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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Civil Case No. 6:25-cv-1666-MTK

v.

THE STATE OF OREGON; and
TOBIAS READ, in his official capacity as the
Oregon Secretary of State,

Defendants.

NOTICE OF SUPPLEMENTAL AUTHORITY

The United States of America submits this Notice of Supplemental Authority raised by its counsel during oral arguments on January 14, 2026. *See* Tr. of Proceedings on Jan. 14, 2026, 124:15-125:9, 126:11-14, 131:20-132:10, 134:21-22, 136:15-16, 139:9-15, 150:20-151:21. In the following two matters, the United States made written demands for statewide voter registration lists (“SVRLs”) under Title III of the Civil Rights Act of 1960 (“CRA”). The United States obtained the SVRLs, including drivers’ license numbers and the last four digits of social security numbers for purposes of evaluating compliance with federal law, including list maintenance requirements.

In *United States v. Georgia*, No. 1:06-cv-02442 (N.D. Ga. Oct. 12, 2006), the United States filed a single-count Complaint to enforce the requirements of the CRA. A true and accurate copy of the Complaint is attached as Exhibit 1. The demand was made under the CRA “to assess compliance by the State with the procedures for voter registration at motor vehicle licensing and other State agencies, as well as the list maintenance provisions of the National Voter Registration Act...” *Id.* ¶ 9.

The Court subsequently entered a Consent Decree in the Georgia case, a true and accurate copy of which is attached as Exhibit 2. The Consent Decree provided, in pertinent part, “Defendants shall immediately make available to the United States the full statewide voter registration list including each registered voters’ full name, address, birth date and all additional voter identification information, including social security numbers or drivers license numbers as collected by the State for voter application and registration purposes. The State shall produce such data in electronic format on a CD-ROM or DVD formatted in consultation and full agreement with the United States.” *Id.* ¶ 2.

On May 13, 2008, the United States and the Secretary of State of Texas resolved a prelitigation written demand for the Texas SVRL through a Memorandum of Understanding (“MOU”), a true and accurate copy of which is attached as Exhibit 3. The recitals to the MOU state that in the absence of the agreement, the United States would “seek to compel the production of the current Texas voter registration list, including, *inter alia*, voters’ driver license numbers, social security numbers, and other personal information from the SOS in order to assess

compliance by the State of Texas with the procedures for voter registration at motor vehicle licensing and other state agencies, as well as the list maintenance provisions of the National Voter Registration Act...” *Id.* at 1. The MOU provided that “SOS shall immediately make available to DOJ the full statewide voter registration list including, where available, the following information: each registered voters’ full name, address, full date of birth, social security number, driver license number, race, voter status (*i.e.*, active or inactive), and voting history. SOS shall produce such data in electronic format on a CD-ROM or DVD formatted in consultation and full agreement with DOJ.” *Id.* ¶ 1. The MOU provided, “DOJ shall use the voter registration list information to assess the State’s compliance with the federal voting laws, including, but not limited to, the NVRA.” *Id.* ¶ 2.

Dated: January 26, 2026

Respectfully submitted,

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/s/ James Thomas Tucker
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CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2026, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ James Thomas Tucker