

Subject: RE: [External] SC Freedom of Information Request (SC-SEC-25-2585)
Date: Wednesday, November 12, 2025 at 12:40:31 PM Eastern Standard Time
From: Chavis, Madelyn
To: AO Records
Category: PRODUCTION
Attachments: SC-SEC-25-2585.pdf, SC-SEC-25-2586.pdf, South Carolina SEC Request; Response to DOJ Letter of 08-14-2025.pdf, State of South Carolina Final.pdf, State of South Carolina.pdf, DOJ Emails_Redacted.pdf

EXTERNAL SENDER

Good afternoon,

We have received your FOIA requests. Your requests have been granted, and the responsive records are attached.
Please note PII has been redacted in accordance with applicable state and federal laws.

Thank you,

Madelyn Chavis
Senior Paralegal

South Carolina State Election Commission
1122 Lady St., 5th Floor, Columbia, SC 29201
P.O. Box 5987, Columbia, S.C. 29250
Office: 803.734.0145
Fax: 803.734.9366

From: AO Records <records@americanoversight.org>
Sent: Wednesday, November 5, 2025 11:18 AM
To: _Elections - Foia <foia@elections.sc.gov>
Subject: [External] SC Freedom of Information Request (SC-SEC-25-2585)

Dear Freedom of Information Officer,

Please find attached a request for records under the South Carolina Freedom of Information Act.

Sincerely,
Katie Barton

Katherine Barton | She/Her
Paralegal | American Oversight
records@americanoversight.org
www.americanoversight.org | @weareoversight



From: [Riordan, Maureen \(CRT\)](#)
To: [Nicholson, Thomas](#)
Cc: [Wooten, Jenny](#); [Chavis, Madelyn](#)
Subject: Re: [External] Crook v. South Carolina Election Commission
Date: Wednesday, October 1, 2025 2:50:21 PM

Thank you! We are shut down so I'm only checking emails intermittently.
Be in touch soon!

Maureen S. Riordan
Senior Counsel
Acting Chief, Voting Section
Civil Rights Division
maureen.riordan2@usdoj.gov

From: Nicholson, Thomas <tnicholson@elections.sc.gov>
Sent: Wednesday, October 1, 2025 2:17:26 PM
To: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Cc: Wooten, Jenny <jwooten@elections.sc.gov>; Chavis, Madelyn <mchavis@elections.sc.gov>
Subject: RE: [External] Crook v. South Carolina Election Commission

Maureen –

Fyi, see the attached. Judge Coble denied plaintiff's motion for an injunction. This is a very good order for us.

Thomas W. Nicholson
General Counsel

South Carolina State Election Commission
1122 Lady St., 5th Floor, Columbia, SC 29201
P.O. Box 5987, Columbia, S.C. 29250
Office: 803.734.9063
Fax: 803.734.9366

From: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Sent: Monday, September 29, 2025 12:57 PM
To: Nicholson, Thomas <tnicholson@elections.sc.gov>
Subject: Re: [External] Crook v. South Carolina Election Commission

Ok. Thx

Maureen S. Riordan
Senior Counsel
Acting Chief, Voting Section
Civil Rights Division
maureen.riordan2@usdoj.gov

From: Nicholson, Thomas <tnicholson@elections.sc.gov>
Sent: Monday, September 29, 2025 12:55:59 PM
To: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Cc: Chavis, Madelyn <mchavis@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>
Subject: RE: [External] Crook v. South Carolina Election Commission

Yes that's direct to my office.

Thomas W. Nicholson
General Counsel

South Carolina State Election Commission
1122 Lady St., 5th Floor, Columbia, SC 29201
P.O. Box 5987, Columbia, S.C. 29250
Office: 803.734.9063
Fax: 803.734.9366

From: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Sent: Monday, September 29, 2025 12:50 PM
To: Nicholson, Thomas <tnicholson@elections.sc.gov>
Cc: Chavis, Madelyn <mchavis@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>
Subject: Re: [External] Crook v. South Carolina Election Commission

Yes. That works. Should I call you at the number on your signature?

Maureen S. Riordan
Senior Counsel
Acting Chief, Voting Section
Civil Rights Division
maureen.riordan2@usdoj.gov

From: Nicholson, Thomas <tnicholson@elections.sc.gov>
Sent: Monday, September 29, 2025 12:48:14 PM
To: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Cc: Chavis, Madelyn <mchavis@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>
Subject: RE: [External] Crook v. South Carolina Election Commission

Will 2:30 work? I've got a meeting at 3:00 that shouldn't take more than an hour, so I'm available after 4:00, too.

Thomas W. Nicholson
General Counsel

South Carolina State Election Commission

1122 Lady St., 5th Floor, Columbia, SC 29201
P.O. Box 5987, Columbia, S.C. 29250
Office: 803.734.9063
Fax: 803.734.9366

From: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Sent: Sunday, September 28, 2025 7:27 PM
To: Nicholson, Thomas <tnicholson@elections.sc.gov>
Subject: Re: [External] Crook v. South Carolina Election Commission

Thomas, let me know when you're available after 10:30 am tomorrow. And we can do a call.

We are still waiting on some approvals.

Thanks so much for your patience.

Maureen

Maureen S. Riordan
Senior Counsel
Acting Chief, Voting Section
Civil Rights Division
maureen.riordan2@usdoj.gov

From: Nicholson, Thomas <tnicholson@elections.sc.gov>
Sent: Friday, September 19, 2025 4:43 PM

To: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Cc: Chavis, Madelyn <mchavis@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>
Subject: RE: [External] Crook v. South Carolina Election Commission

Maureen –

Just wanted to check with an update. First, our Executive Director was terminated by the Commission on Wednesday. Jenny Wooten has been appointed as Interim Director. Second, the Crook case has been transferred to Richland County with a hearing on the Governor's motion to intervene scheduled for this Wednesday the 24th. If Plaintiff intends to file a motion for a preliminary injunction, she must do so by Wednesday. If she does, it will be heard on Friday the 26th.

