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Republican National Committee

Electronically Filed

FIRST CIRCUIT

1CCV-25-0001691

14-OCT-2025

07:00 AM

Dkt. 1 CMPS

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

REPUBLICAN NATIONAL COMMITTEE,

Plaintiff,

v.

STATE OF HAWAII, OFFICE OF
ELECTIONS; SCOTT NAGO, in his official
capacity as Chief Election Officer of the State
of Hawaii,

Defendants.

CASE NO. _____
(Other Civil Action: Uniform Information
Practices Act)

**COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF; SUMMONS**

Plaintiff REPUBLICAN NATIONAL COMMITTEE (the “RNC”), by and through its attorneys, Dhillon Law Group Inc., for a Complaint against Defendants STATE OF HAWAII, OFFICE OF ELECTIONS (the “Office”) and SCOTT NAGO, in his official capacity as Chief Election Officer of the State of Hawaii (“Mr. Nago”), alleges and avers as follows:

I. INTRODUCTION

1. The RNC submitted a public records request pursuant to Hawaii’s Uniform Information Practices Act (“UIPA”) to Mr. Nago and the Office seeking sixteen categories of information related to the State of Hawaii’s programs and practices pertaining to the maintenance



of accurate voter rolls as required by the National Voter Registration Act of 1993 (“NVRA”).

2. Under the NVRA, states are required to permit members of the public to inspect the kinds of records the RNC requested.

3. When state or federal law expressly authorizes disclosure of a given record (as the NVRA does), UIPA requires that agencies disclose it to requestors.

4. Despite the Office’s clear obligation to provide the RNC with various records related to its voter rolls, the Office refused to tell the RNC whether it possessed records responsive to the RNC’s requests. Instead, the Office told the RNC’s counsel to request the records from the county clerks.

5. The Office’s response to the RNC’s UIPA request violated Mr. Nago and the Office’s obligations under UIPA. The Office and Mr. Nago were required to provide the RNC with responsive records in their possession unless an exception to UIPA’s right of open access to government access applies.

6. The RNC therefore brings this action to enforce its rights under UIPA and to obtain access to the records from Mr. Nago and the Office to which it is entitled under UIPA.

II. JURISDICTION AND VENUE

7. This Court has jurisdiction over this matter because UIPA expressly authorizes “person[s] aggrieved by a denial of access to a government record [to] bring an action against the agency” in circuit court. Haw. Rev. Stat. §§ 92F-15(a), (e).

8. Venue is proper in the First Circuit because the Office’s headquarters are located in the City and County of Honolulu, and, upon information and belief, the records the RNC requested are maintained in the City and County of Honolulu.

III. PARTIES

9. Plaintiff Republican National Committee is a national political party committee that is responsible for the strategic and day-to-day operation of the Republican Party at the national level and for promoting the election of Republican candidates for federal office in the United States, including in Hawaii. The RNC has a direct, personal, and substantial interest in ensuring that the State of Hawaii ensures the accuracy of voter rolls, including by complying with the NVRA.

10. Defendant State of Hawaii, Office of Elections is a state agency created to “provide support to the chief election officer.” Haw. Rev. Stat. § 11-1.5(a).

11. Defendant Scott Nago is the Chief Election Officer of the State of Hawaii. He is named as a defendant in this action in his official capacity only. “The chief election officer shall maintain data concerning registered voters, elections, apportionment, and districting.” Haw. Rev. Stat. § 11-2(c).

IV. LEGAL BACKGROUND

The NVRA

12. The NVRA is a federal law that sets forth various voter registration requirements that pertain to elections for federal offices.

13. The NVRA created various requirements for states relating to voter registration. For example, states must, among other things, adopt certain procedures relating to voter registration through motor vehicle registration, “conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters” because of death or a change in residence, and inform applicants of voter eligibility requirements and penalties for the submission of false voter registration applications. *See generally* 52 U.S.C.

§ 20507.

14. The NVRA further requires open access to records it requires states to maintain: “Each State shall maintain for at least 2 years and shall make available for public inspection and, where available, photocopying at a reasonable cost, all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters, except to the extent that such records relate to a declination to register to vote or to the identity of a voter registration agency through which any particular voter is registered.” 52 U.S.C. § 20507(i)(1).

Hawaii’s UIPA

15. Hawaii’s UIPA gives the public broad rights to access records maintained by government agencies.

16. “All government records are open to public inspection unless access is restricted or closed by law.” Haw. Rev. Stat. § 92F-11(A).

17. “Except as provided in section 92F-13, each agency upon request by any person shall make government records available for inspection and copying during regular business hours.” Haw. Rev. Stat. § 92F-11(B).

18. Section 92F-13 contains five exceptions to disclosure, which, upon information and belief, do not apply to the records at issue in this case.

19. “Government records which, pursuant to federal law or a statute of this State, are expressly authorized to be disclosed to the person requesting access.” Haw. Rev. Stat. § 92F-12(b)(2).

20. When an agency receives a request for access to a record for which disclosure is required under HRS § 92F-12, the “agency shall disclose the record within a reasonable time not

to exceed ten business days.” Hawaii Administrative Rules (“HAR”) § 2-71-13(a).

21. “When an agency receives a request for a record that it does not maintain and reasonably believes that another agency maintains the record, the agency receiving the request shall provide a notice in accordance with section 2-71-14(c)(1).” HAR § 2-71-13(f).

22. Under section 2-71-14(c)(1), “[w]hen an agency is unable to disclose a record, the agency’s notice shall state that the agency is unable to disclose the requested record, or part thereof, because: . . . [t]he agency does not maintain the record, and the agency may provide the name and address of another agency that, as the agency reasonably believes, may maintain the requested record.” HAR § 2-71-14(c)(1).

23. Accordingly, an agency that possesses records responsive to a UIPA request cannot simply refuse to permit access to the records by pointing to another agency that may have the same records.

V. DEFENDANTS’ VIOLATIONS OF UIPA

24. On March 25, 2025, the RNC, through its counsel, Dhillon Law Group Inc. (“DLG”), sent a request to Mr. Nago and the Office requesting sixteen categories of records that the RNC believes the Office must possess given its obligations under the NVRA, citing both the NVRA and state public records law (the “March 25 Request”). A true and correct copy of the March 25 Request is attached hereto as **Exhibit 1**. Broadly speaking, the March 25 Request sought records related to the types of voter registration and list maintenance activities covered by the NVRA.

25. The March 25 Request satisfied the requirements for a request under UIPA inasmuch as it (1) provided the RNC’s legal representative’s contact information; (2) contained a reasonable description of the requested records that would have enabled agency personnel to

locate them with reasonable effort; and (3) contained a request to obtain the records, including the preferred means of receiving the records. *See* HAR § 2-71-12(b).

26. The March 25 Request made clear that to the extent the RNC was requesting non-public voter registration information, the RNC was doing so for election purposes only as defined by HAR § 3-177-160(e).

27. On April 1, 2025, Raymund de Vega of the Office's Voter Services division responded to the March 25 Request as follows: "Thank you for your email. For records concerning voter registration, please contact the county clerks. Their contact information can be found at <https://elections.hawaii.gov/resources/county-election-divisions/>. Any further related questions may be directed to the county clerks." A true and correct copy of Mr. de Vega's email is attached hereto as **Exhibit 2**.

28. On April 10, 2025, DLG responded to Mr. de Vega's email, noting that Mr. de Vega did not confirm whether the Office searched for the records at issue and that it would be highly unlikely for the Office not to have any of the types of records requested, such as memos, manuals, policies, emails, or voter registration data. DLG further requested that the Office confirm that it conducted a search for responsive records discussing list maintenance procedures and related list maintenance data. A true and correct copy of DLG's email is attached hereto as **Exhibit 3**.

29. On April 21, 2025, Mr. de Vega responded: "Thank you for your email. As it relates to your letter, dated March 25, 2024, our office is referring you to the county clerks. Their contact information can be found at <https://elections.hawaii.gov/resources/county-election-divisions/>. Any further related questions may be directed to the county clerks." A true and correct copy of Mr. de Vega's email is attached hereto as **Exhibit 4**.

30. On June 3, 2025, DLG sent a letter to Mr. de Vega explaining that his direction to seek records from the county clerks was insufficient, repeating the RNC's request for the responsive records referenced in the March 25 Request. A true and correct copy of DLG's email is attached hereto as **Exhibit 5**.

31. While the RNC is entitled to access records responsive to the March 25 Request that the Office and Mr. Nago maintain regardless of whether any other agencies may also maintain those records, the Counties of Kauai and Hawaii's respective responses to similar UIPA requests make clear that the RNC properly sought the records at issue from the Office and Mr. Nago.

32. On or about September 2, 2025, DLG spoke with an employee in the Office of the County Clerk of the County of Kauai, who directed DLG to seek the records at issue from the State. When DLG explained that the Office had directed the RNC to obtain the records from the county clerks, the employee spoke with her supervisor and then repeated her earlier instruction to request the records from the State.

33. On or about September 19, 2025, the County of Hawaii issued a Notice to Requester to DLG responding in part to a UIPA request that mirrored the RNC's UIPA request to the Office and Mr. Nago. The County of Hawaii's response addressed only request numbers 4, 5, 7, 11, 12, and 15. The County of Hawaii represented that it cannot disclose the records at issue because it does not maintain them. A true and correct copy of the Notice to Requester is attached hereto as **Exhibit 6**. The County of Hawaii separately provided DLG with a cost estimate to inspect and copy documents responsive to certain other requests. However, the County of Hawaii's possession of certain documents the RNC requested from the Office and Mr. Nago does not excuse the Office and Mr. Nago from complying with their obligations under the UIPA, and the fact that the County of Hawaii maintains certain records makes clear that they do indeed exist.

34. On or about September 29, 2025, DLG sent certifications to Mr. Nago as well as all four county clerks that certified by self-subscribing oath (1) the election purpose for which the RNC was seeking the information DLG had requested; (2) that the RNC was seeking the information for election purposes only; (3) and that that the information will not be sold, released, distributed, or used in any way for commercial purposes. True and correct copies of each of these certifications are attached hereto as **Exhibit 7**.

35. To date, the Office has not responded to DLG's June 3, 2025, letter or provided any further response to the March 25 Request, including any response to the September 29, 2025, certification DLG provided.

36. The Office and Mr. Nago have never stated whether they have records responsive to the March 25 Request nor have they agreed to permit access to any such records.

37. The Office and Mr. Nago's refusal to respond to the RNC's March 25 Request beyond directing the RNC to request the records at issue from the county clerks therefore violates various provisions of UIPA and its implementing regulations.

38. Given the Office and Mr. Nago's refusal to provide a lawful response to the March 25 Request, there is an actual and immediate controversy between the RNC, on the one hand, and the Office and Mr. Nago, on the other hand, in which both sides have genuine and opposing interests, which are direct and substantial. The RNC is therefore entitled to declaratory relief in this matter.

[continued on following page.]

VI. CLAIMS FOR RELIEF

COUNT ONE

FAILURE TO PERMIT INSPECTION AND COPYING OF GOVERNMENT RECORDS (Haw. Rev. Stat. §§ 92F-11, *et seq.*; HAR §§ 2-71-11, *et seq.*) (against both Defendants)

39. The RNC repeats and realleges each of the foregoing paragraphs as if explicitly stated herein.

40. By sending the March 25 Request to Mr. Nago and the Office, the RNC sought to inspect and copy government records within the possession of Mr. Nago and the Office under UIPA.

41. The records the RNC sought to inspect were government records within the scope of UIPA, including, without limitation, records that are required to be disclosed under the NVRA.

42. Upon information and belief, the Office and Mr. Nago have records responsive to the March 25 Request in their possession.

