April 10, 2026

Michael Watson
Mississippi Secretary of State
401 Mississippi Street
Jackson, Mississippi 39201
michael.watson@sos.ms.gov

Cc: Mississippi County Circuit Clerks
Mississippi County Election Commissioners

Sent via email

Re: Notice of Mississippi's Non-Compliance with the National Voter Registration Act

Dear Secretary Watson:

On behalf of the League of Women Voters of Mississippi ("LWVMS"), Mississippi Immigrants Rights Alliance ("MIRA"), We Must Vote, Mississippi Votes, Delta Sigma Theta Sorority, Inc., Disability Rights Mississippi, and IAJE, as well as their members who are eligible voters or eligible to register to vote in Mississippi, and other persons and organizations similarly situated, the undersigned write regarding Section 23-15-15 and Section 23-15-165.1 of the Mississippi Code, as amended and created by Senate Bill 2588 ("SB 2588"), which was signed into law by Governor Tate Reeves on April 1, 2026, and will take effect on July 1, 2026. Pursuant to 52 U.S.C. § 20510(b)(1), this letter serves as notice that Sections 23-15-15 and 23-15-165.1 (the "DPOC Provisions") violate the National Voter Registration Act of 1993 ("NVRA"), 52 U.S.C. § 20501 *et seq*., by requiring certain voter registration applicants and currently registered voters to present documentary proof of citizenship ("DPOC") to register to vote, to remain on the voter rolls, or to cast a ballot that will be counted.

Under Mississippi's unitary voter registration system, an applicant registers for federal and state elections concurrently. They may register by mail using the Mississippi Mail-In Voter Registration Application ("State Form") or the National Mail Voter Registration Form ("Federal Form"), which is promulgated by the U.S. Election Assistance Commission ("EAC") pursuant to the NVRA, 52 U.S.C. § 20508. They may also register to vote in person at county Circuit Clerk offices or at several NVRA-mandated public assistance agencies. Irrespective of how an applicant registers, Mississippi is bound to comply with the NVRA. *See Arizona v. Inter Tribal Council of Ariz., Inc*. (*ITCA*), 570 U.S. 1, 14 (2013) (finding that the NVRA specifically preempts state election laws, given Congress's power under the Elections Clause).

Under the NVRA, all states must "accept and use" the Federal Form to allow voters to register to vote in federal elections. 52 U.S.C. § 20505(a)(1). The Federal Form requires an attestation of citizenship under penalty of perjury and does not require any documentary proof establishing it. *Id.* § 20508(b)(2). Furthermore, the Federal Form permits applicants who do not

have a state driver's license number to utilize other identifying procedures, including providing a partial social security number. *Id.* § 21083(a)(5)(A)(i)–(ii).

A state may employ its own voter registration form for purposes of federal elections if it meets the same requirements as the Federal Form, and if it "only" requires "identifying information" that is "necessary to enable the appropriate State election official to assess the eligibility of the applicant and to administer voter registration and other parts of the election process." *Id.* § 20508(b); *see also id.* § 20505(a)(2). Additionally, the NVRA requires certain state public assistance agencies to provide voter registration services using the Federal Form or an "equivalent" state-created form. *Id.* § 20506(a)(6)(A).

The DPOC Provisions conflict with Mississippi's responsibilities under the NVRA in multiple respects, as outlined below. Accordingly, pursuant to 52 U.S.C. § 20510(b)(1), this letter serves as formal notice for your office, as Mississippi's Chief Election Officer, and all other implementing state and local entities, including those copied and thereby made recipients hereto, to refrain from enforcing these DPOC Provisions. Miss. Code Ann. § 23-15-211.1.

