

**United States District Court
District of New Mexico**

PUBLIC INTEREST LEGAL FOUNDATION, INC.,

Plaintiff,

v.

MAGGIE TOULOUSE OLIVER, in her official
capacity as New Mexico Secretary of State,

Defendant.

Civil Case No. _____

COMPLAINT FOR DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF

Plaintiff Public Interest Legal Foundation, Inc., by and through counsel, brings this action for declaratory and injunctive relief against Defendant for violations of the National Voter Registration Act of 1993 (“NVRA”), 52 U.S.C. § 20507.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, because the action arises under the laws of the United States. This Court also has jurisdiction under 52 U.S.C. § 20510(b), because the action seeks injunctive and declaratory relief under the NVRA. This Court may also grant declaratory relief under 28 U.S.C. § 2201.

2. This Court also has jurisdiction because Plaintiff complied with the NVRA’s pre-litigation notice requirements and Defendant failed to cure the violation of law in the time the NVRA affords. *See* 52 U.S.C. § 20510(b)(1)-(3).

3. Venue in this Court is proper under 28 U.S.C. § 1391(b)(1), because the Defendant resides in this district, and under 28 U.S.C. § 1391(b)(2), because a substantial part of the events or omissions giving rise to the claim occurred in this district.

PARTIES

4. The Public Interest Legal Foundation is a non-partisan, public interest organization incorporated and based in Alexandria, Virginia. The Foundation seeks to promote the integrity of the electoral process nationwide through research, education, remedial programs, and litigation. The Foundation regularly utilizes the NVRA's Public Disclosure Provision and state and federal open records laws that require government records be made available to the public. Using records and data compiled through these open records laws, the Foundation analyzes the programs and activities of state and local election officials to determine whether lawful efforts are being made to keep voter rolls current and accurate, and to determine whether eligible registrants have been improperly removed from voter rolls. Where necessary, the Foundation takes remedial action based on issues revealed by these public records. To advance the public education aspect of its organizational mission, the Foundation uses records and data to produce and disseminate reports, articles, blog and social media posts, and newsletters. The Foundation also uses records and data to inform and advise lawmakers, including members of Congress and state legislators, about different circumstances, including possible amendments to the NVRA, the State's compliance with federal law, and whether the NVRA's four articulated legislative purposes are actualized.

5. Defendant Maggie Toulouse Oliver ("Secretary") is the Secretary of State for the State of New Mexico and "is the chief election officer of the state." NMSA § 1-2-1(A). The Secretary is sued in her official capacity only.

BACKGROUND

The NVRA

6. The NVRA provides, in relevant part, “In the administration of voter registration for elections for Federal office, each State shall—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—the death of the registrant[.]” 52 U.S.C. § 20507(a)(4)(A).

7. The NVRA also provides, in relevant part, “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[.]” 52 U.S.C. § 20507(i)(1) (hereafter, the “Public Disclosure Provision”).¹

8. The Public Disclosure Provision thus has two distinct requirements: maintenance and disclosure. *See id.*

9. In November 2025, the Tenth Circuit held that New Mexico violated the NVRA when it denied a request for voter roll data on the condition that the requestor abide by use and publication restrictions, implicitly recognizing that New Mexico’s voter roll data is within the NVRA’s scope. *See Voter Reference Found., LLC v. Torrez*, 160 F.4th 1068, 1088 (10th Cir. 2025) (“We therefore agree with the district court that the Use Restrictions violate the NVRA. By refusing to produce VRF’s requested voter data per the Use Restrictions, we find that the State violated the NVRA.”).

10. Other federal appellate courts have similarly recognized the NVRA’s broad reach and voter-protection goals. In the words of the Fourth Circuit, the Public Disclosure Provision

¹ The records described by the Public Disclosure Provision are commonly referred to as “voter list maintenance records.”

“embodies Congress’s conviction that Americans who are eligible under law to vote have every right to exercise their franchise, a right that must not be sacrificed to administrative chicanery, oversights, or inefficiencies.” *Project Vote/Voting for Am., Inc. v. Long*, 682 F.3d 331, 334-35 (4th Cir. 2012).

11. In the words of the First Circuit, the Public Disclosure Provision “evinces Congress’s belief that public inspection, and thus public release, of Voter File data is necessary to accomplish the objectives behind the NVRA.” *Pub. Int. Legal Found., Inc. v. Bellows*, 92 F.4th 36, 54 (1st Cir. 2024).

