

**SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE**

**League of Women Voters of  
Alaska, Alaska Black Caucus,  
and Alaska Public Interest  
Research Group,**

*Plaintiffs,*

v.

Case No.: 3AN-26-06319-CI

**Nancy Dahlstrom**, in her official  
capacity as Lieutenant Governor  
for the State of Alaska,

**Carol Beecher**, in her official  
capacity as the Director of  
Elections for the Division of  
Elections for the State of Alaska,

*Defendants.*

**AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE  
RELIEF**

**I. INTRODUCTION**

1. In May 2025, the Civil Rights Division of the U.S. Department of Justice (DOJ) began issuing demands for full, unredacted voter lists from most states and the District of Columbia,<sup>1</sup> ostensibly to ensure compliance with federal voter list maintenance requirements.

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<sup>1</sup> Kaylie Martinez-Ochoa, Eileen O'Connor, & Patrick Berry, *Tracker of Justice Department Requests for Voter Information*, Brennan Center for Justice (pub. Aug. 28, 2025; updated Apr. 17, 2026),

2. However, representations made by current and former DOJ staff soon elucidated that the agency sought to use this data beyond its stated purpose to create an unauthorized national voter database<sup>2</sup> and to conduct criminal and immigration investigations.<sup>3</sup> Recent developments have confirmed these ulterior motives.<sup>4</sup>

3. To date, DOJ has sued thirty states and the District of Columbia for refusing to share the sensitive information contained in their voter registration lists, demanding those states turn over detailed voter lists, including confidential information.

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<https://www.brennancenter.org/our-work/research-reports/tracker-justice-department-requests-voter-information>.

<sup>2</sup> See, e.g., Devlin Barrett & Nick Corasaniti, *Trump Administration Quietly Seeks to Build National Voter Roll*, N.Y. TIMES (Sept. 9, 2025), <https://www.nytimes.com/2025/09/09/us/politics/trump-voter-registration-data.html>; Brief of Amicus Curiae Former Employees of the U.S. Department of Justice, U.S. v. Weber, Case No. 2:25-cv-09149-DOC-ADS (Dec. 22, 2025), (No. 121).

<sup>3</sup> See, e.g., Jonathan Shorman, *DOJ Is Sharing State Voter Roll Lists with Homeland Security*, HOMELAND SEC. NEWSWIRE (Sept. 13, 2025), <https://www.homelandsecuritynewswire.com/dr20250913-doj-is-sharing-state-voter-roll-lists-with-homeland-security>; *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>.

<sup>4</sup> See, Shorman, Jonathan, *DOJ confirms voter data sharing with Homeland Security, but denies building national list*, STATELINE (Mar. 27, 2026), <https://stateline.org/2026/03/27/doj-confirms-voter-data-sharing-with-homeland-security-but-denies-building-national-list/>; Exec. Order No. 14399, 91 FR 17125 (2026).

4. Thus far, courts have affirmed the right of states to maintain the privacy of certain sensitive fields in their voter lists. As the State of Alaska’s Legislative Affairs Agency has noted, “[A]t this point every federal court that has issued a substantive ruling has rejected DOJ’s claims. No federal court has ruled in favor of DOJ.”<sup>5</sup>

5. Alaska is one of only eleven states with an explicit right to privacy in its constitution.<sup>6</sup> The Privacy Amendment was added to the Alaska Constitution in 1972 out of a “concern about the privacy risks posed by computer databases of personal information,”<sup>7</sup> which the legislature feared would “result in privacy intrusions reminiscent of a ‘Big Brother’ government surveillance regime.”<sup>8</sup>

6. Despite Alaska’s long held commitment to privacy rights, in December 2025, the Director of the Division of Elections signed a

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<sup>5</sup> Memorandum from Division of Legal and Research Services, Legislative Affairs Agency, *Voter information shared with the Department of Justice (Work Order No. 34-LS1434)* State of Alaska (Feb. 17, 2026). Since this memo was authored, two more courts have dismissed claims brought by DOJ against Massachusetts and Rhode Island. *United States v. Galvin*, No. 1:25-cv-13816, 2026 WL 972129 (D. Mass. Apr. 9, 2026); *United States v. Amore*, No. 1:25-cv-00639, 2026 WL 1040637 (D.R.I. Apr. 17, 2026).

<sup>6</sup> The “right of the people to privacy is recognized and shall not be infringed.” Alaska Const. art. 1, § 22.

<sup>7</sup> *Doe. V. Dept’ of Pub. Safety*, 444 P.3d 116, 128 (Alaska 2019).

<sup>8</sup> Eric Buchanan, *Alaska’s Explicit Right to Privacy Warrants Greater Protection of Alaskans’ Personal Data*, 37 AK LAW REV. 25-55 (2020).

memorandum of understanding (MOU) with DOJ, agreeing to share Alaska’s complete and unredacted voter file (including confidential information) with DOJ and to promptly “clean” its voter list by removing any voters flagged by DOJ upon later instruction.

7. The Defendants’ actions in releasing Alaska’s unredacted voter registration list, including each registrant’s full name, date of birth, residential address, and his or her state driver’s license number or the last four digits of the registrant’s social security number to DOJ violated the constitutionally protected privacy rights of all Alaskan voters.

8. Of particular concern to Plaintiffs is the federal government’s recent track record of mishandling sensitive personal data.<sup>9</sup>

9. Defendants’ actions in entering an agreement which binds the State to remove Alaskans from the voter registration list upon DOJ’s unilateral request violate Article V, Section 1 and Article I, Section 7 of the Alaska Constitution by giving DOJ the power to select which Alaskans have

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<sup>9</sup> Letter from Dana L. Gold and Andrea Meza to Senate Comm. on Homeland Sec. and Gov’t. Aff., Senate Comm. on Fin., House Comm. on Oversight and Gov’t. Reform, House Ways and Means Comm., and the U.S. Off. of Spec. Couns. (Aug. 26, 2025), <https://whistleblower.org/wp-content/uploads/2025/08/08-26-2025-Borges-Disclosure-Sanitized.pdf>; *Fed’n of State, Cnty. & Mun. Emps., AFL-CIO v. Soc. Sec. Admin.*, 771 F. Supp. 3d 717 (D. Md. 2025); Fowler, Stephen & Jude Joffe-Block, *The Trump administration admits even more ways DOGE accessed sensitive personal data*, NPR (Jan. 30, 2026), <https://www.npr.org/2026/01/23/nx-s1-5684185/doge-data-social-security-privacy>.

the right to vote and by obligating Defendants to purge voters from the voter list without any stated basis in law or process to challenge such an action.

## II. JURISDICTION & VENUE

10. This is a complaint for declaratory and injunctive relief brought under AS 22.10.020(a), (c), and (g). This court has jurisdiction over the parties and over the subject matter of this dispute pursuant to AS 09.05.015(a)(1) and AS 22.10.020(a).

11. Venue is proper in this district under AS 22.10.030 and Alaska Rule of Civil Procedure 3(c) because one or more Defendants has offices in this district and because one or more Plaintiffs' claims arise in this district.

## III. PARTIES

12. Plaintiff League of Women Voters of Alaska (LWVAK) is a 501(c)(3) nonprofit, nonpartisan, membership organization committed to educating Alaskan voters; encouraging voter involvement in local, state, and federal elections; and ensuring voter access and protection.