A. The DPOC Provisions Require Certain Voter Registration Applicants and Currently Registered Voters to Provide DPOC

Prior to SB 2588, the Mississippi Election Code already required that all registration applications be compared against the Mississippi Department of Public Safety ("DPS") database for citizenship status. Miss. Code Ann. § 23-15-15(1)–(2) (2024). If the information in the DPS database "indicate[d]" that the applicant was potentially a non-citizen, then the registrar must enter the applicant's information through the United States Citizenship and Immigration Service's Systematic Alien Verification for Entitlements ("SAVE") system. *Id.* § 23-15-15(2)–(3). If a registrant was identified in "both" the DPS and the SAVE systems as a potential non-citizen, the registrar was required to provide notice to the registrant inquiring whether the individual was eligible to be registered to vote. *Id.* § 23-15-15(3). The registrant was then required to provide DPOC within 30 days of receiving that notice to complete registration. *Id.* § 23-15-15(4). Until these applicants provided DPOC, they were not allowed to cast a regular ballot. They could cast an affidavit ballot in the next federal election, which would be "considered" if the registrant provided DPOC within five days of casting the affidavit ballot. *Id.* § 23-15-15(7)(a). If the registrant failed to provide DPOC within 30 days of receiving notice and failed to cast an affidavit ballot at the next federal election and provide DPOC within five days, their registration would be "REJECTED." *Id.* § 23-15-15(7)(b).

SB 2588 amends Section 23-15-15 to provide that if "either" the DPS or the SAVE system indicates the applicant is a potential non-citizen, then the applicant must provide DPOC for their application to be accepted. SB 2588 § 2 (amending and renumbering Miss. Code Ann. § 23-15-15(3)).

SB 2588 further provides that if an applicant registers to vote without including their Mississippi driver's license number on their application—*e.g.*, by using the last four digits of their social security number or a current utility bill, bank statement, government check, paycheck, or other government document—and the Statewide Elections Management System ("SEMS") is unable to retrieve that number from the DPS system based on the other information provided, they are automatically treated as a potential non-citizen and required to show DPOC. *Id.* (amending and

renumbering Miss. Code Ann. § 23-15-15(2)). Again, this designation requires the applicant to provide DPOC before their application is accepted and they are allowed to cast a regular ballot; if they do not, their registration is "REJECTED." *Id.* (amending and renumbering Miss. Code Ann. § 23-15-15(7)).

SB 2588 also requires Mississippi to run all registered voters through the SAVE system on an annual basis. *Id.* § 3 (enacting Miss. Code Ann. § 23-15-165.1(1)); *see also id.* § 4 (enacting Miss. Code Ann. § 23-15-165.2). If SAVE indicates that the voter is "not a citizen," the voter is sent a notice to provide DPOC and is placed in "PENDING" status and prevented from casting a regular ballot. *Id.* § 2 (amending and renumbering Miss. Code Ann. § 23-15-15(3), (7)); *see also id.* § 3 (enacting Miss. Code Ann. § 23-15-165.1). If the voter does not provide DPOC, they are eventually removed from the voter rolls. *Id.* § 3 (enacting Miss. Code Ann. § 23-15-165.1); *id.* § 2 (amending and renumbering Miss. Code Ann. § 23-15-15(7)).

B. Section 23-15-15 Violates Section 6 of the NVRA Because It Prohibits the Acceptance and Use of the Federal Form

The NVRA establishes minimum procedures that NVRA-covered states must make available for registering to vote in federal elections. 52 U.S.C. § 20503(a). Section 6 of the NVRA establishes the Federal Form as one method for registering to vote. *Id*. § 20505(a)(1). Covered states must "accept and use" the Federal Form. *Id*. The Federal Form requires only an attestation of citizenship under penalty of perjury rather than any documentary evidence establishing it. *Id.* § 20508(b)(2). Furthermore, the Federal Form permits applicants who do not have a state driver's license number to utilize other identifying procedures. *Id.* § 21083(a)(5)(A)(i)–(ii). When a valid Federal Form is timely received by state election officials, the NVRA mandates that the State "ensure that any eligible applicant is registered to vote." *Id.* § 20507(a)(1).

In *ITCA*, the Supreme Court held that "a state-imposed requirement of evidence of citizenship not required by the Federal Form is 'inconsistent with' the NVRA's mandate that States 'accept and use' the Federal Form." 570 U.S. at 15 (citation modified). The Court explained that the NVRA does not permit states to "receive the Federal Form willingly and use that form as one element in its . . . transaction with a prospective voter." *Id.* at 9. Rather, the Federal Form "acts as both a ceiling and a floor" for registering to vote in federal elections. *Id.* at 18. As such, all otherwise eligible voters using the Federal Form must be accepted and registered to vote at least in federal elections even if they do not comply with a state's citizenship verification regime.