12. In the words of the Ninth Circuit, the Public Disclosure Provision “encompasses materials documenting each step a state undertakes when actively implementing relevant programs,” which “might include duplicate-removal reports, procedural manuals about list maintenance tasks, or correspondence with voters[.]” *Pub. Int. Leg. Found., Inc. v. Nago*, No. 24-6629, 2026 LX 252625, at *32-33 (9th Cir. Apr. 28, 2026).

13. United States District Courts accord. *Bellitto v. Snipes*, No. 16-cv-61474, 2018 U.S. Dist. LEXIS 103617, at *12 (S.D. Fla., Mar. 30, 2018) (citing 52 U.S.C. § 20507(i)) (“To ensure that election officials are fulfilling their list maintenance duties, the NVRA contains public inspection provisions.”); *True the Vote v. Hosemann*, 43 F. Supp. 3d 693, 721 (S.D. Miss 2014) (“The Public Disclosure Provision thus helps ‘to ensure that accurate and current voter registration rolls are maintained.’”) (citations and quotations omitted).

14. The Public Disclosure Provision is thus a means to ensure eligible registrants are registered and ineligible registrants are not. *See, e.g., Project Vote/Voting for Am., Inc. v. Long*, 752 F. Supp. 2d 697, 706 (E.D. Va. 2010) (explaining that the “‘official lists of eligible voters’ would be inaccurate and obsolete if eligible voters were improperly denied registration.”).

The Electronic Registration Information Center

15. The Electronic Registration Information Center (“ERIC”) is a non-profit organization with the mission of assisting states to “improve the accuracy of America’s voter rolls” and “increase access to voter registration for all eligible citizens.” ERIC, Home, <https://ericstates.org/> (last accessed May 27, 2026).

16. Members control ERIC. “The chief election official from each member jurisdiction designates a Member Representative to the ERIC Board of Directors. Each Member Representative serves as a voting member of the board.” ERIC: FAQ’s, “Who Controls ERIC?”, <https://ericstates.org/faq/> (last accessed May 27, 2026) (hereafter, “ERIC FAQs”).

17. Members also fund ERIC. New members “pay a one-time membership fee of \$25,000” and “annual dues.” ERIC FAQs, “How is ERIC funded?”, <https://ericstates.org/faq/> (last accessed May 27, 2026).

18. New Mexico has been a member of ERIC since 2016. *See* ERIC, Who We Are, <https://ericstates.org/who-we-are/> (last accessed May 27, 2026); NM SOS, Voting and Elections, ERIC Project FAQs, <https://www.sos.nm.gov/voting-and-elections/voter-information-portal-nmvote-org/eric-project-faqs/> (last accessed May 27, 2026).

19. All members of ERIC, including New Mexico, signed the ERIC “Membership Agreement,” which sets forth the terms and conditions of membership in ERIC. ERIC Bylaws, Exhibit A, Section 3 (PDF pages 13-27), <https://ericstates.org/wp-content/uploads/documents/ERIC-Bylaw-MA-FINAL.pdf> (hereafter, “ERIC Bylaws”) (last accessed May 27, 2026).

20. Per the ERIC Membership Agreement, New Mexico provides the following to ERIC “every sixty (60) days”:

- “(1) all inactive and active voter files” and,
- “(2) all licensing or identification records from motor vehicles departments[.]”

ERIC Bylaws, Exhibit A (Membership Agreement) at Section 2(b) (PDF page 17).

21. Using member and third-party data, ERIC makes reports available to New Mexico and other members. *See* ERIC Bylaws, Exhibit A (Membership Agreement) at Section 3(a)(i) (PDF pages 17-18).

22. One of the reports ERIC makes available to New Mexico and other members is the Deceased Report, which “identifies voters who may have died.” ERIC Bylaws, Exhibit A (Membership Agreement) at Section 3(a)(i)(D) (PDF page 18) (hereafter, “ERIC Deceased Reports”).

23. New Mexico receives ERIC Deceased Reports from ERIC.

24. When New Mexico receives ERIC Deceased Reports, it “must use these reports to improve the accuracy of [its] voter rolls.” ERIC Bylaws, Exhibit A (Membership Agreement) at Section 4(b)(i)(A) (PDF page 24).