13. LWVAK is the Alaska affiliate of the League of Women Voters of the United States (LWVUS), and consists of four local leagues in Anchorage, Juneau, Kenai Peninsula, and Tanana Valley, with a "member-at-large" category for members who live in more rural parts of the state. LWVAK has approximately 400 members throughout Alaska, the majority of whom are

citizens 18 years of age or older who are registered to vote or eligible to register to vote in Alaska.

14. LWVAK is made up of Alaskan volunteers committed to the organization's core values of empowering voters and defending democracy. LWVAK has a long-standing interest in ensuring that all eligible Alaskan voters register to vote and participate in government and politics through the electoral process. Ensuring voter access and protection is integral to promoting this interest. Together with LWVUS and other affiliates, LWVAK contributes to one of the longest-running and largest nonpartisan voter registration efforts in the nation. LWVAK's interests are negatively impacted by the degradation of voter privacy in Alaska and the threat of disenfranchisement of eligible voters.

15. Plaintiff Alaska Black Caucus (ABC) is a 501(c)(3) nonprofit, nonpartisan, membership organization whose mission is to assert the Constitutional rights of African Americans in Alaska. ABC advances this mission in part by actively supporting and advancing the political well-being of the African American community, including by promoting voter registration and active voter participation within the African American community throughout the state.

16. ABC takes an active role in engaging its members and the wider community, including through its Community Conversations series that

tackles critical issues, such as the importance of the Black Vote and voter suppression tactics that disproportionately affect the Black community, including the potential purging of voter lists. Additionally, ABC plays a crucial role in the democratic process by hosting candidate forums for local and state elections, ensuring that the voices of its constituents are heard and represented.

17. ABC serves communities that have been historically marginalized and disenfranchised and actively seeks to empower the Black vote. ABC's interests are negatively impacted by violations of voter privacy and the threat of disenfranchisement without due process.

18. Plaintiff Alaska Public Interest Research Group (AKPIRG) is a 501(c)(3) nonprofit, non-partisan organization which focuses on public interest consumer and good governance issues through advocacy and research. AKPIRG's work includes advocating for transparent, accountable government systems that reflect and serve Alaskans.

19. AKPIRG is an organizational partner of the Alaska Voter Hub, a nonpartisan coalition that strives to increase access to the ballot box through direct voter engagement and policy. In recent election cycles, AKPIRG has engaged with thousands of voters at community events and through its civic engagement initiatives, encouraging Alaskans to participate in the democratic process, including by voting. AKPIRG also monitors state

agencies and seeks to hold them accountable for ethics violations and other wrongdoing.

20. AKPIRG’s interests in voter engagement and good governance are negatively impacted by the violations of voter privacy in Alaska and the potential removal of voters from the Alaska voter list at the behest of the DOJ.

21. Defendant Nancy Dahlstrom is the Lieutenant Governor of the State of Alaska (the “Lieutenant Governor”). Defendant Dahlstrom “control[s] and supervise[s] the division of elections.” AS 15.10.105(a). Defendant Dahlstrom transmitted Alaska’s voter list to DOJ. Defendant Dahlstrom is sued in her official capacity only.

22. Defendant Carol Beecher is the Director of Elections for the Division of Elections for the State of Alaska (the “Director”). Defendant Beecher prepares the statewide voter list and is charged with the maintenance of the voter registration list. AS 15.07.127, AS 15.07.130. Defendant Beecher executed the MOU and, upon information and belief, per its terms, will “clean” Alaska’s voter list at DOJ’s instruction and resubmit to DOJ within 45 days of that instruction an updated list. Defendant Beecher is sued in her official capacity only.

#### IV. FACTUAL BACKGROUND

18. On July 2, 2025, DOJ issued a demand letter to Alaska’s Lieutenant Governor for, *inter alia*, the “most current or most updated” electronic copy of the State of Alaska’s computerized statewide voter registration list, including “all fields” contained within the list. A copy of this letter is included as Exhibit A.

19. On August 4, 2025, the Director responded to DOJ’s request by transmitting a “copy of the publicly available statewide voter registration list” via DOJ’s secure file-sharing system. A copy of this response is included as Exhibit B.

20. Defendants’ initial decision to limit the information it disclosed to DOJ aligned with the Division of Election’s (the “Division”) well-established position that the NVRA’s disclosure provisions “cannot require the disclosure of all Division records” and “does not require the Division to produce every granular input it considers, particularly when those inputs . . . contain voters’ sensitive personal information.”<sup>10</sup>

21. In response to the Division’s limited disclosure, on August 14, 2025, DOJ reiterated its demand for Alaska’s “complete” voter registration list that “must contain all fields, including the registrant’s full name, date of

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<sup>10</sup> *PILF v. Dahlstrom*, 1:22-cv-00001-SLG, Doc. No. 40, pp. 12–13 (Sep. 12, 2022).

birth, residential address, his or her state driver's license number or the last four digits of the registrant's social security number." A copy of this letter is included as Exhibit C.

22. On December 19, 2025, the Lieutenant Governor agreed to provide DOJ with the complete list of eligible, registered voters, including all the fields specified in the August 14 request (hereafter the "Alaska VRL").

23. That same day, the Director executed a MOU with DOJ as to the Alaska VRL. A copy of the MOU is included as Exhibit D.

24. The MOU details, among other provisions, the timing and method of data transfer, the safeguards to be employed to protect the data, steps to be taken in case of loss or breach of data, and provisions for the archiving or destruction of data.

25. Section VIII of the MOU states: "After analysis and assessment of your state's VRL, the Justice Department will securely notify you or your state of any voter list maintenance issues, insufficiencies, inadequacies, deficiencies, anomalies, or concerns, the Justice Department found when testing, assessing, and analyzing your state's VRL for NVRA and HAVA compliance, i.e. that your state's VRL only includes eligible voters."

26. Section VIII also states that the Division agrees "that within forty-five days of receiving that notice" from DOJ, it will "clean its VRL/Data by removing ineligible voters and resubmit the updated VRL/Data to the

Civil Rights Division of the Justice Department to verify proper list maintenance has occurred by your state pursuant to the NVRA and HAVA.” Notably, this provision does not provide that Defendants will “review” or “investigate” any voters flagged by DOJ as “ineligible;” nor does it provide that such removals will only occur in compliance with governing Alaska law. Rather, the MOU requires that Defendants will “remov[e]” any voters that DOJ flags as “ineligible” “within forty-five days.”

27. Section IX allows DOJ to use the data shared by Defendants for other purposes, including by presenting the data to “a contractor with the Department of Justice who needs access to the VRL/Data information in order to perform duties related to the Department’s list maintenance verification procedures.”

28. Section XI requires DOJ to “destroy all VRL/Data associated with actual records as soon as the purposes of the list maintenance project have been accomplished and the time required for records retention pursuant to applicable law has passed.” However, it goes on to specify that only “hard copies containing confidential data” will be destroyed, while electronic data containing confidential information will be “archive[d] and store[d]. . . offline in a secure location.”

29. In a letter to Eric Neff, Acting Chief of the Civil Rights Division, Voting Section of DOJ, sent on the same day as the MOU was signed, the

Lieutenant Governor stated that “Alaska will continue to comply with all state and federal laws while implementing this memorandum of understanding.” A copy of this letter is included as Exhibit E.

30. On December 23, 2025, the Lieutenant Governor transmitted the Alaska VRL to DOJ, as confirmed in a release by the Division. A copy of this release is included as Exhibit F.

