included in the closed enforcement file are distinguishable from transitory documents that must be culled when appropriate.
- Identify and isolate documents that are sensitive and should not be accessible in the common enforcement file (*e.g.*, documents that must be screened by independent privilege review teams).
- Identify and, where appropriate, isolate documents that contain PII or records that must be disposed of pursuant to independent authorities, such as FERPA or HIPPA.
- Use document logs to track documents received or produced during investigations and discovery.
- Maintain documents received through investigations and discovery in their original "as-received" format, and trace the origin of subsequently created documents used for analytical purposes (*e.g.*, do not filter or sort original Excel files and create "save as" files before altering original photographs).
- Periodically review the assigned enforcement files to ensure they are well-organized and properly maintained.
- Comply with applicable record retention schedules and delete all transitory documents when they are no longer needed and you are authorized to do so (*i.e.*, periodically if allowed under the Rule 26(f) Stipulation, when a litigation hold is lifted, or when the case ends, etc.).

OITC is available to help Sections update their individual policies, upgrade their S: drive structure, and migrate files as needed. OITC also is developing proposals to modify user restrictions and enhance CRT's file preservation and protection protocols.<sup>14</sup> Section Managers may contact the CRT Help Desk to inquire about this initiative. Individual staff also should contact the CRT Help Desk immediately if you discover that any files have been mistakenly moved or deleted from their enforcement files.

#### **4. Creating and Maintaining Enforcement Email**

In addition to the S: drive enforcement file, all staff must create a folder for each of their assigned enforcement actions in their Outlook accounts that includes the DJ Number. All emails concerning the enforcement action, including related voicemail messages sent to email accounts as .wav files, must be placed in that case or matter specific folder or subfolders.

Consistent with Section policies, you should adopt best practice techniques for the use of emails. For example, you should:

- Clearly identify all enforcement-related emails in the subject line by adopting a uniform case- or matter-specific identifier to be used by all staff assigned to the enforcement action. This may include the DJ Number or some other short, Section-approved identifier that will enable users (or OITC and OLSS) to quickly search all email files and locate emails that relate to specific enforcement matters and may be subject to future production, disclosure, or retention.
- Consider using subfolders to identify and isolate substantive emails that are official enforcement records and must be retained in the closed enforcement file apart from other transitory emails that should be deleted when they are no longer needed and you are authorized to do so. You may also use similar techniques to isolate emails that contain PII or are subject to other preservation or destruction rules (*e.g.*, FERPA).
- Consider identifying one team member as the record custodian to be copied on all enforcement-related emails. This increases the likelihood that one individual will have a complete record of all communications related to the case or matter. It also reduces the burden and expense of preparing discovery and FOIA responses.
- Use hyperlinks and other tools that reduce unnecessary document duplication (*e.g.*, attaching a draft motion already located in the enforcement folder on the S: drive to an email creates additional copies of that document in one's Outlook sent folder and the Outlook inboxes of every recipient of that email).
- Periodically review your Inbox and Sent emails to ensure all enforcement-related emails are placed in the proper folders. You are reminded that all mail is stored on

---

<sup>14</sup> Some of these modifications may limit the number of people who may move or delete a file while allowing more people permissions to open and review them, thereby reducing the risk of documents being accidentally deleted.

the server. Typically, however, only the past several months of mail is visible in Outlook. Searching for email in Outlook or clicking to view more on Microsoft Exchange will expand all results.

- Comply with applicable record retention schedules and delete all transitory emails when they are no longer needed and you are authorized to do so (*i.e.*, periodically if allowed under the Rule 26(f) Stipulation, when a litigation hold is lifted, etc.).
- Comply with Department policies prohibiting the use of personal or non-official email accounts to send communications related to official business, except in exigent circumstances.

CRT's current email system has a permanent retention policy. Files are not deleted automatically, but must be deleted manually by each user. If CRT amends its retention policy in the future, OITC will notify all staff and help the Sections implement record retention policies. Individual staff also may contact the CRT Help Desk if you discover that any emails have been mistakenly moved or deleted from their enforcement folder.

## **5. Maintaining Paper Records, Evidence Subject to a Litigation Hold, and Other Media**

As noted above, CRT's record system requires you to maintain all records related to an open enforcement action electronically whenever feasible and documents that can be accurately converted to ESI should be timely scanned for day-to-day use and inclusion in the closed enforcement file. At the same time, you must also comply with all applicable rules of evidence and preservation policies, and some records must be retained in their original "as-received" format after they are scanned or uploaded to the S: drive, so they may be properly authenticated in any future legal proceeding.

Documents that cannot be accurately retained electronically and ESI that cannot be safely uploaded or properly stored on the S: drive (*e.g.*, due to size or security limitations), may be kept in their original format and should be stored in the Section's file room or some other organized and secure location. Some portions of an enforcement file also may be specifically exempted from scanning (*e.g.*, oversized documents that cannot be scanned), and the case management specialists will coordinate with the RIM Program Team to address the storage of these records on a case-by-case basis.

The original versions of all records that have potential evidentiary value, as well as all non-CRT Agency Records and all records that are subject to a litigation hold, must be preserved in their original "as-received" format after they are scanned or uploaded, until the parties to the enforcement action have reached a stipulation regarding the preservation or authenticity of the documents, any litigation hold is lifted, or the enforcement action is closed. The electronic copies of such records should be placed on the S: drive for day-to-day use and eventual inclusion in the closed enforcement files while the original versions are maintained in the Section's file room or other secure location.

You should also preserve all enforcement-related data storage devices, including all DVDs and thumb drives, in their original condition to ensure their content can be properly authenticated should the need arise. As noted above, each Section will establish policies to ensure these devices are labeled clearly and stored safely until they can be properly overwritten and recycled when they are no longer needed and you are authorized to dispose of the records. You are required to timely download to the S: drive all enforcement-related records that you create or collect using other devices (*e.g.*, iPhone photos). However, you may continue to preserve the original versions until such time as they are no longer needed and you are authorized to dispose of them.

Each Section will develop policies concerning the storage of paper files in the Section's file room, in collaboration with the RIM Program Team and all other Sections that share the same space. These policies will establish the rules for accessing file rooms, placing and removing files, labeling, and organizing files, maintaining over-sized documents, safeguarding data storage devices, etc.

## **B. Closing and Preserving Enforcement Action Files Under the Record Retention Schedule**

### **1. Record Retention Schedules and Federal Record Centers**

As noted above, the Department's record classification system assigns a DJ Number to every enforcement action, which corresponds to a particular record retention schedule that indicates if and when CRT may dispose of the enforcement file after the case or matter closes. *See* Section II, above. An enforcement file is either "temporary" and CRT must preserve it for a pre-determined period of time (3 years, 10 years, or 25 years) or "permanent" and CRT must eventually transfer it to NARA.<sup>15</sup>

Previously, CRT would "print and retain" enforcement files that were then transferred to the FRC for safe storage for the applicable retention period, the time between when the enforcement file was closed and the appropriate disposition date. During the retention period, an enforcement file remains in the care and custody of CRT. FRC would contact the RIM Program Team on the disposition date to determine whether the file should be destroyed or transferred to NARA. In addition, CRT's records management policy anticipates the use of the FRC being eliminated in the future as a repository to store analog records. Those will be maintained on CRT's computer servers.<sup>16</sup>

---

<sup>15</sup> Currently, the majority of CRT's closed enforcement files are classified as historically significant and are considered permanent records. Although CRT may create new DJ Numbers under the existing classification system, it cannot change the classification system or the corresponding record retention schedules without approval from NARA and the Department's Office of Records Management Policy (ORMP).

<sup>16</sup> You will still be able to request the return of files that were previously transferred to the FRC, and are being stored there for the remainder of their retention period, if those files need to be retrieved for any reason (*e.g.*, to respond to FOIA requests), and should confer with their Section's case management

When the enforcement action concludes, you must prepare the closed enforcement file by compiling and organizing all official enforcement records and culling out all non-record materials. *See* Section IV., below.

## **2. Closing Electronic Enforcement Files on Shared Drive**

When an enforcement action concludes and all other preservation obligations other than the FRA (*e.g.*, litigation holds) end, the lead attorney must ensure that all ESI related to that action is reviewed, culled, and placed into proper folders and subfolders on the S: drive and that the closed enforcement file:

- (a) Contains all electronic enforcement records necessary and appropriate for inclusion in the closed file, except for email correspondence and other records retained in Outlook; and
- (b) Does not contain any transitory or non-record material that should not be included in the closed files

*Compare supra at part IV A. with B.*

Preparing a closed enforcement file will require you to identify and retain the records needed to understand the substantive nature, course, or outcome of the enforcement action, and to delete all other items that should not be retained in the official enforcement file. Before organizing the S: drive file, the lead attorney must coordinate with every individual who worked on the enforcement action and may have records that should be included in the closed enforcement file. *See* Section V.B.4, below. For example, a lead attorney should coordinate with Section Managers to ensure that the closed enforcement file includes any official enforcement record the reviewers may have placed outside the designated enforcement folder on the S: drive. Lead attorneys must ensure that the closed enforcement file contains only one copy of each enforcement record by deduplicating and deleting all copies. Finally, they must ensure that all transitory and non-record materials are deleted.

Consistent with Section policies, if the assigned staff believes a convenience copy of certain documents from their enforcement actions should be retained elsewhere in the Section's S: drive for future instructional purposes and easy access (*i.e.*, template/sample motions), you should confer with their Section Management about how to copy those particular files and where to place them. Whenever possible, such documents should be modified/redacted to distinguish them from enforcement files.

The lead attorney, and the Section Records Liaison, or other individuals designated by Section Leadership are responsible for inspecting closed enforcement files to ensure they are properly culled and organized. Once the inspection is completed, the lead attorney will notify

---

specialist on how to do so.

the Section's case management specialist that the file is ready for processing for records purposes. The case management specialist will then record the applicable disposition date,<sup>17</sup> index the files, and coordinate with the CRT Help Desk and RIM Program Team to ensure the entire closed enforcement file is transferred to a secure "archival" server location for the duration of the applicable retention period. Access to this archival folder will be limited to read-only for most staff, and may be further restricted pursuant to Section protocols.