25. After receipt of an ERIC Deceased Report, New Mexico has “ninety (90) days” to “act on the report for the purposes of ... removing Deceased voters.” *Id.* at Section 4(b)(i)(C)-(D) (PDF page 24-25).

26. New Mexico must certify in writing that it has complied with the requirements with respect to ERIC Deceased Reports. *Id.* at Section 4(c) (PDF pages 26-27).

27. New Mexico thus uses ERIC Deceased Reports to conduct list maintenance programs and activities required by state law and the NVRA, including cancellation of registration records belonging to deceased individuals. *See* 52 U.S.C. § 20507(a)(4)(A).

28. ERIC Deceased Reports are plausibly subject to disclosure under the NVRA’s Public Disclosure Provision. *See, e.g., Pub. Interest Legal Found., Inc. v. Dahlstrom*, 673 F. Supp. 3d 1004, 1014 (D. Alaska 2023) (“The Foundation has plausibly alleged in its complaint that the ERIC data falls within the reach of the disclosure provision because the review of the ERIC data is an ‘activity’ or ‘program’ that the State has ‘implement[ed]’ to determine the continued eligibility of registered voters for the purpose ‘of ensuring the accuracy and currency of official lists of eligible voters.’”); *Pub. Int. Legal Found., Inc. v. Griswold*, Civil Action No. 21-cv-03384-PAB-MEH, 2023 U.S. Dist. LEXIS 176231, at *13 (D. Colo. Sep. 29, 2023) (“[T]he Foundation has sufficiently alleged the ERIC records it seeks are concerned with implementing a program or activity under the NVRA, namely, maintaining accurate voter rolls.”).

29. The ERIC Bylaws similarly provide that Member States may publicly disclose ERIC Deceased Reports under certain circumstances. ERIC Bylaws, Exhibit A (Membership Agreement) at Section 3(d)(ii)(B) (PDF page 20).

ERIC SSA Corrections Updates

30. ERIC acknowledges that ERIC Deceased Reports “may include errors or omissions, for example misidentifying an individual as being deceased.” *Id.* at Section 3(a)(i)(D).

31. When ERIC learns about errors or omissions in its Deceased Reports, ERIC “automatically shares [Social Security Administration’s] corrections with its Members” in a report called the “SSA Corrections Update.” *Id.*

32. The SSA Corrections Updates “contain[] Voter Registration Data data [sic] that matches individuals previously misidentified by the SSA as deceased and that were previously included in a Deceased Report.” *Id.*

33. SSA Corrections Updates are provided to New Mexico and other members so that members can remedy or correct erroneous cancellations, which may include notifying and re-registering an erroneously cancelled registrant.

34. SSA Corrections Updates thus concern New Mexico's voter list maintenance programs and activities.

35. New Mexico receives SSA Corrections Updates from ERIC and relies on those Updates to conduct programs and activities designed to ensure New Mexico's voter roll is accurate and current.

36. SSA Corrections Updates are therefore subject to disclosure under the NVRA's Public Disclosure Provision.

37. The ERIC Bylaws confirm that SSA Corrections Updates may be publicly disclosed. ERIC Bylaws, Exhibit A (Membership Agreement) at Section 3(d)(ii)(C) (PDF page 20).

The Secretary is Denying the Foundation Access to Voter List Maintenance Records

38. On January 29, 2026, the Foundation emailed a letter to the New Mexico Secretary of State's office. The letter requested inspection or production of the following records, pursuant to the NVRA's Public Disclosure Provision:

1. Copies of all "Deceased Retractions" reports received from ERIC.
2. Copies of all other records concerning "Deceased Retractions" reports, *e.g.*, correspondence.

Exhibit A (hereafter, the "Request").

39. The Request described the SSA Corrections Updates as Deceased Retractions reports. The ERIC Bylaws were updated at an unknown date to formally title these Reports as

SSA Corrections Updates. This Complaint hereafter uses SSA Corrections Updates to describe the requested records.

40. On February 27, 2026, the Secretary's office acknowledged receipt of the Request.

41. Between March 16, 2026, and May 15, 2026, the Secretary's office sought five separate fifteen-day extensions of time to respond to the Request. Each extension explained the request was allegedly "broad and burdensome."

42. The most recent extension request sought until May 30, 2026, to respond to the Request.

43. The Secretary's office never divulged whether it maintained the SSA Corrections Updates or provided a date on which production of the Updates would occur.

