

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION**

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 3:25-cv-3398

BERNADETTE MATTHEWS, in her official
capacity as Executive Director of the State
Board of Elections for the State of Illinois,

Defendant.

DEFENDANT’S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM

Defendant Bernadette Matthews, in her official capacity as Executive Director of the State Board of Elections for the State of Illinois, moves to dismiss the complaint, ECF 4, for failure to state a claim pursuant to Rule 12(b)(6). The Department of Justice (“DOJ”) demands an unredacted copy of the Illinois voter registration list that would reveal all registered voters’ sensitive personal identifiers—driver’s license and social security numbers. But DOJ lacks statutory authority for its sweeping demand, so the complaint must be dismissed. The grounds for Matthews’s motion are set forth in her supporting memorandum of law, which is incorporated by reference. *See* Civil Local Rule 7.1(B)(1).

Dated: March 23, 2026

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Respectfully submitted,

KWAME RAOUL,
Attorney General of Illinois, on behalf of
Bernadette Matthews, Executive Director of the
Illinois State Board of Elections

By: /s/ R. Henry Weaver
Assistant Attorney General