43. The Office and Mr. Nago have failed to establish that they do not possess records responsive to the March 25 Request.

44. The Office and Mr. Nago have failed to establish that there is a statutory exception allowing them to deny the RNC permission to inspect the records requested in the March 25 Request.

45. The Office and Mr. Nago therefore unlawfully denied the RNC access to all records referenced in the March 25 Request.

[continued on following page.]

COUNT TWO
FAILURE TO PERMIT ACCESS TO GOVERNMENT RECORDS WITHIN 10
BUSINESS DAYS (HAR § 2-71-13(a))
(against both Defendants)

46. The RNC repeats and realleges each of the foregoing paragraphs as if explicitly stated herein.

47. By sending the March 25 Request to Mr. Nago and the Office, the RNC sought to access government records within the possession of Mr. Nago and the Office under UIPA.

48. The records the RNC sought to access were government records within the scope of UIPA, including, without limitation, records that are required to be disclosed under the NVRA.

49. Upon information and belief, the Office and Mr. Nago have records responsive to the March 25 Request in their possession.

50. The Office and Mr. Nago have failed to establish that they do not possess records responsive to the March 25 Request.

51. The Office and Mr. Nago have failed to establish that there is a statutory exception allowing them to deny the RNC permission to access the records requested in the March 25 Request.

52. The Office and Mr. Nago failed to permit the RNC to access all records referenced in the March 25 Request within a reasonable period of time not to exceed ten business days, which constitutes a denial of access under UIPA. *See* HAR § 2-71-13(a).

COUNT THREE
FAILURE TO IDENTIFY AND JUSTIFY GOVERNMENT RECORDS BEING
WITHHELD (HAR §§ 2-71-13(f); 2-71-14(b)(1-2) & (c))
(against both Defendants)

53. The RNC repeats and realleges each of the foregoing paragraphs as if explicitly stated herein.

54. By sending the March 25 Request to Mr. Nago and the Office, the RNC sought to access government records within the possession of Mr. Nago and the Office under UIPA.

55. The records the RNC sought to access were government records within the scope of UIPA, including, without limitation, records that are required to be disclosed under the NVRA.

56. In responding to the March 25 Request, the Office and Mr. Nago refused to permit access to any records without confirming whether they had records responsive to the March 25 Request in their possession, without identifying the records to which they would be denying access, and without identifying the legal authorities under which they would be denying the RNC access to the records.

57. The Office and Mr. Nago therefore violated HAR 2-71-14(b), which contains the following requirement: “When the agency intends to deny access to all or part of the information in the requested record, the agency’s notice to the requester shall state: . . . (1) [t]he specific record or parts of the record that will not be disclosed; and (2) [t]he specific legal authorities under which the request for access is denied under section 92F-13.”

58. Mr. de Vega’s repeated direction to the RNC that it seek the requested records from the county clerks is insufficient as a matter of law because an agency may only satisfy its obligations under UIPA by providing “the name and address of another agency that, as the agency reasonably believes, may maintain the requested record” when its notice also states that it does not maintain the record, which Mr. de Vega did not state in his two emails to DLG. *See* HAR §§ 2-71-13(f); 2-71-14(c)(1).

59. Upon information and belief, Mr. de Vega did not state that the Office does not have records responsive to the March 25 Request in his correspondence with DLG because the Office and Mr. Nago do in fact possess records responsive to the March 25 Request.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Republican National Committee prays that the Court grant the following relief:

- A. For judgment in its favor and against both Defendants on all claims alleged herein;
- B. For a declaratory judgment stating that Defendants violated UIPA and its implementing regulations by (1) failing to permit the RNC to inspect and copy all records referenced in the March 25 Request; (2) failing to permit the RNC to access such records within 10 business days; and (3) failing to identify the records they refused to let the RNC access and provide a justification for their refusal.
- C. For preliminary and permanent injunctive relief ordering Defendants to grant the RNC the ability to inspect and copy all records referenced in the March 25 Request;
- D. For an award of the RNC's attorney's fees and costs pursuant to HRS § 92F-15(d) and as otherwise permitted by law; and
- E. For such other relief that the Court may deem just and proper.

Dated: San Francisco, California, October 14, 2025.

Respectfully submitted,

DHILLON LAW GROUP INC.

By: /s/ Jesse D. Franklin-Murdock
JESSE D. FRANKLIN-MURDOCK

Counsel for Plaintiff
Republican National Committee

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FIRST CIRCUIT
1CCV-25-0001691
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EXHIBIT 1





2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Lee E. Goodman
Phone: 415-433-1700
RNCNVRA@dhillonlaw.com

March 25, 2025

VIA CERTIFIED MAIL AND EMAIL

Mr. Scott Nago
Chief Election Officer
Office of Elections
802 Lehua Avenue
Pearl City, HI 96782
elections@hawaii.gov

**Re: Public Records Request Under the National Voter Registration Act &
State Public Records Law**

Dear Chief Election Officer:

This firm represents the Republican National Committee (“RNC”). As you know, RNC is committed to a fair electoral process that ensures both access to the ballot and election integrity. Public confidence in the administration of our elections is critical to our democracy.

The starting block for voter participation and election integrity is voter registration. RNC and state and local Republican parties assist thousands of citizens each year to register to vote and devote substantial resources to get-out-the-vote efforts in reliance upon public voter registration lists. RNC also monitors elections to ensure accurate results and public confidence in election outcomes. All of these efforts rely upon accurate voter rolls. Accordingly, RNC supports state and federal laws and practices to keep voter registration rolls up to date.

Because RNC’s voter registration drives, get-out-the-vote drives, and election integrity efforts depend upon the processes implemented by each state to ensure its voter rolls are accurate, RNC is conducting a review of each state’s programs and practices for maintaining accurate voter rolls. As part of that review, RNC is requesting records concerning your state’s programs and practices to maintain accurate voter rolls pursuant to the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20507(i), as well as all applicable freedom of information laws and election transparency laws of your state.

The NVRA contains a public records provision. It requires that “[e]ach state shall maintain for at least 2 years and shall make available for public inspection . . . all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters.” *Id.* § 20507(i)(1). The

scope of records required to be maintained by each state is “sweeping” and includes records of all “voter list registration and maintenance activities.” *United States v. Dion*, 37 F.4th 31, 35 (1st Cir. 2022). These documents must be made available upon request.

Accordingly, RNC respectfully requests the following public records:¹

1. Each record setting forth, documenting, describing, or discussing the programs and activities conducted in your state for the purpose of ensuring the accuracy and currency of official lists of eligible voters from March 2023 to the time of your response to this request.
2. From March 2023 until the time of your response to this request, each record identifying, documenting or discussing the names of the voters removed from your state’s voter rolls as a result of:
 - (a) death;
 - (b) relocation (i.e., change of address);
 - (c) criminal conviction;
 - (d) non-citizenship;
 - (e) duplicate registrations for the same voter;
 - (f) administrative error;
 - (g) non-voting (i.e., inactive) for a period of years; or
 - (h) failure to respond to a mailed or public cancellation notice.
3. Each record that lists or identifies persons **sent an address confirmation** in your state for voter registration purposes from March 2023 until the date of your response to this request.
4. Each record that lists or identifies persons sent an address confirmation who **responded to the notice** from March 2023 until the time of your response to this request.
5. Each record that lists or identifies persons sent an address confirmation who did **not** respond to the notice from March 2023 until the time of your response to this request.
6. Each record that lists or identifies **inactive voters** from March 2023 until the date of your response to this request.

¹ For purpose of this request, a “record” is defined as any document or information, in electronic form or paper copy form, and includes policies, procedures, manuals, memoranda, audits, guidance, lists, spreadsheets, data, and communications (including emails, text messages, and letters). “Record” also includes documents, information, and data found within your statewide voter registration system, the database through which your state carries out its voter list registration and maintenance activities. *See Pub. Int. Legal Found. v. Bellows*, 92 F.4th 36, 47 (1st Cir. 2024).

7. Each record that lists or identifies persons sent a voter registration **cancellation notice** from March 2023 until the time of your response to this request.
8. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **deceased** voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
9. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **relocated** (i.e., change of residence) voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
10. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about voters **convicted of a crime** for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;

- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

11. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about the **non-citizenship** of voters for the purpose of updating voter registrations exchanged between your office and the following offices:

- (a) State Department of Health;
- (b) State Department of Corrections;
- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

12. Each record utilizing, documenting, or discussing any of the following databases/systems/centers for the purpose of identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters and updating your state's voter registration list from March 2023 until the time of your response to this request:

- (a) National Change of Address database;
- (b) Systematic Alien Verification for Entitlements database;
- (c) Electronic Registration Information Center;
- (d) Social Security Death Index; and
- (e) National Association of Public Health Statistics and Information System.

13. Each record utilizing, documenting, or discussing the use or comparison of the voter registration list to **potential juror questionnaires or jury pool records** from March 2023 until the time of your response to this request.

14. Each record exchanged between your office and **other state officials or state agencies** discussing or identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters for the purpose of updating your state's voter registration list from March 2023 until the time of your response

to this request.

15. From March 2023 until the time of your response to this request, each record exchanged between your office and a **county/city/town** voter registration official transmitting or discussing:
- (a) Instructions to the county/city/town concerning their voter list maintenance practices and responsibilities;
 - (b) Instructions to the county/city/town for the identification and removal of noncitizens;
 - (c) Instructions to the county/city/town for the identification and removal of deceased voters;
 - (d) Instructions to the county/city/town for the identification and removal of voters who changed residences;
 - (e) Instructions to the county/city/town for the identification and removal of convicted felons;
 - (f) Instructions to the county/city/town for the identification and removal of voters who are registered to vote in more than one jurisdiction;
 - (g) Instructions to the county/city/town for the identification and removal of voters who have not voted in successive elections;
 - (h) Notices to the county/city/town concerning any failure to comply with its voter list maintenance obligations under your state's program or law; and
 - (i) Records from a county/city/town reporting on the locality's implementation of a program to identify and remove from the voter registration list those voters who are ineligible, deceased, relocated, felons, registered in more than one location, or noncitizens.
16. Each record that is or mentions a complaint, message, report, study, notice, email, or other communication (electronic form or paper form) your office has received discussing **voter roll inaccuracies**, and each record documenting your office's **corrective action or response** to each complaint, message, report, notice, email, or other communication.

When providing records, data or lists identifying voters in response to any request above, we request all information identifying each voter contained within your record, including but not limited to each voter's name, voter identification number/identifier assigned by your voter registration system, address, date of birth, age, and gender. You should not exclude or redact any of this identifying information if it is contained within your records or data.

As you may be aware, the NVRA's public records disclosure provision preempts any purported public records law exemptions of your state preventing the disclosure or inspection of the requested records related to your state's voter registration list and list maintenance practices. 52 U.S.C. § 20507(i). If you intend to assert exemptions under the

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NVRA, please provide a log identifying which exemptions you believe apply and what records those exemptions implicate, and provide a detailed explanation of why you believe those exemptions are applicable to each record. If you contend for any reason that the NVRA does not apply to a record, then please provide a log identifying any exemption you believe applies to specific records pursuant to your state freedom of information law.

If there are any fees for searching, copying, compiling or transmitting these records, please inform me if the cost will exceed \$500 prior to incurring the expense. However, you should not charge any fees because the disclosure of the requested information furthers a significant public interest in the transparency of election administration and will contribute to the public's understanding of, and confidence in, your state's efforts to ensure free and fair elections. This information is not being sought for commercial purposes.

I am requesting these records in electronic format and on a rolling basis. Per NVRA requirements, my firm's address is 2121 Eisenhower Avenue, Suite 608, Alexandria, VA 22314, and I can be reached at **RNCNVRA@dhillonlaw.com** or **415-433-1700**.