44. The Secretary has effectively denied the Foundation's Request.

The Foundation Notified the Secretary that She is Violating the NVRA

45. On May 26, 2026, the Foundation notified the Secretary that she is violating the NVRA by refusing to maintain and permit inspection of the SSA Corrections Updates and related correspondence, as required by 52 U.S.C. § 20507(i)(1). Exhibit B (hereafter, the "Violation Notice").

46. The Violation Notice further notified the Secretary that the requested records fall within the NVRA's scope and are subject to public inspection and reproduction. Exhibit B at 3.

47. The Violation Notice further notified the Secretary that litigation may commence against her if the violation about which she was notified was not cured within the time the NVRA affords. Exhibit B at 1, 3.

48. Because the violation described herein is occurring within thirty (30) days of an election for federal office,² the Foundation did not need to notify the Secretary of her NVRA violation.³ The Foundation chose to do so anyway, to avoid federal litigation.

The Secretary Did Not Cure Her Violation

49. As of the date of this pleading, the Secretary has not cured her NVRA violation. This action is therefore ripe.

The Secretary's Actions Are Harming the Foundation

50. The requested records are records within the scope of the NVRA's Public Disclosure Provision.

51. The NVRA's Public Disclosure Provision requires the Secretary to maintain the requested records for at least two years.

52. The Public Disclosure Provision authorizes and entitles the Foundation to inspect and reproduce or otherwise receive the requested records electronically.

53. The Secretary's NVRA violation is causing the Foundation to suffer a concrete informational injury because the Foundation does not have records and information to which it is entitled under federal law. *FEC v. Akins*, 524 U.S. 11, 21 (1998) (“[A] plaintiff suffers an ‘injury in fact’ when the plaintiff fails to obtain information which must be publicly disclosed pursuant to a statute.”).

54. The Foundation's information injury is causing the Foundation to suffer additional adverse consequences or downstream consequences.

² NM SOS, Voting and Elections, Upcoming Statewide Elections, <https://www.sos.nm.gov/voting-and-elections/> (explaining that New Mexico's 2026 Primary Election is scheduled for June 2, 2026) (last accessed May 27, 2026).

³ Normally, the curative period is 90 days, but when the violation is occurring within 120 days of an election for federal office, the curative period shrinks to 20 days. *See* 52 U.S.C. § 20510(b)(2). When the violation is occurring within 30 days of an election for federal office, the aggrieved person does not need to provide written notice to the chief election official. *See* 52 U.S.C. § 20510(b)(3).

55. First, by denying the Foundation the requested voter list maintenance records, the Secretary is preventing the Foundation from evaluating whether New Mexico is complying with the NVRA and state voter list maintenance obligations. The NVRA permits New Mexico to remove a registrant for being deceased only if the registrant is in fact deceased. *See* 52 U.S.C. § 20507(a)(3)(C); 4(A) (providing that “the name of a registrant **may not** be removed from the official list of eligible voters except” pursuant to “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 ... the death of the registrant”) (emphasis added). If New Mexico is removing living registrants and not re-registering them promptly upon receipt of SSA Corrections Updates, New Mexico is violating the NVRA. Without the SSA Corrections Updates, the Foundation cannot evaluate whether New Mexico is acting lawfully—precisely what Congress intended the public to do with Section 8(i) records. *See, e.g., Bellitto v. Snipes*, No. 16-cv-61474, 2018 U.S. Dist. LEXIS 103617, at *12 (S.D. Fla. Mar. 30, 2018) (explaining that the Public Disclosure Provision “convey[s] Congress’s intention that the public should be monitoring the state of the voter rolls and the adequacy of election officials’ list maintenance programs”).

56. Second, by denying the Foundation the requested voter list maintenance records, the Secretary is preventing the Foundation from acting to re-register registrants erroneously cancelled as deceased. The Foundation has so acted in Arizona. When the Foundation received SSA Corrections Updates from the Arizona Secretary of State, the Foundation contacted an impacted registrant whose voter registration record was erroneously cancelled as deceased, according to Arizona. The contacted registrant was aware of the problem generally but was under the belief that the cancellation of his voter registration had been fixed. The Foundation informed the registrant that according to Arizona, his voter registration was still marked as

cancelled. At some point after the Foundation contacted the impacted registrant, his voter registration record was reactivated—likely due to the registrant acting on the information the Foundation provided him. The Foundation intends to take similar action with respect to New Mexico registrants erroneously cancelled as deceased but cannot do so because the Secretary is denying the Foundation’s request for SSA Corrections Updates.