### **3. Closing Enforcement Action Email**

When an enforcement action concludes and all other preservation obligations other than the FRA (*e.g.*, litigation holds) end, the lead attorney must ensure that all email correspondence and other enforcement-related records retained in Outlook is reviewed, culled, and placed into folders labeled with the applicable DJ Numbers in the custodians' Outlook accounts. This process should ensure that the remaining folders:

- (a) Contains all Outlook emails, .wav files, etc. that are necessary and appropriate for inclusion in the closed file; and
- (b) Does not contain any transitory or non-record material that should not be included in the closed files.

*Compare supra at part IV A with B.*

Preparing closed enforcement files in Outlook will require assigned staff to identify and retain the email communications and voicemail messages needed to understand the substantive nature, course, or outcome of the enforcement action, and to delete all other items that should not be retained in the official enforcement file. Lead attorneys also must coordinate with their reviewers and Section Chiefs to ensure that their Outlook files are similarly culled and that all official enforcement records are identified and isolated for inclusion in the closed enforcement file (*e.g.*, emails between the Section Chief and OAAG personnel).

As noted above, staff can employ different strategies during the life of the enforcement action to ensure all email correspondence that are official enforcement records can be readily identified and placed in the closed enforcement file (*e.g.*, identifying email custodians) and the labor involved in culling the file can be reduced. The case management specialist and lead attorneys also may contact the OITC Help Desk to discuss the use of various document review technologies that may help them identify emails that need to be retained, deleted, or methods to reduce duplicates.

Consistent with Section policies, if the assigned staff believes a convenience copy of certain email should be retained for future institutional purposes and easy access, you should

---

<sup>17</sup> The RIM Program Team will devise a uniform system for monitoring disposition dates throughout CRT and will work with each Section's case management specialist to determine what documents need to be included in the index and any accompanying memo.

confer with their Section Managers about where to store those particular emails. Whenever possible, such items should be relabeled, in order to distinguish them from enforcement files.

Once the relevant Outlook files have been prepared and reviewed, the lead attorney will notify the Section's case management specialist who will then record the applicable disposition date, index of the files, and coordinate with the OITC Help Desk and the RIM Program Team to ensure the relevant Outlook files are transferred to a secure "archival" location for the duration of the applicable retention period. After the necessary emails are transferred and the closed enforcement file has been properly stored, all staff who worked on the case or matter should delete their email folders for that DJ Number.

#### **4. Closing Enforcement Files Not Stored on Shared Drive or Email**

When an enforcement action concludes and all other preservation obligations other than the FRA (*e.g.*, litigation holds) end, the lead attorney must identify and locate all enforcement-related files that need to be reviewed and either included in the closed enforcement file or deleted, which may require the lead attorney to coordinate with a number of different individuals who may have such records.

The following are some of the steps the lead attorney may need to take:

- Notify the reviewers within the Section when you anticipate closing an enforcement action so they can prepare their files for potential inclusion in the closed enforcement file.
- Inspect Section's file room and all data storage devices for files that may need to be included in the closed enforcement file. If these files were previously scanned/uploaded to the S: drive and/or they do not need to be included in the closed enforcement file, the lead attorney should coordinate with the Section's case management specialist to dispose of the files and recycle the data storage devices in a proper manner.<sup>18</sup>
- Coordinate with the case management specialist and RIM Program Team concerning the long-term storage of all portions of the closed enforcement file that are exempted from scanning (*e.g.*, oversized documents).
- Inspect the S: drive "gone" folders of former CRT Section employees who may have worked on the enforcement action and kept files on their H: drives. The lead attorneys also may need to have their reviewers contact the OITC Help Desk to initiate a review of the former users' Outlook accounts.

---

<sup>18</sup> CRT still utilizes "burn boxes" to dispose of various files, as well as large recycling bins for paper files. The Case Management Specialist also may send data storage devices to either the OITC Help Desk or OLSS to have the data properly scrubbed and the media recycled.

- Ask all staff who worked on the enforcement action to inspect their H: drives and any other locations where documents may be stored, and to move the relevant files to the proper location on the S: drive.
- If applicable, notify the referring Agencies, the USAO, other Department components (*e.g.*, Office of the Solicitor General), and all litigating consultants and expert witnesses and inform them that the enforcement action has concluded and coordinate with them to facilitate the collection or disposition of all relevant records.
- Notify all other Sections and Offices within CRT that worked on the enforcement action (*e.g.*, APP, OAAG, or OLSS) and coordinate with them to facilitate the collection or disposition of all relevant records. As noted above:
  - All Division staff must cooperate to ensure the custodian Section's closed enforcement file is complete.
  - While most OLSS records and discovery databases will not be included in the closed enforcement file, the lead attorney should confer with OLSS when an action concludes to determine what records they have and enable OLSS to delete the applicable files and reclaim space on the relevant computer servers.
- Ensure that all non-CRT Agency Records are returned to that Agency or disposed of at the Agency's request.

As noted above, enforcement-related paper documents should be scanned upon receipt, and the lead attorney should ensure that any paper files located in the file room that were not scanned and need to be included in the closed enforcement file are scanned and placed on the S: drive. If the lead attorney identifies any paper files that need to be included in the closed enforcement file that cannot be scanned or downloaded (*e.g.*, oversized documents), the lead attorney must notify the Section's case management specialist who in turn will coordinate with the RIM Program Team to ensure the files are stored properly for the duration of the applicable retention period.

## **5. Specialized Procedures for Handling Sensitive Information**

Federal law mandates that certain documents or other information obtained during an enforcement action require specialized handling. In addition to the Privacy Act that affects all Sections, there is grand jury material under the Federal Rules of Criminal Procedure, and documents subject to the FERPA, HIPAA, and the Right to Financial Privacy Act (RFPA). In some circumstances, information or documents may also be subject to a protective order, filed under seal, or involve classified materials.

All staff assigned to any enforcement action implicated by one of these obligations must pay careful attention to isolating the appropriate information or document(s), limiting access to authorized personnel during the pendency of the enforcement action, and following the appropriate retention or destruction processes. Although Sections retain discretion to craft their

individual records protocols in the manner that suits their business practices, the Sections' policies must comply with the following:

**Privacy Act:** CRT's enforcement activities often result in the acquisition of PII about individuals, including names, identifying numbers, symbols, and other identifying information, such as educational, financial, medical, criminal, and employment data. The Privacy Act requires Department staff to collect only such information as is authorized; limit its use; minimize its proliferation; and secure it from unwarranted disclosure. Each Section shall consult with the RIM Program Team and OITC in developing their procedures, particularly with regard to PII that may be maintained in connection with enforcement actions that have been closed. Once completed and prior to their implementation, Sections shall obtain the concurrence of the Freedom of Information Act/Privacy Act Office and the Executive Officer with regard to the protocols.

**Grand Jury Materials:** Federal Rule of Criminal Procedure 6(e) requires that all "records, orders, and subpoenas relating to grand-jury proceedings must . . . be kept under seal to the extent and as long as necessary to prevent the unauthorized disclosure of a matter occurring before a grand jury." The Department staff necessary to enforce federal criminal law shall maintain the secrecy of grand jury proceedings. *See* Fed. R. Crim. P. 6(e)(2) and (3).

When an enforcement action is open, Rule 6(e) materials that exist in hard copy must be stored in authorized locked containers or vaults and electronic Rule 6(e) materials must be stored in a clearly marked subfolder. Regardless of format, access to this material must be restricted to those staff identified on the 6(e) list for that specific enforcement. When an enforcement action is closed, grand jury materials must be retained in the clearly marked archival grand jury subfolder with appropriate access restrictions. When another Section wishes to review 6(e) records in a related or parallel proceeding, the affected Section Chief shall consult with CRT's Criminal Section to determine the legal requirements for seeking access to material protected by Rule 6(e).

**Federal Education Rights and Privacy Act:** FEPPRA establishes a stringent framework for the receipt, dissemination, and disposal of personally identifiable information contained in education records and covered by the statute (student PII).

- Student PII can only be handled by or disseminated to certain authorized representatives of the Attorney General;
- All authorized representatives must maintain student PII in a manner that will not permit the personal identification of students or their parents by any unauthorized person; and
- Student PII must be destroyed when CRT no longer needs it for auditing or evaluating Federal- or state-supported education programs or enforcing Federal legal requirements related to such programs (*i.e.*, "enforcement purposes").

See 20 U.S.C. §§ 1232g(b)(1)(C); 1232g(b)(3); 34 C.F.R. § 99.35(b)(2). Staff who handle, disseminate, and dispose of student PII covered for enforcement purposes must store the records containing the student PII in a secure and organized manner that protects it from further disclosure or unauthorized use and you must refrain from disseminating student PII to anyone who is not authorized to see it.

Except for documents enumerated below, which are federal records that must be retained in the closed enforcement file, all other documents or records received from an education agency, including all documents received in responses to discovery, information requests, and compliance reports, should be destroyed when they are no longer needed for CRT's enforcement purposes, but no later than when the enforcement action is concludes and the enforcement file is closed.

With respect to FERPA-covered federal records that were:

- (a) Used as an exhibit (in a deposition, motion, or hearing).
- (b) Attached or referenced with specificity in a memorandum sent to a Section Chief or someone authorized to approve some action by the Department. and/or
- (c) Attached or referenced with specificity in a substantive communication to the school district or another party to the enforcement (*e.g.*, a letter of finding, an issues letter or notice of objection, a settlement proffer).

You will redact all the student PII on the record when the information is no longer needed for enforcement purposes, and before such records are placed into the closed enforcement file. If a line-by-line redaction of the student PII is overly burdensome, you may delete the entire document containing the PII and substitute it with a short memorandum in the closed enforcement action file, describing the information that was removed and the reason for removing it.

**Health Insurance Portability and Accountability Act:** Compliance with HIPAA can be achieved in the same manner as FERPA.

**Right to Financial Privacy Act:** This Act implicates individually identifiable financial records of financial institution customers. It provides for the release of records by financial institutions pursuant to customer authorization, administrative or judicial subpoena, search warrant, or formal agency request. As with the protections related to PII, you must take all steps to protect such information from unwarranted disclosure and to limit access to only authorized personnel.