31. AS 15.07.130 and AS 15.07.135 establish the legal framework by which the Division can cancel the registration of a voter:

### **Death**

32. AS 15.07.130 requires the Director to “promptly” or “at least once a month” cancel the registration of all deceased voters upon receipt of a certified list from the bureau of vital statistics “of all residents over 18 years of age who have died or who have been presumptively declared dead.”

### **Felony Involving Moral Turpitude**

33. AS 15.07.135 requires the Director to “promptly” cancel the voter registration of a person “after receipt of evidence satisfactory to the director that a person has been convicted of a felony involving moral turpitude.”

### **Change of Residence**

34. AS 15.07.130 establishes the process by which a voter’s registration can be cancelled due to change of residence. Once a year, the Director shall send notice by nonforwardable mail requesting address

confirmation or correction to each voter's registration mailing address (1) whose mail from the Division has been returned to the Division in the previous two years; (2) who has not contacted the Division in the prior two years; or (3) who has not voted or appeared to vote in the prior two general elections.

35. If a registered voter (1) has not contacted the Division within the preceding four calendar years; and (2) has neither voted nor appeared to vote in a local, regional school board, primary, special, or general election during the last four calendar years; and (3) a notice requesting address confirmation or correction sent to the voter was returned as undeliverable, the Division shall advise the voter by a notice sent by forwardable mail to the voter's last known address that their registration will be "inactivated" unless the voter responds to the notice no later than 45 days after the date the notice was sent. AS 15.07.130(b).

36. Once a voter's registration is listed as inactive, the Director "shall cancel a voter's inactive registration in accordance with the procedures set out in 42 U.S.C. 1973gg-6 (sec. 8, National Voter Registration Act of 1993) after the second general election that occurs after the registration becomes inactive if the voter does not contact the Division or vote or appear to vote."

## Duplication

37. The Division’s List Maintenance Process—Revised 12.13.2023 also notes that the Division’s system “searches for any potential duplicate voter records monthly” and merges voter records that are deemed by Division staff to be for the same person. *See*, Exhibit B.

38. Given the terms of the Alaska Statutes described above, there are only two circumstances in which a voter’s registration can be promptly cancelled: upon death or conviction of a felony involving moral turpitude.

39. But the terms of the MOU *prima facie* commit the Division to remove supposedly ineligible voters flagged by DOJ via an unstated process and for undisclosed reasons within 45 days and to resubmit the voter list to DOJ to prove this purging has occurred.

40. Despite the incongruity between the terms of the MOU and the statutory provisions circumscribing when and how the Division can inactivate or cancel voter registration, Defendants have maintained that, per their interpretation of the MOU, they will only remove voters “to the extent allowed by state and federal law.”<sup>11</sup> Defendants’ non-binding interpretation is irreconcilable with the plain language of the MOU.

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<sup>11</sup> Letter from Carol Beecher, Dir. of the AK Div. of Elections to the Chairs of the AK Senate and House Judiciary and State Affairs Comms. (Mar. 19, 2026), [https://www.akleg.gov/basis/get\\_documents.asp?session=34&docid=12963](https://www.akleg.gov/basis/get_documents.asp?session=34&docid=12963).

41. Based on information and belief, DOJ has not yet notified the Division of any “issues, insufficiencies, inadequacies, deficiencies, anomalies, or concerns” it identified in the Alaska VRL that the Division transmitted on December 23, 2025.

## VI. CLAIMS

### Count I

#### Article I, Section 22: Right of Privacy

42. The allegations above are incorporated by reference in this Count.

43. Article I, Section 22 of the Alaska Constitution expressly states that “[t]he right of the people to privacy is recognized and shall not be infringed.”

44. Alaska courts have interpreted this protection to encompass an individual’s interest in protecting sensitive personal information which, if disclosed, could cause “embarrassment, anxiety, humiliation, harassment, or economic and physical reprisals.” *Doe. v. Dep’t of Pub. Safety*, 444 P.3d 116, 127 (Alaska 2019).

45. The Division’s website makes clear that “voter number, social security number, Alaska driver’s license, phone numbers, date of birth, place of birth, social security number and/or last 4 of SSN etc. on the voter record is

maintained as confidential.”<sup>12</sup> Plaintiffs both subjectively and reasonably expected that their private information would be kept confidential by the Division.

46. By disclosing Plaintiffs’ personal information, along with all Alaska voters’ information, including their full name, date of birth, residential address, his or her state driver’s license number or the last four digits of their social security number to DOJ, Defendants violated Plaintiffs’ constitutionally protected right to privacy.

**Count II**  
**Article V, Section 1: Right to Vote**

47. The allegations above are incorporated by reference in this Count.

48. Article V § 1 of the Alaska Constitution ensures the right of qualified voters to vote in any state or local election.

49. Article V § 4 establishes that the “legislature may provide a system of permanent registration of voters.” This it has done in promulgating Alaska Statutes 15.07.130.

50. Defendants’ commitment under the MOU to remove Alaskans from the registered voter list based on unspecified and unqualified “issues,

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<sup>12</sup> Alaska Division of Elections, *Public and Confidential Information*, <https://www.elections.alaska.gov/Core/publicandconfidentialinformation.php> (last visited Apr. 21, 2026).

insufficiencies, inadequacies, anomalies, or concerns” as determined by the federal government violates the Alaska Constitution’s protections for qualified voters.

51. Removing voters from the registered voter list based on DOJ’s “issues, insufficiencies, inadequacies, anomalies, or concerns” will reasonably and foreseeably lead to the unlawful disenfranchisement of eligible voters, violating Article V of the Alaska Constitution.

**Count III**

**AS 15.07.130: Voter registration list maintenance**

52. The allegations above are incorporated by reference in this Count.

53. Alaska Statutes 15.07.130 governs voter registration list maintenance. It establishes the process by which the Division conducts list maintenance as required by state and federal law.

54. Per the terms of the MOU signed by the Director, the Division agrees to remove voters from the Alaska VRL “within forty-five (45) days of receiving notice from the Justice Department of any issues, insufficiencies, inadequacies, anomalies, or concerns.”

55. These terms are in direct conflict with the requirements established in AS 15.07.130.

56. As a matter of law, the Division cannot comply with the terms of the MOU without violating the statutory requirements on voter registration list management—unless the only “ineligible voters” DOJ identifies are deceased, presumed deceased, or have been convicted of a felony crime of moral turpitude.

57. By committing to remove individuals from the voter registration list at the behest of DOJ, on grounds and subject to procedures that are not authorized by AS 15.07.130, Defendants acted outside of the scope of their authority.

**Count IV**  
**Article I, Section 7: Right to Due Process**

58. The allegations above are incorporated by reference in this Count.

59. Article I, Section 7 of the Alaska Constitution provides that “[n]o person shall be deprived of life, liberty, or property, without due process of law. The right of all persons to fair and just treatment in the course of legislative and executive investigation shall not be infringed.”

60. The right to Due Process applies in the context of depriving an Alaskan of their right to vote. *See, Lake and Peninsula Borough Assembly v. Oberlatz*, 329 P.3d 214, 219-20 (Alaska 2014) (citing with approval a Superior Court’s decision to hold a trial de novo because voters were deprived of their

right to vote in Borough elections via a process that violated Due Process).  
*See also, In re 2021 Redistricting Cases Matanuska-Susitna Borough*, 528 P.3d 40, 58 (Alaska 2023) (noting that “courts in other jurisdictions have found Due Process violations if state action ‘seriously undermine[s] the fundamental fairness of the electoral process’”) (citation omitted).