Section 23-15-15 violates these requirements because it does not permit Mississippi registrars to accept and use the Federal Form whenever state or federal data sources are not able to confirm the applicant's citizenship, or whenever an applicant is automatically designated as a potential non-citizen due to the absence of a driver's license number on their application. SB 2588 § 2 (amending Miss. Code Ann. § 23-15-15). Instead, applicants who are flagged by the process must provide DPOC to have their application accepted. *Id.* Because the Federal Form does not require DPOC at any stage of the registration process, Section 23-15-15 prevents Mississippi registrars from accepting and using the Federal Form in violation of the NVRA.

In addition, the Federal Form allows applicants to use the last four digits of their social security number under certain circumstances in the voter registration process. 52 U.S.C. § 21083(a)(5)(A)(i). But SB 2588 requires presumptive rejection of valid Federal Forms that include

the last four digits of an applicant's social security number, or other government document showing the name and address of the voter, if SEMS cannot retrieve the applicant's driver's license number from DPS based on the other information provided on the application and an applicant does not provide DPOC. SB 2588 § 2 (amending Miss. Code Ann. § 23-15-15). In other words, Mississippi will not "accept" the Federal Form but will impermissibly make it only "one element in its . . . transaction with a prospective voter." *ITCA*, 570 U.S. at 9; *see also Mi Familia Vota v. Fontes* (*MFV II*), 129 F.4th 691, 712 (9th Cir. 2025) (finding a similar Section 6 violation). Under *ITCA*, that refusal is a violation of the NVRA.

C. Section 23-15-15 Violates Sections 6 and 9 of the NVRA Because It Requires DPOC for Certain Applicants Using the State Form

While NVRA Sections 6 and 9 permit Mississippi to create its own State Form, which "'may require information the Federal Form does not,'" Mississippi cannot require DPOC in connection with registering in Federal elections using the State Form, unless the State can "show that the information required on the State Form is 'necessary' to determine the eligibility of the applicant." *Mi Familia Vota v. Fontes* (*MFV I*), 719 F. Supp. 3d 929, 996 (D. Ariz. 2024), *affirmed in part and vacated in part*, 129 F.4th 691 (9th Cir. 2025) (quoting *ITCA*, 570 U.S. at 12, 18).

Mississippi has not and cannot demonstrate that DPOC is "necessary" for it to determine eligibility for voter registration. 52 U.S.C. § 20508(b)(1). The attestation of citizenship in the Federal Form, which is backed by criminal penalties, is sufficient for applicants to prove citizenship in federal elections. *See MFV II*, 129 F.4th at 719 (finding that the DPOC requirement is not "necessary" for new applicants because attestation sufficiently confirms the eligibility of registered voters). Mississippi has made no showing that DPOC is "necessary" to determine eligibility when registrants already attest under penalty of perjury that they are U.S. citizens. Section 23-15-15's duplicative and unnecessary DPOC requirement for registrants using the State Form thus violates Sections 6 and 9 of the NVRA.

D. Section 23-15-15 Violates Section 7 of the NVRA Because It Requires DPOC for Certain Applicants Registering by Public Assistance Agencies

Section 23-15-15 also violates Section 7 of the NVRA because registering to vote using the Federal Form does not require any of the elements of Mississippi's citizenship verification regime mandated by Section 23-15-15. Section 23-15-15 requires certain voters who register to vote at public assistance agencies to produce DPOC to the Circuit Clerk. The NVRA requires these agencies to use either the Federal Form or forms that are "equivalent" to the Federal Form. 52 U.S.C. § 20506(a)(6)(A). In particular, they must include "a statement that . . . (I) specifies each eligibility requirement (including citizenship); (II) contains an attestation that the applicant meets each such requirement; and (III) requires the signature of the applicant, under penalty of perjury." *Id.*

As discussed above, Mississippi cannot require applicants using the Federal Form to provide DPOC in order to register and cast a regular ballot in federal elections. *See ITCA*, 570 U.S. at 15. And applicants using the State Form with a public assistance agency cannot be required to provide information or documents not required by the Federal Form. *MFV II*, 129 F.4th at 720 ("Section 7 of the NVRA requires that state forms supplied to public assistance agencies be equivalent or virtually identical to the federal form." (citation modified)). Because applicants using

the Federal Form can register without providing DPOC, any requirement that certain applicants using the State Form with a public assistance agency provide DPOC makes the State Form not "equivalent" or "virtually identical" to the Federal Form. *Id.* ("If applicants who do not include DPOC use the state form, they will not be registered as federal-only voters but if they use the federal form, they will be registered. That difference prevents the forms from being 'virtually identical' for applicants without DPOC, and the requirement of DPOC for state-form applicants violates Section 7 of the NVRA.").