In the meantime, we continue to look forward to reviewing your draft of the MOU when it is ready.

Let us know if you have any questions.

Thomas W. Nicholson
General Counsel

South Carolina State Election Commission

1122 Lady St., 5th Floor, Columbia, SC 29201
P.O. Box 5987, Columbia, S.C. 29250
Office: 803.734.9063
Fax: 803.734.9366

From: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Sent: Friday, September 12, 2025 3:00 PM
To: Nicholson, Thomas <tnicholson@elections.sc.gov>
Subject: RE: [External] Crook v. South Carolina Election Commission

Thanks. Still waiting on approval

From: Nicholson, Thomas <tnicholson@elections.sc.gov>
Sent: Friday, September 12, 2025 2:36 PM
To: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Cc: Chavis, Madelyn <mchavis@elections.sc.gov>

Subject: RE: [External] Crook v. South Carolina Election Commission

Maureen, just as an fyi I thought I would forward you a couple of examples of existing state-to-state data-sharing MOUs South Carolina has entered into under S.C. Code § 7-5-186. In both these instances we were provided with generic initial drafts by Virginia and Texas and then worked out the finer details. They are of course adapted to the particular state involved, as I expect DOJ's draft will be for USDOJ.

Thomas W. Nicholson
General Counsel

South Carolina State Election Commission

1122 Lady St., 5th Floor, Columbia, SC 29201
P.O. Box 5987, Columbia, S.C. 29250
Office: 803.734.9063
Fax: 803.734.9366

From: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Sent: Thursday, September 11, 2025 2:36 PM
To: Nicholson, Thomas <tnicholson@elections.sc.gov>
Cc: Chavis, Madelyn <mchavis@elections.sc.gov>
Subject: Re: [External] Crook v. South Carolina Election Commission

Hello Thomas. Out MOU

Is near the apex of review. It's a very long chain of command. I will send as soon as I have approval

Maureen S. Riordan
Senior Counsel
Acting Chief, Voting Section
Civil Rights Division
maureen.riordan2@usdoj.gov

From: Nicholson, Thomas <tnicholson@elections.sc.gov>
Sent: Thursday, September 11, 2025 2:25:38 PM
To: Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>
Cc: Chavis, Madelyn <mchavis@elections.sc.gov>
Subject: Fw: [External] Crook v. South Carolina Election Commission

Please see the attached. TRO is reversed. There was no settlement. Circuit court instructed to rule on motion to change venue within 10 days and to take no other action before that. Gov's motion to intervene granted.

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From: Shealy, Brenda <BShealy@sccourts.org>

Sent: Thursday, September 11, 2025 2:01:36 PM

To: cbhutto@williamsattys.com <cbhutto@williamsattys.com>; 'skyler@williamsattys.com' <skyler@williamsattys.com>; Limehouse, Thomas <tlimehouse@governor.sc.gov>; Lambert, Grayson <glambert@governor.sc.gov>; Shedd, Erica <eshedd@governor.sc.gov>; McBride, Tyra <tmcbride@governor.sc.gov>; Crum, Liz <lcrum@burr.com>; 'mburchstead@burr.com' <mburchstead@burr.com>; Nicholson, Thomas <tnicholson@elections.sc.gov>

Subject: [External] Crook v. South Carolina Election Commission

Dear Counsel:

Attached is a copy of an opinion of the Court in the above matter.

Thank you,



Brenda F. Shealy
Supreme Court of South Carolina
P. O. Box 11330
Columbia, SC 29211
Office: (803) 734-1080

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

**From:** [Nicholson, Thomas](#)  
**To:** [Michael.Gates2@usdoj.gov](mailto:Michael.Gates2@usdoj.gov)  
**Cc:** [Knapp, Howard](#); [Chavis, Madelyn](#); [Wooten, Jenny](#); [Harrell, Elizabeth](#)  
**Subject:** Request for Extension; DOJ Request for Voter List Data  
**Date:** Wednesday, August 20, 2025 4:28:00 PM  
**Attachments:** [South Carolina SEC Request; Response to DOJ Letter of 08-14-2025.pdf](#)

---

Deputy Gates –

Please find the attached correspondence from Executive Director Knapp relating to the DOJ request for voter list data you had forwarded on August 14, 2025.

Thank for your attention to this matter.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, S.C. 29250

Office: 803.734.9063

Fax: 803.734.9366

**From:** [Gates, Michael \(CRT\)](#)  
**To:** [Knapp, Howard](#); [Elections, SCEC](#)  
**Cc:** [Riordan, Maureen \(CRT\)](#); [Mellett, Timothy F \(CRT\)](#)  
**Subject:** [External] Complete Voter Registration List with All Fields  
**Date:** Thursday, August 14, 2025 2:47:13 PM  
**Attachments:** [State of South Carolina Final.pdf](#)

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Executive Director Knapp, please find attached the Justice Department's letter requesting your state's complete electronic Voter Registration List, with applicable legal authorities for this request. Please note the August 21, 2025, deadline. Thank you.

**Michael E. Gates**

Deputy Assistant Attorney General  
Civil Rights Division, U.S. Department of Justice  
Cell: [REDACTED]

**From:** [Hayden, Paul \(CRM\)](#)  
**To:** [Wooten, Jenny](#); [Chavis, Madelyn](#); [Laragy, Scott \(CRM\)](#); [Nicholson, Thomas](#)  
**Subject:** [External] EO Call  
**Start:** Friday, June 27, 2025 10:00:00 AM  
**End:** Friday, June 27, 2025 10:30:00 AM  
**Location:** Microsoft Teams Meeting

---

Microsoft Teams Need help?