61. The MOU allows DOJ to control Alaska’s voting list by flagging voters for mandatory removal within 45 days without any apparent notice or process for impacted voters to challenge those decisions in violation of Due Process.

## VII. PRAYER FOR RELIEF

Plaintiffs pray that this Court:

- (1) Declare that Defendants’ sharing the dates of birth, complete or partial social security numbers, driver’s license numbers, or addresses (for those who elected to keep their residential address confidential) with DOJ violated the Privacy Clause of the Alaska Constitution.
- (2) Declare that Defendants’ *ultra vires* action in entering the MOU with DOJ is unlawful for being beyond the scope of Defendants’ authority.
- (3) Declare that the summary removal of voters from the state’s voter list at the behest of DOJ on grounds other than those

allowed by Alaska law, as contemplated by the MOU, would violate the Due Process and Right to Vote protections enshrined in the Alaska Constitution and AS 15.07.195 and 15.07.130.

- (4) Grant permanent injunctive relief requiring Defendants to make reasonable efforts to ensure the immediate destruction by DOJ of hard copies and electronic versions of the Alaska VRL previously shared with DOJ.
- (5) Grant permanent injunctive relief voiding the MOU and/or enjoining Defendants from removing voters from the Alaska voter registration list on grounds other than those allowed by Alaska law and from transmitting any further unredacted voter list information to DOJ pursuant to the MOU.
- (6) Award full reasonable attorney’s fees and costs to Plaintiffs as the law allows for public interest litigants who enforce constitutional rights under AS 09.60.010(c).
- (7) Award Plaintiffs all other and further relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED at Anchorage, Alaska this 4th day of May 2026.

**ACLU OF ALASKA FOUNDATION**

/s/ Katherine Wagner  
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*\* Motion for admission Pro Hac Vice  
forthcoming*

*Counsel for Plaintiffs*

**CERTIFICATE OF TYPEFACE**

This pleading uses a 13-point Century Schoolbook typeface.

**CERTIFICATE OF SERVICE**

On May 4, 2026, a true and correct copy of this Amended Complaint was served on:

Margaret Paton-Walsh  
Chief, Special Litigation Section  
Alaska Department of Law  
margaret.paton-walsh@alaska.gov

/s/ Katherine Wagoner  
Alaska Bar No. 2503016



**U.S. Department of Justice**

**Civil Rights Division**

*Voting Section  
950 Pennsylvania Ave, NW – 4CON  
Washington, DC 20530*

July 2, 2025

Via Mail and Email

The Honorable Nancy Dahlstrom  
Lieutenant Governor  
P.O. Box 110015  
Juneau, AK 99811-0001  
nancy.dahlstrom@alaska.gov

Dear Lieutenant Governor Dahlstrom:

We write to you as the chief election official for the State of Alaska to request information regarding the State's procedures for complying with the statewide voter registration list maintenance provisions of the National Voter Registration Act ("NVRA"), 52 U.S.C. § 20501 et seq.

Please provide a list of the election officials who are responsible for implementing Alaska's general program of voter registration list maintenance, including those responsible officials not employed by your office (such as local election officials) who are also involved in that effort. Please also provide a description of the steps that you have taken to ensure that the State's list maintenance program has been properly carried out in full compliance with the NVRA.

A review of the most recent report from the Election Assistance Commission's Election Administration and Voting Survey ("EAVS") report indicates that there are more registered voters listed as active in the State of Alaska than citizen voting age population in the State.

The NVRA requires each state and the District of Columbia to make available for 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)(1). Section 11 of the NVRA authorizes the Attorney General to bring NVRA enforcement actions.

Pursuant to Section 20507(i) of the NVRA, the Attorney General requests that you produce for inspection the following records:

1. The most current or most updated electronic copy of the State of Alaska's computerized statewide voter registration list ("statewide voter registration list") as required by Section 303(a) of the Help America Vote Act. Please include all fields contained within the list.

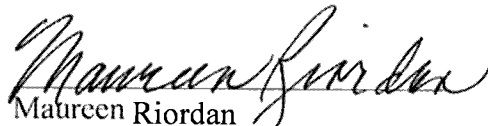
Additionally, please provide the following information. The time period for these requests is January 1, 2023, to December 2024.

1. In the EAVS data for Question A3d, Alaska had 4,893 voters (.5 percent) with duplicate registrations, which was well below the national average. In the EAVS data for Question A12h, Alaska also reported it removed no voters. Please provide a list of all registrations that were cancelled based on the determination that they were duplicate registration records. If the records were merged, please provide that information.
2. A list of all registrations that were cancelled due to non-citizenship of the registrant.
3. A complete vote history of all registrants determined to be non-citizens.
4. No data was listed for Alaska regarding removals due to mental incompetence. Please provide a list of all registrants who were removed from the statewide voter registration list due to a finding of mental incompetence.

Please provide this information within 20 days of the date of this letter. The information and materials may be sent by encrypted email to [voting.section@usdoj.gov](mailto:voting.section@usdoj.gov) or via the Department's secure file-sharing system, Justice Enterprise File Sharing (JEFS).

Should further clarification be required, please contact Maureen Riordan at [maureen.riordan2@usdoj.gov](mailto:maureen.riordan2@usdoj.gov). We look forward to your assistance in advance.

Sincerely,



Maureen Riordan  
Acting Chief, Voting Section  
Civil Rights Division

Michael E. Gates  
Deputy Assistant Attorney General  
Civil Rights Division

cc: Carol Beecher  
Director, Division of Elections  
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August 4, 2025

Via Email

Ms. Maureen Riordan  
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950 Pennsylvania Ave NW-4CON  
Washington, D.C. 20530  
[voting.section@usdoj.gov](mailto:voting.section@usdoj.gov)

Dear Ms. Riordan,

On behalf of Lieutenant Governor Nancy Dahlstrom and as Director of the Alaska Division of Elections (DOE), I am responding to your letter dated July 2, 2025. I am the election official responsible for managing Alaska’s voter registration list maintenance program, along with DOE Division Operations Manager Michaela Thompson. In addition to the applicable provisions of the National Voter Registration Act (NVRA), voter registration list maintenance in Alaska is primarily governed by Alaska Statute 15.07.130. Attached is a document that provides an overview of Alaska’s process.

Your letter stated that a review of the most recent report from the Election Assistance Commission’s Election Administration and Voting Survey (EAVS) report indicates that there are more registered voters listed as active in the State of Alaska than the citizen voting age population (CVAP) in the state. For Alaska, the report cites a total of 565,681 active registered voters and a total CVAP of 540,681, resulting in a surplus of 4.54 percent.

The following chart shows that the 2024 data indicate a significant decline in the number of active registered voters and CVAP compared to the 2022 and 2020 EAVS reports, highlighting Alaska’s progress in cleaning up its voter rolls.

Year	Total Active Registered Voters	Total Citizen Age Voting Population (CVAP)	Numerical Difference (Registered Voters minus CVAP)	Percent Overage (Registered Voters vs CVAP)
2024	565,242	540,681	+24,561	+4.54
2022	601,795	533,852	+67,943	+12.73
2020	595,647	533,151	+62,496	+11.72

Ms. Maureen Riordan  
Acting Chief, Voting Section  
U.S. DOJ Civil Rights Division  
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Nevertheless, there are a few key reasons why Alaska reports more active registered voters than its citizen voting age population, including the use of different data sources by EAVS as well as state laws regarding automatic voter registration, rules for determining voter residence, and voter registration list maintenance. Governor's bills have been introduced to address some of these issues, which are currently pending in the state legislature.

