



Office of the Assistant Attorney General

U.S. Department of Justice

Civil Rights Division

950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

January 2, 2026

Via Electronic Mail

The Honorable Steve Simon
Minnesota Secretary of State
Veterans Service Building, Ste. 210
20 W. 12th Street
Saint Paul, MN 55155
Secretary.State@state.mn.us

Re: Demand for Records Pursuant to the Civil Rights Act of 1960 (52 U.S.C. § 20701, et. seq.)

Dear Secretary Simon:

This letter is a demand for records relating to Minnesota's voter registration practices. On behalf of the Attorney General, and pursuant to the Civil Rights Act of 1960 (52 U.S.C. § 20703), please produce the following records to me within fifteen (15) days of this request:

1. All records supporting or documenting same day voter registrations, as authorized under Minn. Stat. 201.061, Subd. 3.¹
2. All records for the votes cast by voters registered under Minn. Stat. 201.061, Subd. 3.
3. All records related to these registrations and votes that your office deems relevant to complying with its auditability and other minimum requirements under the Help America Vote Act ("HAVA") of 2002 (52 U.S.C. §§ 21081-5.)
4. All records kept under Minn. Stat. 201.061, Subds. 7 and 8.

This request is for all federal elections held within the previous 22 months from the date of receipt of this letter, including the March 5, 2024 Primary and November 5, 2024 General Elections. All records must be provided in their complete, digital, unredacted form and transferred through the Department of Justice's secure file transfer platform, Justice Enterprise File Sharing ("JEFS").

The basis and purpose of this demand is to ensure Minnesota's registration and voting practices are in compliance with federal law, particularly the minimum requirements under HAVA. The Department of Justice is particularly concerned with votes and registrations accepted on the basis of "vouching" from other registered voters or residential facility employees pursuant to Minn. Stat. 201.061, Subd. 3(a)(4)-(e), as well

¹ This shall include, without limitation, all forms submitted by same day registered voters and/or the parties who provided any attestation or information relevant to registration.

as other same day registration procedures.

Please do not hesitate to contact my office if you need any further clarification of the scope, purpose, basis, timing, or any other facet of this demand. For any clarifications, please contact Eric Neff, Acting Chief of the Voting Section, at Eric.Neff@usdoj.gov. I look forward to your prompt compliance.

Regards,

Harmeet K. Dhillon
Assistant Attorney General
U.S. Department of Justice, Civil Rights Division

CC: Justin R. Erickson
General Counsel
Justin.Erickson@state.mn.us