Sincerely,

DHILLON LAW GROUP INC.

By: /s/Lee E. Goodman

Lee E. Goodman

4917-2256-5932, v. 1

Electronically Filed
FIRST CIRCUIT
1CCV-25-0001691
14-OCT-2025
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EXHIBIT 2



From: [OE.Elections](#)
To: [Erin Potter \(Dhillon Law\)](#); [OE.Elections](#)
Cc: [Josiah Contarino \(Dhillon Law\)](#); [Lee Goodman \(Dhillon Law\)](#)
Subject: RE: Public Records Request
Date: Tuesday, April 1, 2025 7:12:05 PM

External Email

Aloha,

Thank you for your email. For records concerning voter registration, please contact the county clerks. Their contact information can be found at <https://elections.hawaii.gov/resources/county-election-divisions/>. Any further related questions may be directed to the county clerks.

Thank you,

Raymund de Vega

Voter Services

State of Hawaii, Office of Elections

(808) 453-VOTE (8683)

elections@hawaii.gov

From: Erin Potter (Dhillon Law) <EPotter@dhillonlaw.com>
Sent: Tuesday, March 25, 2025 6:10 AM
To: OE.Elections <elections@hawaii.gov>
Cc: Josiah Contarino (Dhillon Law) <JContarino@dhillonlaw.com>; Lee Goodman (Dhillon Law) <LGoodman@DHILLONLAW.COM>
Subject: [EXTERNAL] Public Records Request

Dear Chief Election Officer,

Please see the attached records request.

Thank you,

Erin Potter, Paralegal

Dhillon Law Group

2121 Eisenhower Avenue, Suite 608

Alexandria, VA 22314

EPotter@dhillonlaw.com

SAN FRANCISCO ADDRESS:

[177 Post Street, Suite 700](#)

[San Francisco, California 94108](#)

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FIRST CIRCUIT
1CCV-25-0001691
14-OCT-2025
07:00 AM
Dkt. 4 EXH

EXHIBIT 3



From: [RNCNVRA \(Dhillon Law\)](#)
To: [OE.Elections](#)
Subject: RE: Public Records Request
Date: Thursday, April 10, 2025 11:44:20 AM

Mr. de Vega,

I am in receipt of your response to our Mar. 25 request for public records regarding voter registration and voter list maintenance in Hawaii pursuant to the National Voter Rights Act and the Hawaii public records law. Your response does not indicate that your office conducted any search for responsive records. I would find it highly unlikely that the Hawaii Office of Elections has absolutely no memos, manuals, policies, emails, or voter registration data/information responsive to our requests. As the chief election official for Hawaii, your office must maintain some NVRA records and other records or data regarding voter registration and voter roll maintenance, since that is a legal responsibility under federal law. Before we take further action, I would ask that you confirm you have conducted a search for responsive records discussing list maintenance procedures and related list maintenance data as set forth in our request of Mar. 25. Please let me know if it is your position that your office possesses absolutely no records regarding these topics.

Thank you.

Lee Goodman

From: OE.Elections <elections@hawaii.gov>
Sent: Tuesday, April 1, 2025 10:12 PM
To: Erin Potter (Dhillon Law) <EPotter@dhillonlaw.com>; OE.Elections <elections@hawaii.gov>
Cc: Josiah Contarino (Dhillon Law) <JContarino@dhillonlaw.com>; Lee Goodman (Dhillon Law) <LGoodman@DHILLONLAW.COM>
Subject: RE: Public Records Request

External Email

Aloha,

Thank you for your email. For records concerning voter registration, please contact the county clerks. Their contact information can be found at <https://elections.hawaii.gov/resources/county-election-divisions/>. Any further related questions may be directed to the county clerks.

Thank you,

Raymund de Vega

Voter Services

State of Hawaii, Office of Elections

(808) 453-VOTE (8683)

elections@hawaii.gov

From: Erin Potter (Dhillon Law) <EPotter@dhillonlaw.com>

Sent: Tuesday, March 25, 2025 6:10 AM

To: OE.Elections <elections@hawaii.gov>

Cc: Josiah Contarino (Dhillon Law) <JContarino@dhillonlaw.com>; Lee Goodman (Dhillon Law) <LGoodman@DHILLONLAW.COM>

Subject: [EXTERNAL] Public Records Request

Dear Chief Election Officer,

Please see the attached records request.

Thank you,

Erin Potter, Paralegal

Dhillon Law Group

2121 Eisenhower Avenue, Suite 608

Alexandria, VA 22314

EPotter@dhillonlaw.com

SAN FRANCISCO ADDRESS:

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[San Francisco, California 94108](#)

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Dkt. 5 EXH

EXHIBIT 4



From: [OE.Elections](#)
To: [RNCNVRA \(Dhillon Law\)](#); [OE.Elections](#)
Subject: RE: Public Records Request
Date: Monday, April 21, 2025 7:19:13 PM

External Email

Aloha,

Thank you for your email. As it relates to your letter, dated March 25, 2024, our office is referring you to the county clerks. Their contact information can be found at <https://elections.hawaii.gov/resources/county-election-divisions/>. Any further related questions may be directed to the county clerks.

Thank you,

Raymund de Vega

Voter Services

State of Hawaii, Office of Elections

(808) 453-VOTE (8683)

elections@hawaii.gov

From: RNCNVRA (Dhillon Law) <RNCNVRA@DHILLONLAW.COM>
Sent: Thursday, April 10, 2025 8:44 AM
To: OE.Elections <elections@hawaii.gov>
Subject: [EXTERNAL] RE: Public Records Request

Mr. de Vega,

I am in receipt of your response to our Mar. 25 request for public records regarding voter registration and voter list maintenance in Hawaii pursuant to the National Voter Rights Act and the Hawaii public records law. Your response does not indicate that your office conducted any search for responsive records. I would find it highly unlikely that the Hawaii Office of Elections has absolutely no memos, manuals, policies, emails, or voter registration data/information responsive to our requests. As the chief election official for Hawaii, your office must maintain some NVRA records and other records or data regarding voter registration and voter roll maintenance, since that is a legal responsibility under federal law. Before we take further action, I would ask that you confirm you have conducted a search for responsive records discussing list maintenance procedures and related list maintenance data as set forth in our request of Mar. 25. Please let me know if it is your position that your office possesses absolutely no records regarding these topics.

Thank you.

Lee Goodman

From: OE.Elections <elections@hawaii.gov>
Sent: Tuesday, April 1, 2025 10:12 PM
To: Erin Potter (Dhillon Law) <EPotter@dhillonlaw.com>; OE.Elections <elections@hawaii.gov>
Cc: Josiah Contarino (Dhillon Law) <JContarino@dhillonlaw.com>; Lee Goodman (Dhillon Law) <LGoodman@DHILLONLAW.COM>
Subject: RE: Public Records Request

External Email

Aloha,

Thank you for your email. For records concerning voter registration, please contact the county clerks. Their contact information can be found at <https://elections.hawaii.gov/resources/county-election-divisions/>. Any further related questions may be directed to the county clerks.

Thank you,

Raymund de Vega

Voter Services

State of Hawaii, Office of Elections

(808) 453-VOTE (8683)

elections@hawaii.gov

From: Erin Potter (Dhillon Law) <EPotter@dhillonlaw.com>
Sent: Tuesday, March 25, 2025 6:10 AM
To: OE.Elections <elections@hawaii.gov>
Cc: Josiah Contarino (Dhillon Law) <JContarino@dhillonlaw.com>; Lee Goodman (Dhillon Law) <LGoodman@DHILLONLAW.COM>
Subject: [EXTERNAL] Public Records Request

Dear Chief Election Officer,

Please see the attached records request.

Thank you,

Erin Potter, Paralegal

Dhillon Law Group
2121 Eisenhower Avenue, Suite 608
Alexandria, VA 22314
EPotter@dhillonlaw.com

SAN FRANCISCO ADDRESS:

[177 Post Street, Suite 700](#)
[San Francisco, California 94108](#)

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EXHIBIT 5





2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Lee E. Goodman
Phone: 415-433-1700
RNCNVRA@dhillonlaw.com

June 3, 2025

VIA CERTIFIED MAIL R/R/R AND EMAIL

Mr. Raymund de Vega
Voter Services
Office of Elections
802 Lehua Avenue
Pearl City, HI 96782
elections@hawaii.gov

**Re: Follow Up on Public Records Request Under the National Voter
Registration Act & State Public Records Law Dated March 25, 2025.**

Dear Mr. de Vega:

This firm represents the Republican National Committee (“RNC”). This letter follows our public records request to your office on behalf of the RNC that was dated March 25, 2025 (enclosed for ease of reference). On April 1, 2025, you acknowledged receipt of our request and, instead of fulfilling our request, referred us to “the county clerks.”

On April 10, 2025, we responded to your letter and reminded you of your obligation under federal law to maintain certain records responsive to our request. On April 25, 2025, you replied to our response, again referring us to “the county clerks” as opposed to agreeing to fulfill your legal obligation to produce records that you are required to maintain. Again, we would like to make clear to your office that this response does not comply with your legal obligations. Accordingly, we ask that you, in furtherance of your duty to maintain and produce certain records, please advise us of your progress on this matter by no later than **June 10, 2025**, and provide an estimate for when you expect to produce the requested records.

Sincerely,

DHILLON LAW GROUP INC.

By: /s/Lee E. Goodman
Lee E. Goodman

Encl.: (Public Records Request Under the National Voter Registration Act & State Public
Records Law)



2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Lee E. Goodman
Phone: 415-433-1700
RNCNVRA@dhillonlaw.com

March 25, 2025

VIA CERTIFIED MAIL AND EMAIL

Mr. Scott Nago
Chief Election Officer
Office of Elections
802 Lehua Avenue
Pearl City, HI 96782
elections@hawaii.gov

**Re: Public Records Request Under the National Voter Registration Act &
State Public Records Law**

Dear Chief Election Officer:

This firm represents the Republican National Committee (“RNC”). As you know, RNC is committed to a fair electoral process that ensures both access to the ballot and election integrity. Public confidence in the administration of our elections is critical to our democracy.

The starting block for voter participation and election integrity is voter registration. RNC and state and local Republican parties assist thousands of citizens each year to register to vote and devote substantial resources to get-out-the-vote efforts in reliance upon public voter registration lists. RNC also monitors elections to ensure accurate results and public confidence in election outcomes. All of these efforts rely upon accurate voter rolls. Accordingly, RNC supports state and federal laws and practices to keep voter registration rolls up to date.

Because RNC’s voter registration drives, get-out-the-vote drives, and election integrity efforts depend upon the processes implemented by each state to ensure its voter rolls are accurate, RNC is conducting a review of each state’s programs and practices for maintaining accurate voter rolls. As part of that review, RNC is requesting records concerning your state’s programs and practices to maintain accurate voter rolls pursuant to the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20507(i), as well as all applicable freedom of information laws and election transparency laws of your state.

The NVRA contains a public records provision. It requires that “[e]ach state shall maintain for at least 2 years and shall make available for public inspection . . . all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters.” *Id.* § 20507(i)(1). The

scope of records required to be maintained by each state is “sweeping” and includes records of all “voter list registration and maintenance activities.” *United States v. Dion*, 37 F.4th 31, 35 (1st Cir. 2022). These documents must be made available upon request.