DOE is responding to your requests for records under the NVRA (52 USC § 20507(i)(1)). A copy of the publicly available statewide voter registration list was sent today via the U.S. Department of Justice's secure file-sharing system.

DOE also sent a list of voters designated as inactive and non-citizens with the code "INC" in Alaska's voter registration database. Voters receive this designation for multiple reasons, including an indication from the voter or from other state agencies that the voter is not a U.S. citizen. Voters with this designation are not registered voters, but they may register and vote if they affirm their citizenship. This list will also include their voting history.

You asked about Alaska's responses to the Election Assistance Commission's 2024 Election Administration and Voting Survey (EAVS), specifically about duplicate voter registrations and questions A3d and A12h. DOE provided accurate responses based on its current voter registration database.

Question A3d asks for the number of "[r]egistration transactions," meaning new or updated voter registrations submitted by individuals who are already registered to vote. This question does not ask for the number of voters with duplicate registrations, as your letter suggests. DOE's low number of registration transactions is due to the reporting limitations of its current voter registration database, which DOE is currently upgrading.


Question A12h asks about the number of voter registrations removed from the voter registration database, as opposed to merged. Because DOE merges duplicate voter registrations, DOE reported this number as zero. DOE does not track the number of voter registrations it merges, so it also did not report a number in question A13a. EAVS recognizes that states may not track this data. DOE's upgraded voter registration database will track this data.

Finally, DOE is not aware of any voters removed from the voter registration list because they were "judicially determined to be of unsound mind" during the period you specified. See Alaska Constitution, Article 5, Section 2.

Ms. Maureen Riordan  
Acting Chief, Voting Section  
U.S. DOJ Civil Rights Division  
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Please do not hesitate to contact me with any questions or concerns. We would welcome the opportunity to meet with you to discuss Alaska's voter registration list maintenance in more detail and the active efforts underway to improve our processes.

Sincerely,

  
Carol Beecher  
Director, Division of Elections

Enclosures: (1)

Cc: The Honorable Nancy Dahlstrom  
Lieutenant Governor  
State of Alaska  
[lt.governor@alaska.gov](mailto:lt.governor@alaska.gov)

Thomas Flynn, Chief Assistant Attorney General  
Alaska Department of Law  
State of Alaska  
[thomas.flynn@alaska.gov](mailto:thomas.flynn@alaska.gov)

## The Division of Elections List Maintenance Processes

### **Voter Qualifications:**

State law allows voters to remain residents for voting purposes as long as they intend to return to Alaska and have not voted in another state in accordance to AS 15.05.020. Active military personnel and their spouses are exempt from the intent-to-return requirement, and they may vote in state and federal elections in accordance with federal law. Overseas voters may also register and vote even if they do not intend to return, but they may only vote in federal elections in accordance to AS 15.05.011.

State law does not allow those convicted of certain felonies to vote in accordance to AS 15.05.030. The division weekly seeks information from the Alaska court system to identify those who have been convicted of felonies involving moral turpitude. The division removes these voters from the voter list, and it will reregister them if they have been unconditionally discharged from incarceration, probation, and/or parole upon receipt of a voter registration application.

### **List Maintenance:**

The Division of Elections conducts list maintenance as prescribed by state and federal law. List maintenance ensures our voter list is as accurate and up-to-date as possible.

The annual list maintenance process is described in AS 15.07.130. List maintenance is also required by the federal National Voter Registration Act (NVRA). The state list maintenance statute was enacted in 1998 and the NVRA was enacted in 1993. Voters cannot be removed from the voter list simply because they have not voted or because they appear to have moved to another state.

The division's annual list maintenance process has two steps:

#### **Step 1:**

At least once a year, the division reviews the statewide voter registration list and sends notices (by nonforwardable mail) requesting address confirmation or correction to all voters:

- Whose mail from the division has been returned to the division in the last two years;
- Who have not contacted the division in the last two years; or
- Who have not voted or appeared to vote in the last two general elections.

#### **Step 2:**

If the first notice is returned as undeliverable and the voter has not, within the preceding four calendar years, contacted the division, voted, or appeared to vote in any election, the division sends a second notice (by forwardable mail) to the voter's last known address. This notice states that the voter's registration will be inactivated unless the voter responds to the notice within 45 days.

A voter whose record has been inactivated will be canceled and removed from the voter list after two general elections—four years—if the voter does not contact the division, vote, or appear to vote.

Inactive voters may vote, but they must vote a questioned ballot, as their names do not appear on the precinct register. This means they must complete questioned ballot envelopes and their

ballots are reviewed with all other questioned ballots by a bi-partisan questioned ballot review board. Their ballots are then counted to the greatest extent allowed by state law.

#### **Electronic Registration Information Center:**

Alaska is a member of the Electronic Registration Information Center (ERIC), an organization of 30+ jurisdictions that share and match their voter records. The division uses the ERIC program to send quarterly and/or yearly notices to voters who appear to have moved to other states, requesting that they update or cancel their voter registration in Alaska.

ERIC also helps the division update voters' addresses, identify deceased voters, and merge duplicate records. ERIC compares Alaska's DMV database with the voter list. Prior to every general election, the division sends an in-state move notification card to any voter who may have a more current residence address with DMV, asking them to update their registration. The division sends this notice prior to the registration deadline for the general election so there is time for the voters to update their registration.

To identify deceased voters, ERIC compares our voter list with a Social Security Administration database. The division uses this information to remove deceased voters from the voter list.

Finally, ERIC helps identify potential duplicate voting records and the division will merge any duplicate voting records for the same voter into one.

#### **Additional List Maintenance Steps:**

*Notices from Other States Election Officials:* The division also receives notification directly from other states when someone registers there and indicates they were previously registered in Alaska. We also recommend that voters who move from Alaska and do not intend to return immediately contact the division to cancel their registration. Alaska monthly sends notifications to other states of voters who have registered to vote in Alaska and who have provided us with the state where they were previously registered.

*Deceased Voters:* The division removes deceased voters every month based on information received from the Division of Vital Statistics. Regional offices weekly review obituaries to remove deceased voters from the list and will remove deceased voters upon notification by city clerks or family members.

*Duplicate Voter Registration:* The division's system also searches for any potential duplicate voter records monthly. After a division staff member reviews any potential duplicate record matches, those deemed to be the same voter are merged together.

*Undeliverable:* The division diligently flags voter records with undeliverable mailing addresses upon receipt of any undeliverable mail.



U.S. Department of Justice

Civil Rights Division

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Office of the Assistant Attorney General

Washington, D.C. 20530

August 14, 2025

Via Mail and Email

The Honorable Nancy Dahlstrom  
Lieutenant Governor  
P.O. Box 110015  
Juneau, AK 99811-0001  
[nancy.dahlstrom@alaska.gov](mailto:nancy.dahlstrom@alaska.gov)

Re: **Complete Alaska's Voter Registration List with All Fields**

Lieutenant Governor Dahlstrom:

We have received Alaska's statewide voter registration list ("VRL"). However, as the Attorney General requested, the electronic copy of the statewide VRL must contain *all fields*, including the registrant's full name, date of birth, residential address, his or her state driver's license number or the last four digits of the registrant's social security number as required under the Help America Vote Act ("HAVA")<sup>1</sup> to register individuals for federal elections. *See* 52 U.S.C. § 21083(a)(5)(A)(i).