E. Section 23-15-15 Violates Section 8(a) of the NVRA by Prohibiting the Placement of Valid Applicants on the Rolls

The foregoing violations also lead to a violation of Section 8(a) of the NVRA. Section 8(a) obligates states to "ensure that any eligible applicant is registered to vote" if the valid registration form is timely received by an election official. 52 U.S.C. § 20507(a)(1). That means the applicant must be placed on the registration list and able to cast a regular ballot. If an eligible voter registration applicant has delivered a voter registration form consistent with the requirements of the NVRA, the state must accept that form and place that voter on the rolls to vote in federal elections. *Id.* Because Section 23-15-15 requires the rejection of voter registration applications even if they are submitted on valid voter registration forms, it violates Section 8(a) of the NVRA.

F. The DPOC Provisions Violate Section 8(b) of the NVRA by Employing Discriminatory Procedures

The DPOC Provisions require discriminatory and non-uniform list maintenance procedures impacting eligible Mississippi voters who: (1) are naturalized or derived U.S. citizens who are flagged incorrectly as non-citizens in the DPS or SAVE systems; (2) do not have a Mississippi driver's license and are therefore automatically flagged as non-citizens under SB 2588; or (3) do not possess or lack ready access to DPOC.

Section 8(b) of the NVRA requires that "[a]ny State program or activity to protect the integrity of the electoral process by ensuring the maintenance of an accurate and current voter registration roll for elections for Federal office . . . shall be uniform, nondiscriminatory, and in compliance with the Voting Rights Act of 1965." 52 U.S.C. § 20507(b). A program or activity violates Section 8(b) as non-uniform and discriminatory where "the properly registered citizens who would be required to respond and provide [citizenship] documentation would be primarily newly naturalized citizens." *MFV II*, 129 F.4th at 714 (quoting *United States v. Florida*, 870 F. Supp. 2d 1346, 1350 (N.D. Fla. 2012)).

The DPS and SAVE checks required by the DPOC Provisions create a significant risk of incorrectly flagging naturalized citizens and requiring them to provide documents not required to be provided by U.S.-born citizens, causing the State's program to be non-uniform and discriminatory in violation of Section 8(b). Mississippi permits non-citizens to obtain driver's licenses, and they are required to provide documents that reflect their immigration status when applying for the license. These licenses need only be renewed every four years, and may only be renewed within 30 days of expiration. Miss. Code Ann. § 63-1-47(4)(a). This means that many individuals receive a driver's license as a legal permanent resident and subsequently naturalize, but their DPS record does not necessarily reflect their citizenship until after they renew their

identification—potentially years after becoming a citizen. Native-born citizens will never face this situation.

Moreover, the SAVE system has been shown to incorrectly flag naturalized U.S. citizens and derived U.S. citizens (*i.e.*, foreign-born children of naturalized citizens) as non-citizens based on inaccurate or out-of-date information.[1] For example, the North Carolina State Board of Elections concluded in its audit of the 2016 election "based on past experience that a match with the SAVE database is not a reliable indicator that a person is not a U.S. citizen because the database is not always updated in a timely manner and individuals who derived citizenship from their parents through naturalization or adoption may show up as non-citizens in SAVE."[2] Federal courts have arrived at similar conclusions. *See, e.g.*, *Pub. Int. Legal Found., Inc. v. N.C. State Bd. of Elections*, 996 F.3d 257, 261 (4th Cir. 2021) ("The Board determined that 97.6% of persons identified by the DMV as noncitizens, in fact were citizens, and that about 75% of individuals who later provided proof of citizenship continued to be listed as noncitizens in the SAVE system.").

