

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

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|-------------------------------|---------------------|
| THE UNITED STATES OF AMERICA: | 3:26-CV-00021-KAD |
| <i>Plaintiff</i> | : |
| | : |
| v. | : |
| | : |
| STEPHANIE THOMAS | : |
| <i>Defendant.</i> | : February 27, 2026 |

MOTION TO DISMISS OF DEFENDANT SECRETARY THOMAS

Defendant, Secretary of the State of Connecticut Stephanie Thomas, files this motion to dismiss in full the action brought by Plaintiff, United States. Through this action, the Department of Justice (“DOJ”) is demanding Connecticut’s voter registration list (“VRL”) as part of a broader effort to conduct a nationwide audit of VRLs, assessing each state’s compliance with two federal election administration laws: the National Voter Registration Act (“NVRA”) and the Help America Vote Act (“HAVA”). In so doing, DOJ relies on a novel reading of Title III of the Civil Rights Act of 1960 (“CRA”), which has never been used in this manner or at this scale. The demand is improper. Moreover, according to DOJ’s own conduct and statements—and at least two other federal courts—DOJ intends to use states’ voter data for purposes that are even more clearly outside the scope of the CRA and in ways that violate a number of federal privacy laws. For these reasons, set forth more fully in the accompanying memorandum of law, the Court should grant the Secretary’s Motion to Dismiss. Alternatively, the Court should reserve ruling to allow discovery as set forth in the accompanying Response to the Order to Show Cause.

Respectfully submitted,

DEFENDANT
STEPHANIE THOMAS,

WILLIAM TONG
ATTORNEY GENERAL

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CERTIFICATION

I hereby certify that on February 27, 2026, a copy of the foregoing was electronically filed and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's system.

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