

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

*Plaintiff,**v.*WILLIAM FRANCIS GALVIN, in his
official capacity as Secretary of the
Commonwealth of Massachusetts,*Defendant.*

CASE NO: 1:25-cv-13816

MOTION TO COMPEL PRODUCTION
OF RECORDS, PURSUANT TO 52 U.S.C.
§ 20701, et seq.**MOTION TO COMPEL PRODUCTION OF RECORDS DEMANDED PURSUANT TO
THE CIVIL RIGHTS ACT OF 1960**

Plaintiff, UNITED STATES OF AMERICA, by and through the Attorney General, pursuant to Title III of the Civil Rights Act of 1960 (“CRA”), 52 U.S.C. § 20701, et seq., hereby moves this Honorable Court for an Order Compelling Defendant, WILLIAM FRANCIS GALVIN, Secretary of the Commonwealth, to show why he should not be compelled to produce the documents requested by Plaintiff. The United States offers the attached Memorandum of Law, and Declaration of Eric Neff, in Support of its Motion to Compel Production.

Introduction

The Attorney General has been tasked by Congress with enforcement authority for both the National Voter Registration Act (“NVRA”) and the Help America Vote Act (“HAVA”). *See* 52 U.S.C. § 20510(a) and 52 U.S.C. § 21111. Both statutes require Defendant to conduct specified maintenance of Massachusetts’s voter registration list. These requirements are an integral measure to ensure that Massachusetts’s statewide voter registration lists (“SVRL”) are accurate. Ensuring the accuracy of the list of eligible voters preserves the integrity of Massachusetts’s federal election procedures.

Pursuant to Section 301 of the CRA, 52 U.S.C. § 20701, “every officer of election shall retain and preserve, for a period of twenty-two months from the date of any general, special, or

primary election of which candidates for the office of President, Vice President, presidential elector, Member of the Senate, Member of the House of Representatives, or Resident Commissioner from the Commonwealth of Puerto Rico are voted for, all records and papers which come into his possession relating to any *application, registration, payment of poll tax, or other act requisite to voting in such election[.]*” (emphasis added).

Further, Section 303 of the CRA provides, “Any record or paper required by section 301 to be retained and preserved shall, *upon demand in writing by the Attorney General or [her] representative directed to the person having custody, possession, or control of such record or paper, be made available for inspection, reproduction, and copying at the principal office of such custodian by the Attorney General or [her] representative. This demand shall contain a statement of the basis and the purpose therefor.*” 52 U.S.C. § 20703 (emphasis added).

The United States has properly demanded records from Defendant, pursuant to these federal statutes, and Defendant has failed to comply as detailed in the Memorandum of Law in Support of this Motion, and exhibits filed contemporaneously herein. The United States brings this action and files this Motion to Compel Defendant to produce the requested records forthwith.

Section 305 of the CRA, 52 U.S.C. § 20705, provides that “[t]he United States District Court for the district in which a demand is made pursuant to Section 303, or in which a record or paper so demanded is located, shall have jurisdiction by appropriate process to compel the production of such record or paper.”

Prayer for Relief

For the foregoing reasons, Plaintiff requests that this Court enter an Order Compelling Defendant to produce the records demanded. Plaintiff further requests this Court:

- A. Order Defendant to produce an electronic copy of the Massachusetts statewide Voter Registration List with all fields, including each registrant’s name, date of birth, address, and as required by HAVA, the last four digits of the registrant’s social security number, driver’s license/state identification number, or the unique HAVA identifier;

- B. Order Defendant to submit all demanded documents electronically to the Attorney General, within five (5) days of this order; and
- C. Award such additional relief as the interests of justice may require.

DATED: December 12, 2025

Respectfully submitted,

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2025, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

*/s/*David D. Vandenberg
David D. Vandenberg

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