**Protective Order & Sealed Records:** During the pendency of an enforcement action, electronic documents subject to a protective order or filed under seal will be saved according to Section protocols with access limited to authorized staff. For those documents that are not deleted or destroyed by court order when the enforcement action is completed, the Section's case management specialists will coordinate with the RIM

Program Team to ensure the folders containing the covered files and the accompanying record indexes are appropriately labeled to indicate that they contain restricted information.

**Classified Materials:** CRT enforcement actions rarely involve the need to review or handle classified materials. Should such a situation arise, the reviewer overseeing the enforcement action, along with the Section’s case management specialists and lead attorneys, shall contact the RIM Program Team to develop policies for the handling and disposition of the classified materials.

## **6. Final Disposition of Enforcement Files**

Closed enforcement files will remain in the appropriate archival file location(s), until their disposition date, as mandated by the applicable records schedule.

When a closed enforcement file reaches its disposition date, the Section’s case management specialists will coordinate with the RIM Program Team to either dispose of the files or transfer the permanent files to NARA. The RIM Program Team is working with ORMP and NARA to coordinate this process with the Sections’ involvement.

## **VI. Capstone**

In accordance with DOJ Instruction 0801.04.04 ([Records Closeout and Processing for Capstone Officials](#)), specifically section II (*Background*, see second paragraph), “DOJ uses the Capstone approach for the capture of all business records as a record series from officials at or near the top of an agency (or an organizational subcomponent). Capstone records are scheduled and preserved as permanent.”

Accordingly, CRT has designated the Assistant Attorney General, Principal Deputy Assistant Attorney General, Deputy Assistant Attorneys General, Director of Operational Management, Chief of Staff, Senior Counsels and all career and non-career employees in the OAG (whether acting, on detail, or otherwise temporary performing these roles) as Capstone officials, whose official records and email accounts will be retained as permanent, historically significant records.

As this relates to CRT, when a Capstone Official leaves the Division, the Front Office (FO) staff, with guidance from the RIM Program Team, is responsible for organizing and securing his or her record information for proper management, storage, and disposition according to federal requirements. In turn, all email contained in their email accounts will automatically be retained as long-term records, including emails deleted by the user.

Individual portions of this guidance, involving the planning and implementation tasks, may be delegated or designated to FO staff. However, the AAG maintains ultimate responsibility for the Division meeting all of its Capstone implementation requirements.

## **VII. Roles and Responsibilities**

All CRT staff have an important function to perform in the lifecycle and management of most enforcement files (*e.g.* creating, maintaining, and closing):

#### **A. Section Managers**

Section Managers are responsible for maintaining all Section files, ensuring Section staff comply with this RRG, and ensuring the Section adopts and implements a records policy that addresses each of the following:

- Adopting a Section-level RIM Policy;
- Procedure for requesting and obtaining a DJ Number;
- Practices for ensuring open enforcement files are retained in an organized, accessible, and secure manner (*i.e.*, folders structures, naming conventions, deduplicating records, scanning protocols, etc.);
- Practices for storing enforcement-related emails;
- Practices for storing enforcement-related electronic materials on the S: drive;
- Procedure for delegating responsibility for maintaining open and closed enforcement files to a specific individual;
- Procedures for closing enforcement files; and
- Protocols for communicating with OITC and the RIM Program Team.

#### **B. Assigned Staff**

While an enforcement file is open, all staff assigned to the enforcement action are responsible for complying with this RRG, as well as the requirements of their Section-level RIM Policy. This includes policies for disposing of transitory records and ensuring long-term records are properly maintained in Outlook and S: drive folders, and any original hard copy or media are properly and securely stored.

When an enforcement action concludes, attorneys are responsible for reviewing all enforcement-related emails, ESI, and any hard copy documents to ensure the enforcement file contains only official enforcement records. Once that task is completed, professional and support staff are responsible for coordinating with their Section's case management specialists and OITC to move the closed enforcement file to the proper archival locations for preservation in accordance with the applicable record retention schedule.

#### **C. Section RIM POCs**

Section RIM POCs are required to work with the Division's RIM Program Team to resolve any policy questions/issues related to both open and closed enforcement files. Section RIM POCs also are responsible for preparing records for long-term storage and archiving of files in accordance with their record retention schedules, and for transferring all permanent closed enforcement files to NARA (*i.e.* making sure they are in an appropriate [NARA approved file type](#)).

#### **D. Administrative Management Section**

ADM is responsible for creating, setting and training on the CRT RIM policy, encompassing proper Records Lifecycle Management (*e.g.* records creation, maintenance, and disposition). ADM also is responsible for ensuring that CRT's policies are periodically reviewed and updated to ensure compliance with DOJ and NARA standards.

#### **E. Division Records and Information Management Program Team**

The RIM Program Team is responsible for retiring hard copy closed enforcement files to the FRC, and then assisting with Reference Requests (*i.e.* obtaining subsequent access to them). With the support of OITC, the RIM Program Team will work with Section records liaisons to ensure the official enforcement files are deleted/destroyed upon reaching their disposition date, and permanent enforcement files (electronic and any hard copy files), which are historically significant, are prepared appropriately for accession into the Archives.

The RIM Program Team serves as the Division's liaison to ORMP, the FRC, and as needed, to NARA. The RIM Program Team also coordinates Section-level reviews and approvals for records that have reached their disposition date, and are therefore eligible for destruction (temporary), and/or accession (permanent) into the Archives. They also provide advice, guidance, and support to Division management, which is consistent with the FRA, relevant regulations, and laws.

### **VIII. Departing Employees**

Each Section shall establish a protocol for all departing employees, including employees who are transferring within the Division or leaving the Division, to organize and transfer open enforcement files to another staff member and prepare their closed enforcement files for proper disposition. Each staff member shall certify their compliance with their Section's protocol and this RRG prior to their departure. Moreover, all staff members must submit the Department's Records Exit Checklist to the CRT Records Manager or designee. By completing the checklist, employees affirm that you have not removed any government material, including working files, without obtaining specific authorization for such removal from the AAG or his/her designee. [See DOJ Policy Statement 0801.02](#) (Removal of and Access to Department of Justice Information, section II (Requests for Removal of Information), subsection A (Departing Employees)).

**DUPLICATE.**

CREW v. DOJ - CRT - 000844-000845

**DUPLICATE.**

**CREW v. DOJ - CRT - 000846-000860**

**DOCUMENT PRODUCED IN NATIVE FORMAT.**

---

**From:** Gates, Michael (CRT) [(b)(6)]  
**Sent:** 8/11/2025 1:36:30 PM  
**To:** Osete, Jesus (CRT) [(b)(6)]  
**CC:** Zandi, Matt (CRT) [(b)(6)]  
**Subject:** MOA to sign  
**Attachments:** Dept of Justice SAVE VV MOA.pdf

Jesus, attached is the latest version. This was DHS's standard MOA – they asked for our enforcement authorities, which Maureen assisted in articulating. We can discuss more if you have questions.

**Michael E. Gates**

Deputy Assistant Attorney General  
Civil Rights Division, U.S. Department of Justice  
Cell: [(b)(6)]

---

**From:** Riordan, Maureen (CRT) [(b)(6)]  
**Sent:** 8/11/2025 2:35:56 PM  
**To:** Buchko, John (CRT) [(b)(6)]  
**Attachments:** Dept of Justice SAVE VV MOA.pdf

Maureen S. Riordan  
Senior Counsel  
Acting Chief, Voting Section  
Civil Rights Division

[(b)(6)]

---

**From:** Song, Harin C. (CRT) [(b)(6)]  
**Sent:** 8/27/2025 4:48:52 PM  
**To:** Lott, Jasmin (CRT) [(b)(6)]; Reid, Arielle (CRT) [(b)(6)]; Rosenberg, Mary E. (CRT) [(b)(6)]  
**CC:** Bruzzone, Callie (CRT) [(b)(6)]  
**Subject:** FW: NVRA/HAVA Assignments  
**Attachments:** Draft response letter Maryland 8-15-25.docx

FYI below are emails that Tim and I had about Maryland's August 13 letter; Maryland reiterates its questions in its August 25 letter. I did not hear back about the letter draft after I sent it on August 15 and learned this week that a revised letter went out on August 18. The three letters are on the S drive.

Best,  
Harin

---

**From:** Song, Harin C. (CRT)  
**Sent:** Friday, August 15, 2025 6:56 PM  
**To:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Subject:** RE: NVRA/HAVA Assignments

Hi, Tim,

Please see a draft response letter to Maryland as requested. I started from the Arkansas letter that you sent me at 2 pm

[(b)(5)]

Thank you.

Best,  
Harin

---

**From:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Sent:** Friday, August 15, 2025 2:34 PM  
**To:** Song, Harin C. (CRT) [(b)(6)]  
**Subject:** Re: NVRA/HAVA Assignments

My understanding is that [(b)(5)]

[(b)(5)]

Get [Outlook for iOS](#)

---

**From:** Song, Harin C. (CRT) <[(b)(6)]>  
**Sent:** Friday, August 15, 2025 2:06:37 PM  
**To:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Subject:** FW: NVRA/HAVA Assignments

Hi, Tim,

There are several questions and requests in Maryland's August 13 response that I do not think the template letter addresses or is responsive to. Could we please discuss the below?

(b)(5)

Thank you.

Best,  
Harin

---

**From:** Song, Harin C. (CRT)  
**Sent:** Friday, August 15, 2025 1:37 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Subject:** RE: NVRA/HAVA Assignments

Thank you, Tim. When you have a chance, could you send a Word version of the Wyoming letter? Sorry to bother you; I looked in the HAVA letters 2025 folder but could not find it.

Best,  
Harin

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Friday, August 15, 2025 11:56 AM  
**To:** Song, Harin C. (CRT) <(b)(6)>  
**Subject:** Re: NVRA/HAVA Assignments

Thanks, Harin. Use Wyoming as the template bu adapt to Maryland. Yes, only one footnote.

