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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Plaintiff,

v.

SHIRLEY WEBER, in her official capacity as Secretary of State of the State of California, and the STATE OF CALIFORNIA,

Defendant(s).

CASE NO:

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

ACTION SEEKING STATEWIDE RELIEF

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

**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, 2

United States of America v. Shirley Weber in her Official Capacity as Secretary of State of the State of California  
COMPLAINT

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

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

14 **I. INTRODUCTION**

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

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

25 **JURISDICTION AND VENUE**

26 1. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§  
27 1331, 1345, and 2201(a); 52 U.S.C. §§ 20510(a) and 21111; and 52 U.S.C. §  
28 20705.

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

## II. PARTIES

6       3. Plaintiff, United States of America, through the Attorney General, has  
7 authority to enforce the NVRA, 52 U.S.C. § 20510(a), and Sections 21081 through  
8 83, and 21083a of HAVA, 52 U.S.C. § 21111. Both the NVRA and HAVA  
9 authorize the Attorney General to bring a civil action in an appropriate district  
10 court for such declaratory and injunctive relief as are necessary to carry out the  
11 relevant requirements under the statute. 52 U.S.C. §§ 20510(a) and 21111.

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

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

18       6.    Defendant, Secretary of State Shirley Weber, is sued in her official  
19 capacity as chief state election official responsible for coordinating California's  
20 responsibilities under the NVRA. *See* 52 U.S.C. § 20509; Cal. Gov't Code §  
21 12172.5.

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

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

### III. STATUTORY BACKGROUND

## A. The Civil Rights Act of 1960

28 ||| 9. Congress empowered the Attorney General to request records

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

19 **IV. FACTUAL ALLEGATIONS**

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

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

1 Survey 2024 Comprehensive Report: A Report from the U.S. Election Assistance  
2 Commission to the 119th Congress” (“2024 EAVS Report”), explains that as part  
3 of the 2024 EAVS, states “reported data on their efforts to keep voter registration  
4 lists current and accurate, known as list maintenance[,]” such as the number of  
5 confirmation notices states sent “to verify continued eligibility from registered  
6 voters[,]” and the number of voter registration records that state removed from  
7 their voter lists. EAC, 2024 EAVS Report,  
8 [https://www.eac.gov/sites/default/files/2025-07/2024\\_EAVS\\_Report\\_508.pdf](https://www.eac.gov/sites/default/files/2025-07/2024_EAVS_Report_508.pdf), at 7.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

22 **V. CAUSES OF ACTION**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## COUNT THREE- VIOLATION OF HAVA

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

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

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

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

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

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

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

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

4 **VI. PRAYER FOR RELIEF**

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

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

1 and

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

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DATED: September 25, 2025

Respectfully submitted,

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HARMEET K. DHILLON  
7 Assistant Attorney General  
Civil Rights Division

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/s/ Michael E. Gates

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MICHAEL E. GATES

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Deputy Assistant Attorney General

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MAUREEN RIORDAN

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Acting Chief, Voting Section

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BRITTANY E. BENNETT

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Trial Attorney, Voting Section

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**CERTIFICATE OF SERVICE**

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

/s/ Brittany E. Bennett

Brittany E. Bennett  
Trial Attorney, Voting Section  
Civil Rights Division  
U.S. Department of Justice  
4 Constitution Square  
150 M Street NE, Room 8.141  
Washington, D.C. 20002  
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<b>I. (a) PLAINTIFFS</b> ( Check box if you are representing yourself <input type="checkbox"/> ) UNITED STATES OF AMERICA		<b>DEFENDANTS</b> ( Check box if you are representing yourself <input type="checkbox"/> ) SHIRLEY WEBER, in her official capacity as Secretary of State for the State of California, and the State of California.																																																																																																																																																																									
(b) County of Residence of First Listed Plaintiff _____ (EXCEPT IN U.S. PLAINTIFF CASES)		County of Residence of First Listed Defendant Los Angeles (IN U.S. PLAINTIFF CASES ONLY)																																																																																																																																																																									
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. See attachment.		Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.																																																																																																																																																																									
<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)		<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant)																																																																																																																																																																									
<input checked="" type="checkbox"/> 1. U.S. Government Plaintiff	<input type="checkbox"/> 3. Federal Question (U.S. Government Not a Party)	Citizen of This State	PTF <input type="checkbox"/> 1 DEF <input type="checkbox"/> 1 Incorporated or Principal Place of Business in this State																																																																																																																																																																								
<input type="checkbox"/> 2. U.S. Government Defendant	<input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State	PTF <input type="checkbox"/> 2 DEF <input type="checkbox"/> 2 Incorporated and Principal Place of Business in Another State																																																																																																																																																																								
		Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3 DEF <input type="checkbox"/> 3 Foreign Nation																																																																																																																																																																								
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<b>V. REQUESTED IN COMPLAINT: JURY DEMAND:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		(Check "Yes" only if demanded in complaint.)																																																																																																																																																																									
<b>CLASS ACTION under F.R.Cv.P. 23:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<b>MONEY DEMANDED IN COMPLAINT:</b> \$ _____																																																																																																																																																																									
<b>VI. CAUSE OF ACTION</b> (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) Federal enforcement of Section 303(a) of HAVA, Section 8 of NVRA, and Civil Rights Act of 1960 with respect to voter list maintenance in California. 52 U.S.C																																																																																																																																																																											
<b>VII. NATURE OF SUIT</b> (Place an X in one box only).																																																																																																																																																																											
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**VIII. VENUE:** Your answers to the questions below will determine the division of the Court to which this case will be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