Accordingly, RNC respectfully requests the following public records:¹

1. Each record setting forth, documenting, describing, or discussing the programs and activities conducted in your state for the purpose of ensuring the accuracy and currency of official lists of eligible voters from March 2023 to the time of your response to this request.
2. From March 2023 until the time of your response to this request, each record identifying, documenting or discussing the names of the voters removed from your state’s voter rolls as a result of:
 - (a) death;
 - (b) relocation (i.e., change of address);
 - (c) criminal conviction;
 - (d) non-citizenship;
 - (e) duplicate registrations for the same voter;
 - (f) administrative error;
 - (g) non-voting (i.e., inactive) for a period of years; or
 - (h) failure to respond to a mailed or public cancellation notice.
3. Each record that lists or identifies persons **sent an address confirmation** in your state for voter registration purposes from March 2023 until the date of your response to this request.
4. Each record that lists or identifies persons sent an address confirmation who **responded to the notice** from March 2023 until the time of your response to this request.
5. Each record that lists or identifies persons sent an address confirmation who did **not** respond to the notice from March 2023 until the time of your response to this request.
6. Each record that lists or identifies **inactive voters** from March 2023 until the date of your response to this request.

¹ For purpose of this request, a “record” is defined as any document or information, in electronic form or paper copy form, and includes policies, procedures, manuals, memoranda, audits, guidance, lists, spreadsheets, data, and communications (including emails, text messages, and letters). “Record” also includes documents, information, and data found within your statewide voter registration system, the database through which your state carries out its voter list registration and maintenance activities. *See Pub. Int. Legal Found. v. Bellows*, 92 F.4th 36, 47 (1st Cir. 2024).

7. Each record that lists or identifies persons sent a voter registration **cancellation notice** from March 2023 until the time of your response to this request.
8. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **deceased** voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
9. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **relocated** (i.e., change of residence) voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
10. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about voters **convicted of a crime** for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;

- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

11. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about the **non-citizenship** of voters for the purpose of updating voter registrations exchanged between your office and the following offices:

- (a) State Department of Health;
- (b) State Department of Corrections;
- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

12. Each record utilizing, documenting, or discussing any of the following databases/systems/centers for the purpose of identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters and updating your state's voter registration list from March 2023 until the time of your response to this request:

- (a) National Change of Address database;
- (b) Systematic Alien Verification for Entitlements database;
- (c) Electronic Registration Information Center;
- (d) Social Security Death Index; and
- (e) National Association of Public Health Statistics and Information System.

13. Each record utilizing, documenting, or discussing the use or comparison of the voter registration list to **potential juror questionnaires or jury pool records** from March 2023 until the time of your response to this request.

14. Each record exchanged between your office and **other state officials or state agencies** discussing or identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters for the purpose of updating your state's voter registration list from March 2023 until the time of your response

to this request.

15. From March 2023 until the time of your response to this request, each record exchanged between your office and a **county/city/town** voter registration official transmitting or discussing:
 - (a) Instructions to the county/city/town concerning their voter list maintenance practices and responsibilities;
 - (b) Instructions to the county/city/town for the identification and removal of noncitizens;
 - (c) Instructions to the county/city/town for the identification and removal of deceased voters;
 - (d) Instructions to the county/city/town for the identification and removal of voters who changed residences;
 - (e) Instructions to the county/city/town for the identification and removal of convicted felons;
 - (f) Instructions to the county/city/town for the identification and removal of voters who are registered to vote in more than one jurisdiction;
 - (g) Instructions to the county/city/town for the identification and removal of voters who have not voted in successive elections;
 - (h) Notices to the county/city/town concerning any failure to comply with its voter list maintenance obligations under your state's program or law; and
 - (i) Records from a county/city/town reporting on the locality's implementation of a program to identify and remove from the voter registration list those voters who are ineligible, deceased, relocated, felons, registered in more than one location, or noncitizens.
16. Each record that is or mentions a complaint, message, report, study, notice, email, or other communication (electronic form or paper form) your office has received discussing **voter roll inaccuracies**, and each record documenting your office's **corrective action or response** to each complaint, message, report, notice, email, or other communication.

When providing records, data or lists identifying voters in response to any request above, we request all information identifying each voter contained within your record, including but not limited to each voter's name, voter identification number/identifier assigned by your voter registration system, address, date of birth, age, and gender. You should not exclude or redact any of this identifying information if it is contained within your records or data.

As you may be aware, the NVRA's public records disclosure provision preempts any purported public records law exemptions of your state preventing the disclosure or inspection of the requested records related to your state's voter registration list and list maintenance practices. 52 U.S.C. § 20507(i). If you intend to assert exemptions under the

March 25, 2025

Page 6 of 6

NVRA, please provide a log identifying which exemptions you believe apply and what records those exemptions implicate, and provide a detailed explanation of why you believe those exemptions are applicable to each record. If you contend for any reason that the NVRA does not apply to a record, then please provide a log identifying any exemption you believe applies to specific records pursuant to your state freedom of information law.

If there are any fees for searching, copying, compiling or transmitting these records, please inform me if the cost will exceed \$500 prior to incurring the expense. However, you should not charge any fees because the disclosure of the requested information furthers a significant public interest in the transparency of election administration and will contribute to the public's understanding of, and confidence in, your state's efforts to ensure free and fair elections. This information is not being sought for commercial purposes.

I am requesting these records in electronic format and on a rolling basis. Per NVRA requirements, my firm's address is 2121 Eisenhower Avenue, Suite 608, Alexandria, VA 22314, and I can be reached at **RNCNVRA@dhillonlaw.com** or **415-433-1700**.

Sincerely,

DHILLON LAW GROUP INC.

By: /s/Lee E. Goodman

Lee E. Goodman

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EXHIBIT 6



NOTICE TO REQUESTER (Part 1)

TO: **Dhillon Law Group Inc. (RNCNVRA@DHILLONLAW.COM)**
(Requester's name)

FROM: **County of Hawai'i, Office of the County Clerk**
Relley Araceley 808-961-8429 / relley.araceley@hawaiicounty.gov
(Agency, and agency contact person's name, telephone number, & email address)

DATE THAT THE RECORD REQUEST WAS RECEIVED BY AGENCY: August 5, 2025

DATE OF THIS NOTICE: September 19, 2025

GOVERNMENT RECORDS YOU REQUESTED (attach copy of request or provide brief description below):

*Full request attached in email response

For this initial increment we will be responding to requests #4, 5, 7, 11, 12 and 15

THIS NOTICE IS TO INFORM YOU THAT YOUR RECORD REQUEST:

☐ Will be granted in its entirety.

☒ **Cannot be granted. Agency is unable to disclose the requested records for the following reason:**

☒ Agency does not maintain the records. (HRS § 92F-3):

Other agency that is believed to maintain records: Not aware.

☐ Agency needs further clarification or description of the records requested. Please contact the agency and provide the following information: _____

☐ Request requires agency to create a summary or compilation from records, but requested information is not readily retrievable. (HRS § 92F-11(c))

☐ Will be granted in part and denied in part, **OR** ☐ Is denied in its entirety

Although the agency maintains the requested records, it is not disclosing all or part of them based on the exemptions provided in HRS § 92F-13 and/or § 92F-22 or other laws cited below.

(Describe the portions of records that the agency will not disclose.

RECORDS OR
INFORMATION WITHHELD

APPLICABLE
STATUTES

AGENCY
JUSTIFICATION

REQUESTER'S RESPONSIBILITIES:

You are required to (1) pay any lawful fees and costs assessed; (2) make any necessary arrangements with the agency to inspect, copy or receive copies as instructed below; and (3) provide the agency any additional information requested. If you do not comply with the requirements set forth in this notice within 20 business days after the postmark date of this notice or the date the agency makes the records available, you will be presumed to have abandoned your request and the agency shall have no further duty to process your request. Once the agency begins to process your request, you may be liable for any fees and costs incurred. If you wish to cancel or modify your request, you must advise the agency upon receipt of this notice.

METHOD & TIMING OF DISCLOSURE:

Records available for public access in their entireties must be disclosed within a reasonable time, not to exceed 10 business days from the date the request was received, or after receipt of any prepayment required. Records not available in their entireties must be disclosed within 5 business days after this notice or after receipt of any prepayment required. HAR § 2-71-13(c). If incremental disclosure is authorized by HAR § 2-71-15, the first increment must be disclosed within 5 business days of this notice or after receipt of any prepayment required.

Method of Disclosure:

- ☐ Inspection at the following location: _____
- ☒ As requested, a copy of the record(s) will be provided in the following manner:
- ☐ Available for pick-up at the following location: _____
- ☐ Will be mailed to you.
- ☒ Will be transmitted to you by other means requested: RNCNVRA@DHILLONLAW.COM

Timing of Disclosure: All records, or the first increment if applicable, will be made available or provided to you:

- ☐ Date: _____
- ☐ **After prepayment** of 50% of fees and 100% of costs, as estimated below.

For incremental disclosures, each subsequent increment will be disclosed within 20 business days after:

- ☐ The prior increment (if one prepayment of fees is required and received), or
- ☐ Receipt of each incremental prepayment, if prepayment for each increment is required.

Records will be disclosed in increments because the records are voluminous and the following extenuating circumstances exist:

- ☐ Agency must consult with another person to determine whether the record is exempt from disclosure under HRS chapter 92F.
- ☐ Request requires extensive agency efforts to search, review, or segregate the records or otherwise prepare the records for inspection or copying.
- ☐ Agency requires additional time to respond to the request in order to avoid an unreasonable interference with its other statutory duties and functions.
- ☐ A natural disaster or other situation beyond agency's control prevents agency from responding to the request within 10 business days.

ESTIMATED FEES & COSTS AND PAYMENT:

FEES: For personal record requests under Part III of chapter 92F, HRS, the agency may charge you for its costs only, and fee waivers do not apply.

For public record requests under Part II of chapter 92F, HRS, the agency is authorized to charge you fees to search for, review, and segregate your request (even if a record is subsequently found to not exist or will not be disclosed in its entirety). The agency must waive the first \$30 in fees assessed for general requesters, OR in the alternative, the first \$60 in fees when the agency finds that the request is made in the public interest. Only one waiver is provided for each request. See HAR §§ 2-71-19, -31 and -32.

COSTS: For either personal or public record requests, the agency may charge you for the costs of copying and delivering records in response to your request, and other lawful fees and costs.

PREPAYMENT: The agency may require prepayment of 50% of the total estimated fees and 100% of the total estimated costs prior to processing your request. If a prepayment is required, the agency may wait to start any search for or review of the records until the prepayment is received by the agency. Additionally, if you have outstanding fees or costs from previous requests, including abandoned requests, the agency may require prepayment of 100% of the unpaid balance from prior requests before it begins any search or review for the records you are now seeking.

The following is an itemization of what you must pay, based on the estimated fees and costs that the agency will charge you and the applicable waiver amount that will be deducted:

For public record requests only:

Fees: Search	Estimate of time to be spent: <u>1.5</u> hours (\$2.50 for each 15-minute period)	\$ <u>30</u>
Review & segregation	Estimate of time to be spent: <u> </u> hours (\$5.00 for each 15-minute period)	\$
Fees waived	☒ general (\$30), OR ☐ public interest (\$60) (Only one waiver per request)	<\$ <u>30</u> >
Other	_____	\$
	(Pursuant to HAR §§ 2-71-19 & 2-71-31)	
Total Estimated Fees:		\$ 0

For public or personal record requests:

Costs: Copying	Estimate of # of pages to be copied: _____ (@ \$ _____ per page, pursuant to HRS § 92-21)	\$
Delivery	Postage	\$
Other	_____	\$
Total Estimated Costs:		\$

TOTAL ESTIMATED FEES AND COSTS from above: **\$ 0**

☒ The estimated fees and costs above are for the first incremental disclosure only. Additional fees and costs, and no further fee waivers, will apply to future incremental disclosures.