Get [Outlook for iOS](#)

---

**From:** Song, Harin C. (CRT) <(b)(6)>  
**Sent:** Friday, August 15, 2025 10:21:18 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Subject:** Re: NVRA/HAVA Assignments

Hi, Tim,

Thank you for your email. I had to get my PIV updated yesterday, and the syncing is supposed to take about 3 hours but is still having issues. The HelpDesk is kindly working on it and a possible workaround so I can use my computer.

When I can use my computer again, for the Maryland letter, can I work from the last version that Jewel sent yesterday for AZ? Also, I noticed that the WY letter repeats a footnote.

Thank you, and I hope you can enjoy at least a little break next week.

Best,  
Harin

Get [Outlook for iOS](#)

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Friday, August 15, 2025 6:13:12 AM  
**To:** Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>  
**Subject:** RE: NVRA/HAVA Assignments

All,

The Front Office sent out 33 letters yesterday. Jewel will put them in the folders for your respective states. I have attached Wyoming as an example. Thanks to everyone who had a hand in writing letters to specific states! We have two letters that we still need to send out. Maryland replied on August 13, about not sending us public voter roll data. Harin, we will want to use the standard letter but reference the 8/13 response by Maryland. We also need send a letter to New Hampshire that follows the Minnesota model sent on Wednesday. Arielle, please send that draft to me <(b)(5)>.

I also wanted you to know that I will be on vacation all next week. You should still send me emails, but you should expect a longer delay for my responses.  
Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)  
**Sent:** Wednesday, August 13, 2025 11:28 AM  
**To:** Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>  
**Subject:** RE: NVRA/HAVA Assignments

All,

We are waiting for approval of the letter templates, but I have attached the draft template for California for those of you with group three states. Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)  
**Sent:** Tuesday, August 12, 2025 5:49 PM  
**To:** Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>  
**Cc:** Riordan, Maureen (CRT) <(b)(6)>  
**Subject:** RE: NVRA/HAVA Assignments

All,

As indicated in the spreadsheet, we will have a bunch of letters going out tomorrow. There will be three types of letters going out tomorrow. You will not need to do anything for the letters in Group 1 and Group 2. The letters in Group 3 will all be different. For group 3, I will need you to do a separate response to the letter in addition to the letter template that you will get tomorrow morning. AZ and MA are getting the one week/one month California style letter. CA is the template for all the letters going out tomorrow. DE and AL want assurances about how we are using data. And Maine is Maine. I think the Maine letter will probably need to go out on Thursday because there is more going on there.

Group 1 – They have given us files, but they did not provide driver’s license or ssn4.  
Members of Group 1 – AK, UT, IN, IA, MD, DC, MS, IL, WY, NJ, NV, NM, SD, FL, and MT

Group 2 – They have not replied with whether they will provide a voter list yet.  
Members of Group 2 – AR, OR, MI, KY, VA, PA, OH, KS, SC, NY, TX, TN, and GA

Group 3 – They have replied and not given us a voter list. These will need to be individually tailored, and the attorneys will do this for their assigned states.  
Members of Group 3 – AZ, CA, DE, MA, AL, and ME

Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)

**Sent:** Tuesday, August 12, 2025 11:07 AM

**To:** Tucker, James T. (CRT) <(b)(6)> Muench, Kevin (CRT) <(b)(6)> Bruzzone, Callie (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)> Rameres, Jewel (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>

**Cc:** Riordan, Maureen (CRT) <(b)(6)>

**Subject:** RE: NVRA/HAVA Assignments

All,

Here is an updated spreadsheet with column J including the analyst/paralegal assigned. Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)

**Sent:** Monday, August 11, 2025 5:06 PM

**To:** Tucker, James T. (CRT) <(b)(6)> Muench, Kevin (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>

**Cc:** Daniel, Tamica (CRT) <(b)(6)>; Riordan, Maureen (CRT) <(b)(6)>

**Subject:** NVRA/HAVA Assignments

All,

Please see the attached spreadsheet about the status of everything currently. Your assignments are in column I in purple. We are using the general numbers right now for NVRA -- 166-16P-52 and HAVA 166-16P-53. When the investigation progresses into a more likely litigation phase, then we will assign a separate DJ number for a particular state. Please let me know if you have any questions. Thanks,

Tim

**DOCUMENT WITHHELD IN FULL UNDER FOIA EXEMPTION B(5).**

---

**From:** Song, Harin C. (CRT) [redacted] (b)(6)  
[redacted] (b)(6)  
**Sent:** 8/15/2025 6:51:00 PM  
**To:** Mellett, Timothy F (CRT) [redacted] (b)(6)  
**Subject:** RE: NVRA/HAVA Assignments

Ok, thank you, Tim. FYI my PIV apparently keeps un-syncing and therefore not working, working, etc.

Best,  
Harin

**uplicated in**

**CREW v. DOJ - CRT - 000889-000893**

**duplicate in**

**CREW v. DOJ - CRT - 000889-000893**

**duplicate in**

**CREW v. DOJ - CRT - 000889-000893**

**duplicate in**

**CREW v. DOJ - CRT - 000889-000893**

**duplicate in**

**CREW v. DOJ - CRT - 000889-000893**

**DUPLICATE.**

CREW v. DOJ - CRT - 000889-000893



**Jared DeMarinis**  
State Administrator

**Katherine Berry**  
Deputy Administrator

**Michael Summers**, Chairman  
**Jim Shalleck**, Vice Chairman  
**Yaakov "Jake" Weissmann**  
**Diane Butler**  
**Victoria Jackson-Stanley**

August 13, 2025

Michael E. Gates  
Deputy Assistant Attorney General

Maureen Riordan  
Acting Chief, Voting Section  
Civil Rights Division  
Department of Justice  
950 Pennsylvania Avenue, NW – 4CON  
Washington, DC 20530

Sent via email: [voting.section@doj.gov](mailto:voting.section@doj.gov)

RE: Voter Registration List Request

Thank you for your request for Maryland's voter registration list.

Maryland law requires that the voter registration list not be used for "commercial solicitation" and, more importantly, may not be used for "any other purpose not related to the electoral process." Md. Code Ann., Elec. Law § 3-506(a)(1). Based upon the current request and similar requests made to other states, it is not clear what you intend to do with Maryland's voter registration list.

From your request, we understand the Department of Justice (Department) to be creating a system of records of Maryland voters, subject to the Federal Privacy Act (5 USC § 552a). Accordingly, the Department must share the Department's purpose in creating that system of records, including the notice published in the Federal Register required by 5 USC § 552A(e)(4) and how the public voter registration list requested is necessary and relevant to that purpose.

Because the request seeks past records, could you also share how the system of records you seek to establish of Maryland's voters will be maintained with "such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination." *Id.* at § 552A(e)(5). Moreover, since the voter registration list the Department requested includes party affiliation and voting history information, could you please provide your analysis for how the system of records the Department is establishing avoids maintaining a record "describing how any individual exercises rights guaranteed by the First Amendment." *Id.* at § 552A(e)(6).

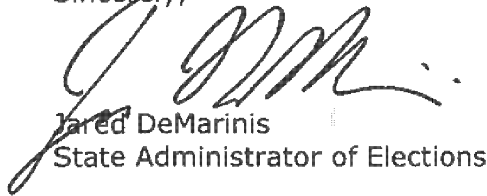
Finally, I request that the Department state whether the voter registration list will be

used in any investigative actions for potential violations of federal law. Specifically, whether the voter registration list will be used for enforcement of immigration laws against Maryland residents.

The voter registration list may not be used in a manner that intimidates a voter from going to the polls, results in or has the intent to result in the denial or abridgement of the right of a Maryland citizen to vote or causes a qualified voter to be stricken from voter registration list.

Maryland voters have the right to know what the Department intends to do with the state's voter registration list. That is why use is restricted to purposes related to the electoral process in Maryland.

Sincerely,



Jared DeMarinis  
State Administrator of Elections

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DUPLICATE.**

**CREW v. DOJ - CRT - 000903**

---

**From:** Song, Harin C. (CRT) [(b)(6)]  
**Sent:** 8/14/2025 3:36:01 PM  
**To:** Mellett, Timothy F (CRT) [(b)(6)]  
**CC:** Bruzzone, Callie (CRT) [(b)(6)]; Lott, Jasmin (CRT) [(b)(6)]; Reid, Arielle (CRT) [(b)(6)]; Rosenberg, Mary E. (CRT) [(b)(6)]  
**Subject:** RE: Draft Letter for Arizona

Thank you very much, Tim. This is helpful to know, and I appreciate your taking time to provide responses. I am copying my colleagues so they have the information as well.

Best,  
Harin

---

**From:** Mellett, Timothy F (CRT) [(b)(6)]  
**Sent:** Thursday, August 14, 2025 11:19 AM  
**To:** Song, Harin C. (CRT) [(b)(6)]  
**Subject:** RE: Draft Letter for Arizona

See responses below. We are going to have to get Arizona out in the next 90 minutes though because of Armeet's schedule

---

**From:** Song, Harin C. (CRT) [(b)(6)]  
**Sent:** Thursday, August 14, 2025 10:07 AM  
**To:** Mellett, Timothy F (CRT) [(b)(6)]  
**Subject:** RE: Draft Letter for Arizona

Thank you, Tim. My understanding is that the added portions are the template language paragraphs decided upon by the FO yesterday, but I have some initial questions, which I've listed below. I would like to understand the legal bases for assertions and positions reflected in this letter and other letters recently circulated, and if these issues proceed to litigation, courts may ask many of these questions. I apologize that the below may be incomplete, but I wanted to get this to you quickly. Thank you.

(b)(5)

(b)(5)

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>

**Sent:** Thursday, August 14, 2025 8:32 AM

**To:** Song, Harin C. (CRT) <(b)(6)> Rameres, Jewel (CRT) <(b)(6)>

**Subject:** Draft Letter for Arizona

Hi Harin and Jewel,

I have attached a draft of the letter to Arizona. Let me know if you have any edits. This will need to go out this morning. Thanks,

Tim

**DUPLICATE.**

**CREW v. DOJ - CRT - 000903**



**U.S. Department of Justice**

Civil Rights Division

---

*Office of the Assistant Attorney General*

*Washington, D.C. 20530*

August 14, 2025

Via Mail and Email

The Honorable Nancy Dahlstrom  
Lieutenant Governor  
P.O. Box 110015  
Juneau, AK 99811-0001  
[nancy.dahlstrom@alaska.gov](mailto:nancy.dahlstrom@alaska.gov)

**Re: Complete Alaska's Voter Registration List with All Fields**

Lieutenant Governor Dahlstrom:

We have received Alaska's statewide voter registration list ("VRL"). However, as the Attorney General requested, the electronic copy of the statewide VRL must contain *all fields*, including the registrant's full name, date of birth, residential address, his or her state driver's license number or the last four digits of the registrant's social security number as required under the Help America Vote Act ("HAVA")<sup>1</sup> to register individuals for federal elections. *See* 52 U.S.C. § 21083(a)(5)(A)(i).