Dial in by phone

**From:** [Riordan, Maureen \(CRT\)](#)  
**To:** [Nicholson, Thomas](#); [Gates, Michael \(CRT\)](#)  
**Cc:** [Knapp, Howard](#); [Chavis, Madelyn](#); [Wooten, Jenny](#); [Harrell, Elizabeth](#); [Mellett, Timothy F \(CRT\)](#)  
**Subject:** [External] Re: DOJ Request for Voter Data; Phone Conference  
**Date:** Sunday, August 31, 2025 7:49:45 PM

---

Good evening Mr. Nicholson

Mr. Gates is unavailable next Wednesday. However I can be available for a call.

Please provide me with the time and any link.

Thanks in advance

Maureen Riordan

Maureen S. Riordan  
Senior Counsel  
Acting Chief, Voting Section  
Civil Rights Division  
[maureen.riordan2@usdoj.gov](mailto:maureen.riordan2@usdoj.gov)

---

**From:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Sent:** Friday, August 29, 2025 4:46:30 PM  
**To:** Gates, Michael (CRT) <[Michael.Gates2@usdoj.gov](mailto:Michael.Gates2@usdoj.gov)>  
**Cc:** Knapp, Howard <[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)>; Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Wooten, Jenny <[jwooten@elections.sc.gov](mailto:jwooten@elections.sc.gov)>; Harrell, Elizabeth <[EHarrell@elections.sc.gov](mailto:EHarrell@elections.sc.gov)>; Riordan, Maureen (CRT) <[Maureen.Riordan2@usdoj.gov](mailto:Maureen.Riordan2@usdoj.gov)>; Mellett, Timothy F (CRT) <[Timothy.F.Mellett@usdoj.gov](mailto:Timothy.F.Mellett@usdoj.gov)>  
**Subject:** [EXTERNAL] DOJ Request for Voter Data; Phone Conference

Deputy Gates:

The State Election Commission met earlier this week to discuss your letter of August 6, 2025, Assistant Attorney General Dhillon's letter of August 14, 2025, and the Department of Justice's request for voter registration information. Judge Shedd, our Chairman, would like to schedule a phone conference with Assistant Attorney General Dhillon, you, Executive Director Knapp and myself to discuss such a transfer of data. Please let us know when you are available on Tuesday or Wednesday of next week for a call, or another time that may be convenient.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**  
1122 Lady St., 5th Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

**From:** [Gates, Michael \(CRT\)](#)  
**To:** [Nicholson, Thomas](#)  
**Cc:** [Knapp, Howard](#); [Chavis, Madelyn](#); [Wooten, Jenny](#); [Harrell, Elizabeth](#); [Riordan, Maureen \(CRT\)](#); [Mellett, Timothy F \(CRT\)](#)  
**Subject:** [External] RE: Request for Extension; DOJ Request for Voter List Data  
**Date:** Wednesday, August 20, 2025 4:43:21 PM  
**Attachments:** [South Carolina SEC Request: Response to DOJ Letter of 08-14-2025.pdf](#)

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Mr. Nicholson and Mr. Knapp, while we are amenable to accommodating a *reasonable request*, a 60-day extension is not reasonable. The electronic form of South Carolina's Voter Registration List already exists and can be easily transmitted to the Justice Department by following the instructions in our letter. The legal authorities presented by the Justice Department's for the transmittal of the VRL are clear and unambiguous. Having said this, we will extend the time to respond for South Carolina to August 28<sup>th</sup>. Thank you.

**Michael E. Gates**

Deputy Assistant Attorney General  
Civil Rights Division, U.S. Department of Justice  
Cell: [REDACTED]

---

**From:** Nicholson, Thomas <tnicholson@elections.sc.gov>  
**Sent:** Wednesday, August 20, 2025 4:28 PM  
**To:** Gates, Michael (CRT) <Michael.Gates2@usdoj.gov>  
**Cc:** Knapp, Howard <hknapp@elections.sc.gov>; Chavis, Madelyn <mchavis@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>; Harrell, Elizabeth <EHarrell@elections.sc.gov>  
**Subject:** [EXTERNAL] Request for Extension; DOJ Request for Voter List Data

Deputy Gates –

Please find the attached correspondence from Executive Director Knapp relating to the DOJ request for voter list data you had forwarded on August 14, 2025.

Thank for your attention to this matter.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063

Fax: 803.734.9366

**From:** [Riordan, Maureen \(CRT\)](#)  
**To:** [Nicholson, Thomas](#)  
**Cc:** [Chavis, Madelyn](#); [Knapp, Howard](#); [Wooten, Jenny](#)  
**Subject:** [External] RE: S.C. Governor's office contact  
**Date:** Wednesday, September 3, 2025 10:59:04 AM

---

Thanks, I received both emails.