57. Third, by denying the Foundation the requested voter list maintenance records, the Secretary is preventing the Foundation from drafting and publicizing a report about New Mexico’s programs and activities concerning SSA Corrections Updates. Specifically, the Foundation intends to draft and publicize a report documenting the number of registrants erroneously cancelled as deceased in New Mexico, as well as New Mexico’s program to re-register impacted registrants. The planned report will also educate the public and state and federal policymakers about the impact of ERIC membership as well as best practices and solutions that could minimize disenfranchisement. The Foundation would draft and publicize this report but for the Secretary’s denial of its request for SSA Corrections Updates and related correspondence.

58. Fourth, by denying the Foundation the requested voter list maintenance records, the Secretary is preventing the Foundation from assisting New Mexico in carrying out its voter list maintenance programs and activities with the goal of ensuring that New Mexico’s voter roll is accurate and current, and registrants are not unlawfully disenfranchised due to errors and omissions in official records of death. *See* 52 U.S.C. § 20501(b)(4) (explaining that one of the NVRA’s purposes is “to ensure that accurate and current voter registration rolls are maintained”); *see also, e.g.*, Public Interest Legal Foundation, *Best Practices for Achieving Integrity in Voter Registration*, June 21, 2017, <https://publicinterestlegal.org/pilf-files/PILF-best->

[practices-report-FINAL.pdf](#) (last accessed May 27, 2026); *see also, e.g.*, Public Interest Legal Foundation, *Steeling the Vote: Allegheny County, PA Reveals How Citizenship Verification Protects Citizens and Immigrants Alike* at 15 (Proposed Solutions), July 12, 2018, <https://publicinterestlegal.org/blog/report-how-noncitizens-vote-in-allegheeny-county-pa/> (last accessed May 27, 2026).

59. Fifth, by denying the Foundation the requested voter list maintenance records, the Secretary is preventing the Foundation from speaking (and educating) about matters of public and government importance—namely, erroneous disenfranchisement of voters and voter roll accuracy.⁴ On March 11, 2026, the Foundation responded to an inquiry from members of Congress expressing concerns about SSA Correction Updates. *See* Exhibit C. The Foundation intends to continue educating members of Congress about this issue—through written and spoken testimony—including the number of New Mexicans impacted and New Mexico’s program for resolving SSA errors. The Foundation cannot do so because the Secretary is denying the Foundation access to SSA Correction Updates and related correspondence. Relatedly, the Foundation is prevented from providing similar policy advice to state officials and legislative guidance and testimony to Congress regarding state compliance with voting rights legislation. *See, e.g.*, Public Interest Legal Foundation, *ICYMI: PILF Testified to U.S. Congress on Preventing Aliens from Voting*, May 17, 2024, <https://publicinterestlegal.org/election-frontline/icymi-pilf-testified-to-u-s-congress-on-preventing-aliens-from-registering-and-voting/> (last accessed May 27, 2026).

⁴ *See, e.g.*, Public Interest Legal Foundation, *Critical Condition: American Voter Rolls Filled with Errors, Dead Voters, and Duplicate Registrations*, Sept. 16, 2020, <https://publicinterestlegal.org/pilf-files/Report-Critical-Condition-Web-FINAL-FINAL.pdf> (last accessed May 27, 2026).

60. Sixth, by denying the Foundation the requested voter list maintenance records, the Secretary frustrates the Foundation's accumulation of current and timely institutional knowledge upon which it depends to operate effectively and accurately.

61. As described in the preceding paragraphs, the Secretary's NVRA violation is frustrating, impeding, and harming the Foundation's efforts to carry out specific planned activities and its organizational mission and thereby injuring the Foundation.

62. The Foundation intends to request similar records from the Secretary in the future.

COUNT I

Violation of NVRA Section 8(i), 52 U.S.C. § 20507(i) Failure to Maintain Voter List Maintenance Records for At Least Two Years

63. The Foundation realleges the preceding paragraphs as if fully stated herein.

64. The requested SSA Corrections Updates and related correspondence are records subject to maintenance and disclosure under the NVRA's Public Disclosure Provision, 52 U.S.C. § 20507(i)(1).