We have requested Alaska's VRL to assess your state's compliance with the statewide VRL maintenance provisions of the National Voter Registration Act ("NVRA"), 52 U.S.C. § 20501, *et seq.* Our request is pursuant to the Attorney General's authority under Section 11 of the NVRA to bring enforcement actions. *See* 52 U.S.C. § 20501(a).

The Help America Vote Act ("HAVA"), 52 U.S.C. § 20501, *et seq.*, also provides authority for the Justice Department to seek the State's VRL via Section 401, which makes the Attorney General solely responsible for actions to enforce HAVA's computerized statewide Voter Registration List requirements. *See* 52 U.S.C. § 21111; *see also Brunner v. Ohio Republican Party*, 555 U.S. 5, 6 (2008) (*per curiam*) (finding there is no private right of action to enforce those requirements in HAVA).

---

<sup>1</sup> In charging the Attorney General with enforcement of the voter registration list requirements in the HAVA and in the NVRA, Congress plainly intended that Justice Department be able to conduct an independent review of each state's list. Any statewide prohibitions are clearly preempted by federal law.

In addition to those authorities, the Attorney General is also empowered by Congress to request records pursuant to Title III of the Civil Rights Act of 1960 (“CRA”), codified at 52 U.S.C. § 20701, *et seq.* Section 301 of the CRA requires state and local officials to retain and preserve records related to voter registration and other acts requisite to voting for any federal office for a period of 22 months after any federal general, special or primary election. *See* 52 U.S.C. § 20701.

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

Pursuant to the foregoing authorities, including the CRA, the Attorney General is demanding an electronic copy of Alaska’s complete and current VRL. The purpose of the request is to ascertain Alaska’s compliance with the list maintenance requirements of the NVRA and HAVA.

When providing the electronic copy of the statewide VRL, Alaska must ensure that it contains *all fields*, which includes the registrant’s full name, date of birth, residential address, his or her state driver’s license number or the last four digits of the registrant’s social security number as required under the Help America Vote Act (“HAVA”)<sup>2</sup> to register individuals for federal elections. *See* 52 U.S.C. § 21083(a)(5)(A)(i).

To the extent there are privacy concerns, the voter registration list is subject to federal privacy protections. Section 304 of the CRA provides the answer:

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

Moreover, HAVA specifies that the “last 4 digits of a social security number . . . shall not be considered a social security number for purposes of section 7 of the Privacy Act of 1974” (5 U.S.C. § 552a note); 52 U.S.C. § 21083(c). In addition, any prohibition of disclosure of a motor vehicle record contained in the Driver’s License Protection Act, codified at 18 U.S.C. § 2721(b)(1), is exempted when the disclosure is for use by a government agency in carrying out the government agency’s function to accomplish its enforcement authority as the Justice Department is now doing. That said, all data received from you will be kept securely and treated consistently with the Privacy Act.

---

<sup>2</sup> In charging the Attorney General with enforcement of the voter registration list requirements in the HAVA and in the NVRA, Congress plainly intended that Justice Department be able to conduct an independent review of each state’s list. Any statewide prohibitions are clearly preempted by federal law.

In charging the Attorney General with enforcement of the voter registration list requirements in HAVA and in the NVRA, Congress plainly intended that DOJ be able to conduct an independent review of each state's list. Any statewide prohibitions are preempted by federal law.

To that end, please provide the requested electronic Voter Registration List<sup>3</sup> to the Justice Department within seven days or by August 21, 2025.

The information and materials may be sent by encrypted email to [voting.section@usdoj.gov](mailto:voting.section@usdoj.gov) or via the Department's secure file-sharing system, Justice Enterprise File Sharing ("JEFS"). Should further clarification be required, please contact Maureen Riordan at (b)(6)

Regards,



Harmeet K. Dhillon  
Assistant Attorney General  
Civil Rights Division

cc: Carol Beecher  
Director, Division of Elections  
Court Plaza Building  
240 Main Street, 4th Floor  
Juneau, AK 99801  
(b)(6)

---

<sup>3</sup> Containing *all fields*, which includes either the registrant's full name, date of birth, residential address, his or her state driver's license number or the last four digits of the registrant's social security number as required by HAVA.

**DUPLICATE.**

CREW v. DOJ - CRT - 000908-000910

**DUPLICATE.**

CREW v. DOJ - CRT - 000908-000910

**DUPLICATE.**

**CREW v. DOJ - CRT - 000787-000788**

---

**From:** Rameres, Jewel (CRT) [(b)(6)]  
**Sent:** 8/28/2025 7:26:49 PM  
**To:** Mellett, Timothy F (CRT) [(b)(6)]; Song, Harin C. (CRT) [(b)(6)]  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You  
**Attachments:** 2025.08.28 Maryland template letter\_clean.docx

Please see attached MD letter.

---

**From:** Rameres, Jewel (CRT)  
**Sent:** Thursday, August 28, 2025 3:24 PM  
**To:** Mellett, Timothy F (CRT) <[(b)(6)]>; Song, Harin C. (CRT) <[(b)(6)]>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Makes sense! I will send back with just the footnote included.

---

**From:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Sent:** Thursday, August 28, 2025 3:23 PM  
**To:** Rameres, Jewel (CRT) <[(b)(6)]>; Song, Harin C. (CRT) <[(b)(6)]>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Thanks, Jewel, I would be inclined to [(b)(5)]  
[(b)(5)]  
[(b)(5)] I do like your footnote though.

---

**From:** Rameres, Jewel (CRT) <[(b)(6)]>  
**Sent:** Thursday, August 28, 2025 3:18 PM  
**To:** Song, Harin C. (CRT) <[(b)(6)]>; Mellett, Timothy F (CRT) <[(b)(6)]>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Hi Harin,

Here are my suggestions/edits for the MD letter. Also, I agree with your corrections on the cites. Thanks for spotting those!

Jewel

---

**From:** Song, Harin C. (CRT) <[(b)(6)]>  
**Sent:** Thursday, August 28, 2025 1:32 PM  
**To:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Cc:** Rameres, Jewel (CRT) <[(b)(6)]>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Hi, Tim and Jewel,

Please see attached a draft letter for Maryland for review. I made the below edit to the highlighted citation as well; I [(b)(5)] I also capitalized s in "JEFS" at the beginning of the first full paragraph on the second page.

• JUSTICE/DOJ-014, Department of Justice Employee Directory Systems, last published in full at 74 Fed. Reg. 57194 (Nov. 4, 2009), and modified at 82 Fed. Reg. 24151, 24153 (May 25, 2017);

Thank you.

Best,  
Harin

---

**From:** Song, Harin C. (CRT)  
**Sent:** Thursday, August 28, 2025 12:01 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Similarly, I made these edits in the below portion and also formatted the dates to be consistent with the previous citations.

(b)(5)

---

**From:** Song, Harin C. (CRT)  
**Sent:** Thursday, August 28, 2025 11:54 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Hi, Tim,

For these Fed Reg cites, there are multiple results (e.g., -01, -02), so for purposes of clarity when states look up the citations, I wonder if it's worth adding the hyphenated numbers. I just wanted to raise for consideration. Thank you.

JUSTICE/DOJ-002, Department of Justice Computer Systems Activity and Access Records, last published in full at 64 Fed. Reg. 73585-02 (Dec. 30, 1999), and modified at 66 Fed. Reg. 8425-02 (Jan. 31, 2001) and 82 Fed. Reg. 24147-01 (May 25, 2017)

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 11:37 AM  
**To:** Song, Harin C. (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Yes. Thanks!

---

**From:** Song, Harin C. (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 11:33 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

For the Maryland letter, I made these edits to the template letter: (b)(5)  
(b)(5) I also added the comma after the final item in a list in a few places.

(b)(5)

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 9:53 AM  
**To:** Song, Harin C. (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Yes, Voting letterhead

**From:** Song, Harin C. (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 9:52 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Hi, Jewel,

I will put the template into the letterhead using the previous Word drafts of the initial letters to Oregon and Maryland, so no need to do so. I will send you and Tim drafts for review and finalizing as soon as I can. Thank you.

Tim – we should use the CRT/Voting letterhead we used for the initial EAVS-related letters and not the AAG letterhead, is that correct?

Best,  
Harin

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 9:40 AM  
**To:** Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Bennett, Brittany (CRT) <(b)(6)>; Vandenberg, David (CRT) <(b)(6)>  
**Cc:** Riordan, Maureen (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

All,  
I have attached the approved template of the privacy letter. Please use this in preparing the privacy letter for your states. These letters will need to go out today. Likewise, Alabama and Oklahoma also need to go out today.

I have also attached the latest spreadsheet. Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)

**Sent:** Tuesday, August 26, 2025 12:50 PM

**To:** Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>

**Cc:** Riordan, Maureen (CRT) <(b)(6)>

**Subject:** Letters to States Updated Spreadsheet and Tasks for You

All,

I am forwarding the latest spreadsheet. Please look at columns l and j for your states.

If you have a “No Response”, please contact the state to find out if they will be responding. If you cannot reach someone in a phone call, please send an email. If you do talk to someone, please send an email confirming the information from the call. If the State asks for more time, you are authorized to let them know we need a response no later than September 2.

If you have “Refuse Cooperation; Sending Privacy Letter”, please look at your state’s response letter. We will be providing a template for a reply to that letter which sites the SORN and other Privacy Act information, but we will want you to adapt the template to the specifics of your state’s letter. We will provide states one more week to respond to that letter.