---

**From:** Nicholson, Thomas <tnicholson@elections.sc.gov>  
**Sent:** Wednesday, September 3, 2025 10:58 AM  
**To:** Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>  
**Cc:** Chavis, Madelyn <mchavis@elections.sc.gov>; Knapp, Howard <hknapp@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>  
**Subject:** [EXTERNAL] S.C. Governor's office contact

Maureen –

See the contact information for Grayson Lambert with Governor McMaster's office below:

[GLambert@governor.sc.gov](mailto:GLambert@governor.sc.gov)

(803) 734-2100

Wm. Grayson Lambert

Chief Deputy & Senior Litigation Counsel

Office of Governor Henry Dargan McMaster

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, S.C. 29250

Office: 803.734.9063

Fax: 803.734.9366

**From:** [Riordan, Maureen \(CRT\)](#)  
**To:** [Nicholson, Thomas](#); [Knapp, Howard](#)  
**Cc:** [Gates, Michael \(CRT\)](#)  
**Subject:** [External] Request for telephone meeting with Mr. Gates...  
**Date:** Tuesday, September 2, 2025 10:44:13 AM

---

Mr. Nicholson, as my previous email explained I will be the DOJ Contact for the requested call. Wednesday is better for me. Please let me know when you would like to discuss.

Thank you

Maureen Riordan

Maureen S. Riordan  
United States Department of Justice  
Senior Counsel  
Acting Chief, Voting Section  
Civil Rights Division  
150 M Street NE  
Washington, D.C. 20002  
Maureen.riordan2@usdoj.gov  
(202)-702-6110

**From:** [Nicholson, Thomas](#)  
**To:** [Hayden, Paul \(CRM\)](#)  
**Subject:** Accepted: [External] EO Call  
**Start:** Friday, June 27, 2025 10:00:00 AM  
**End:** Friday, June 27, 2025 10:30:00 AM  
**Location:** Microsoft Teams Meeting

---

**From:** [Wooten, Jenny](#)  
**To:** [Hayden, Paul \(CRM\)](#)  
**Subject:** Accepted: [External] EO Call  
**Start:** Friday, June 27, 2025 10:00:00 AM  
**End:** Friday, June 27, 2025 10:30:00 AM  
**Location:** Microsoft Teams Meeting

---

**From:** [Nicholson, Thomas](#)  
**To:** [Gates, Michael \(CRT\)](#)  
**Cc:** [Knapp, Howard](#); [Chavis, Madelyn](#); [Wooten, Jenny](#); [Harrell, Elizabeth](#); [Riordan, Maureen \(CRT\)](#); [Mellett, Timothy F \(CRT\)](#)  
**Subject:** DOJ Request for Voter Data; Phone Conference  
**Date:** Friday, August 29, 2025 4:46:34 PM

---

Deputy Gates:

The State Election Commission met earlier this week to discuss your letter of August 6, 2025, Assistant Attorney General Dhillon's letter of August 14, 2025, and the Department of Justice's request for voter registration information. Judge Shedd, our Chairman, would like to schedule a phone conference with Assistant Attorney General Dhillon, you, Executive Director Knapp and myself to discuss such a transfer of data. Please let us know when you are available on Tuesday or Wednesday of next week for a call, or another time that may be convenient.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

**From:** [Nicholson, Thomas](#)  
**To:** [Jeri.Neff@usdoj.gov](mailto:Jeri.Neff@usdoj.gov)  
**Cc:** [Chavis, Madelyn](#); [Harrell, Elizabeth](#)  
**Bcc:** [Knapp, Howard](#)  
**Subject:** FW: [External] DOJ Civil Rights Division contact  
**Date:** Tuesday, July 1, 2025 5:48:00 PM

---

Ms. Neff –

Executive Director Knapp asked me to contact you about this. I am available tomorrow morning from 10:00 AM to 11:30 AM for a call, or in the afternoon after 2:00 PM. Thursday morning should also work; just let me know.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

---

**From:** Neff, Katie (CRT) <[Jeri.Neff@usdoj.gov](mailto:Jeri.Neff@usdoj.gov)>  
**Sent:** Tuesday, July 1, 2025 2:24 PM  
**To:** Knapp, Howard <[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)>  
**Cc:** Gates, Michael (CRT) <[Michael.Gates2@usdoj.gov](mailto:Michael.Gates2@usdoj.gov)>  
**Subject:** [External] DOJ Civil Rights Division contact

Good afternoon Secretary Knapp,

I am Counsel at the Civil Rights Division working for AAG Harmeet Dhillon. I would like to speak with you about some voting information regarding South Carolina. Would there be a time that you might be available to speak with me? I am available most days this week before the holiday. Of course, I can be available on the holiday or the weekend if that works for you.

I look forward to connecting at your earliest convenience on this issue.

Thank you in advance,

**Katie Neff** | Counsel  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave. NW | Washington, DC 20530  
(202) 305-0543 | [jeri.neff@usdoj.gov](mailto:jeri.neff@usdoj.gov)

**From:** [Neff, Katie \(CRT\)](#)  
**To:** [Nicholson, Thomas](#)  
**Cc:** [Chavis, Madelyn](#); [Harrell, Elizabeth](#)  
**Subject:** Re: [External] DOJ Civil Rights Division contact  
**Date:** Wednesday, July 2, 2025 9:24:59 AM

---

Yes, 2:30 works well. Talk to you then.

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**From:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Sent:** Wednesday, July 2, 2025 9:06:13 AM  
**To:** Neff, Katie (CRT) <[Jeri.Neff@usdoj.gov](mailto:Jeri.Neff@usdoj.gov)>  
**Cc:** Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Harrell, Elizabeth <[EHarrell@elections.sc.gov](mailto:EHarrell@elections.sc.gov)>  
**Subject:** RE: [External] DOJ Civil Rights Division contact

Could we do 2:30 instead?

You can call the office number below.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

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**From:** Neff, Katie (CRT) <[Jeri.Neff@usdoj.gov](mailto:Jeri.Neff@usdoj.gov)>  
**Sent:** Wednesday, July 2, 2025 8:17 AM  
**To:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Cc:** Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Harrell, Elizabeth <[EHarrell@elections.sc.gov](mailto:EHarrell@elections.sc.gov)>  
**Subject:** Re: [External] DOJ Civil Rights Division contact

Let's do today at 2 pm if that's still open. What number is best?