☐ **PREPAYMENT IS REQUIRED** (50% of fees + 100% of costs, as estimated above) \$

☐ **UNPAID BALANCE FROM PRIOR REQUESTS** (100% must be paid before work begins) \$

TOTAL AMOUNT DUE AT THIS TIME **\$ 0**

Payment may be made by: ☐ cash
☐ personal check payable to _____
☐ other _____

For questions about this notice or the records being sought, please contact the agency person named at the beginning of this form. Please note that the Office of Information Practices (OIP) does not maintain the records of other agencies, and a requester must seek records directly from the agency it believes maintains the records. If the agency denies or fails to respond to your written request for records or if you have other questions regarding compliance with the UIPA, then you may contact OIP at (808) 586-1400, ois@hawaii.gov, or 250 South Hotel Street, Suite 107, Honolulu, Hawaii 96813.

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EXHIBIT 7





177 Post Street, Suite 700
San Francisco, CA 94108

Jesse Franklin-Murdock
HSBA No. 10778
JFM@dhillonlaw.com

September 29, 2025

VIA FEDERAL EXPRESS AND EMAIL

Mr. Scott Nago
Chief Election Officer
Office of Elections
802 Lehua Avenue
Pearl City, Hawaii 96782
elections@hawaii.gov

Re: Addendum to March 25, 2025, Public Records Request Under the National Voter Registration Act and Uniform Information Practices Act

Dear Mr. Nago:

Our law firm represents the Republican National Committee (the "RNC"). On March 25, 2025, my colleague Lee E. Goodman, Esq., sent you a request to inspect and copy various records pursuant to the National Voter Registration Act and the Uniform Information Practices Act ("March 25 Letter"). Mr. Goodman explained that the RNC's interest in these records relates to the RNC's voter registration drives, get-out-the-vote drives, and election integrity efforts. March 25 Letter at 1. Nonetheless, we wanted to provide you with the enclosed certification pursuant to Hawaii Administrative Rule § 3-177-160.

Thank you for your attention to this matter.

Regards,

A handwritten signature in blue ink, appearing to read "JFM", with a stylized flourish extending from the end.

Jesse Franklin-Murdock

Encls.: March 25, 2025 Letter from Lee E. Goodman, Esq.
Affidavit of Jesse D. Franklin-Murdock



2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Lee E. Goodman
Phone: 415-433-1700
RNCNVRA@dhillonlaw.com

March 25, 2025

VIA CERTIFIED MAIL AND EMAIL

Mr. Scott Nago
Chief Election Officer
Office of Elections
802 Lehua Avenue
Pearl City, HI 96782
elections@hawaii.gov

**Re: Public Records Request Under the National Voter Registration Act &
State Public Records Law**

Dear Chief Election Officer:

This firm represents the Republican National Committee (“RNC”). As you know, RNC is committed to a fair electoral process that ensures both access to the ballot and election integrity. Public confidence in the administration of our elections is critical to our democracy.

The starting block for voter participation and election integrity is voter registration. RNC and state and local Republican parties assist thousands of citizens each year to register to vote and devote substantial resources to get-out-the-vote efforts in reliance upon public voter registration lists. RNC also monitors elections to ensure accurate results and public confidence in election outcomes. All of these efforts rely upon accurate voter rolls. Accordingly, RNC supports state and federal laws and practices to keep voter registration rolls up to date.

Because RNC’s voter registration drives, get-out-the-vote drives, and election integrity efforts depend upon the processes implemented by each state to ensure its voter rolls are accurate, RNC is conducting a review of each state’s programs and practices for maintaining accurate voter rolls. As part of that review, RNC is requesting records concerning your state’s programs and practices to maintain accurate voter rolls pursuant to the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20507(i), as well as all applicable freedom of information laws and election transparency laws of your state.

The NVRA contains a public records provision. It requires that “[e]ach state shall maintain for at least 2 years and shall make available for public inspection . . . all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters.” *Id.* § 20507(i)(1). The

scope of records required to be maintained by each state is “sweeping” and includes records of all “voter list registration and maintenance activities.” *United States v. Dion*, 37 F.4th 31, 35 (1st Cir. 2022). These documents must be made available upon request.

Accordingly, RNC respectfully requests the following public records:¹

1. Each record setting forth, documenting, describing, or discussing the programs and activities conducted in your state for the purpose of ensuring the accuracy and currency of official lists of eligible voters from March 2023 to the time of your response to this request.
2. From March 2023 until the time of your response to this request, each record identifying, documenting or discussing the names of the voters removed from your state’s voter rolls as a result of:
 - (a) death;
 - (b) relocation (i.e., change of address);
 - (c) criminal conviction;
 - (d) non-citizenship;
 - (e) duplicate registrations for the same voter;
 - (f) administrative error;
 - (g) non-voting (i.e., inactive) for a period of years; or
 - (h) failure to respond to a mailed or public cancellation notice.
3. Each record that lists or identifies persons **sent an address confirmation** in your state for voter registration purposes from March 2023 until the date of your response to this request.
4. Each record that lists or identifies persons sent an address confirmation who **responded to the notice** from March 2023 until the time of your response to this request.
5. Each record that lists or identifies persons sent an address confirmation who did **not** respond to the notice from March 2023 until the time of your response to this request.
6. Each record that lists or identifies **inactive voters** from March 2023 until the date of your response to this request.

¹ For purpose of this request, a “record” is defined as any document or information, in electronic form or paper copy form, and includes policies, procedures, manuals, memoranda, audits, guidance, lists, spreadsheets, data, and communications (including emails, text messages, and letters). “Record” also includes documents, information, and data found within your statewide voter registration system, the database through which your state carries out its voter list registration and maintenance activities. *See Pub. Int. Legal Found. v. Bellows*, 92 F.4th 36, 47 (1st Cir. 2024).

7. Each record that lists or identifies persons sent a voter registration **cancellation notice** from March 2023 until the time of your response to this request.
8. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **deceased** voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
9. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **relocated** (i.e., change of residence) voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
10. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about voters **convicted of a crime** for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;

- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

11. From March 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about the **non-citizenship** of voters for the purpose of updating voter registrations exchanged between your office and the following offices:

- (a) State Department of Health;
- (b) State Department of Corrections;
- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

12. Each record utilizing, documenting, or discussing any of the following databases/systems/centers for the purpose of identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters and updating your state's voter registration list from March 2023 until the time of your response to this request:

- (a) National Change of Address database;
- (b) Systematic Alien Verification for Entitlements database;
- (c) Electronic Registration Information Center;
- (d) Social Security Death Index; and
- (e) National Association of Public Health Statistics and Information System.

13. Each record utilizing, documenting, or discussing the use or comparison of the voter registration list to **potential juror questionnaires or jury pool records** from March 2023 until the time of your response to this request.

14. Each record exchanged between your office and **other state officials or state agencies** discussing or identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters for the purpose of updating your state's voter registration list from March 2023 until the time of your response

to this request.

15. From March 2023 until the time of your response to this request, each record exchanged between your office and a **county/city/town** voter registration official transmitting or discussing:
 - (a) Instructions to the county/city/town concerning their voter list maintenance practices and responsibilities;
 - (b) Instructions to the county/city/town for the identification and removal of noncitizens;
 - (c) Instructions to the county/city/town for the identification and removal of deceased voters;
 - (d) Instructions to the county/city/town for the identification and removal of voters who changed residences;
 - (e) Instructions to the county/city/town for the identification and removal of convicted felons;
 - (f) Instructions to the county/city/town for the identification and removal of voters who are registered to vote in more than one jurisdiction;
 - (g) Instructions to the county/city/town for the identification and removal of voters who have not voted in successive elections;
 - (h) Notices to the county/city/town concerning any failure to comply with its voter list maintenance obligations under your state's program or law; and
 - (i) Records from a county/city/town reporting on the locality's implementation of a program to identify and remove from the voter registration list those voters who are ineligible, deceased, relocated, felons, registered in more than one location, or noncitizens.
16. Each record that is or mentions a complaint, message, report, study, notice, email, or other communication (electronic form or paper form) your office has received discussing **voter roll inaccuracies**, and each record documenting your office's **corrective action or response** to each complaint, message, report, notice, email, or other communication.

When providing records, data or lists identifying voters in response to any request above, we request all information identifying each voter contained within your record, including but not limited to each voter's name, voter identification number/identifier assigned by your voter registration system, address, date of birth, age, and gender. You should not exclude or redact any of this identifying information if it is contained within your records or data.

As you may be aware, the NVRA's public records disclosure provision preempts any purported public records law exemptions of your state preventing the disclosure or inspection of the requested records related to your state's voter registration list and list maintenance practices. 52 U.S.C. § 20507(i). If you intend to assert exemptions under the

March 25, 2025

Page 6 of 6

NVRA, please provide a log identifying which exemptions you believe apply and what records those exemptions implicate, and provide a detailed explanation of why you believe those exemptions are applicable to each record. If you contend for any reason that the NVRA does not apply to a record, then please provide a log identifying any exemption you believe applies to specific records pursuant to your state freedom of information law.

If there are any fees for searching, copying, compiling or transmitting these records, please inform me if the cost will exceed \$500 prior to incurring the expense. However, you should not charge any fees because the disclosure of the requested information furthers a significant public interest in the transparency of election administration and will contribute to the public's understanding of, and confidence in, your state's efforts to ensure free and fair elections. This information is not being sought for commercial purposes.

I am requesting these records in electronic format and on a rolling basis. Per NVRA requirements, my firm's address is 2121 Eisenhower Avenue, Suite 608, Alexandria, VA 22314, and I can be reached at **RNCNVRA@dhillonlaw.com** or **415-433-1700**.

Sincerely,

DHILLON LAW GROUP INC.

By: /s/Lee E. Goodman

Lee E. Goodman

4917-2256-5932, v. 1

1 **AFFIDAVIT OF JESSE D. FRANKLIN-MURDOCK**

2 STATE OF CALIFORNIA)
3) ss.
4 COUNTY OF SAN FRANCISCO)

5 I, Jesse D. Franklin-Murdock, being duly sworn under oath, deposes and declares as follows:

6 1. I am an attorney at Dhillon Law Group Inc. and am one of the attorneys representing
7 the Republican National Committee ("RNC").

8 2. The RNC is seeking the records referenced in Lee E. Goodman, Esq.'s March 25,
9 2025, letter to Scott Nago ("March 25 Letter") to support or encourage voter registration and/or
10 the voting process.

11 3. The RNC is seeking the records referenced in the March 25 Letter for election
12 purposes only.

13 4. The information will not be sold, released, distributed, or used in any way for
14 commercial purposes.

15
16
17 I, Jesse D. Franklin-Murdock, declare under penalty of perjury under the laws of the State of
18 Hawaii that the foregoing is true and correct to the best of my knowledge and belief.

19
20 

21 _____
Jesse D. Franklin-Murdock

22 The following instrument was acknowledged before me this 29th day of September, 2025,
23 by Jesse D. Franklin-Murdock.

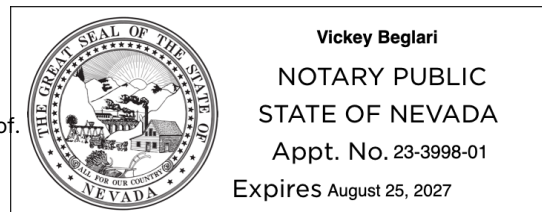
24
25 

26 _____
Notary Public

27 State of Nevada, Clark County

28 Commission Expiration: 08/25/2027

Notarized remotely using audio-video communication technology via Proof.





