

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
sos@sos.iowa.gov

RE: NVRA Violation Notice

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation in regards to the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act that we submitted to your office and to 31 Iowa counties in letters dated September 15, 2017.

Your response of September 27, 2017, expressly rejected our inspection request. Section 20507(i) of the NVRA requires your office to 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.” 52 U.S.C. § 20507(i); *see also*, *Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that your office will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
lchurchwell@publicinterestlegal.org

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Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Adams County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



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[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

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Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Allamakee County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

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**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Audubon County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



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[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Carroll County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

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**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Chickasaw County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

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Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Clay County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

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Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Dallas County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also*, *Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

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Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:


I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Emmet County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also*, *Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

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Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Fremont County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



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Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Guthrie County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



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Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Hancock County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

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**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Iowa County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

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It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

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**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Jackson County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

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**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Johnson County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

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**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Lyon County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)



# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Bldg  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Madison County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Mahaska County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Marion County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the O'Brien County Auditor's Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney's fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Palo Alto County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Warren County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also*, *Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Webster County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lgchurchwell@publicinterestlegal.org](mailto:lgchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Winnebago County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)



# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Worth County Auditor’s Office in a letter dated September 15, 2017.

We have received no response from the County regarding this request. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

RE: NVRA Violation Notice

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Dickinson County Auditor’s Office in a letter dated September 15, 2017.

Via email on November 27, 2017, Dickinson County stated that it would not be responding to our letter. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

RE: NVRA Violation Notice

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Plymouth County Auditor’s Office in a letter dated September 15, 2017.

The County’s email response on September 29, 2017 did not respond to our request for disclosure and inspection of voter list maintenance records. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

# PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA FIRST CLASS MAIL AND EMAIL

June 1, 2018

The Hon. Paul D. Pate  
Iowa Secretary of State  
Elections Division  
First Floor, Lucas Blding  
321 E. 12th St  
Des Moines, IA 50319  
[sos@sos.iowa.gov](mailto:sos@sos.iowa.gov)

**RE: NVRA Violation Notice**

Dear Secretary Pate:

I am writing on behalf of the Public Interest Legal Foundation regarding the request for disclosure and inspection of voter list maintenance records pursuant to the public inspection provision of the National Voter Registration Act (“NVRA”) that we submitted to the Poweshiek County Auditor’s Office in a letter dated September 15, 2017.

The County's email response on June 1, 2018 did not respond to our request for disclosure and inspection of voter list maintenance records. Section 20507(i) of the NVRA requires the County to 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.” 52 U.S.C. § 20507(i); *see also, Project Vote v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

Accordingly, this letter serves as statutory notice to you, required by 52 U.S.C. § 20510(b) prior to the commencement of any lawsuit in order to enforce provisions of Section 8 of the NVRA, 52 U.S.C. § 20507(i), for failure to grant inspection of the requested records.

It is our hope that the County will work quickly to provide for inspection of all of the records previously requested. If not, according to federal law, a lawsuit under the NVRA may be filed if this violation is not corrected within 20 days because there are less than 120 days before a federal election. 52 U.S.C. § 20510(b). For any lawsuits initiated by a private party, an award of attorney’s fees, expenses and costs incurred are available under 52 U.S.C. §20510(c).

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)