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---

**From:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Sent:** Tuesday, July 1, 2025 5:48:05 PM  
**To:** Neff, Katie (CRT) <[Jeri.Neff@usdoj.gov](mailto:Jeri.Neff@usdoj.gov)>

**Cc:** Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Harrell, Elizabeth <[EHarrell@elections.sc.gov](mailto:EHarrell@elections.sc.gov)>  
**Subject:** FW: [External] DOJ Civil Rights Division contact

Ms. Neff –

Executive Director Knapp asked me to contact you about this. I am available tomorrow morning from 10:00 AM to 11:30 AM for a call, or in the afternoon after 2:00 PM. Thursday morning should also work; just let me know.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

---

**From:** Neff, Katie (CRT) <[Jeri.Neff@usdoj.gov](mailto:Jeri.Neff@usdoj.gov)>  
**Sent:** Tuesday, July 1, 2025 2:24 PM  
**To:** Knapp, Howard <[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)>  
**Cc:** Gates, Michael (CRT) <[Michael.Gates2@usdoj.gov](mailto:Michael.Gates2@usdoj.gov)>  
**Subject:** [External] DOJ Civil Rights Division contact

Good afternoon Secretary Knapp,

I am Counsel at the Civil Rights Division working for AAG Harmeet Dhillon. I would like to speak with you about some voting information regarding South Carolina. Would there be a time that you might be available to speak with me? I am available most days this week before the holiday. Of course, I can be available on the holiday or the weekend if that works for you.

I look forward to connecting at your earliest convenience on this issue.

Thank you in advance,

**Katie Neff** | Counsel

Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Ave. NW | Washington, DC 20530  
(202) 305-0543 | [jeri.neff@usdoj.gov](mailto:jeri.neff@usdoj.gov)

**From:** [Nicholson, Thomas](#)  
**To:** [Hayden, Paul \(CRM\)](#); [Laragy, Scott \(CRM\)](#)  
**Cc:** [Chavis, Madelyn](#); [Wooten, Jenny](#)  
**Subject:** RE: [External] Executive Order Implementation  
**Date:** Tuesday, June 24, 2025 8:53:00 AM

---

Very good, we are set for Friday at 10:00. Please Cc Madelyn & Jenny.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

---

**From:** Hayden, Paul (CRM) <Paul.Hayden2@usdoj.gov>  
**Sent:** Monday, June 23, 2025 3:54 PM  
**To:** Nicholson, Thomas <tnicholson@elections.sc.gov>; Laragy, Scott (CRM) <Scott.Laragy@usdoj.gov>  
**Cc:** Chavis, Madelyn <mchavis@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>  
**Subject:** RE: [External] Executive Order Implementation

Hi Thomas,

Let's do Friday at 10am. Happy to circulate a Teams invite. Are those cc'd above who should be included?

Best,  
Paul

---

**From:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Sent:** Monday, June 23, 2025 2:20 PM  
**To:** Hayden, Paul (CRM) <[Paul.Hayden2@usdoj.gov](mailto:Paul.Hayden2@usdoj.gov)>; Laragy, Scott (CRM) <[Scott.Laragy@usdoj.gov](mailto:Scott.Laragy@usdoj.gov)>  
**Cc:** Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Wooten, Jenny <[jwooten@elections.sc.gov](mailto:jwooten@elections.sc.gov)>  
**Subject:** FW: [External] Executive Order Implementation  
**Importance:** High

I am available for a call to discuss this any time after 10:00 AM Wednesday or Friday of this week.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

---

**From:** Hayden, Paul (CRM) <[Paul.Hayden2@usdoj.gov](mailto:Paul.Hayden2@usdoj.gov)>  
**Sent:** Monday, June 23, 2025 10:42 AM  
**To:** Elections, SCEC <[elections@elections.sc.gov](mailto:elections@elections.sc.gov)>  
**Cc:** Laragy, Scott (CRM) <[Scott.Laragy@usdoj.gov](mailto:Scott.Laragy@usdoj.gov)>  
**Subject:** [External] Executive Order Implementation

To whom it may concern,

By way of virtual introduction, we are Paul Hayden and Scott Laragy from the U.S. Department of Justice. We are reaching out to you regarding the implementation of Presidential Executive Order (EO) 14248, Preserving and Protecting the Integrity of American Elections. Pursuant to the EO, we would like to request a call with the relevant election official in your office, to discuss information sharing as it relates to the EO.

Please let us know a date and time convenient to your schedule.

Sincerely,

Paul Hayden and Scott Laragy  
Senior Counsels  
U.S. Department of Justice  
(202) 774-7723  
(202) 465-0107

**From:** [Nicholson, Thomas](#)  
**To:** [Hayden, Paul \(CRM\)](#)  
**Cc:** [Laragy, Scott \(CRM\)](#); [Wooten, Jenny](#); [Chavis, Madelyn](#)  
**Subject:** RE: [External] POCs  
**Date:** Friday, June 27, 2025 10:42:31 AM

---

Very good, thank you Paul.

I'll forward this information to our IT folks as well.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

---

**From:** Hayden, Paul (CRM) <Paul.Hayden2@usdoj.gov>  
**Sent:** Friday, June 27, 2025 10:24 AM  
**To:** Wooten, Jenny <jwooten@elections.sc.gov>; Nicholson, Thomas <tnicholson@elections.sc.gov>  
**Cc:** Laragy, Scott (CRM) <Scott.Laragy@usdoj.gov>  
**Subject:** [External] POCs

Hi Jenny and Tom,

I apologize for the technical issues with my Teams. It acts up at the worst times!