2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Domenic P. Aulisi
Phone: (703) 574-1093
daulisi@dhillonlaw.com

September 29, 2025

VIA FEDEX AND EMAIL

Jon Henricks
County Clerk
25 Aupuni Street, Room 1502
Hilo, Hawaii 96720
hiloelec@hawaiicounty.gov

Re: Addendum to August 5, 2025, Public Records Request Under the National Voter Registration Act and Uniform Information Practices Act

Dear Mr. Henricks:

Our law firm represents the Republican National Committee (the "RNC"). On August 5, 2025, my colleague Lee E. Goodman, Esq., sent you a request to inspect and copy various records pursuant to the National Voter Registration Act and the Uniform Information Practices Act ("August 5 Letter"). Mr. Goodman explained that the RNC's interest in these records relates to the RNC's voter registration drives, get-out-the-vote drives, and election integrity efforts. August 5 Letter at 1. Nonetheless, we wanted to provide you with the enclosed certification pursuant to Hawaii Administrative Rule § 3-177-160.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Aulisi", written in a cursive style.

Domenic P. Aulisi

Encl:

1. August 5, 2025, Public Records Request Under the National Voter Registration Act & State Public Records Law;
2. Affidavit of Domenic P. Aulisi



2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Lee E. Goodman
Phone: 415-433-1700
RNCNVRA@dhillonlaw.com

August 5, 2025

VIA CERTIFIED MAIL AND EMAIL

Jon Henricks
County Clerk
25 Aupuni Street, Room 1502
Hilo, Hawaii 96720
hiloelec@hawaiicounty.gov

**Re: Public Records Request Under the National Voter Registration Act &
State Public Records Law**

Dear County Clerk:

This firm represents the Republican National Committee (“RNC”). As you know, RNC is committed to a fair electoral process that ensures both access to the ballot and election integrity. Public confidence in the administration of our elections is critical to our democracy.

The starting block for voter participation and election integrity is voter registration. RNC and state and local Republican parties assist thousands of citizens each year to register to vote and devote substantial resources to get-out-the-vote efforts in reliance upon public voter registration lists. RNC also monitors elections to ensure accurate results and public confidence in election outcomes. All of these efforts rely upon accurate voter rolls. Accordingly, RNC supports state and federal laws and practices to keep voter registration rolls up to date.

Because RNC’s voter registration drives, get-out-the-vote drives, and election integrity efforts depend upon the processes implemented by each state to ensure its voter rolls are accurate, RNC is conducting a review of each state’s programs and practices for maintaining accurate voter rolls. Because the State of Hawaii conducts its list maintenance procedures at the county level, RNC is requesting records concerning your county’s programs and practices to maintain accurate voter rolls pursuant to the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20507(i), as well as all applicable freedom of information laws and election transparency laws of your state.

The NVRA contains a public records provision. It requires that “[e]ach state shall maintain for at least 2 years and shall make available for public inspection . . . all records concerning the implementation of programs and activities conducted for the purpose of

ensuring the accuracy and currency of official lists of eligible voters.” *Id.* § 20507(i)(1). The scope of records required to be maintained by each state is “sweeping” and includes records of all “voter list registration and maintenance activities.” *United States v. Dion*, 37 F.4th 31, 35 (1st Cir. 2022). These documents must be made available upon request.

Accordingly, RNC respectfully requests the following public records:¹

1. Each record setting forth, documenting, describing, or discussing the programs and activities conducted in your county for the purpose of ensuring the accuracy and currency of official lists of eligible voters from August 2023 to the time of your response to this request.
2. From August 2023 until the time of your response to this request, each record identifying, documenting or discussing the names of the voters removed from your county’s voter rolls as a result of:
 - (a) death;
 - (b) relocation (i.e., change of address);
 - (c) criminal conviction;
 - (d) non-citizenship;
 - (e) duplicate registrations for the same voter;
 - (f) administrative error;
 - (g) non-voting (i.e., inactive) for a period of years; or
 - (h) failure to respond to a mailed or public cancellation notice.
3. Each record that lists or identifies persons **sent an address confirmation** in your county for voter registration purposes from August 2023 until the date of your response to this request.
4. Each record that lists or identifies persons sent an address confirmation who **responded to the notice** from August 2023 until the time of your response to this request.
5. Each record that lists or identifies persons sent an address confirmation who did **not** respond to the notice from August 2023 until the time of your response to this request.
6. Each record that lists or identifies **inactive voters** from August 2023 until the date

¹ For purpose of this request, a “record” is defined as any document or information, in electronic form or paper copy form, and includes policies, procedures, manuals, memoranda, audits, guidance, lists, spreadsheets, data, and communications (including emails, text messages, and letters). “Record” also includes documents, information, and data found within your voter registration system, the database through which your county carries out its voter list registration and maintenance activities. *See Pub. Int. Legal Found. v. Bellows*, 92 F.4th 36, 47 (1st Cir. 2024).

of your response to this request.

7. Each record that lists or identifies persons sent a voter registration **cancellation notice** from August 2023 until the time of your response to this request.
8. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **deceased** voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
9. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **relocated** (i.e., change of residence) voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
10. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about voters **convicted of a crime** for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;

- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

11. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about the **non-citizenship** of voters for the purpose of updating voter registrations exchanged between your office and the following offices:

- (a) State Department of Health;
- (b) State Department of Corrections;
- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

12. Each record utilizing, documenting, or discussing any of the following databases/systems/centers for the purpose of identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters and updating your county's voter registration list from August 2023 until the time of your response to this request:

- (a) National Change of Address database;
- (b) Systematic Alien Verification for Entitlements database;
- (c) Electronic Registration Information Center;
- (d) Social Security Death Index; and
- (e) National Association of Public Health Statistics and Information System.

13. Each record utilizing, documenting, or discussing the use or comparison of the voter registration list to **potential juror questionnaires or jury pool records** from August 2023 until the time of your response to this request.

14. Each record exchanged between your office and **state officials or state agencies** discussing or identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters for the purpose of updating your

county's voter registration list from August 2023 until the time of your response to this request.

15. From August 2023 until the time of your response to this request, each record exchanged between your office and any other **county/city/town** voter registration official transmitting or discussing:
- (a) Instructions to the county/city/town concerning their voter list maintenance practices and responsibilities;
 - (b) Instructions to the county/city/town for the identification and removal of noncitizens;
 - (c) Instructions to the county/city/town for the identification and removal of deceased voters;
 - (d) Instructions to the county/city/town for the identification and removal of voters who changed residences;
 - (e) Instructions to the county/city/town for the identification and removal of convicted felons;
 - (f) Instructions to the county/city/town for the identification and removal of voters who are registered to vote in more than one jurisdiction;
 - (g) Instructions to the county/city/town for the identification and removal of voters who have not voted in successive elections;
 - (h) Notices to the county/city/town concerning any failure to comply with its voter list maintenance obligations under your state's or county's program or law; and
 - (i) Records from a county/city/town reporting on the locality's implementation of a program to identify and remove from the voter registration list those voters who are ineligible, deceased, relocated, felons, registered in more than one location, or noncitizens.
16. Each record that is or mentions a complaint, message, report, study, notice, email, or other communication (electronic form or paper form) your office has received discussing **voter roll inaccuracies**, and each record documenting your office's **corrective action or response** to each complaint, message, report, notice, email, or other communication.

When providing records, data, or lists identifying voters in response to any request above, we request all information identifying each voter contained within your record, including but not limited to each voter's name, voter identification number/identifier assigned by your voter registration system, address, date of birth, age, and gender. You should not exclude or redact any of this identifying information if it is contained within your records or data.

As you may be aware, the NVRA's public records disclosure provision preempts any purported public records law exemptions of your state preventing the disclosure or inspection of the requested records related to your county's voter registration list and list

August 5, 2025

Page 6 of 6

maintenance practices. 52 U.S.C. § 20507(i). If you intend to assert exemptions under the NVRA, please provide a log identifying which exemptions you believe apply and what records those exemptions implicate, and provide a detailed explanation of why you believe those exemptions are applicable to each record. If you contend for any reason that the NVRA does not apply to a record, then please provide a log identifying any exemption you believe applies to specific records pursuant to your state freedom of information law.

If there are any fees for searching, copying, compiling or transmitting these records, please inform me if the cost will exceed \$500 prior to incurring the expense. However, you should not charge any fees because the disclosure of the requested information furthers a significant public interest in the transparency of election administration and will contribute to the public's understanding of, and confidence in, your state's efforts to ensure free and fair elections. This information is not being sought for commercial purposes.

I am requesting these records in electronic format and on a rolling basis. Per NVRA requirements, my firm's address is 2121 Eisenhower Avenue, Suite 608, Alexandria, VA 22314, and I can be reached at **RNCNVRA@dhillonlaw.com** or **415-433-1700**.

Sincerely,

DHILLON LAW GROUP INC.

By: /s/ Lee E. Goodman

Lee E. Goodman

AFFIDAVIT OF DOMENIC P. AULISI

STATE OF VIRGINIA)
) ss.
CITY OF ALEXANDRIA)

I, Domenic P. Aulisi, being duly sworn under oath, depose and declare as follows:

1. I am an attorney at Dhillon Law Group Inc. and am one of the attorneys representing the Republican National Committee ("RNC").

2. The RNC is seeking the records referenced in Lee E. Goodman, Esq.'s August 5, 2025, letter to Jon Henricks ("August 5 Letter") to support or encourage voter registration and/or the voting process.

3. The RNC is seeking the records referenced in the August 5 Letter for election purposes only.

4. The information will not be sold, released, distributed, or used in any way for commercial purposes.

I, Domenic P. Aulisi, declare under penalty of perjury under the laws of the State of Hawaii that the foregoing is true and correct to the best of my knowledge and belief.



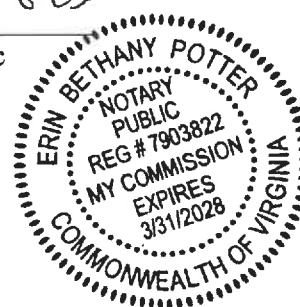
Domenic P. Aulisi

The following instrument was acknowledged before me this 29th day of September, 2025, by Domenic P. Aulisi.



Notary Public

Commission Expiration: 3/31/28





2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Domenic P. Aulisi
Phone: (703) 574-1093
daulisi@dhillonlaw.com

September 29, 2025

VIA FEDEX AND EMAIL

Glen Takahashi
City Clerk
530 South King Street, Room 100
Honolulu, Hawaii 96813
elections@honolulu.gov

Re: Addendum to August 5, 2025, Public Records Request Under the National Voter Registration Act and Uniform Information Practices Act

Dear Mr. Takahashi:

Our law firm represents the Republican National Committee (the "RNC"). On August 5, 2025, my colleague Lee E. Goodman, Esq., sent you a request to inspect and copy various records pursuant to the National Voter Registration Act and the Uniform Information Practices Act ("August 5 Letter"). Mr. Goodman explained that the RNC's interest in these records relates to the RNC's voter registration drives, get-out-the-vote drives, and election integrity efforts. August 5 Letter at 1. Nonetheless, we wanted to provide you with the enclosed certification pursuant to Hawaii Administrative Rule § 3-177-160.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Aulisi", written in a cursive style.

Domenic P. Aulisi

Encl:

1. August 5, 2025, Public Records Request Under the National Voter Registration Act & State Public Records Law;
2. Affidavit of Domenic P. Aulisi



2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Lee E. Goodman
Phone: 415-433-1700
RNCNVRA@dhillonlaw.com

August 5, 2025

VIA CERTIFIED MAIL AND EMAIL

Glen Takahashi
City Clerk
530 South King Street, Room 100
Honolulu, Hawaii 96813
elections@honolulu.gov

**Re: Public Records Request Under the National Voter Registration Act &
State Public Records Law**

Dear City Clerk:

This firm represents the Republican National Committee (“RNC”). As you know, RNC is committed to a fair electoral process that ensures both access to the ballot and election integrity. Public confidence in the administration of our elections is critical to our democracy.