We have requested Alaska's VRL to assess your state's compliance with the statewide VRL maintenance provisions of the National Voter Registration Act ("NVRA"), 52 U.S.C. § 20501, *et seq.* Our request is pursuant to the Attorney General's authority under Section 11 of the NVRA to bring enforcement actions. *See* 52 U.S.C. § 20501(a).

The Help America Vote Act ("HAVA"), 52 U.S.C. § 20501, *et seq.*, also provides authority for the Justice Department to seek the State's VRL via Section 401, which makes the Attorney General solely responsible for actions to enforce HAVA's computerized statewide Voter Registration List requirements. *See* 52 U.S.C. § 21111; *see also Brunner v. Ohio Republican Party*, 555 U.S. 5, 6 (2008) (*per curiam*) (finding there is no private right of action to enforce those requirements in HAVA).

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<sup>1</sup> In charging the Attorney General with enforcement of the voter registration list requirements in the HAVA and in the NVRA, Congress plainly intended that Justice Department be able to conduct an independent review of each state's list. Any statewide prohibitions are clearly preempted by federal law.

In addition to those authorities, the Attorney General is also empowered by Congress to request records pursuant to Title III of the Civil Rights Act of 1960 (“CRA”), codified at 52 U.S.C. § 20701, *et seq.* Section 301 of the CRA requires state and local officials to retain and preserve records related to voter registration and other acts requisite to voting for any federal office for a period of 22 months after any federal general, special or primary election. *See* 52 U.S.C. § 20701.

Section 303 of the CRA provides, in pertinent part, “Any record or paper required by section 20701 of this title to be retained and preserved shall, upon demand in writing by the Attorney General or his representative directed to the person having custody, possession, or control of such record or paper, be made available for inspection, reproduction, and copying at the principal office of such custodian by the Attorney General or his representative...” 52 U.S.C. § 20703.

Pursuant to the foregoing authorities, including the CRA, the Attorney General is demanding an electronic copy of Alaska’s complete and current VRL. The purpose of the request is to ascertain Alaska’s compliance with the list maintenance requirements of the NVRA and HAVA.

When providing the electronic copy of the statewide VRL, Alaska must ensure that it contains *all fields*, which includes the registrant’s full name, date of birth, residential address, his or her state driver’s license number or the last four digits of the registrant’s social security number as required under the Help America Vote Act (“HAVA”)<sup>2</sup> to register individuals for federal elections. *See* 52 U.S.C. § 21083(a)(5)(A)(i).

To the extent there are privacy concerns, the voter registration list is subject to federal privacy protections. Section 304 of the CRA provides the answer:

Unless otherwise ordered by a court of the United States, neither the Attorney General nor any employee of the Department of Justice, nor any other representative of the Attorney General, shall disclose any record or paper produced pursuant to this chapter, or any reproduction or copy, except to Congress and any committee thereof, governmental agencies, and in the presentation of any case or proceeding before any court or grand jury.

Moreover, HAVA specifies that the “last 4 digits of a social security number . . . shall not be considered a social security number for purposes of section 7 of the Privacy Act of 1974” (5 U.S.C. § 552a note); 52 U.S.C. § 21083(c). In addition, any prohibition of disclosure of a motor vehicle record contained in the Driver’s License Protection Act, codified at 18 U.S.C. § 2721(b)(1), is exempted when the disclosure is for use by a government agency in carrying out the government agency’s function to accomplish its enforcement authority as the Justice Department is now doing. That said, all data received from you will be kept securely and treated consistently with the Privacy Act.

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<sup>2</sup> In charging the Attorney General with enforcement of the voter registration list requirements in the HAVA and in the NVRA, Congress plainly intended that Justice Department be able to conduct an independent review of each state’s list. Any statewide prohibitions are clearly preempted by federal law.

League of Women Voters of Alaska et al., v. Dahlstrom, et al.

AMENDED COMPLAINT, Exh. C, 2 of 3

Case No. 3AN-26-06319-CI

In charging the Attorney General with enforcement of the voter registration list requirements in HAVA and in the NVRA, Congress plainly intended that DOJ be able to conduct an independent review of each state's list. Any statewide prohibitions are preempted by federal law.

To that end, please provide the requested electronic Voter Registration List<sup>3</sup> to the Justice Department within seven days or by August 21, 2025.

The information and materials may be sent by encrypted email to [voting.section@usdoj.gov](mailto:voting.section@usdoj.gov) or via the Department's secure file-sharing system, Justice Enterprise File Sharing ("JEFS"). Should further clarification be required, please contact Maureen Riordan at [maureen.riordan2@usdoj.gov](mailto:maureen.riordan2@usdoj.gov).

Regards,



Harmeet K. Dhillon  
Assistant Attorney General  
Civil Rights Division

cc: Carol Beecher  
Director, Division of Elections  
Court Plaza Building  
240 Main Street, 4th Floor  
Juneau, AK 99801  
[carol.beecher@alaska.gov](mailto:carol.beecher@alaska.gov)

<sup>3</sup> ~~Containing *all fields*, which includes either the registrant's full name, date of birth, residential address, his or her state driver's license number or the last four digits of the registrant's social security number as required by HAVA.~~



U.S. Department of Justice  
Civil Rights Division

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**CONFIDENTIAL MEMORANDUM OF UNDERSTANDING**

**I. PARTIES & POINTS OF CONTACT.**

Requester

Federal Agency Name: Civil Rights Division, U.S. Department of Justice

VRL/Data User:

Title:

Address:

Phone:

VRL/Data Provider

State Agency Name: Alaska Division of Elections

Custodian: Carol Beecher

Title: Director

Address: PO Box 110017, Juneau AK 99811

Phone: (907) 465-4611

The parties to this Memorandum of Understanding (“MOU” or “Agreement”) are the Department of Justice, Civil Rights Division (“Justice Department” or “Department”), and the State of Alaska (“Alaska”).

**II. AUTHORITY.**

By this Agreement, Alaska has agreed to, and will, provide an electronic copy of your state’s complete statewide Voter Registration List (“VRL” or “VRL/Data”) to the Civil Rights Division of the U.S. Department of Justice (at times referred to as the “Department”). The VRL/Data must include, among other fields of data, the voter registrant’s full name, date of birth, residential address, his or her state driver’s license number or the last four digits of the registrant’s

social security number as required under the HAVA to register individuals for federal elections.

*See* 52 U.S.C. § 21083(a)(5)(A).

The authorities by which this information is requested by the Department of Justice are:

- National Voter Registration Act of 1993, 52 U.S.C. § 20501, *et seq.*
- Attorney General’s authority under Section 11 of the NVRA to bring enforcement actions. *See* 52 U.S.C. § 20501(a).
- Help America Vote Act of 2002, 52 U.S.C. § 20901, *et seq.*
- Attorney General’s authority to enforce the Help America Vote Act under 53 U.S.C. § 21111.
- Attorney General authority to request records pursuant to Title III of the Civil Rights Act of 1960 (“CRA”), codified at 52 U.S.C. § 20701, *et seq.*
- The Privacy Act of 1974, 5 U.S.C. § 552a, as amended.