Anyway, per our discussion, HSI has advised us the following POCs (Sindy and Julie) will assist you with any referrals:

[HSIVoterFraudLeads@ice.dhs.gov](mailto:HSIVoterFraudLeads@ice.dhs.gov)  
[Sindy.t.Maradiaga@hsi.dhs.gov](mailto:Sindy.t.Maradiaga@hsi.dhs.gov)  
[Julie.E.Hilario@ice.dhs.gov](mailto:Julie.E.Hilario@ice.dhs.gov)

Please email all 3 addresses so they can cover your referrals correctly.

In addition, Pablo Juarez from USCIS is available to assist with any issues involving your

use of SAVE. He can be reached at the following email address:

[Pablo.a.juarez@uscis.dhs.gov](mailto:Pablo.a.juarez@uscis.dhs.gov)

Please don't hesitate to contact us if you have any further questions.

Best,  
Paul

**From:** [Gates, Michael \(CRT\)](#)  
**To:** [Nicholson, Thomas](#)  
**Cc:** [Knapp, Howard](#); [Chavis, Madelyn](#); [Wooten, Jenny](#); [Harrell, Elizabeth](#); [Riordan, Maureen \(CRT\)](#); [Mellett, Timothy F \(CRT\)](#)  
**Subject:** RE: [External] RE: Request for Extension; DOJ Request for Voter List Data  
**Date:** Tuesday, August 26, 2025 3:03:59 PM

---

Thank you. If you are looking for an extension to September 5, 2025, in order to produce the requested Voter Registration List, that is granted.

**Michael E. Gates**

Deputy Assistant Attorney General

Civil Rights Division, U.S. Department of Justice

Cell: [REDACTED]

---

**From:** Nicholson, Thomas <tnicholson@elections.sc.gov>  
**Sent:** Tuesday, August 26, 2025 2:54 PM  
**To:** Gates, Michael (CRT) <Michael.Gates2@usdoj.gov>  
**Cc:** Knapp, Howard <hknapp@elections.sc.gov>; Chavis, Madelyn <mchavis@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>; Harrell, Elizabeth <EHarrell@elections.sc.gov>; Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>; Mellett, Timothy F (CRT) <Timothy.F.Mellett@usdoj.gov>  
**Subject:** RE: [External] RE: Request for Extension; DOJ Request for Voter List Data

Deputy Gates –

We have a Commission meeting scheduled for tomorrow afternoon, August 27th, to fully discuss the DOJ's request and how the SEC may share voter data with the DOJ. Please note that whatever the Commission's decision, on our end we could not extract and configure any dataset for transfer by this Thursday. We have limited in-house programming staff and rely on a third party vendor for database support. We respectfully request that you give the Commission a further extension of time for a full response.

Feel free to call me to discuss this matter.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, S.C. 29250

Office: 803.734.9063

Fax: 803.734.9366

---

**From:** Gates, Michael (CRT) <[Michael.Gates2@usdoj.gov](mailto:Michael.Gates2@usdoj.gov)>  
**Sent:** Wednesday, August 20, 2025 4:43 PM  
**To:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Cc:** Knapp, Howard <[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)>; Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Wooten, Jenny <[jwooten@elections.sc.gov](mailto:jwooten@elections.sc.gov)>; Harrell, Elizabeth <[EHarrell@elections.sc.gov](mailto:EHarrell@elections.sc.gov)>; Riordan, Maureen (CRT) <[Maureen.Riordan2@usdoj.gov](mailto:Maureen.Riordan2@usdoj.gov)>; Mellett, Timothy F (CRT) <[Timothy.F.Mellett@usdoj.gov](mailto:Timothy.F.Mellett@usdoj.gov)>  
**Subject:** [External] RE: Request for Extension; DOJ Request for Voter List Data

Mr. Nicholson and Mr. Knapp, while we are amenable to accommodating a *reasonable request*, a 60-day extension is not reasonable. The electronic form of South Carolina's Voter Registration List already exists and can be easily transmitted to the Justice Department by following the instructions in our letter. The legal authorities presented by the Justice Department's for the transmittal of the VRL are clear and unambiguous. Having said this, we will extend the time to respond for South Carolina to August 28<sup>th</sup>. Thank you.

**Michael E. Gates**

Deputy Assistant Attorney General  
Civil Rights Division, U.S. Department of Justice  
Cell: [REDACTED]

---

**From:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Sent:** Wednesday, August 20, 2025 4:28 PM  
**To:** Gates, Michael (CRT) <[Michael.Gates2@usdoj.gov](mailto:Michael.Gates2@usdoj.gov)>  
**Cc:** Knapp, Howard <[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)>; Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Wooten, Jenny <[jwooten@elections.sc.gov](mailto:jwooten@elections.sc.gov)>; Harrell, Elizabeth <[EHarrell@elections.sc.gov](mailto:EHarrell@elections.sc.gov)>  
**Subject:** [EXTERNAL] Request for Extension; DOJ Request for Voter List Data

Deputy Gates –

Please find the attached correspondence from Executive Director Knapp relating to the DOJ request for voter list data you had forwarded on August 14, 2025.

Thank for your attention to this matter.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, S.C. 29250

Office: 803.734.9063

Fax: 803.734.9366

**From:** [Juarez, Pablo A](#)  
**To:** [Wooten, Jenny](#); [Maradiaga, Sindy T](#); [HSIVoterFraudLeads](#); [Hilario, Julie](#); [Quinones, Francisco](#); [Cichetti, Gregory M](#)  
**Cc:** [Hayden, Paul \(CRM\)](#); [Nicholson, Thomas](#); [Scott.Laragy](#); [Leach, Brian](#); [Jennings, David M](#)  
**Subject:** Re: [External] RE: South Carolina Election Commission Follow Up  
**Date:** Wednesday, July 2, 2025 12:51:37 PM

---

Hi Everyone,

It is a pleasure to meet you all and I am looking forward to seeing where I can help with any technical concerns or questions. I have copied David Jennings who can answer any SAVE business/process related questions you may have.

