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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11 UNITED STATES OF AMERICA

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13 Plaintiff,

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15 v.

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

21 Defendant(s).
22

CASE NO:

NOTICE OF RELATED CIVIL
CASES

23
24 **NOTICE OF RELATED CIVIL CASES**

25 Pursuant to Local Rule 83-1.3, Plaintiff, UNITED STATES OF AMERICA,
26 files this Notice of Related Civil Cases, and shows this Court as follows:

27 **BACKGROUND**

- 28 1. On June 25, 2025, United States filed an action in this court against

1 Defendant, Robert Page, in his official capacity as Registrar of Voters for Orange
2 County, California, Case Number 8:25-cv-01370-DOC-ADS (“Orange County
3 Action”).

4 2. The Orange County Action has been assigned to Honorable Judge
5 David O. Carter.

6 3. The Orange County Action arises from the same or closely related
7 transaction, happening, or event, to the action being filed contemporaneously with
8 this Notice against Defendants Shirley Weber, in her official capacity as Secretary
9 of State of the State of California, and the State of California (“California Action”).

10 4. The Orange County Action calls for the determination of the related
11 or substantially similar questions of law or fact as the California Action.

12 **FACTUAL SUMMARY**

13 5. Both the Orange County Action and the California Action arise out of
14 the authority of the Attorney General of the United States to enforce requirements
15 of Section 303(a) of HAVA, 52 U.S.C. § 21083(a)(2), and to enforce the list
16 maintenance requirements of Section 8 of the NVRA, 53 U.S.C. § 20507(a)(4),
17 with respect to the conduct of elections in Orange County, and the State of
18 California.

19 6. All Defendants in both actions are subject to the requirements of
20 HAVA and the NVRA including voter list maintenance requirements. 52 U.S.C. §
21 21083(a)(2) and 52 U.S.C. § 20507(a)(4), and the disclosure requirements of 52
22 U.S.C. § 20507(i).

23 7. Section 303(a)(2)(B) of HAVA requires State election officials to
24 ensure that the statewide computerized list of voters is accurate and current by (i)
25 ensuring that all registered voters are included in the list, (ii) removing the names
26 of voters who are not registered to vote or who are ineligible to vote; and (iii)
27 removing duplicate names from the computerized list.

28 8. The NVRA was enacted “to establish procedures that will increase the

1 number of eligible citizens who register to vote in Federal elections “while
2 “ensur[ing] that accurate and current voter registration rolls are maintained.” 52
3 U.S.C. § 20501(b)(1), (4).

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

11 10. The Attorney General of the United States requested voter registration
12 lists from Defendants in the Orange County Action and the California Action.

13 11. Defendants refused to fully comply with the requests for unredacted
14 voter registration lists to include names, birth dates, social security numbers,
15 identification card numbers, and State assigned voter identification numbers.

16 12. Defendants are required to “maintain for at least 2 years and shall
17 make available for public inspection and, where available, photocopying at a
18 reasonable cost, all records concerning the implementation of programs and
19 activities conducted for the purpose of ensuring the accuracy and currency of
20 official lists of eligible voters[.]” 52 U.S.C. §20507(i)(1).

21 13. Defendants’ refusal to provide unredacted information prevents the
22 Attorney General from determining if the Defendant is complying with the list
23 maintenance requirements of both HAVA and the NVRA.

24 14. Pursuant to § 401 of HAVA, 52 U.S.C. § 21111, the Attorney General
25 has enforcement authority over Sections 301, 302, and 303 of Title III of HAVA,
26 including 52 U.S.C. § 21083(a)(2).

27 15. Pursuant to § 11 of the NVRA, 52 U.S.C. § 20510(a), the Attorney
28 General has enforcement authority over Section 8 of the NVRA, including 52

1 U.S.C. § 20507(a)(4) and § 20507(i).

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5 DATED: September 25, 2025

Respectfully submitted,

6 HARMEET K. DHILLON
7 Assistant Attorney General
8 Civil Rights Division

9 /s/ Michael E. Gates

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CERTIFICATE OF SERVICE

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

/s/ Brittany E. Bennett

Brittany E. Bennett

Trial Attorney, Voting Section

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