### **III. PURPOSE.**

A VRL is a Voter Registration List pursuant to the NVRA and HAVA, commonly referred to as “voter roll,” compiled by a state – often from information submitted by counties – containing a list of all the state’s *eligible* voters. Regardless of the basis for ineligibility, ineligible voters do not appear on a state’s VRL when proper list maintenance is performed by states. The Justice Department is requesting your state’s VRL to test, analyze, and assess states’ VRLs for proper list maintenance and compliance with federal law. In the event the Justice Department’s analysis of a VRL results in list maintenance issues, insufficiency, inadequacy, anomalies, or concerns, the Justice Department will notify your state’s point of contact of the issues to assist your state with curing.

The purpose of this MOU is to establish the parties' understanding as to the security protections for data transfer and data access by the Department of Justice of the electronic copy of the statewide voter registration list, including all fields requested by the Department of Justice.

**IV. TIMING OF AGREEMENT – TIME IS OF ESSENCE.**

Although the Justice Department is under no such obligation as a matter of law, because this Agreement is proposed, made, and to be entered into at your state's request as part of your state's transmission of its VRL to the Justice Department, this Agreement is to be fully executed within seven (7) days of the Justice Department presenting this Agreement to you. Both parties agree that no part of this Agreement or execution is intended to, or will, cause delay of the transmission of your state's VRL to the Justice Department for analysis.

**V. TIMING OF VRL/DATA TRANSFER.**

You agree to transfer an electronic copy of your state's complete statewide VRL/Data to the Civil Rights Division of the U.S. Department of Justice as described in Section III of this Agreement no later than five (5) business days from the execution of this Agreement, which is counted from the last day of the last signatory.

**VI. METHOD OF VRL/DATA ACCESS OR TRANSFER.**

The VRL will be submitted by your state via the Department of Justice's secure file-sharing system, i.e., Justice Enterprise File Sharing (JEFS"). A separate application to use JEFS must be completed and submitted by your state through the Civil Rights Help Desk. JEFS implements strict access controls to ensure that each user can only access their own files. All files and folders are tied to a specific user, and each user has defined permissions that govern how they may interact with those files (e.g., read, write, or read-only).

Whenever a user attempts to access a file or folder, JEFS validates the request against the assigned permissions to confirm that the user is explicitly authorized. This process guarantees that users can only access files and folders only where they have permission. Users are also limited to the authorized type of interaction with each file or folder. Within the Department of Justice, access to JEFS is restricted to specific roles: Litigation Support, IT staff, and Civil Rights Division staff.

## **VII. LOCATION OF DATA AND CUSTODIAL RESPONSIBILITY.**

The parties mutually agree that the Civil Rights Division (also “Department”) will be designated as “Custodian” of the file(s) and will be responsible for the observance of all conditions for use and for establishment and maintenance of security agreements as specified in this agreement to prevent unauthorized use. The information that the Department is collecting will be maintained consistent with the Privacy Act of 1974, 5 U.S.C. § 552a. The full list of routine uses for this collection of information can be found in the Systems of Record Notice (“SORN”) titled, JUSTICE/CRT – 001, “Central Civil Rights Division Index File and Associated Records,” 68 Fed. Reg. 47610-01, 611 (August 11, 2003); 70 Fed. Reg. 43904-01 (July 29, 2005); and 82 Fed. Reg. 24147-01 (May 25, 2017). It should be noted that the statutes cited for routine use include NVRA, HAVA, and the Civil Rights Act of 1960, and the Justice Department is making our request pursuant to those statutes. The records in the system of records are kept under the authority of 44 U.S.C. § 3101 and in the ordinary course of fulfilling the responsibility assigned to the Civil Rights Division under the provisions of 28 C.F.R. §§ 0.50, 0.51.

VRL/Data storage is similar to the restricted access provided on JEFS and complies with the SORN: Information in computer form is safeguarded and protected in accordance with applicable Department security regulations for systems of records. Only a limited number of staff members who are assigned a specific identification code will be able to use the computer to access

the stored information. However, a section may decide to allow its employees access to the system in order to perform their official duties.

All systems storing the VRL data will comply with all security requirements applicable to Justice Department systems, including but not limited to all Executive Branch system security requirements (e.g., requirements imposed by the Office of Management and Budget [OMB] and National Institute of Standards and Technology [NIST]), Department of Justice IT Security Standards, and Department of Justice Order 2640.2F.

**VIII. NVRA/HAVA COMPLIANT VOTER REGISTRATION LIST.**

After analysis and assessment of your state’s VRL, the Justice Department will securely notify you or your state of any voter list maintenance issues, insufficiencies, inadequacies, deficiencies, anomalies, or concerns, the Justice Department found when testing, assessing, and analyzing your state’s VRL for NVRA and HAVA compliance, i.e., that your state’s VRL only includes eligible voters.

You agree therefore that within forty-five (45) days of receiving that notice from the Justice Department of any issues, insufficiencies, inadequacies, deficiencies, anomalies, or concerns, your state will clean its VRL/Data by removing ineligible voters and resubmit the updated VRL/Data to the Civil Rights Division of the Justice Department to verify proper list maintenance has occurred by your state pursuant to the NVRA and HAVA.

**IX. CONFIDENTIALITY & DEPARTMENT SAFEGUARDS.**

Any member of the Justice Department in possession of a VRL/Data will employ reasonable administrative, technical, and physical safeguards designed to protect the security and confidentiality of such data. Compliance with these safeguards will include secure user authentication protocols deploying either: (i) Two-Factor Authentication (“2FA”), which requires users to go through two layers of security before access is granted to the system; or (ii) the

assignment of unique user identifications to each person with computer access plus unique complex passwords, which are not vendor supplied default passwords.

The Department will activate audit logging for the records, files, and data containing the state's VRL/Data in order to identify abnormal use, as well as to track access control, on computers, servers and/or Devices containing the VRL/Data.

For all devices storing records, files, and data containing the VRL/Data: there is (i) up-to-date versions of system security agent software that includes endpoint protection and malware protection and reasonably up-to-date patches and virus definitions, or a version of such software that can still be supported with up-to-date patches and virus definitions, and is set to receive the most current security updates on a regular basis; and (ii) up-to-date operating system security patches designed to maintain the integrity of the personal information.

For all devices storing records, files, and data containing the VRL/Data: there is (i) controlled and locked physical access for the Device; and (ii) the prohibition of the connection of the Device to public or insecure home networks.

There will be no copying of records, files, or data containing the VRL/Data to unencrypted USB drives, CDs, or external storage. In addition, the use of devices outside of moving the records, files, or data to the final stored device location shall be limited.

Any notes, lists, memoranda, indices, compilations prepared or based on an examination of VRL/Data or any other form of information (including electronic forms), that quote from, paraphrase, copy, or disclose the VRL/Data with such specificity that the VRL/Data can be identified, or by reasonable logical extension can be identified will not be shared by the Department. Any summary results, however, may be shared by the Department.

In addition to the Department's enforcement efforts, the Justice Department may use the information you provide for certain routine, or pre-litigation or litigation purposes including:

present VRL/Data to a court, magistrate, or administrative tribunal; a contractor with the Department of Justice who needs access to the VRL/Data information in order to perform duties related to the Department's list maintenance verification procedures. Recipients of information shall be required to comply with the requirements of the Privacy Act of 1974, as amended, pursuant to 5 U.S.C. § 552a(m).