Thanks,  
Pablo

---

**From:** Wooten, Jenny <jwooten@elections.sc.gov>  
**Date:** Wednesday, July 2, 2025 at 12:09 PM  
**To:** Maradiaga, Sindy T <Sindy.T.Maradiaga@hsi.dhs.gov>, HSIVoterFraudLeads, <HSIVoterFraudLeads@ice.dhs.gov>, Hilario, Julie <Julie.E.Hilario@hsi.dhs.gov>, Juarez, Pablo A <pablo.a.juarez@uscis.dhs.gov>, Quinones, Francisco <Francisco.Quinones@hsi.dhs.gov>, Cichetti, Gregory M <Gregory.M.Cichetti@hsi.dhs.gov>  
**Cc:** Hayden, Paul (CRM) <paul.hayden2@usdoj.gov>, Nicholson, Thomas <tnicholson@elections.sc.gov>, Scott.Laragy <scott.laragy@usdoj.gov>, Leach, Brian <bleach@elections.sc.gov>  
**Subject:** RE: [External] RE: South Carolina Election Commission Follow Up

You don't often get email from jwooten@elections.sc.gov. [Learn why this is important](#)

Sindy,

Thanks for your response. Our Chief Information Officer, Brian Leach, will send over the data when he gets a chance and then we can set up a call.

Jenny

Jenny Wooten, Chief of Staff  
Director of Government Affairs & Policy

South Carolina Election Commission  
1122 Lady St, 5<sup>th</sup> Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, SC 29250  
Phone: 803.734.4139 Website: [scVOTES.gov](http://scVOTES.gov)

---

**From:** Maradiaga, Sindy T <[Sindy.t.Maradiaga@hsi.dhs.gov](mailto:Sindy.t.Maradiaga@hsi.dhs.gov)>  
**Sent:** Tuesday, July 1, 2025 7:48 PM  
**To:** Wooten, Jenny <[jwooten@elections.sc.gov](mailto:jwooten@elections.sc.gov)>; HSI Voter Fraud Leads, <[HSIVoterFraudLeads@ice.dhs.gov](mailto:HSIVoterFraudLeads@ice.dhs.gov)>; Hilario, Julie <[Julie.E.Hilario@hsi.dhs.gov](mailto:Julie.E.Hilario@hsi.dhs.gov)>; Juarez, Pablo A <[pablo.a.juarez@uscis.dhs.gov](mailto:pablo.a.juarez@uscis.dhs.gov)>; Quinones, Francisco <[Francisco.Quinones@hsi.dhs.gov](mailto:Francisco.Quinones@hsi.dhs.gov)>; Cichetti, Gregory M <[Gregory.M.Cichetti@hsi.dhs.gov](mailto:Gregory.M.Cichetti@hsi.dhs.gov)>  
**Cc:** Hayden, Paul (CRM) <[paul.hayden2@usdoj.gov](mailto:paul.hayden2@usdoj.gov)>; Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>; Scott.Laragy <[scott.laragy@usdoj.gov](mailto:scott.laragy@usdoj.gov)>; Leach, Brian <[bleach@elections.sc.gov](mailto:bleach@elections.sc.gov)>  
**Subject:** [External] RE: South Carolina Election Commission Follow Up

Good evening,

We would be happy to get on a call to discuss the data received. However, prior to setting up a call, would you mind sending us the data received so that we can review. HSI does not manage SAVE and our call would prove more fruitful if we were able to review the data.

Thank you.

Respectfully,

*Sindy Maradiaga*

Executive Liaison for Special Projects  
Homeland Security Investigations  
Office of the Executive Associate Director  
Cell: [REDACTED]

---

**From:** Wooten, Jenny <[jwooten@elections.sc.gov](mailto:jwooten@elections.sc.gov)>  
**Sent:** Tuesday, July 1, 2025 5:36 PM  
**To:** HSI Voter Fraud Leads, <[HSIVoterFraudLeads@ice.dhs.gov](mailto:HSIVoterFraudLeads@ice.dhs.gov)>; Maradiaga, Sindy T <[Sindy.t.Maradiaga@hsi.dhs.gov](mailto:Sindy.t.Maradiaga@hsi.dhs.gov)>; Hilario, Julie <[Julie.E.Hilario@ice.dhs.gov](mailto:Julie.E.Hilario@ice.dhs.gov)>; Juarez, Pablo A <[Pablo.a.juarez@uscis.dhs.gov](mailto:Pablo.a.juarez@uscis.dhs.gov)>  
**Cc:** Hayden, Paul (CRM) <[paul.hayden2@usdoj.gov](mailto:paul.hayden2@usdoj.gov)>; Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>; Scott.Laragy <[scott.laragy@usdoj.gov](mailto:scott.laragy@usdoj.gov)>; Leach, Brian <[bleach@elections.sc.gov](mailto:bleach@elections.sc.gov)>  
**Subject:** South Carolina Election Commission Follow Up

You don't often get email from [jwooten@elections.sc.gov](mailto:jwooten@elections.sc.gov). [Learn why this is important](#)

**CAUTION:** This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize

and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

Good evening,

I'm pleased to share that the South Carolina Election Commission has received data from SAVE regarding the status of registered voters in our state. Unfortunately, the information has raised more questions than it answered.