The starting block for voter participation and election integrity is voter registration. RNC and state and local Republican parties assist thousands of citizens each year to register to vote and devote substantial resources to get-out-the-vote efforts in reliance upon public voter registration lists. RNC also monitors elections to ensure accurate results and public confidence in election outcomes. All of these efforts rely upon accurate voter rolls. Accordingly, RNC supports state and federal laws and practices to keep voter registration rolls up to date.

Because RNC’s voter registration drives, get-out-the-vote drives, and election integrity efforts depend upon the processes implemented by each state to ensure its voter rolls are accurate, RNC is conducting a review of each state’s programs and practices for maintaining accurate voter rolls. Because the State of Hawaii conducts its list maintenance procedures at the county level, RNC is requesting records concerning your county’s programs and practices to maintain accurate voter rolls pursuant to the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20507(i), as well as all applicable freedom of information laws and election transparency laws of your state.

The NVRA contains a public records provision. It requires that “[e]ach state shall maintain for at least 2 years and shall make available for public inspection . . . all records concerning the implementation of programs and activities conducted for the purpose of

ensuring the accuracy and currency of official lists of eligible voters.” *Id.* § 20507(i)(1). The scope of records required to be maintained by each state is “sweeping” and includes records of all “voter list registration and maintenance activities.” *United States v. Dion*, 37 F.4th 31, 35 (1st Cir. 2022). These documents must be made available upon request.

Accordingly, RNC respectfully requests the following public records:¹

1. Each record setting forth, documenting, describing, or discussing the programs and activities conducted in your county for the purpose of ensuring the accuracy and currency of official lists of eligible voters from August 2023 to the time of your response to this request.
2. From August 2023 until the time of your response to this request, each record identifying, documenting or discussing the names of the voters removed from your county’s voter rolls as a result of:
 - (a) death;
 - (b) relocation (i.e., change of address);
 - (c) criminal conviction;
 - (d) non-citizenship;
 - (e) duplicate registrations for the same voter;
 - (f) administrative error;
 - (g) non-voting (i.e., inactive) for a period of years; or
 - (h) failure to respond to a mailed or public cancellation notice.
3. Each record that lists or identifies persons **sent an address confirmation** in your county for voter registration purposes from August 2023 until the date of your response to this request.
4. Each record that lists or identifies persons sent an address confirmation who **responded to the notice** from August 2023 until the time of your response to this request.
5. Each record that lists or identifies persons sent an address confirmation who did **not** respond to the notice from August 2023 until the time of your response to this request.
6. Each record that lists or identifies **inactive voters** from August 2023 until the date

¹ For purpose of this request, a “record” is defined as any document or information, in electronic form or paper copy form, and includes policies, procedures, manuals, memoranda, audits, guidance, lists, spreadsheets, data, and communications (including emails, text messages, and letters). “Record” also includes documents, information, and data found within your voter registration system, the database through which your county carries out its voter list registration and maintenance activities. See *Pub. Int. Legal Found. v. Bellows*, 92 F.4th 36, 47 (1st Cir. 2024).

of your response to this request.

7. Each record that lists or identifies persons sent a voter registration **cancellation notice** from August 2023 until the time of your response to this request.
8. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **deceased** voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
9. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **relocated** (i.e., change of residence) voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
 - (c) State Department of Motor Vehicles;
 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
 - (g) U.S. Citizenship & Immigration Service;
 - (h) U.S. Department of Homeland Security (or any agency of the Department);
 - (i) U.S. Judiciary System (including court clerks); and
 - (j) U.S. Department of Justice (or any agency of the Department).
10. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about voters **convicted of a crime** for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;

- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

11. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about the **non-citizenship** of voters for the purpose of updating voter registrations exchanged between your office and the following offices:

- (a) State Department of Health;
- (b) State Department of Corrections;
- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
- (e) U.S. Social Security Administration;
- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

12. Each record utilizing, documenting, or discussing any of the following databases/systems/centers for the purpose of identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters and updating your county's voter registration list from August 2023 until the time of your response to this request:

- (a) National Change of Address database;
- (b) Systematic Alien Verification for Entitlements database;
- (c) Electronic Registration Information Center;
- (d) Social Security Death Index; and
- (e) National Association of Public Health Statistics and Information System.

13. Each record utilizing, documenting, or discussing the use or comparison of the voter registration list to **potential juror questionnaires or jury pool records** from August 2023 until the time of your response to this request.

14. Each record exchanged between your office and **state officials or state agencies** discussing or identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters for the purpose of updating your

county's voter registration list from August 2023 until the time of your response to this request.

15. From August 2023 until the time of your response to this request, each record exchanged between your office and any other **county/city/town** voter registration official transmitting or discussing:
- (a) Instructions to the county/city/town concerning their voter list maintenance practices and responsibilities;
 - (b) Instructions to the county/city/town for the identification and removal of noncitizens;
 - (c) Instructions to the county/city/town for the identification and removal of deceased voters;
 - (d) Instructions to the county/city/town for the identification and removal of voters who changed residences;
 - (e) Instructions to the county/city/town for the identification and removal of convicted felons;
 - (f) Instructions to the county/city/town for the identification and removal of voters who are registered to vote in more than one jurisdiction;
 - (g) Instructions to the county/city/town for the identification and removal of voters who have not voted in successive elections;
 - (h) Notices to the county/city/town concerning any failure to comply with its voter list maintenance obligations under your state's or county's program or law; and
 - (i) Records from a county/city/town reporting on the locality's implementation of a program to identify and remove from the voter registration list those voters who are ineligible, deceased, relocated, felons, registered in more than one location, or noncitizens.
16. Each record that is or mentions a complaint, message, report, study, notice, email, or other communication (electronic form or paper form) your office has received discussing **voter roll inaccuracies**, and each record documenting your office's **corrective action or response** to each complaint, message, report, notice, email, or other communication.

When providing records, data, or lists identifying voters in response to any request above, we request all information identifying each voter contained within your record, including but not limited to each voter's name, voter identification number/identifier assigned by your voter registration system, address, date of birth, age, and gender. You should not exclude or redact any of this identifying information if it is contained within your records or data.

As you may be aware, the NVRA's public records disclosure provision preempts any purported public records law exemptions of your state preventing the disclosure or inspection of the requested records related to your county's voter registration list and list

August 5, 2025

Page 6 of 6

maintenance practices. 52 U.S.C. § 20507(i). If you intend to assert exemptions under the NVRA, please provide a log identifying which exemptions you believe apply and what records those exemptions implicate, and provide a detailed explanation of why you believe those exemptions are applicable to each record. If you contend for any reason that the NVRA does not apply to a record, then please provide a log identifying any exemption you believe applies to specific records pursuant to your state freedom of information law.

If there are any fees for searching, copying, compiling or transmitting these records, please inform me if the cost will exceed \$500 prior to incurring the expense. However, you should not charge any fees because the disclosure of the requested information furthers a significant public interest in the transparency of election administration and will contribute to the public's understanding of, and confidence in, your state's efforts to ensure free and fair elections. This information is not being sought for commercial purposes.

I am requesting these records in electronic format and on a rolling basis. Per NVRA requirements, my firm's address is 2121 Eisenhower Avenue, Suite 608, Alexandria, VA 22314, and I can be reached at **RNCNVRA@dhillonlaw.com** or **415-433-1700**.

Sincerely,

DHILLON LAW GROUP INC.

By: /s/Lee E. Goodman

Lee E. Goodman

1 **AFFIDAVIT OF DOMENIC P. AULISI**

2 STATE OF VIRGINIA)
3) ss.
4 CITY OF ALEXANDRIA)

5 I, Domenic P. Aulisi, being duly sworn under oath, depose and declare as follows:

6 1. I am an attorney at Dhillon Law Group Inc. and am one of the attorneys representing
7 the Republican National Committee ("RNC").

8 2. The RNC is seeking the records referenced in Lee E. Goodman, Esq.'s August 5,
9 2025, letter to Glen Takahashi ("August 5 Letter") to support or encourage voter registration and/or
10 the voting process.

11 3. The RNC is seeking the records referenced in the August 5 Letter for election
12 purposes only.

13 4. The information will not be sold, released, distributed, or used in any way for
14 commercial purposes.

15
16
17 I, Domenic P. Aulisi, declare under penalty of perjury under the laws of the State of Hawaii that
18 the foregoing is true and correct to the best of my knowledge and belief.

19
20 

21 Domenic P. Aulisi

22 The following instrument was acknowledged before me this 29th day of September, 2025,
23 by Domenic P. Aulisi.

24 

25 Notary Public

26 Commission Expiration: 3/31/28



AFFIDAVIT ON APPLICATION FOR VOTER REGISTRATION DATA

STATE OF HAWAI'I
County of Kaua'i } SS

1. Pursuant to Hawai'i Revised Statutes § 11-97, the undersigned hereby makes application to:

☒ Purchase Voter Data

☐ Purchase Voter Registration Street Data

☐ Other: _____

☒ Mark this box if you wish to receive the requested file(s) on CD. Applicants requesting voter data on CD must provide a pre-paid FedEx, UPS, or USPS shipping label or contact the Elections Division to confirm the cost of USPS Flat Rate shipping prior to submitting this Application.

2. Pursuant to Hawai'i Administrative Rules § 3-177-160, the undersigned seeks this information for the following election or government purpose (be specific):

Dhillon Law Group is seeking the requested records on behalf of its client, the Republican National Committee, to support voter registration and the voting process.

3. Pursuant to Hawai'i Administrative Rules § 3-177-160 (g) (3) government agencies seeking the voter's full or last four digits of the social security number, driver license number, state identification card number, electronic mail address, telephone number, or date of birth, shall provide a statement setting forth reasons why such information is required.

Are you a government agency seeking voter registration information that is not public under Hawai'i Administrative Rules § 3-177-160 (b)?

☐ Yes ☒ No

If "Yes", please explain why this information is required (be specific):

4. The undersigned fully understands and hereby does solemnly swear and declare on oath, or in the alternative, does solemnly, sincerely, and truly affirm and declare, under penalty of law, that the following is true and correct:
- a. The contents of this affidavit, including what I have set forth as the election or government purpose for which the information is sought, are true and correct;
 - b. Under penalty of law, the requested voter registration information will only be used for election or government purposes stated in this affidavit; and
 - c. I understand that any voter registration information that may be provided in response to this request that is not public under HAR § 3-177-160 (b) may not be used for any commercial purpose, such as mailing or delivering an advertisement or offer for any property, establishment, organization, product or service, or for the purpose of mailing or delivering any solicitation for money, services, or anything of value; provided that service bureaus may charge a fee for their services involving the use or disclosure of voter registration information that is not public under HAR § 3-177-160 (b) so long as the underlying election purpose is verified.

Dhillon Law Group Inc.

Organization

Domenic P. Aulisi

Attorney

Applicant Name

Title

2121 Eisenhower Avenue, Suite 608 Alexandria, VA 22314

Mailing Address

RNCNVRA@dhillonlaw.com

(703) 574-1093

Email Address

Telephone



09/29/2025

Applicant Signature

Date

WARNING: PURSUANT TO CHAPTER 19 OF THE HAWAII' I REVISED STATUTES, ANY PERSON KNOWINGLY PROVIDING FALSE INFORMATION MAY BE GUILTY OF A CLASS C FELONY, PUNISHABLE BY UP TO 5 YEARS IMPRISONMENT AND/OR \$10,000 FINE.

