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Attorneys for Plaintiff, UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

17 United States of America
18
19 Plaintiff,

20
21 v.

22
23 Adrian Fontes, in his Official Capacity as
24 Secretary of State for the State of Arizona,
25
26 Defendant.

CASE NO: 2:26-cv-00066-SMB

MOTION FOR ORDER TO COMPEL
PRODUCTION OF RECORDS
PURSUANT TO 52 U.S.C. § 20701, *et*
seq.

1 principal office of such custodian by the Attorney General or his representative. This
2 demand shall contain a statement of the basis and the purpose therefor.” 52 U.S.C. § 20703
3 (emphasis added).

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

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

13 **Prayer for Relief**

14 For the foregoing reasons, Plaintiff requests that this Court enter an Order directing
15 Defendant to show cause why he has failed to produce the demanded records. Plaintiff
16 further requests this Court:

- 17 A. Order Defendant to produce an electronic copy of the Arizona statewide voter
18 registration list, with *all fields*, to include each registrant’s name, date of Birth,
19 address, and as required by HAVA, the last four digits of the registrant’s social
20 security number, driver’s license/state identification number or the unique
21 HAVA identifier;
- 22 B. Order Defendant to produce the other documents demanded by the Attorney
23 General to ascertain Defendant’s compliance with federal law; specifically, the
24 National Voter Registration Act (“NVRA”), 52 U.S.C. § 20501, *et seq.*, and the
25 Help America Vote Act of 2002 (“HAVA”), 52 U.S.C § 20901, *et seq.*;
- 26 C. Order Defendant to submit electronically to the Attorney General, Civil Rights
27 Division Voting Section, within 5 (five) days of this order; and
- 28 D. Order Defendant to produce all documents requested immediately.

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DATED: January 7, 2026

TIMOTHY COURCHINE
United States Attorney
District of Arizona

Respectfully submitted,

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

ERIC V. NEFF
Acting Chief, Voting Section
Civil Rights Division

/s/ Brittany E. Bennett
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CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2026, a true and correct copy of the foregoing document was served via the Court’s ECF system to all counsel of record.

/s/ Brittany E. Bennett

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