

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

United States of America

Plaintiff,

v.

STEVEN KOSKI, in his Official Capacity as
Commissioner of the Virginia Department of
Elections,

Defendant.

CASE NO: 3:26-cv-00042-RCY

**MOTION FOR ORDER TO COMPEL 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 to Show Cause requiring Defendant, STEVEN KOSKI, Commissioner of the Virginia Department of Elections, to show why he should not be compelled to produce the documents requested by the United States. The United States offers the attached Memorandum of Law, Declaration of Eric Neff, and Exhibits, in Support of its Motion to Show Cause.

WHEREFORE, Plaintiff requests that this Court enter an Order directing Defendant to show cause why he has failed to produce the demanded records. Plaintiff further requests this Court:

- A. Declare that Commissioner Koski's refusal to provide the election records upon a demand by the Attorney General violates Title III of the Civil Rights Act as required by 52 U.S.C. § 20703;
- B. Order Commissioner Koski to provide to the Attorney General the current electronic copy of Virginia's computerized voter registration list, with all fields, including each registrant's full name, date of birth, residential address, and either their driver's license number, the last four digits of their Social Security number, or HAVA unique identifier as required by 52 U.S.C. § 21083 within five (5) days of a Court order.
- C. Order Commissioner Koski to produce such other federal records demanded by the Attorney General to ascertain Virginia's compliance with the NVRA and HAVA.
- D. Order such relief as the interests of justice may require.

DATED: April 29, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April, 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ John Casali _____

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