Alabama and Oklahoma were not sent 8/14 letters, but we will need to send that type of letter now with the Privacy Act information included.

Please note that we are also working on templates for a notice letter and a complaint to sue for failure to provide the information requested. Let me know if you have any questions. Thanks,

Tim

**DOCUMENT WITHHELD IN FULL UNDER FOIA EXEMPTION B(5).**

---

**From:** Song, Harin C. (CRT) [(b)(6)]  
**Sent:** 8/28/2025 5:34:08 PM  
**To:** Rosenberg, Mary E. (CRT) [(b)(6)]; Reid, Arielle (CRT) [(b)(6)] Lott, Jasmin (CRT) [(b)(6)]  
**Subject:** FW: Letters to States Updated Spreadsheet and Tasks for You  
**Attachments:** 2025.08.28 Maryland template letter.docx

FYI the draft I just sent to Tim. Tim has not yet approved some of the additional edits I made to citations.

Best,  
Harin

**duplicate in**

CREW v. DOJ - CRT - 000914-000917

**duplicate in**

**CREW v. DOJ - CRT - 000914-000917**

**duplicate in**

**CREW v. DOJ - CRT - 000914-000917**

**duplicate in**

**CREW v. DOJ - CRT - 000914-000917**

**DOCUMENT WITHHELD IN FULL UNDER FOIA EXEMPTION B(5).**

**DUPLICATE.**

CREW v. DOJ - CRT - 000914-000917

**DOCUMENT WITHHELD IN FULL UNDER FOIA EXEMPTION B(5).**

---

**From:** Song, Harin C. (CRT) [(b)(6)]  
**Sent:** 8/28/2025 7:28:05 PM  
**To:** Daniel, Tamica (CRT) [(b)(6)]; Bruzzone, Callie (CRT) [(b)(6)]; Lott, Jasmin (CRT) [(b)(6)]; Reid, Arielle (CRT) [(b)(6)]; Rosenberg, Mary E. (CRT) [(b)(6)]  
**Subject:** FW: Letters to States Updated Spreadsheet and Tasks for You

FYI

---

**From:** Song, Harin C. (CRT)  
**Sent:** Thursday, August 28, 2025 3:27 PM  
**To:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Hi, Tim,

I wanted to raise for consideration [(b)(5)]

(b)(5)

Thank you.

Best,  
Harin

---

**From:** Mellett, Timothy F (CRT) <[(b)(6)]>  
**Sent:** Thursday, August 28, 2025 10:45 AM  
**To:** Song, Harin C. (CRT) [(b)(6)]  
**Cc:** Rameres, Jewel (CRT) <[(b)(6)]>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Hi Harin,

(b)(5)

(b)(5)

Thanks,

Tim

---

**From:** Song, Harin C. (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 9:55 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Rameres, Jewel (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Thank you.

Best,  
Harin

**duplicated in**

**CREW v. DOJ - CRT - 000914-000917**

**duplicate in**

**CREW v. DOJ - CRT - 000914-000917**

---

**From:** Mellett, Timothy F (CRT) [REDACTED]  
**Sent:** 8/28/2025 8:07:38 PM  
**To:** Song, Harin C. (CRT) [REDACTED]  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Hi Harin,

I would be happy to chat tomorrow if you are in. Thanks,

Tim

**duplicated in**

**CREW v. DOJ - CRT - 000926-000928**

**duplicate in**

**CREW v. DOJ - CRT - 000926-000928**

**duplicate in**

**CREW v. DOJ - CRT - 000926-000928**

---

**From:** Bonilla, German (CRT) <(b)(6)>  
**Sent:** 8/28/2025 6:16:19 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You  
**Attachments:** Mlssissippi Ltr\_2025\_08\_28\_VOT Letterhead\_Draft.docx

Tim,

Here is the draft letter to MS on VOT letterhead. It may need some formatting to make it look good.

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 1:53 PM  
**To:** Lott, Jasmin (CRT) <(b)(6)>  
**Cc:** Bonilla, German (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

Thanks

---

**From:** Lott, Jasmin (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 1:51 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Bonilla, German (CRT) <(b)(6)>  
**Subject:** Re: Letters to States Updated Spreadsheet and Tasks for You

Hey Tim,

I had to leave early today <(b)(6)> and I'm out tomorrow, so I'm sending the draft letter to German to put on letterhead and then send to you.

Get [Outlook for iOS](#)

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Thursday, August 28, 2025 11:42 AM  
**To:** Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Bennett, Brittany (CRT) <(b)(6)>; Vandenberg, David (CRT) <(b)(6)>  
**Cc:** Riordan, Maureen (CRT) <(b)(6)>  
**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

All,

Please note the following two changes in the template courtesy of Harin's eagle eye:

You have also inquired why the Voting Section would need information such as the Driver's License number and the last four digits of the Social Security Number. HAVA requires this voter registration information in Section 303(a)(5)(A), and the Attorney General will be assessing all **states'** compliance with that provision. See 52 U.S.C. § 21083(a)(5)(A).

Thanks,

Tim

---

**From:** Mellett, Timothy F (CRT)

**Sent:** Thursday, August 28, 2025 9:55 AM

**To:** Tucker, James T. (CRT) <(b)(6)>; Muench, Kevin (CRT) <(b)(6)>; Lott, Jasmin (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>; Rosenberg, Mary E. (CRT) <(b)(6)>; Song, Harin C. (CRT) <(b)(6)>; Bonilla, German (CRT) <(b)(6)>; Hyatte, Joi (CRT) <(b)(6)>; Rameres, Jewel (CRT) <(b)(6)>; Wake, Brittany (CRT) <(b)(6)>; Bruzzone, Callie (CRT) <(b)(6)>; Bennett, Brittany (CRT) <(b)(6)>; Vandenberg, David (CRT) <(b)(6)>

**Cc:** Riordan, Maureen (CRT) <(b)(6)>

**Subject:** RE: Letters to States Updated Spreadsheet and Tasks for You

All,

This will go out on Voting letterhead not on AAG letterhead. Thanks,

Tim

CREW v. DOJ - CRT - 000914-000917

**duplicated in**

**duplicate in**

**CREW v. DOJ - CRT - 000914-000917**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

---

**From:** Lott, Jasmin (CRT) [redacted] (b)(6)  
[redacted] (b)(6)  
**Sent:** 8/28/2025 5:58:31 PM  
**To:** Bonilla, German (CRT) [redacted] (b)(6)  
**Subject:** FW: Letters to States Updated Spreadsheet and Tasks for You  
**Attachments:** Mississippi Letter\_2025\_08\_28.docx

German,

Can you put this on CRT letterhead and send it to Tim, copying me? I'm heading out early today for a medical appointment so I'll be offline for a bit. But I can check back in with you later if you have any questions. Just let me know. thanks!

Jasmin

**duplicated in**

**CREW v. DOJ - CRT - 000932-000934**

**duplicate in**

**CREW v. DOJ - CRT - 000932-000934**

**duplicate in**

**CREW v. DOJ - CRT - 000932-000934**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER FOIA EXEMPTION B(5).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

---

**From:** Bruzzone, Callie (CRT) [(b)(6)]  
**Sent:** 9/4/2025 6:31:04 PM  
**To:** Lott, Jasmin (CRT) [(b)(6)]; Rosenberg, Mary E. (CRT) [(b)(6)]; Song, Harin C. (CRT) [(b)(6)]; Reid, Arielle (CRT) [(b)(6)]  
**Subject:** FW: [EXTERNAL] Re: Complete Voter Registration List with All Fields

---

**From:** Bruzzone, Callie (CRT)  
**Sent:** Thursday, September 4, 2025 2:14 PM  
**To:** Mellett, Timothy F (CRT) <[(b)(6)]>; Wake, Brittany (CRT) <[(b)(6)]>  
**Subject:** RE: [EXTERNAL] Re: Complete Voter Registration List with All Fields

Hi Tim,

I wanted to check in on this task, because it has become a bit more complicated than I expected. UT asks specific questions that are unaddressed in the TN model letter. I am not sure of the Section's position on some of these concerns. Here are the specific questions and what I know about each. Please let me know if my understanding is accurate and what to communicate to UT.

(b)(5)

(b)(5)

Thank you for your help with these questions.

Best,

Callie

---

**From:** Mellett, Timothy F (CRT) <(b)(6)>

**Sent:** Wednesday, September 3, 2025 9:49 AM

**To:** Bruzzone, Callie (CRT) <(b)(6)> Wake, Brittany (CRT) <(b)(6)>

**Subject:** FW: [EXTERNAL] Re: Complete Voter Registration List with All Fields

Hi Callie and Brittany,

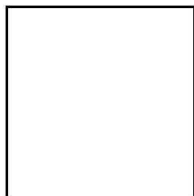
See the attached correspondence from Utah. Please prepare a privacy letter for Utah using the letter to Tennessee as a model. Please send me a draft later today. Thanks,

Tim

---

**From:** Ryan Cowley (b)(6)  
**Sent:** Friday, August 29, 2025 6:54 PM  
**To:** Gates, Michael (CRT) (b)(6)  
**Cc:** (b)(6) @utah.gov; Riordan, Maureen (CRT) (b)(6) Mellett, Timothy F (CRT)  
(b)(6)  
**Subject:** Re: [EXTERNAL] Re: Complete Voter Registration List with All Fields

Mr. Gates, please find attached my response to your email dated August 22, 2025.



**Ryan Cowley** | Director of Elections  
OFFICE OF LIEUTENANT GOVERNOR  
DEIDRE M. HENDERSON  
[LTGOVERNOR.UTAH.GOV](http://LTGOVERNOR.UTAH.GOV)  
801-538-1041

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

---

**From:** Vandenberg, David (CRT) <(b)(6)>  
<(b)(6)>  
**Sent:** 9/11/2025 2:26:18 PM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>; Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Josh,

I understand they would like both of us to work on the ME complaint, which will come soon.

**David D. Vandenberg**  
Trial Attorney  
Civil Rights Division  
U.S. Department of Justice  
Tel. <(b)(6)>  
<(b)(6)>



---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Thursday, September 11, 2025 10:25 AM  
**To:** Vandenberg, David (CRT) <(b)(6)>; Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

We are running down a few points, but this should be back to you before Noon.

