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March 25, 2025

VIA CERTIFIED MAIL AND EMAIL

Karen Brinson Bell
Executive Director
North Carolina State Board of Elections
Dobbs Building, Third Floor
430 N. Salisbury St.
Raleigh, NC 27604
elections.sboe@ncsbe.gov

Re: Public Records Request Under the National Voter Registration Act & State Public Records Law

Dear Chief Election Officer:

This firm represents the Republican National Committee (“RNC”). As you know, RNC is committed to a fair electoral process that ensures both access to the ballot and election integrity. Public confidence in the administration of our elections is critical to our democracy.

The starting block for voter participation and election integrity is voter registration. RNC and state and local Republican parties assist thousands of citizens each year to register to vote and devote substantial resources to get-out-the-vote efforts in reliance upon public voter registration lists. RNC also monitors elections to ensure accurate results and public confidence in election outcomes. All of these efforts rely upon accurate voter rolls. Accordingly, RNC supports state and federal laws and practices to keep voter registration rolls up to date.

Because RNC’s voter registration drives, get-out-the-vote drives, and election integrity efforts depend upon the processes implemented by each state to ensure its voter rolls are accurate, RNC is conducting a review of each state’s programs and practices for maintaining accurate voter rolls. As part of that review, RNC is requesting records concerning your state’s programs and practices to maintain accurate voter rolls pursuant to the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20507(i), as well as all applicable freedom of information laws and election transparency laws of your state.

The NVRA contains a public records provision. It requires that “[e]ach state shall maintain for at least 2 years and shall make available for public inspection . . . all records concerning the implementation of programs and activities conducted for the purpose of

ensuring the accuracy and currency of official lists of eligible voters.” *Id.* § 20507(i)(1). The scope of records required to be maintained by each state is “sweeping” and includes records of all “voter list registration and maintenance activities.” *United States v. Dion*, 37 F.4th 31, 35 (1st Cir. 2022). These documents must be made available upon request.

Accordingly, RNC respectfully requests the following public records:¹

1. Each record setting forth, documenting, describing, or discussing the programs and activities conducted in your state for the purpose of ensuring the accuracy and currency of official lists of eligible voters from March 2023 to the time of your response to this request.
2. From March 2023 until the time of your response to this request, each record identifying, documenting or discussing the names of the voters removed from your state’s voter rolls as a result of:
 - (a) death;
 - (b) relocation (i.e., change of address);
 - (c) criminal conviction;
 - (d) non-citizenship;
 - (e) duplicate registrations for the same voter;
 - (f) administrative error;
 - (g) non-voting (i.e., inactive) for a period of years; or
 - (h) failure to respond to a mailed or public cancellation notice.
3. Each record that lists or identifies persons **sent an address confirmation** in your state for voter registration purposes from March 2023 until the date of your response to this request.
4. Each record that lists or identifies persons sent an address confirmation who **responded to the notice** from March 2023 until the time of your response to this request.
5. Each record that lists or identifies persons sent an address confirmation who did **not** respond to the notice from March 2023 until the time of your response to this request.
6. Each record that lists or identifies **inactive voters** from March 2023 until the date

¹ For purpose of this request, a “record” is defined as any document or information, in electronic form or paper copy form, and includes policies, procedures, manuals, memoranda, audits, guidance, lists, spreadsheets, data, and communications (including emails, text messages, and letters). “Record” also includes documents, information, and data found within your statewide voter registration system, the database through which your state carries out its voter list registration and maintenance activities. *See Pub. Int. Legal Found. v. Bellows*, 92 F.4th 36, 47 (1st Cir. 2024).

of your response to this request.

7. Each record that lists or identifies persons sent a voter registration **cancellation notice** from March 2023 until the time of your response to this request.
8. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **deceased** voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
9. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **relocated** (i.e., change of residence) voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
10. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about voters **convicted of a crime** for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;

- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

11. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about the **non-citizenship** of voters for the purpose of updating voter registrations exchanged between your office and the following offices:

- (a) State Department of Health;
- (b) State Department of Corrections;
- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

12. Each record utilizing, documenting, or discussing any of the following databases/systems/centers for the purpose of identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters and updating your state's voter registration list from March 2023 until the time of your response to this request:

- (a) National Change of Address database;
- (b) Systematic Alien Verification for Entitlements database;
- (c) Electronic Registration Information Center;
- (d) Social Security Death Index; and
- (e) National Association of Public Health Statistics and Information System.

13. Each record utilizing, documenting, or discussing the use or comparison of the voter registration list to **potential juror questionnaires or jury pool records** from March 2023 until the time of your response to this request.

14. Each record exchanged between your office and **other state officials or state agencies** discussing or identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters for the purpose of updating

your state's voter registration list from March 2023 until the time of your response to this request.

15. From March 2023 until the time of your response to this request, each record exchanged between your office and a **county/city/town** voter registration official transmitting or discussing:
 - (a) Instructions to the county/city/town concerning their voter list maintenance practices and responsibilities;
 - (b) Instructions to the county/city/town for the identification and removal of noncitizens;
 - (c) Instructions to the county/city/town for the identification and removal of deceased voters;
 - (d) Instructions to the county/city/town for the identification and removal of voters who changed residences;
 - (e) Instructions to the county/city/town for the identification and removal of convicted felons;
 - (f) Instructions to the county/city/town for the identification and removal of voters who are registered to vote in more than one jurisdiction;
 - (g) Instructions to the county/city/town for the identification and removal of voters who have not voted in successive elections;
 - (h) Notices to the county/city/town concerning any failure to comply with its voter list maintenance obligations under your state's program or law; and
 - (i) Records from a county/city/town reporting on the locality's implementation of a program to identify and remove from the voter registration list those voters who are ineligible, deceased, relocated, felons, registered in more than one location, or noncitizens.

16. Each record that is or mentions a complaint, message, report, study, notice, email, or other communication (electronic form or paper form) your office has received discussing **voter roll inaccuracies**, and each record documenting your office's **corrective action or response** to each complaint, message, report, notice, email, or other communication.

When providing records, data or lists identifying voters in response to any request above, we request all information identifying each voter contained within your record, including but not limited to each voter's name, voter identification number/identifier assigned by your voter registration system, address, date of birth, age, and gender. You should not exclude or redact any of this identifying information if it is contained within your records or data.

As you may be aware, the NVRA's public records disclosure provision preempts any purported public records law exemptions of your state preventing the disclosure or inspection of the requested records related to your state's voter registration list and list

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maintenance practices. 52 U.S.C. § 20507(i). If you intend to assert exemptions under the NVRA, please provide a log identifying which exemptions you believe apply and what records those exemptions implicate, and provide a detailed explanation of why you believe those exemptions are applicable to each record. If you contend for any reason that the NVRA does not apply to a record, then please provide a log identifying any exemption you believe applies to specific records pursuant to your state freedom of information law.

If there are any fees for searching, copying, compiling or transmitting these records, please inform me if the cost will exceed \$500 prior to incurring the expense. However, you should not charge any fees because the disclosure of the requested information furthers a significant public interest in the transparency of election administration and will contribute to the public's understanding of, and confidence in, your state's efforts to ensure free and fair elections. This information is not being sought for commercial purposes.

I am requesting these records in electronic format and on a rolling basis. Per NVRA requirements, my firm's address is 2121 Eisenhower Avenue, Suite 608, Alexandria, VA 22314, and I can be reached at **RNCNVRA@dhillonlaw.com** or **415-433-1700**.

Sincerely,

DHILLON LAW GROUP INC.

By: /s/Lee E. Goodman
Lee E. Goodman

4925-6018-1548, v. 1