More recently in Texas, several voters flagged by DHS's SAVE system already had proof of citizenship on file or had proven their citizenship to Texas's Department of Public Safety.[3] In Missouri, DHS's SAVE system generated an initial list of potential non-citizens that was replaced with a subsequent list, without any explanation, that was significantly shorter, suggesting the initial list likely included many citizens; in St. Louis County, the original "list of 691 potential noncitizens dropped to 133," and in Boone County, it dropped from 74 to 33.[4]

The federal government itself has acknowledged the inaccuracies in the SAVE system. Just last year, the U.S. Department of Homeland Security disclosed that there was a risk that, through SAVE, "U.S. Citizenship and Immigration Services [("USCIS")] may share inaccurate information with registered agencies, which could in turn impact a registered user agency's eligibility determination for an individual . . . due to misspelling of names, transposed numbers, or incomplete information"—a risk that it could only partially mitigate.[5] In addition, to the extent that Social

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[1] *See* Jude Joffe-Block, *Trump's SAVE Tool Is Looking for Noncitizen Voters. But It's Flagging U.S. Citizens Too*, NPR (Dec. 10, 2025), https://www.npr.org/2025/12/10/nx-s1-5588384/save-voting-data-us-citizens [https://perma.cc/3H2P-S9QQ].

[2] N.C. State Board of Elections, *Post-Election Audit Report: General Election 2016*, Appendix p. 2 (2017), https://dl.ncsbe.gov/sboe/Post-Election%20Audit%20Report_2016%20General%20Election/Post-Election_Audit_Report.pdf [https://perma.cc/TX6P-5T4B].

[3] Natalia Contreras, *Some Registered Voters Texas Flagged as "Potential Noncitizens" Had Already Shown DPS Proof of Citizenship*, Tex. Tribune (Dec. 18, 2025), https://www.texastribune.org/2025/12/18/texas-voter-roll-citizens-investigation/ [https://perma.cc/M2CF-24UU].

[4] Jen Fifield & Zach Despart, *"Not Ready for Prime Time." A Federal Tool to Check Voter Citizenship Keeps Making Mistakes*, ProPublica (Feb. 13, 2026), https://www.propublica.org/article/save-voter-citizenship-tool-mistakes-confusion [https://perma.cc/27G4-FFQ2].

[5] U.S. Dep't of Homeland Sec., *Privacy Impact Assessment for the Systematic Alien Verification for Entitlements "SAVE" Program* 19 (Oct. 31, 2025), https://www.dhs.gov/sites/default/files/2025-10/privacy-pia-dhsuscis006d-save-october2025%20%28002%29.pdf [https://perma.cc/F46Y-UK7P].

Security Administration ("SSA") databases are now sharing information with SAVE,[6] this likely only reflects a person's citizenship status when they apply for a social security number and does not automatically update a person's citizenship at any subsequent point.[7]

List maintenance programs that use systems with stale citizenship data like the DPS and SAVE systems for citizenship checks violate Section 8(b) because such checks disproportionally and unfairly target and will "have a discriminatory impact on [naturalized] citizens." *MFV II*, 129 F.4th at 714–15 (quoting *Florida*, 870 F. Supp. 2d at 1350); *see also Va. Coal. for Immigrant Rights v. Beals*, 803 F. Supp. 3d 454, 474 (E.D. Va. 2025) (holding that a list maintenance program that "singles out individuals who were once identified in DMV records as noncitizens and subjects them to scrutiny not generally faced by U.S.-born citizens . . . discriminates based on national origin and against naturalized citizens" (citation modified)).

Here, SB 2588 requires the Secretary of State to compare the statewide voter registration database with SAVE records to verify current registrants' citizenship, SB 2588 § 3 (enacting Miss. Code Ann. § 23-15-165.1(1)); alert the respective election commission of each individual flagged through this process, *id.* (enacting Miss. Code Ann. § 23-15-165.1(2)); and require the election commission to place the voter in "pending" status until they provide DPOC, or otherwise remove the voter from the registration database, *id.* (enacting Miss. Code Ann. § 23-15-165.1(2)); *id.* § 2 (amending and renumbering Miss. Code Ann. § 23-15-15(4)–(7)). This system similarly targets naturalized citizens—a group that will then face disproportionate disenfranchisement and burdens from this unfair targeting—and therefore violates Section 8(b) of the NVRA.