---

**From:** Vandenberg, David (CRT) <(b)(6)>  
**Sent:** Thursday, September 11, 2025 10:20 AM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>; Mellett, Timothy F (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Josh,

Maureen is revising Tim's draft. When that is finished, they will forward it on to us, and we then edit.

That is my understanding.

David

**David D. Vandenberg**  
Trial Attorney  
Civil Rights Division  
U.S. Department of Justice

Tel. (b)(6)  
(b)(6)



---

**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Thursday, September 11, 2025 10:18 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>; Vandenberg, David (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Thanks! What are the next steps here? Do you want us to revise the Oregon complaint or the memorandum of law I sent Maureen in light of the complaint (which I hadn't seen before)?

--

**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: (b)(6) | (b)(6)



---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Thursday, September 11, 2025 8:08 AM  
**To:** Vandenberg, David (CRT) <(b)(6)>; Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

The latest draft of the Oregon Complaint. I will send the Maine Complaint later this morning. Thanks,

Tim

---

**From:** Vandenberg, David (CRT) <(b)(6)>  
**Sent:** Wednesday, September 10, 2025 3:47 PM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Cc:** Mellett, Timothy F (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Well, now it seems we are moving forward on the Oregon complaint, along with Maine.

Tim has a draft, and I would start with him on next steps.

David

**David D. Vandenberg**  
Trial Attorney  
Civil Rights Division  
U.S. Department of Justice  
Tel. (b)(6)  
(b)(6)



---

**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 2:34 PM  
**To:** Vandenberg, David (CRT) (b)(6)  
**Subject:** RE: Oregon Complaint

Thanks! Have you started writing anything yet? If not, we should make a plan to divide the work.

--

**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: (b)(6) | (b)(6)



---

**From:** Vandenberg, David (CRT) (b)(6)  
**Sent:** Tuesday, September 9, 2025 2:18 PM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** FW: Oregon Complaint

Josh,

This is all the information on ME that I have received.

**David D. Vandenberg**

Trial Attorney  
Civil Rights Division  
U.S. Department of Justice  
Tel. (b)(6)  
(b)(6)



---

**From:** Mellett, Timothy F (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 10:36 AM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Cc:** Vandenberg, David (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Hi Josh,

Welcome! I talked with Michael, and we are all going to pivot to Maine. (b)(5)

(b)(5)

(b)(5) I have included David Vandenberg in Voting, who is also working on this project. I have attached a bunch of Maine relevant information. Let me know if you have questions. Thanks,

Tim

---

**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 9:17 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Subject:** FW: Oregon Complaint

Hi Tim,

I'm new to DOJ, and Maureen had me working on the Oregon voter case. I drafted an order to show cause, and Michael asked me to draft a complaint as well. Have you been working on this? I don't want to duplicate efforts. Also, can you please send me the data that Michael mentioned below (highlighted)? Thanks!

--

**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: (b)(6) | (b)(6)



---

**From:** Gates, Michael (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 9:15 AM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Okay, I wasn't sure what was happening in our VOT section with Tim out yesterday and Maureen out today so I had asked Tim to prep an OR lawsuit too, before I then contacted you. So, he may be surprised you are on it, but please work it out with him and let's get it done. Thank you.

**Michael E. Gates**  
Deputy Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530

(b)(6)  
(b)(6)



---

**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 9:13 AM  
**To:** Gates, Michael (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Thanks! I'll ask Tim for the data and will convert the memo ISO order to show cause into a complaint.

--  
**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: (b)(6) | (b)(6)



---

**From:** Gates, Michael (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 8:57 AM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Thank you. Attached is the 'basis'

**Michael E. Gates**

Deputy Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530

(b)(6)

(b)(6)



---

**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Monday, September 8, 2025 6:26 PM  
**To:** Gates, Michael (CRT) (b)(6)  
**Subject:** Re: Oregon Complaint

Hi Michael,

Nice to meet you! I have been working on this project. I drafted the OSC for Maureen today, and I'm happy to draft a complaint tomorrow; I agree that's the safer course of action.

Thanks!  
Josh

---

**From:** Gates, Michael (CRT) (b)(6)  
**Sent:** Monday, September 8, 2025 5:49:27 PM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** Oregon Complaint

Hi Josh, I am the DAAG assigned to the Voting Section. I just got back today from a week off last week. It was my understanding that we were preparing a Complaint against OR (b)(5) (b)(5). Have you been working on this project? If you worked on the attached too, you might be up to speed enough to help draft a Complaint. I do (b)(5) would be ideal – but Maureen is out tomorrow. Are you able to take a stab at a basic Complaint? If so, Tim Mellet of VOT can help provide (b)(5) Attached is a sample Complaint against AZ for HAVA violations; although not sure if this is very helpful.

In any event, a long explanation. We can discuss more. Please advise of your availability and ability to assist. Thank you.

**Michael E. Gates**  
Deputy Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530

(b)(6)

(b)(6)



**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Sunday, September 7, 2025 8:10 PM  
**To:** Riordan, Maureen (CRT) <(b)(6)>  
**Subject:** NVRA research

Hi Maureen,

In conjunction with DOJ's request that the Oregon Secretary of State produce voter data pursuant to 52 USC 20703, you asked me to analyze: (b)(5)

**(b)(5)**

You also asked me to research whether the Attorney General (b)(5)

**(b)(5)**

(b)(5)

(b)(5)

but I'll continue to research that tomorrow.

Thanks!

--

**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: (b)(6) | (b)(6)



---

**From:** Vandenberg, David (CRT) <(b)(6)>  
(b)(6)  
**Sent:** 9/9/2025 6:40:13 PM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

We have a draft of the Oregon complaint somewhere, and I imagine we will amend that reflect the Maine facts, so drafting will not be from square one. It will be the same legal arguments, and this looks like an interesting first-impression case of the CRA 1960, extending prior opinions on racial discrimination to other forms of discrimination.

**David D. Vandenberg**  
Trial Attorney  
Civil Rights Division  
U.S. Department of Justice  
Tel. (b)(6)  
(b)(6)



---

**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 2:37 PM  
**To:** Vandenberg, David (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Sounds good. Thanks!

--  
**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: (b)(6) | (b)(6)



---

**From:** Vandenberg, David (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 2:36 PM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

I have not started yet. I am working on some other matters. Tim will direct us on how to proceed, so if we do not hear from him in a few days, we should bring this up. We are preparing a number of causes for filing Monday, but I do not know whether Maine is included in that.

**David D. Vandenberg**

Trial Attorney

Civil Rights Division

U.S. Department of Justice

Tel. (b)(6)

(b)(6)



---

**From:** Zuckerman, Joshua (CRT) <(b)(6)>

**Sent:** Tuesday, September 9, 2025 2:34 PM

**To:** Vandenberg, David (CRT) (b)(6)

**Subject:** RE: Oregon Complaint

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**DUPLICATE.**

**CREW v. DOJ - CRT - 000961-000968**

**DOCUMENT WITHHELD IN FULL UNDER FOIA EXEMPTION B(5).**

---

**From:** Zuckerman, Joshua (CRT) [(b)(6)]  
**Sent:** 9/9/2025 4:48:01 PM  
**To:** Vandenberg, David (CRT) [David; (b)(6)]; Mellett, Timothy F (CRT) [(b)(6)]  
**Subject:** RE: Oregon Complaint

Likewise! What has already been done, and what do I need to do?

--

**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: [(b)(6)] | [(b)(6)]



---

**From:** Vandenberg, David (CRT) <David; (b)(6)>  
**Sent:** Tuesday, September 9, 2025 12:45 PM  
**To:** Zuckerman, Joshua (CRT) <(b)(6)>; Mellett, Timothy F (CRT) <(b)(6)>  
**Subject:** RE: Oregon Complaint

Please to be working with you on this one, Josh.

**David D. Vandenberg**  
Trial Attorney  
Civil Rights Division  
U.S. Department of Justice  
Tel. [(b)(6)]  
[(b)(6)]



---

**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 10:55 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Vandenberg, David (CRT) [(b)(6)]  
**Subject:** RE: Oregon Complaint

(b)(5)

In any event, I'm happy to pivot to Maine—just let me know what you need from me so I don't redo anything David has already done. I think the memo of law I wrote for Oregon can easily be adapted for Maine.

--

**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: (b)(6) | (b)(6)



**duplicated in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**From:** Mellett, Timothy F (CRT) (b)(6)  
**Sent:** 9/9/2025 2:58:23 PM  
**To:** Zuckerman, Joshua (CRT) (b)(6)  
**CC:** Vandenberg, David (CRT) (b)(6)  
**Subject:** RE: Oregon Complaint

(b)(5)

**From:** Zuckerman, Joshua (CRT) <(b)(6)>  
**Sent:** Tuesday, September 9, 2025 10:55 AM  
**To:** Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Vandenberg, David (CRT) (b)(6)  
**Subject:** RE: Oregon Complaint

(b)(5)

In any event, I'm happy to pivot to Maine—just let me know what you need from me so I don't redo anything David has already done. I think the memo of law I wrote for Oregon can easily be adapted for Maine.

--

**Josh Zuckerman** | Trial Attorney  
U.S. Department of Justice | Civil Rights Division  
950 Pennsylvania Avenue, NW, Washington, D.C. 20530  
Mobile: (b)(6) | (b)(6)



**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicated in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicate in**

**CREW v. DOJ - CRT - 000961-000968**

**duplicated in**

**CREW v. DOJ - CRT - 000961-000968**

**DUPLICATE.**

CREW v. DOJ - CRT - 000961-000968



**U.S. Department of Justice**

Civil Rights Division

*Office of the Assistant Attorney General*

*Washington, D.C. 20530*

August 18, 2025

Via Mail and Email

The Honorable Shenna Bellows  
Secretary of State  
148 State House Station  
Augusta, Maine 04333-0148  
[REDACTED]  
sos.office@maine.gov

**Re: Maine Voter Registration List with All Fields**

Secretary Bellows:

This letter responds to your letter of August 8, 2025. This communication is limited to our request for Maine’s voter registration list (“VRL”) to assess the State’s compliance with the statewide voter registration list maintenance provisions of the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20501 *et seq.* Our request is pursuant to the Attorney General’s authority under Section 11 of the NVRA to bring enforcement actions. *See* 52 U.S.C. § 20501(a).