FOR OFFICE USE ONLY

Approved by:

County Clerk of Kaua'i or Designee

Date

	Date	Notes
Payment:		
Licensed to conduct business in State:		
Other (specify):		

FROM: Elections Division
Office of the County Clerk
4386 Rice St
Rm 101
DUE HI 96766
US

(415) 433-1700

SHIP DATE: 29SEP25
ACTWTGT: 2.00 LB
CAD: 9354362/INET4535
DIMMED: 5 X 3 X 8 IN

BILL SENDER

TO **Domenic P. Aulisi**
Dhillon Law Group
2121 Eisenhower Avenue
Suite 608
ALEXANDRIA VA 22314
(415) 780-2784

REF: 58HJ3/2422/59F2 (US)

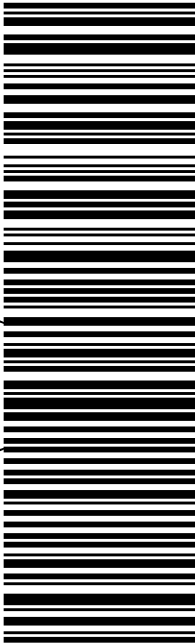
INV: PO: DEPT:



TRK# 8847 5966 4529

22314

9622 0019 0 (000 000 0000) 0 00 8847 5966 4529



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: IMPORTANT: TRANSMIT YOUR SHIPPING DATA AND PRINT A MANIFEST:
At the end of each shipping day, you should perform the FedEx Ground End of Day Close procedure to transmit your shipping data to FedEx. To do so, click on the Ground End of Day Close Button. If required, print the pickup manifest that appears. A printed manifest is required to be tendered along with your packages if they are being picked up by FedEx Ground. If you are dropping your packages off at a FedEx drop off location, the manifest is not required.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide and applicable tariff. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations, including limitations on our liability, can be found in the current FedEx Service Guide and applicable tariff apply. In no event shall FedEx Ground be liable for any special, incidental, or consequential damages, including without limitation, loss of profit, loss to the intrinsic value of the package, loss of sale, interest income or attorney's fees. Recovery cannot exceed actual documented loss. Items of extraordinary value are subject to separate limitations of liability set forth in the Service Guide and tariff. Written claims must be filed within strict time limits, see current FedEx Service Guide.



2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Domenic P. Aulisi
Phone: (703) 574-1093
daulisi@dhillonlaw.com

September 29, 2025

VIA FEDEX AND EMAIL

Moana Lutey
County Clerk
200 South High Street
Wailuku, Hawaii 96793
county.clerk@mauicounty.us

Re: Addendum to August 5, 2025, Public Records Request Under the National Voter Registration Act and Uniform Information Practices Act

Dear Ms. Lutey:

Our law firm represents the Republican National Committee (the "RNC"). On August 5, 2025, my colleague Lee E. Goodman, Esq., sent you a request to inspect and copy various records pursuant to the National Voter Registration Act and the Uniform Information Practices Act ("August 5 Letter"). Mr. Goodman explained that the RNC's interest in these records relates to the RNC's voter registration drives, get-out-the-vote drives, and election integrity efforts. August 5 Letter at 1. Nonetheless, we wanted to provide you with the enclosed certification pursuant to Hawaii Administrative Rule § 3-177-160.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Aulisi", written in a cursive style.

Domenic P. Aulisi

Encl:

1. August 5, 2025, Public Records Request Under the National Voter Registration Act & State Public Records Law;
2. Affidavit of Domenic P. Aulisi



2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314

Lee E. Goodman
Phone: 415-433-1700
RNCNVRA@dhillonlaw.com

August 5, 2025

VIA CERTIFIED MAIL AND EMAIL

Moana Lutey
County Clerk
200 South High Street
Wailuku, Hawaii 96793
county.clerk@mauicounty.us

**Re: Public Records Request Under the National Voter Registration Act &
State Public Records Law**

Dear County Clerk:

This firm represents the Republican National Committee (“RNC”). As you know, RNC is committed to a fair electoral process that ensures both access to the ballot and election integrity. Public confidence in the administration of our elections is critical to our democracy.

The starting block for voter participation and election integrity is voter registration. RNC and state and local Republican parties assist thousands of citizens each year to register to vote and devote substantial resources to get-out-the-vote efforts in reliance upon public voter registration lists. RNC also monitors elections to ensure accurate results and public confidence in election outcomes. All of these efforts rely upon accurate voter rolls. Accordingly, RNC supports state and federal laws and practices to keep voter registration rolls up to date.

Because RNC’s voter registration drives, get-out-the-vote drives, and election integrity efforts depend upon the processes implemented by each state to ensure its voter rolls are accurate, RNC is conducting a review of each state’s programs and practices for maintaining accurate voter rolls. Because the State of Hawaii conducts its list maintenance procedures at the county level, RNC is requesting records concerning your county’s programs and practices to maintain accurate voter rolls pursuant to the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20507(i), as well as all applicable freedom of information laws and election transparency laws of your state.

The NVRA contains a public records provision. It requires that “[e]ach state shall maintain for at least 2 years and shall make available for public inspection . . . all records concerning the implementation of programs and activities conducted for the purpose of

ensuring the accuracy and currency of official lists of eligible voters.” *Id.* § 20507(i)(1). The scope of records required to be maintained by each state is “sweeping” and includes records of all “voter list registration and maintenance activities.” *United States v. Dion*, 37 F.4th 31, 35 (1st Cir. 2022). These documents must be made available upon request.

Accordingly, RNC respectfully requests the following public records:¹

1. Each record setting forth, documenting, describing, or discussing the programs and activities conducted in your county for the purpose of ensuring the accuracy and currency of official lists of eligible voters from August 2023 to the time of your response to this request.
2. From August 2023 until the time of your response to this request, each record identifying, documenting or discussing the names of the voters removed from your county’s voter rolls as a result of:
 - (a) death;
 - (b) relocation (i.e., change of address);
 - (c) criminal conviction;
 - (d) non-citizenship;
 - (e) duplicate registrations for the same voter;
 - (f) administrative error;
 - (g) non-voting (i.e., inactive) for a period of years; or
 - (h) failure to respond to a mailed or public cancellation notice.
3. Each record that lists or identifies persons **sent an address confirmation** in your county for voter registration purposes from August 2023 until the date of your response to this request.
4. Each record that lists or identifies persons sent an address confirmation who **responded to the notice** from August 2023 until the time of your response to this request.
5. Each record that lists or identifies persons sent an address confirmation who did **not** respond to the notice from August 2023 until the time of your response to this request.
6. Each record that lists or identifies **inactive voters** from August 2023 until the date

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8. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **deceased** voters for the purpose of updating voter registrations exchanged between your office and the following offices:
 - (a) State Department of Health;
 - (b) State Department of Corrections;
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 - (d) State Judiciary (including court clerks);
 - (e) U.S. Social Security Administration;
 - (f) U.S. Postal Service;
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 - (h) U.S. Department of Homeland Security (or any agency of the Department);
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 - (j) U.S. Department of Justice (or any agency of the Department).
9. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about **relocated** (i.e., change of residence) voters for the purpose of updating voter registrations exchanged between your office and the following offices:
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 - (b) State Department of Corrections;
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 - (b) State Department of Corrections;

- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
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- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

11. From August 2023 until the time of your response to this request, each record utilizing, documenting or discussing information about the **non-citizenship** of voters for the purpose of updating voter registrations exchanged between your office and the following offices:

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- (b) State Department of Corrections;
- (c) State Department of Motor Vehicles;
- (d) State Judiciary (including court clerks);
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- (f) U.S. Postal Service;
- (g) U.S. Citizenship & Immigration Service;
- (h) U.S. Department of Homeland Security (or any agency of the Department);
- (i) U.S. Judiciary System (including court clerks); and
- (j) U.S. Department of Justice (or any agency of the Department).

12. Each record utilizing, documenting, or discussing any of the following databases/systems/centers for the purpose of identifying deceased, relocated, criminally convicted, duplicate-registered, non-voting, or non-citizen voters and updating your county's voter registration list from August 2023 until the time of your response to this request:

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- (b) Systematic Alien Verification for Entitlements database;
- (c) Electronic Registration Information Center;
- (d) Social Security Death Index; and
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 - (d) Instructions to the county/city/town for the identification and removal of voters who changed residences;
 - (e) Instructions to the county/city/town for the identification and removal of convicted felons;
 - (f) Instructions to the county/city/town for the identification and removal of voters who are registered to vote in more than one jurisdiction;
 - (g) Instructions to the county/city/town for the identification and removal of voters who have not voted in successive elections;
 - (h) Notices to the county/city/town concerning any failure to comply with its voter list maintenance obligations under your state's or county's program or law; and
 - (i) Records from a county/city/town reporting on the locality's implementation of a program to identify and remove from the voter registration list those voters who are ineligible, deceased, relocated, felons, registered in more than one location, or noncitizens.
16. Each record that is or mentions a complaint, message, report, study, notice, email, or other communication (electronic form or paper form) your office has received discussing **voter roll inaccuracies**, and each record documenting your office's **corrective action or response** to each complaint, message, report, notice, email, or other communication.

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As you may be aware, the NVRA's public records disclosure provision preempts any purported public records law exemptions of your state preventing the disclosure or inspection of the requested records related to your county's voter registration list and list

August 5, 2025

Page 6 of 6

maintenance practices. 52 U.S.C. § 20507(i). If you intend to assert exemptions under the NVRA, please provide a log identifying which exemptions you believe apply and what records those exemptions implicate, and provide a detailed explanation of why you believe those exemptions are applicable to each record. If you contend for any reason that the NVRA does not apply to a record, then please provide a log identifying any exemption you believe applies to specific records pursuant to your state freedom of information law.

If there are any fees for searching, copying, compiling or transmitting these records, please inform me if the cost will exceed \$500 prior to incurring the expense. However, you should not charge any fees because the disclosure of the requested information furthers a significant public interest in the transparency of election administration and will contribute to the public's understanding of, and confidence in, your state's efforts to ensure free and fair elections. This information is not being sought for commercial purposes.

I am requesting these records in electronic format and on a rolling basis. Per NVRA requirements, my firm's address is 2121 Eisenhower Avenue, Suite 608, Alexandria, VA 22314, and I can be reached at **RNCNVRA@dhillonlaw.com** or **415-433-1700**.

Sincerely,

DHILLON LAW GROUP INC.

By: /s/ Lee E. Goodman

Lee E. Goodman

1 **AFFIDAVIT OF DOMENIC P. AULISI**

2 STATE OF VIRGINIA)
3) ss.
4 CITY OF ALEXANDRIA)

5 I, Domenic P. Aulisi, being duly sworn under oath, depose and declare as follows:

6 1. I am an attorney at Dhillon Law Group Inc. and am one of the attorneys representing
7 the Republican National Committee ("RNC").

8 2. The RNC is seeking the records referenced in Lee E. Goodman, Esq.'s August 5,
9 2025, letter to Moana Lutey ("August 5 Letter") to support or encourage voter registration and/or
10 the voting process.

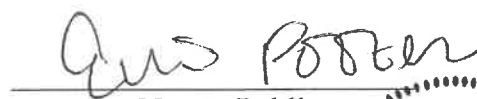
11 3. The RNC is seeking the records referenced in the August 5 Letter for election
12 purposes only.

13 4. The information will not be sold, released, distributed, or used in any way for
14 commercial purposes.

15
16
17 I, Domenic P. Aulisi, declare under penalty of perjury under the laws of the State of Hawaii that
18 the foregoing is true and correct to the best of my knowledge and belief.

19
20 
21 Domenic P. Aulisi

22 The following instrument was acknowledged before me this 29th day of September, 2025,
23 by Domenic P. Aulisi.

24 
25 Notary Public

26 Commission Expiration: 3/31/28