Furthermore, any eligible Mississippi voter who does not have a Mississippi driver's license will be prohibited from accessing the "simplified systems for registering to vote" that the NVRA requires Mississippi to administer. *Young v. Fordice*, 520 U.S. 273, 275 (1997). For example, students who attend school in Mississippi but have an out-of-state license are eligible to vote in Mississippi, but SB 2588 would require them to provide DPOC before their application was accepted. In addition, applicants with disabilities who do not drive and may register to vote without a Mississippi driver's license number would face additional burdens under SB 2588. Similarly, individuals who changed their last name when they married—resulting in a birth certificate or passport that does not match their current name—would be disparately impacted.

We request a written response from you describing the actions you are taking to halt the NVRA violations that result from the implementation of the DPOC Provisions. Under 52 U.S.C. § 20510(b)(1) and (2), if the violations are not corrected within 90 days, the individuals and groups named in this letter may file suit seeking appropriate relief to remedy the violations.

We have also attached as Exhibit 1 a records request pursuant to 52 U.S.C. § 20507(i)(1).

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[6] *See* Press Release, U.S. Citizenship & Immigr. Servs., USCIS Deploys Common Sense Tools to Verify Voters (May 22, 2025), https://www.uscis.gov/newsroom/news-releases/uscis-deploys-common-sense-tools-to-verify-voters [https://perma.cc/V52E-4RWM].

[7] *See* U.S. Soc. Sec. Admin., EN-05-10002, Your Social Security Number and Card at 7 (2026), www.ssa.gov/pubs/EN-05-10002.pdf ("If your immigration status changed or you became a U.S. citizen, you should tell us so we can update your records. To have your immigration status or citizenship updated in our records, you need to show documents that prove your new immigration status or citizenship.").

Thank you for your prompt attention to this matter, and we look forward to hearing from you.

Sincerely,

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EXHIBIT 1

NVRA Records Request

Upon request pursuant to 52 U.S.C. § 20507(i)(1), Mississippi must produce "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). We therefore request that the following documents be produced promptly and to continue to be produced promptly as additional responsive documents are created or discovered:

1. Individualized voter registration applicant information[8] for each of the following voter registration applicants from April 14, 2022 through the present:
    a. All voter registration applicants who were identified as potential non-citizens in the DPS system;
    b. All voter registration applicants who were identified as potential non-citizens in the SAVE system;
    c. All voter registration applicants who were sent a notice after being identified as a potential non-citizen inquiring whether the applicant was eligible to be registered to vote;
    d. All voter registration applicants who provided documentary proof of citizenship to the registrar within 30 days of receiving notice inquiring whether the applicant was eligible to be registered to vote, including the type of document provided;
    e. All voter registration applicants who cast an affidavit ballot because their registration was in "pending" status due to being identified as a potential non-citizen in the DPS and/or SAVE systems;
    f. All voter registration applicants who provided documentary proof of citizenship to the registrar within five days of casting an affidavit ballot because their registration was in "pending" status due to being identified as a potential non-citizen in the DPS and/or SAVE systems, including the type of document provided;
    g. All voter registration applicants whose applications were accepted after being identified as potential non-citizens in the DPS and/or SAVE systems;
    h. All voter registration applicants whose applications were rejected after being identified as potential non-citizens in the DPS and/or SAVE systems.

2. Individualized voter information[9] for each of the following voters from January 1, 2025 through the present:

[8] "Individualized voter registration applicant information" as used in this request includes, to the extent available: first name; last name; middle name; suffix; address, including street number, apartment number, city, state, zip code, and county; mailing address, if different; phone number; precinct code; precinct name; voter ID number assigned by an election official; date of birth; place of birth; date of voter registration; race; gender; reason purged from voter roll or denied registration; and date purged from voter roll or denied registration.