<b>QUESTION A: Was this case removed from state court?</b>		STATE CASE WAS PENDING IN THE COUNTY OF:	INITIAL DIVISION IN CACD IS:	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," skip to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question E, below, and continue from there.		<input type="checkbox"/> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo <input type="checkbox"/> Orange <input type="checkbox"/> Riverside or San Bernardino	Western Southern Eastern	
<b>QUESTION B: Is the United States, or one of its agencies or employees, a PLAINTIFF in this action?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "no," skip to Question C. If "yes," answer Question B.1, at right.		<b>B.1.</b> Do 50% or more of the defendants who reside in the district reside in Orange Co.? <i>check one of the boxes to the right</i> →	YES. Your case will initially be assigned to the Southern Division. <input type="checkbox"/> Enter "Southern" in response to Question E, below, and continue from there.  <input checked="" type="checkbox"/> NO. Continue to Question B.2.	
		<b>B.2.</b> Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) <i>check one of the boxes to the right</i> →	YES. Your case will initially be assigned to the Eastern Division. <input type="checkbox"/> Enter "Eastern" in response to Question E, below, and continue from there.  NO. Your case will initially be assigned to the Western Division. <input checked="" type="checkbox"/> Enter "Western" in response to Question E, below, and continue from there.	
<b>QUESTION C: Is the United States, or one of its agencies or employees, a DEFENDANT in this action?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," skip to Question D. If "yes," answer Question C.1, at right.		<b>C.1.</b> Do 50% or more of the plaintiffs who reside in the district reside in Orange Co.? <i>check one of the boxes to the right</i> →	YES. Your case will initially be assigned to the Southern Division. <input type="checkbox"/> Enter "Southern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Continue to Question C.2.	
		<b>C.2.</b> Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) <i>check one of the boxes to the right</i> →	YES. Your case will initially be assigned to the Eastern Division. <input type="checkbox"/> Enter "Eastern" in response to Question E, below, and continue from there.  NO. Your case will initially be assigned to the Western Division. <input type="checkbox"/> Enter "Western" in response to Question E, below, and continue from there.	
<b>QUESTION D: Location of plaintiffs and defendants?</b>		A. Orange County	B. Riverside or San Bernardino County	C. Los Angeles, Ventura, Santa Barbara, or San Luis Obispo County
Indicate the location(s) in which 50% or more of <i>plaintiffs who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location(s) in which 50% or more of <i>defendants who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>D.1. Is there at least one answer in Column A?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "yes," your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question E, below, and continue from there. If "no," go to question D2 to the right. →		<b>D.2. Is there at least one answer in Column B?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "yes," your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question E, below. If "no," your case will be assigned to the WESTERN DIVISION. Enter "Western" in response to Question E, below.		
<b>QUESTION E: Initial Division?</b>		INITIAL DIVISION IN CACD		
Enter the initial division determined by Question A, B, C, or D above: →		WESTERN		
<b>QUESTION F: Northern Counties?</b> Do 50% or more of plaintiffs or defendants in this district reside in Ventura, Santa Barbara, or San Luis Obispo counties? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				

**IX(a). IDENTICAL CASES:** Has this action been previously filed **in this court?**

NO

YES

If yes, list case number(s):

**IX(b). RELATED CASES:** Is this case related (as defined below) to any civil or criminal case(s) previously filed **in this court?**

NO

YES

If yes, list case number(s): United States v. Page, Case No. 8:25-cv-01370-DOC-ADS

**If yes, you must file a Notice of Related Cases. See Local Rule 83-1.3.**

**Civil cases** are related when they (check all that apply):

- A. Arise from the same or a closely related transaction, happening, or event;
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges.

Note: That cases may involve the same patent, trademark, or copyright is not, in itself, sufficient to deem cases related.

**A civil forfeiture case and a criminal case** are related when they (check all that apply):

- A. Arise from the same or a closely related transaction, happening, or event;
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. Involve one or more defendants from the criminal case in common and would entail substantial duplication of labor if heard by different judges.

**X. STATEWIDE OR NATIONWIDE RELIEF:** Does this case seek to bar or mandate enforcement of a state or federal law and seek declaratory or injunctive relief on a statewide or nationwide basis?

NO

YES

**If yes, see Local Rule 83-11 for additional requirements.**

**XI. SIGNATURE OF ATTORNEY**

**(OR SELF-REPRESENTED LITIGANT):**

*Brittany C. Bennett*

DATE: 9/25/2025

**Notice to Counsel/Parties:** The submission of this Civil Cover Sheet is required by Local Rule 3-1. This Form CV-71 and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. For more detailed instructions, see separate instruction sheet (CV-071A).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

CASE NO:

V.

SHIRLEY WEBER, in her official capacity as Secretary of State of the State of California, and the STATE OF CALIFORNIA,

Defendant(s).

## Attachment to Civil Cover Sheet

(Attorney Names, Addresses, and Phone Numbers)

I.(c)

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