As the Attorney General requested, the electronic copy of the statewide VRL must contain all fields, including the registrant’s full name, date of birth, residential address, his or her state driver’s license number or the last four digits of the registrant’s social security number as required under the Help America Vote Act (“HAVA”)<sup>1</sup> to register individuals for federal elections. *See* 52 U.S.C. § 21083(a)(5)(A)(i).

As you know, the First Circuit Court of Appeals confirmed that “Maine’s Voter File is a ‘record[] concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters’ and is thus subject to disclosure under Section 8(i)(1).” *Pub. Int. Legal Found., Inc. v. Bellows*, 92 F.4th 36, 49 (1st Cir. 2024). In the same decision, the First Circuit found that a provision of Maine’s state privacy law was preempted by the NVRA. *Id.* at

<sup>1</sup> In charging the Attorney General with enforcement of the voter registration list requirements in the HAVA and in the NVRA, Congress plainly intended that Justice Department be able to conduct an independent review of each state’s list. Any statewide prohibitions are clearly preempted by federal law.

53 (“Maine may not “condition [] [the right to vote] ... upon compliance with a rule ... [that] is inconsistent in both purpose and effect with the remedial objectives of the [NVRA].”).

HAVA, 52 U.S.C. § 20901 *et seq.*, also provides authority for the Justice Department to seek the State’s VRL via Section 401, which makes the Attorney General solely responsible for actions to enforce HAVA’s computerized statewide Voter Registration List requirements. *See* 52 U.S.C. § 21111; *see also Brunner v. Ohio Republican Party*, 555 U.S. 5, 6 (2008) (*per curiam*) (finding there is no private right of action to enforce those requirements in HAVA).

In addition to those authorities, the Attorney General is also empowered by Congress to request records pursuant to Title III of the Civil Rights Act of 1960 (“CRA”), codified at 52 U.S.C. § 20701 *et seq.* Section 301 of the CRA requires state and local officials to retain and preserve records related to voter registration and other acts requisite to voting for any federal office for a period of 22 months after any federal general, special or primary election. *See* 52 U.S.C. § 20701.

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

Pursuant to the foregoing authorities, including the CRA, the Attorney General is demanding an electronic copy of Maine’s complete and current VRL. The purpose of the request is to ascertain Maine’s compliance with the list maintenance requirements of the NVRA and HAVA.

As required by Section 303 of the CRA, our letter dated July 24, 2025, provided you with “a statement of the basis and the purpose therefore,” *id.*, namely, to assist in our determination of whether Maine’s list maintenance program complies with the NVRA. At your request, we have reaffirmed that statement in this correspondence.

In addition to the full electronic VRL, we also request by this letter a copy of all original and completed voter registration applications submitted to the State of Maine from December 1, 2023, through July 1, 2025. To be clear, that means copies of all voter registration applications completed and submitted by prospective voters during that time period. When providing a copy of the requested completed registration applications Maine must ensure that they are provided in unredacted format.

Your letter dated August 8, 2025, also indicated concern regarding federal privacy protections of the VRL and other requested information by the Justice Department. Section 304 of the CRA provides the answer:

Unless otherwise ordered by a court of the United States, neither the Attorney General nor any employee of the Department of Justice, nor any other representative of the Attorney General, shall disclose any record or paper produced pursuant to this chapter,

or any reproduction or copy, except to Congress and any committee thereof, governmental agencies, and in the presentation of any case or proceeding before any court or grand jury.

52 U.S.C. § 20704. As you noted, other federal laws may be applicable, including the Privacy Act. All data received from you will be kept securely and treated consistently with the Privacy Act. Maine's privacy laws, to the extent they are inconsistent with federal law, are preempted.

HAVA specifies that the "last 4 digits of a social security number . . . shall not be considered a social security number for purposes of section 7 of the Privacy Act of 1974" (5 U.S.C. § 552(a) note); 52 U.S.C. § 21083(c)). In addition, any prohibition of disclosure of a motor vehicle record contained in the Driver's License Protection Act, codified at 18 U.S.C. § 2721(b)(1), is exempted when the disclosure is for use by a government agency in carrying out the government agency's function to accomplish its enforcement authority as the Justice Department is now doing.

To that end, provide the requested electronic VRL<sup>2</sup> to the Justice Department within seven days or by August 25, 2025.

Maine's VRL and the requested original and completed voter registration applications may be sent by encrypted email to [voting.section@usdoj.gov](mailto:voting.section@usdoj.gov) or via the Department's secure file-sharing system, Justice Enterprise File Sharing ("JEFS"). Should further clarification be required, please contact Maureen Riordan at (b)(6)

Regards,



Harmeet K. Dhillon  
Assistant Attorney General  
Civil Rights Division

cc: The Honorable Julie Flynn  
Deputy Secretary of State  
184 State House Station  
Augusta, Maine 04333-0101  
(b)(6)

---

<sup>2</sup> Containing *all fields*, which includes either the registrant's full name, date of birth, residential address, their state driver's license number or the last four digits of the registrant's social security number as required by HAVA.

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

**DOCUMENT WITHHELD IN FULL UNDER  
FOIA EXEMPTIONS B(5) AND B(6).**

---

**From:** Riordan, Maureen (CRT) [REDACTED] (b)(6)  
[REDACTED] (b)(6)  
**Sent:** 9/11/2025 9:15:55 PM  
**To:** Gates, Michael (CRT) [REDACTED] (b)(6)  
**Subject:** Here is the SAVE MOU which has nothing to do with ours. UGH. Please send to him. So annoying  
**Attachments:** SAVE-MOA-Voter-Reg--List-Maint-Template.pdf

---

**From:** Reid, Arielle (CRT) (b)(6)  
(b)(6)  
**Sent:** 9/19/2025 3:02:39 PM  
**To:** Song, Harin C. (CRT); (b)(6) Rosenberg, Mary E. (CRT) (b)(6)  
**Subject:** FW: Upcoming lawsuits  
**Attachments:** Stamped Complaint 9 17 2025.pdf; Stamped Motion to Show Cause 9 18 2025.pdf; 2025 9 16 Maine Complaint Final (AutoRecovered).docx; Maine Memo ISO Motion to Compel 9 18 2025.docx; Order Maine 9 16 2025.docx; Maureen S Riordan Decl Maine.docx

Arielle Reid  
Trial Attorney

(b)(6)

---

**From:** Vandenberg, David (CRT) <David.(b)(6)>  
**Sent:** Friday, September 19, 2025 11:00 AM  
**To:** Gates, Michael (CRT) (b)(6) Riordan, Maureen (CRT) (b)(6)  
Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Neff, Eric (CRT) <(b)(6)>; Bennett, Brittany (CRT) <(b)(6)>; Reid, Arielle (CRT) (b)(6)  
**Subject:** RE: Upcoming lawsuits

I have attached the final drafts papers, as well as final, stamped versions from the court. These incorporate all the edits from all reviews.

We found that both OR and ME have idiosyncratic filing procedures, certainly for initial filings. Having spoken with the USAOs beforehand and then requesting their assistance on these peculiarities helped a whole lot. If we plan on filing anything next week, we should be contacting the pertinent USAOs today or tomorrow to advise of the filing and identify a point of contact for the future.

David

**David D. Vandenberg**  
Trial Attorney  
Civil Rights Division  
U.S. Department of Justice

Tel. (b)(6)

(b)(6)



**From:** Gates, Michael (CRT) <(b)(6)>  
**Sent:** Friday, September 19, 2025 10:39 AM  
**To:** Riordan, Maureen (CRT) <(b)(6)>; Mellett, Timothy F (CRT) <(b)(6)>  
**Cc:** Neff, Eric (CRT) <(b)(6)>; Bennett, Brittany (CRT) <(b)(6)>; Vandenberg, David (CRT) <(b)(6)>; Reid, Arielle (CRT) <(b)(6)>  
**Subject:** Upcoming lawsuits

Team, thank you for your work on these next suits. As you draft, prepare, and finalize for presentation to the front office, please also prepare the Motions for OSCs. You can use Maine as an example. There are a few filings with those OSCs. (b)(5)  
(b)(5) the sooner we can prep the complaints and have them approved by the FO, the better prepared we will be for the filings.

(b)(5)

(b)(5)

\*\*Adding as this Complaint should be ready as well.

**Michael E. Gates**  
Deputy Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave., NW  
Washington, DC 20530

(b)(6)  
(b)(6)



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No.
SHENNA BELLOWS in her official capacity	)	
as Secretary of the State of Maine and the	)	
STATE OF MAINE.	)	
	)	
	)	
Defendants.	)	
_____	)	

**COMPLAINT**

As President Trump said earlier this year, “[f]ree, fair, and honest elections unmarred by fraud, errors, or suspicion are fundamental to maintaining our 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.*

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 rolls prevent the opportunity for fraud in federal elections. The Civil Rights Division of the Department of Justice has the duty to ensure that States conduct regular voter registration list maintenance to prevent the inclusion of ineligible voters on any State’s voter registration list. This action seeks to remedy Defendant’s violations of federal voting laws by their refusal to comply with lawful data requests from the Department of Justice Civil Rights Division. Plaintiff United States of America (“United States”) brings this action against the State of Maine and Shenna Bellows in her official capacity as the Secretary of State for the State of Maine, and alleges as follows:

1. 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.*

2. Defendants have failed to comply with the important mandates of the NVRA and HAVA by refusing to provide necessary information to enable the United States to assess its compliance. One purpose of the NVRA is to “protect the integrity of the electoral process” and “ensure that accurate and current voter registration rolls are maintained.” 52 U.S.C. § 20501(b)(3)-(4). Consistent with these purposes, the NVRA requires each state to “conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters by reason of the death of a registrant or a change in residence of the registrant.” *Id.* § 20507(a)(4)(A)-(B).

3. Similarly, HAVA requires the appropriate state or local election official to perform list maintenance with respect to the centralized, computerized statewide voter registration list required under HAVA “on a regular basis[.]” 52 U.S.C. § 21083(a)(1)-(2).