[9] "Individualized voter information" as used in this request includes, to the extent available: mapping value, first name; last name; middle name; suffix; address, including street number, apartment number, city, state, zip code, and county; mailing address, if different; phone number; precinct code; precinct name; voter ID number assigned by an

a. All voters who were identified as potential non-citizens in the DPS system;
b. All voters who were identified as potential non-citizens in the SAVE system;
c. All voters who were sent a notice after being identified as a potential non-citizen inquiring whether the voter was eligible to be registered to vote;
d. All voters who provided documentary proof of citizenship to the registrar within 30 days of receiving notice inquiring whether the voter was eligible to be registered to vote, including the type of document provided;
e. All voters who cast an affidavit ballot because their registration was in "pending" status due to being identified as a potential non-citizen in the DPS and/or SAVE systems;
f. All voters who provided documentary proof of citizenship to the registrar within five days of casting an affidavit ballot because their registration was in "pending" status due to being identified as a potential non-citizen in the DPS and/or SAVE systems, including the type of document provided;
g. All voters who were purged for failure to provide documentary proof of citizenship after being identified as potential non-citizens in the DPS and/or SAVE systems.

3. Individualized voter registration applicant information for every voter registration applicant who attempted to register to vote and/or registered to vote without providing a Mississippi driver's license number or state ID number on their voter registration application from January 1, 2020 through the present.

4. Individualized voter registration applicant information for every voter registration applicant who attempted to register to vote and/or registered to vote without providing a Mississippi driver's license number, state ID number, and last four digits of their social security number on their voter registration application from January 1, 2020 through the present.

5. Records sufficient to show the information needed to locate a voter registration applicant's citizenship information through the Verify DPS system.

6. All records regarding the use of Verify DPS to identify the citizenship status of a voter registration applicant or voter, including, but not limited to, how an individual's social security number is utilized to query and locate them in the DPS system.

7. All rules, regulations, guidance, training, advice, presentations, or materials that your office has, has received, has issued, or has shared, internally or externally, regarding implementation of Section 23-15-15 from April 14, 2022 through the present, including but not limited to rules, regulations, guidance, training, advice, presentations, or materials regarding:
    a. How to use the DPS and/or SAVE systems to determine citizenship status;

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election official; date of birth; place of birth; date of voter registration; race; gender; reason purged from voter roll or denied registration; and date purged from voter roll or denied registration.

b. How to provide notice to voter registration applicants or registered voters about being identified as potential non-citizens in the DPS and/or SAVE systems;
c. How to verify an individual's citizenship after notice has been provided of potential non-citizenship;
d. How an individual's registration status should change based on information in the DPS and/or SAVE systems or based on the documentation they do or do not provide to prove citizenship;
e. How an individual in "pending" registration status may cast a ballot and what steps must be taken for that ballot to be counted.

8. All internal communications within your office regarding non-citizen registration or non-citizen voting, including but not limited to communications regarding:
    a. House Bill 1510 (2022);
    b. Section 23-15-15 of the Mississippi Code from April 14, 2022 through the present;
    c. Senate Bill 2588 (2026);
    d. House Bill 1253 (2026);
    e. Use of the DPS and/or SAVE systems to verify citizenship status;
    f. Documentary proof of citizenship.

9. All communications between your office and any other Mississippi state or county agency or governmental entity about non-citizen registration or non-citizen voting, including but not limited to:
    a. House Bill 1510 (2022);
    b. Section 23-15-15 of the Mississippi Code from April 14, 2022 through the present;
    c. Senate Bill 2588 (2026);
    d. House Bill 1253 (2026);
    e. Use of the DPS and/or SAVE systems to verify citizenship status;
    f. Any cases referred for investigation or prosecution.

10. All communications between your office and any federal government entities regarding non-citizen registration or non-citizen voting, including but not limited to communications regarding:
    a. House Bill 1310 (2022);
    b. Section 23-15-15 from April 14, 2022 through the present;
    c. Senate Bill 2588 (2026);
    d. House Bill 1253 (2026);
    e. Use of the DPS and/or SAVE systems to verify citizenship status;
    f. Documentary proof of citizenship.

We expect that any charge for these records will be a "reasonable cost," as required under the NVRA's Public Disclosure Provision. 52 U.S.C. § 20507(i)(1). Please inform us of the expected cost prior to delivery if it exceeds $100.

We would prefer to receive all records in electronic format via email (amir.badat@gmail.com and ahmed.soussi@splcenter.org) or other electronic method, if possible. If this is not possible, we are happy to confer about other ways in which we can meaningfully

access these records. If any responsive documents or communications are in your possession or the possession of any employees of the Secretary of State on non-governmental computers, on electronic devices, or in paper copy, please include such documents and communications in your production.

Sincerely,

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