

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

VIRGINIA COALITION FOR
IMMIGRANT RIGHTS, *et al.*,

Plaintiffs,

v.

SUSAN BEALS, in her official capacity as
Virginia Commissioner of Elections, *et al.*,

Defendants.

Case No. 1:24-cv-01778

Judge Patricia Tolliver Giles

SETTLEMENT AGREEMENT

I. Parties to the Agreement

This settlement agreement and release of claims (the "Agreement") is made by and between all parties to this case. The parties to this Agreement include the following:

Plaintiffs:

- Virginia Coalition for Immigrant Rights ("VACIR")
- League of Women Voters of Virginia ("LWVVA")
- African Communities Together ("ACT")
- Rina Shaw
- Genet Shiferaw

Defendants:

- Steven Koski, in his official capacity as Virginia Commissioner of Elections
- John O'Bannon, in his official capacity as Chair of the State Board of Elections
- Rosalyn R. Dance, in her official capacity as Vice-Chairman of the State Board of Elections
- Georgia Alvis-Long, in her official capacity as Secretary of the State Board of Elections

- Christopher P. Stolle, in his official capacity as a member of the State Board of Elections
- Sally Hudson, in her official capacity as a member of the State Board of Elections
- Jay C. Jones, in his official capacity as Virginia Attorney General

II. General Statement of Purpose

1. This agreement is the result of discussions conducted among representatives of all the Parties. The Parties negotiated in good faith and agree that this Agreement is an appropriate resolution of the claims alleged by Plaintiffs.

2. In return for Defendants adopting the provisions outlined in this agreement, Plaintiffs agree to dismiss Counts I and IV with prejudice against all Defendants and Count II without prejudice against all Defendants. Count III has already been dismissed.

3. This agreement is based on the current status and operation of the challenged list maintenance procedures under Virginia statute, Executive Order 13,¹ and Attorney General Opinion 26-014.² Any challenge to Virginia's list maintenance procedures that differ from that current status and operation will constitute a new claim.

III. Details of Agreed List Maintenance Process and Statutory Interpretation

4. During the National Voter Registration Act's (NVRA's) 90-day Quiet Period, ELECT Defendants will not conduct "Self-Attestation Removals"³ and the "Documentation of Legal Presence Removals"⁴ programs as set forth in Attorney General Opinion 26-014.

¹ *Ensuring Secure, Accurate, and Fair Elections*, Va. Exec. Order No. 13 (2026) ("EO 13"), available at <https://www.governor.virginia.gov/media/governorvirginiagov/governor-of-virginia/pdf/eo/EO-13-Ensuring-Secure,-Accurate,-and-Fair-Elections.pdf>.

² Att'y Gen. Op. 26-014 (Apr. 17, 2026) ("OAG Op."), available at <https://www.oag.state.va.us/files/Opinions/2026/26-014-Koski-Issued.pdf>.

³ *Id.* at 3.

⁴ *Id.* at 2-3.

5. Prior to implementation of any administrative process consisting of a new individualized review program to cancel voter registrations during the Quiet Period, Defendants shall provide thirty (30) days notice to Plaintiffs' counsel. This notice shall be provided so long as there are no changes in the current statutory framework analyzed in Attorney General Opinion 26-014.

6. ELECT Defendants agree that Organizational Plaintiffs may obtain from counsel and use the information they have acquired in discovery to do outreach to voters who have been removed as a part of Defendants' prior list maintenance procedures to ensure those voters are aware of their removal and to assist those voters in the re-registration process, as Plaintiffs would do if they had received this information in response to their NVRA requests. Plaintiffs' counsel will confer with Defendants to ensure that the documents provided to Plaintiffs comport with privacy requirements and contain only the categories of information which would be available if the information had been provided pursuant to Plaintiffs' NVRA requests.

7. Defendants agree to meet with Plaintiffs' representatives to discuss additional recommended changes to the DMV- and noncitizenship-related list maintenance procedures and to provide technical feedback to Plaintiffs on any legislative proposals, similar to continued bills HB 28 and SB 52.

IV. Retention of Jurisdiction and Jurisdiction for Any Later Related Cause of Action

8. The parties agree that the Eastern District of Virginia, Alexandria Division is the appropriate venue to address any claim relating to or arising from any breach of this Agreement. Parties shall provide five (5) days' notice to the party in alleged breach through counsel. No enforcement action may be brought before such notice.

9. The parties agree that the Eastern District of Virginia, Alexandria Division is the appropriate venue for any suit alleging those claims dismissed without prejudice in Count II.

10. Should Plaintiffs bring an action under any of the causes of action and alleging the same or similar harm as in this matter, Defendants agree that any discovery obtained or record established in this matter may be used in that later action. This Section does not extend to a lawsuit brought by any of Plaintiffs against any of Defendants under a different cause of action or alleging a different harm.

11. The agreements related to venue expire upon modification by the General Assembly of the Virginia statutory provisions challenged in this lawsuit.

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For the Plaintiffs:

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Monica Sarmiento 4/17/2026
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Monica Sarmiento
Executive Director, Virginia Coalition for Immigrant Rights

Signed by:
Joan Porte 4/17/2026
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Joan Porte
President, League of Women Voters of Virginia

DocuSigned by:
Bert Bayou 4/17/2026
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Bert Bayou
Deputy Executive Director for Organizing and Member Engagement, African Communities Together

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Genet Shiferaw 4/17/2026
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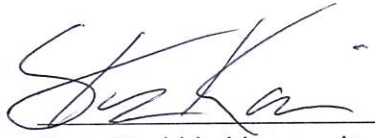
Genet Shiferaw

Signed by:
Rina Shaw 4/17/2026
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Rina Shaw

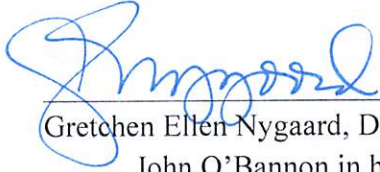
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For the Defendants,



Dated: April 17, 2026

Steve Koski in his capacity as Commissioner of the Department of Elections



Dated: April 17, 2026

Gretchen Ellen Nygaard, Deputy Attorney General for Civil Litigation *on behalf of Defendants*

John O'Bannon in his capacity as Chair of Virginia State Board of Elections

Georgia Alvis-Long in her capacity as Secretary for the Virginia State Board of Elections

Rosalyn Dance in her capacity as Vice Chair of the Virginia State Board of Elections

Christopher Stolle in his capacity as Member of Virginia State Board of Elections

Sally Hudson in her capacity as Member of Virginia State Board of Elections and

Attorney General Jay Jones

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