65. The SSA Corrections Updates are in the Secretary's possession, custody, and control.

66. The NVRA's Public Disclosure Provision requires the Secretary to maintain the SSA Corrections Updates and related correspondence for a minimum of two years.

67. Upon information and belief—and because the Secretary has not acknowledged her maintenance—the Secretary does not maintain SSA Corrections Updates and related correspondence for two years or for any period of time.

68. By not maintaining the SSA Corrections Updates and related correspondence as the NVRA requires, the Secretary is violating the NVRA.

69. Any New Mexico statute, regulation, practice, or policy that conflicts with, overrides, or poses obstacles to the NVRA, a federal statute, is preempted and superseded under the Supremacy Clause and the Elections Clause of the Constitution of the United States. *See Arizona v. Inter Tribal Council of Arizona*, 570 U.S. 1, 9 (2013); *see also Voter Reference Found., LLC v. Torrez*, 160 F.4th 1068, 1089 (10th Cir. 2025) (affirming the district court’s holding that the NVRA preempts New Mexico law prohibiting certain uses and sharing of voter roll data). Any such statute, regulation, practice, or policy is invalid and unenforceable.

70. As alleged herein, the Secretary’s actions are causing concrete harm to the Foundation.

71. The Foundation is entitled to relief but has no adequate remedy at law.

COUNT II

Violation of Section 8(i) of the NVRA, 52 U.S.C. § 20507(i) Failure to Make Voter List Maintenance Records Available for Public Inspection

72. The Foundation realleges the preceding paragraphs as if fully stated herein.

73. The requested SSA Corrections Updates and related correspondence are records subject to maintenance and disclosure under the NVRA’s Public Disclosure Provision, 52 U.S.C. § 20507(i)(1).

74. The SSA Corrections Updates and related correspondence are in the Secretary’s possession, custody, and control.

75. The NVRA’s Public Disclosure Provision requires the Secretary to make the SSA Corrections Updates and related correspondence available for public inspection and duplication, or otherwise produce them electronically. 52 U.S.C. § 20507(i)(1).

76. The Secretary has not allowed inspection and duplication of or produced the requested records electronically to the Foundation.

77. By not permitting inspection and duplication of or producing the requested records electronically to the Foundation as the NVRA requires, the Secretary is violating the NVRA.

78. Any New Mexico statute, regulation, practice, or policy that conflicts with, overrides, or poses obstacles to the NVRA, a federal statute, is preempted and superseded under the Supremacy Clause and the Elections Clause of the Constitution of the United States. *See Arizona v. Inter Tribal Council of Arizona*, 570 U.S. 1, 9 (2013); *see also Voter Reference Found., LLC v. Torrez*, 160 F.4th 1068, 1089 (10th Cir. 2025) (affirming the district court's holding that the NVRA preempts New Mexico law prohibiting certain uses and sharing of voter roll data). Any such statute, regulation, practice, or policy is invalid and unenforceable.

79. As alleged herein, the Secretary's actions are causing concrete harm to the Foundation.

80. The Foundation is entitled to relief but has no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for a judgment:

1. Declaring that Defendant is in violation of Section 8(i) of the NVRA for failing to maintain the SSA Corrections Updates and related correspondence for a minimum of two years.
2. Declaring that Defendant is in violation of Section 8(i) of the NVRA for denying the Foundation the opportunity to inspect and copy, or otherwise receive electronically, the SSA Corrections Updates and related correspondence.
3. Ordering Defendant to make available to the Foundation any SSA Corrections Updates and related correspondence that Defendant currently possesses.

4. Ordering Defendant to obtain from ERIC any SSA Corrections Updates that Defendant has received, but not maintained, and to make those records available to the Foundation.
5. Ordering Defendant to maintain SSA Corrections Updates and related correspondence for a minimum of two years, as the NVRA requires.
6. Permanently enjoining Defendant from engaging in similar unlawful actions.
7. Ordering Defendant to pay the Foundation's reasonable attorney's fees, including litigation expenses and costs, pursuant to 52 U.S.C. § 20510(c); and,
8. Granting the Foundation further relief that this Court deems just and proper.

Dated: June 2, 2026.

For the Plaintiff Public Interest Legal Foundation:

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