

September 5, 2025

VIA EMAIL

Honorable Pamela Bondi
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Mr. Michael Gates
Deputy Assistant Attorney General
U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Re: Violations of National Voter Registration Act by Maine Secretary of State

Dear General Bondi and Mr. Gates:

The Republican National Committee (“RNC”) respectfully submits this complaint and requests that your office investigate the Maine Secretary of State’s violation of the National Voter Registration Act (“NVRA”). The Maine Secretary of State, Shenna Bellows, is the state’s chief election officer and, under the NVRA, is required by law to make “all records” pertaining to the state’s voter list maintenance system available to the public. The RNC requested that Secretary Bellows provide records pertaining to Maine’s voter list maintenance system on March 25, 2025. On May 4, 2025—over one month after our client’s request—Maine finally acknowledged its receipt, but failed to provide any records, including readily accessible records. Five months later, in August, Secretary Bellows tentatively agreed to produce off-the-shelf records, such as policies, procedures, and training manuals, outlining Maine’s list maintenance systems, but to this day, Secretary Bellows has refused to indicate whether she is willing to produce any further records, including concrete data that would demonstrate whether Maine is actually implementing these policies as written.

Furthermore, the limited information provided by Secretary Bellows’ office suggests that Maine is failing to maintain its voter list with any regularity. Therefore, we respectfully request that the Department of Justice investigate Maine’s compliance with the NVRA’s “all records” requirement and its list maintenance obligations.

Background

By letter dated March 25, 2025, pursuant to both the NVRA and Maine’s Freedom of Access Act, the RNC submitted sixteen requests to Secretary Bellows for detailed voter list maintenance records for the purpose of conducting a review of the state’s programs and practices to maintain accurate voter rolls. On May 4, 2025, Secretary Bellows’ office responded to the RNC’s request

by indicating that it was conducting a search for responsive records, but her office failed to provide an estimate regarding its anticipated date of production. Copies of these letters are enclosed.

After nearly two months elapsed with no communication from Secretary Bellows' office, the RNC sent a notice to the Secretary, dated July 23, 2025, asserting, among other things, that Secretary Bellows' failure to produce the requested voter list maintenance records constitutes a violation of the NVRA. Following that letter, a representative of Secretary Bellows' office contacted the RNC's counsel regarding the status of its request. By letter dated August 4, 2025, the representative stated that the Secretary's office would be able to respond to our request within "36 to 48 months," provided that the RNC was willing to pay \$23,000.00 for the requested records. The representative also asserted that Secretary Bellows did not possess records responsive to at least three of our requests because her office "conducted its last address mailing confirmation in June of 2022, before the responsive period identified in [our] letter." Copies of the RNC's notice and Secretary Bellows' response are also enclosed.

After contacting the representative to discuss the matter, she indicated that Secretary Bellows' office would provide information responsive to one of our sixteen requests. That request, Request No. 1, covers the most basic off-the-shelf policies and procedures, which should require no more than a couple of hours to compile. However, she refused to state whether Secretary Bellows would provide other records, responsive to Requests Nos. 2 through 16, to which the RNC is entitled under the NVRA.

Violation of the NVRA "All Records" Requirement

The NVRA requires the state's chief election officer to make available "*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." 52 U.S.C. § 20507(i)(1) (emphasis added). Accordingly, Secretary Bellows, as Maine's chief election officer, is required to make such records available to the public.

As of this letter, it has been over five months since the RNC's original March 25, 2025, request. During that time, the Secretary has failed to provide *any* records responsive to that request. To the extent that the Secretary *has* represented her willingness to address our client's request, the cost and time estimates provided by her office (\$23,000.00 and three to four years) are intentionally prohibitive and contravene the NVRA's clear commitment toward transparent government and public accountability. Indeed, various other states to which our client has sent identical requests have indicated their ability to respond to the request in full within a matter of weeks and at no cost. Although the Secretary's office recently agreed to produce a subset of the requested records (following receipt of our violation letter), the Secretary has refused to commit to providing other responsive records or data showing actual voter removals—the only records that could conclusively indicate whether Maine is adequately maintaining its voter list.

Therefore, Secretary Bellows has violated the NVRA's "all records" provision, and we request that the Department of Justice investigate the Secretary's conduct and help resolve this clear violation of federal law.

Potential Violation of the NVRA List Maintenance Requirement

We also request that the Department of Justice investigate the Secretary's procedures and processes for maintaining accurate voter lists. The NVRA requires that each state "conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters by reason of (A) the death of the registrant; or (B) a change in the residence of the residence, in accordance with subsections (b), (c), and (d)." 52 U.S.C. § 20507(a)(4).

Despite having been previously ordered to maintain its voting list through the regular use of the U.S. Postal Service National Change of Address program, *see United States v. Maine*, No. 06–86–B–W, 2007 WL 1059565, at *4 (D. Maine Apr. 4, 2007), the Secretary asserts that she cannot fulfill several of our client's individual requests concerning Maine's address verification systems because "the Department conducted its last list address confirmation mailing in June of 2022." Whatever constitutes "a reasonable effort," a state's failure to verify the addresses of its registered voters for more than three years plainly falls short of that standard. Moreover, Secretary Bellows has failed to indicate that Maine is, in any way, engaging in regular list maintenance by removing deceased voters from its voter rolls.

This lack of transparency and apparent lack of ongoing list maintenance activity is particularly concerning in light of Secretary Bellows' recent acknowledgment that "some non-citizens" are likely present on Maine's voting list. *See Democracy Docket, Trump's DOJ Can "Jump in the Gulf of Maine,"* at 13:21 (YouTube, Aug. 7, 2025), https://www.youtube.com/watch?v=_R0XP_PKLHSA&ab_channel=DemocracyDocket.

Given Secretary Bellows' explicit admissions and the lack of any assurances from Secretary Bellows that Maine is otherwise complying with the NVRA, combined with the concealment of relevant records, we believe it is likely that Maine is failing to conduct reasonable efforts to maintain the integrity of its voter lists.

Conclusion

The RNC believes that Secretary Bellows' actions justify an immediate federal investigation within the Department of Justice's statutory authority. We thank you for your prompt attention to this matter.

Sincerely,

Mandy Lester
Chief Counsel
Republican National Committee

Encl.:

1. March 25, 2025, Public Records Request Under the National Voter Registration Act & State Public Records Law;
2. May 4, 2025, Maine Secretary of State Acknowledgment Letter;
3. July 23, 2025, Notice of NVRA and State FOIA Violations;
4. August 4, 2025, Maine Letter Regarding Status of March 25, 2025, Request.