**X. LOSS OR BREACH OF DATA.**

If a receiving party discovers any loss of VRL/Data, or a breach of security, including any actual or suspected unauthorized access, relating to VRL/Data, the receiving party shall, at its own expense immediately provide written notice to the producing party of such breach; investigate and make reasonable and timely efforts to remediate the effects of the breach, and provide the producing party with assurances reasonably satisfactory to the producing party that such breach shall not recur; and provide sufficient information about the breach that the producing party can reasonably ascertain the size and scope of the breach. The receiving party agrees to cooperate with the producing party or law enforcement in investigating any such security incident. In any event, the receiving party shall promptly take all necessary and appropriate corrective action to terminate unauthorized access.

**XI. DESTRUCTION OF DATA.**

The Department will destroy all VRL/Data associated with actual records as soon as the purposes of the list maintenance project have been accomplished and the time required for records retention pursuant to applicable law has passed. When the project is complete and such retention requirements by law expires, the Justice Department will:

1. Destroy all hard copies containing confidential data (e.g., shredding);
2. Archive and store electronic data containing confidential information offline in a secure location; and

3. All other data will be erased or maintained in a secured area.

## **XII. OTHER PROVISIONS.**

- A. **Conflicts.** This MOU constitutes the full MOU on this subject between the Department and your state. Any inconsistency or conflict between or among the provisions of this MOU, will be resolved in the following order of precedence: (1) this MOU and (2) other documents incorporated by reference in this MOU (e.g., transaction charges).
- B. **Severability.** Nothing in this MOU is intended to conflict with current law or regulation or the directives of Department, or the your state. If a term of this MOU is inconsistent with such authority, then that term shall be invalid but, to the extent allowable, the remaining terms and conditions of this MOU shall remain in full force and effect.
- C. **Assignment.** Your state may not assign this MOU, nor may it assign any of its rights or obligations under this MOU. To the extent allowable by law, this MOU shall inure to the benefit of, and be binding upon, any successors to the Justice Department and your state without restriction.
- D. **Waiver.** No waiver by either party of any breach of any provision of this MOU shall constitute a waiver of any other breach. Failure of either party to enforce at any time, or from time to time, any provision of this MOU shall not be construed to be a waiver thereof.
- E. **Compliance with Other Laws.** Nothing in this MOU is intended or should be construed to limit or affect the duties, responsibilities, and rights of the User Agency under the National Voter Registration Act, 52 U.S.C. § 20501 *et seq.*, as amended; the Help America Vote Act, 52 U.S.C. § 20901 *et seq.*, as amended; the Voting Rights Act, 52 U.S.C. § 10301 *et seq.*, as amended; and the Civil Rights Act, 52 U.S.C. § 10101 *et seq.*, as amended.
- F. **Confidentiality of MOU.** To the extent allowed by applicable law, this MOU, its contents, and the drafts and communications leading up to the execution of this MOU are deemed

by the parties as “confidential.” Any disclosures therefore could be made, if at all, pursuant to applicable laws or court orders requiring such disclosures.

**SIGNATURES**

VRL/Data Provider

State Agency Name: Alaska Division of Elections

Signature:  Date of Execution: 12/19/2025

Authorized Signatory Name Printed: Carol Beecher

Title: Director

Requester

Federal Agency Name: Civil Rights Division, U.S. Department of Justice

Signature:  Date of Execution: 12/22/2025

Authorized Signatory Name Printed: Harmeet K. Dhillon

Title: Assistant Attorney General

**NANCY DAHLSTROM**  
LIEUTENANT GOVERNOR  
lt.governor@alaska.gov



550 W 7<sup>th</sup> Avenue, Suite 1700  
Anchorage, Alaska 99501  
Main: 907.269.7460

**STATE OF ALASKA**  
**OFFICE OF THE LIEUTENANT GOVERNOR**

December 19, 2025

Eric Neff  
Acting Chief  
Civil Rights Division, Voting Section  
U.S. Department of Justice

Dear Mr. Neff,

Per your written request dated August 14, 2025, the State of Alaska agrees to provide the Department of Justice a complete list of eligible, registered voters, including dates of birth, residential addresses, and driver's license numbers or the last four digits of social security numbers, in accordance with the attached memorandum of understanding, entered at the request of the Department of Justice, and AS 15.07.195(c)(1). This statute allows the Division of Elections to share voters' confidential information with a federal government agency, such as the Department of Justice, provided it uses "the information only for governmental purposes authorized under law."

As stated in the memorandum of understanding, the Department of Justice will use Alaska's voter list to test, analyze, and assess the State's compliance with federal laws, including the National Voter Registration Act and Help America Vote Act. The Department of Justice and any other recipients of the voter list will comply with the Privacy Act of 1974. Alaska will continue to comply with all state and federal laws while implementing this memorandum of understanding.

Sincerely,

A handwritten signature in black ink that reads "Nancy Dahlstrom".

Nancy Dahlstrom  
Lieutenant Governor

[Statewide Links](#)

# Lt. Governor Submits Alaska Voter Registration List to the U.S. Department of Justice

December 23, 2025

**December 23, 2025 (Anchorage, AK)** – The Office of the Lieutenant Governor today confirmed that the State of Alaska has provided the U.S. Department of Justice (DOJ) with a complete list of eligible registered voters in response to the DOJ’s request. The list was securely transmitted to the DOJ on December 23, 2025.

“Alaska is committed to the integrity of our elections and to complying with applicable law,” said Lt. Governor Nancy Dahlstrom. “Upon receiving the DOJ’s request, the Division of Elections, in consultation with the Department of Law, provided the voter registration list in accordance with federal requirements and state authority, while ensuring appropriate safeguards for sensitive information.”

The DOJ requested an electronic copy of Alaska’s complete voter registration list to assess the State’s compliance with the list maintenance provisions of the National Voter Registration Act and other federal laws. The data provided included voters’ full names, dates of birth, residential addresses, and driver’s license numbers or the last four digits of their social security numbers. The transmittal occurred under a DOJ–Alaska Memorandum of Understanding (MOU) that governs access to, use of, and protection of the data.

<https://www.elections.alaska.gov/lt-governor-submits-alaska-voter-registration-list-to-the-u-s-department-of-justice/>

League of Women Voters of Alaska et al. v. Dahlstrom, et al.

AMENDED COMPLAINT, Exh. F, 1 of 3

Case No. 3AN-06319-CI

Primary Federal law: The National Voter Registration Act (NVRA), 52 U.S.C. § 20510, establishes the DOJ’s enforcement authority related to list maintenance.

State authority: The Lieutenant Governor oversees the Alaska Division of Elections and is authorized under Alaska Statute 15.07.195(c)(1) to provide confidential voter information to a federal agency, if that agency only uses it for government purposes authorized by law.

Data protections: The DOJ–Alaska MOU and other federal laws provide explicit limits on use and further disclosure of the voter list, reflecting Alaska’s commitment to safeguarding personally identifiable information while meeting federal obligations.

Lt. Governor Dahlstrom added, “Our role is to uphold the law, protect Alaskans’ data, and promote transparency in election administration. This action aligns with those responsibilities.”

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## Links

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## Mission

Our mission is to ensure public confidence in the electoral process by administering voter registration and elections with the highest level of professional standards, integrity, security, accuracy and fairness.

*([https://twitter.com/ak\\_elections](https://twitter.com/ak_elections))*



*(<https://www.facebook.com/State-of-Alaska-Division-of-Elections-181769025220502/>)*

## Upcoming Events

**03.16 2026** Prepare paperwork for ballot name placement.

**03.30 2026** Seward's Day – Offices Closed

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