Following a recent call with Paul Hayden, we were provided your contact information. We'd greatly appreciate your help in coordinating a call—at your earliest convenience—with the appropriate individuals who can walk us through the dataset and address our questions.

Thank you so much, and I look forward to hearing from you.

Jenny Wooten, Chief of Staff  
Director of Government Affairs & Policy

South Carolina Election Commission  
1122 Lady St, 5<sup>th</sup> Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, SC 29250  
Phone: 803.734.4139 Website: [scVOTES.gov](https://scVOTES.gov)

**From:** [Nicholson, Thomas](#)  
**To:** [Riordan, Maureen \(CRT\)](#)  
**Cc:** [Chavis, Madelyn](#); [Harrell, Elizabeth](#); [Wooten, Jenny](#); [Knapp, Howard](#)  
**Subject:** RE: [External] Request for telephone meeting with Mr. Gates...  
**Date:** Wednesday, September 3, 2025 10:43:00 AM  
**Attachments:** [2025-08-29 Efiled Summons and Petition\(1\).pdf](#)  
[2025.09.02 Efiled Temporary RO.PDF](#)  
[7-5-186 Statewide voter registration database.pdf](#)

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Ms. Riordan –

It was a pleasure talking to you this morning. Attached are the complaint and TRO we mentioned. I've also attached a PDF of the state law provision we spoke of, Sec. 7-5-186(C). We look forward to reviewing the draft MOU you spoke of.

We will forward you the contact information for the Governor's office in a separate email.

Let me know if you have any questions.

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201  
P.O. Box 5987, Columbia, S.C. 29250  
Office: 803.734.9063  
Fax: 803.734.9366

---

**From:** Riordan, Maureen (CRT) <Maureen.Riordan2@usdoj.gov>  
**Sent:** Tuesday, September 2, 2025 3:48 PM  
**To:** Nicholson, Thomas <tnicholson@elections.sc.gov>  
**Cc:** Chavis, Madelyn <mchavis@elections.sc.gov>; Harrell, Elizabeth <EHarrell@elections.sc.gov>; Wooten, Jenny <jwooten@elections.sc.gov>; Knapp, Howard <hknapp@elections.sc.gov>  
**Subject:** Re: [External] Request for telephone meeting with Mr. Gates...

No. I will be the only one attending. If that changes I will let you know.

Maureen S. Riordan  
Senior Counsel  
Acting Chief, Voting Section  
Civil Rights Division

maureen.riordan2@usdoj.gov

---

**From:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>

**Sent:** Tuesday, September 2, 2025 3:20:54 PM

**To:** Riordan, Maureen (CRT) <[Maureen.Riordan2@usdoj.gov](mailto:Maureen.Riordan2@usdoj.gov)>

**Cc:** Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Harrell, Elizabeth <[EHarrell@elections.sc.gov](mailto:EHarrell@elections.sc.gov)>;

Wooten, Jenny <[jwooten@elections.sc.gov](mailto:jwooten@elections.sc.gov)>; Knapp, Howard <[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)>

**Subject:** RE: [External] Request for telephone meeting with Mr. Gates...

Ms. Riordan –

See the call-in information below; please share it with those on the call.

Judge Shedd asked who else would be on the call other than yourself; will Assistant Attorney General Dhillon be participating? I had told him Mr. Gates was not available.

Dial In Number: [REDACTED]

Conference ID: [REDACTED]

10:00 AM

September 3, 2025

---

Thomas W. Nicholson

General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, S.C. 29250

Office: 803.734.9063

Fax: 803.734.9366

---

**From:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>

**Sent:** Tuesday, September 2, 2025 11:05 AM

**To:** Riordan, Maureen (CRT) <[Maureen.Riordan2@usdoj.gov](mailto:Maureen.Riordan2@usdoj.gov)>

**Subject:** RE: [External] Request for telephone meeting with Mr. Gates...

O.K. I'll let everybody know; we'll send further call-in details later today.

General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, S.C. 29250

Office: 803.734.9063

Fax: 803.734.9366

---

**From:** Riordan, Maureen (CRT) <[Maureen.Riordan2@usdoj.gov](mailto:Maureen.Riordan2@usdoj.gov)>  
**Sent:** Tuesday, September 2, 2025 10:53 AM  
**To:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Subject:** RE: [External] Request for telephone meeting with Mr. Gates...

Actually that does.

---

**From:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>  
**Sent:** Tuesday, September 2, 2025 10:52 AM  
**To:** Riordan, Maureen (CRT) <[Maureen.Riordan2@usdoj.gov](mailto:Maureen.Riordan2@usdoj.gov)>  
**Cc:** Gates, Michael (CRT) <[Michael.Gates2@usdoj.gov](mailto:Michael.Gates2@usdoj.gov)>; Chavis, Madelyn <[mchavis@elections.sc.gov](mailto:mchavis@elections.sc.gov)>; Knapp, Howard <[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)>  
**Subject:** RE: [External] Request for telephone meeting with Mr. Gates...

Will 10:00 AM tomorrow morning work?

---

Thomas W. Nicholson  
General Counsel

**South Carolina State Election Commission**

1122 Lady St., 5th Floor, Columbia, SC 29201

P.O. Box 5987, Columbia, S.C. 29250

Office: 803.734.9063

Fax: 803.734.9366

---

**From:** Riordan, Maureen (CRT) <[Maureen.Riordan2@usdoj.gov](mailto:Maureen.Riordan2@usdoj.gov)>  
**Sent:** Tuesday, September 2, 2025 10:44 AM  
**To:** Nicholson, Thomas <[tnicholson@elections.sc.gov](mailto:tnicholson@elections.sc.gov)>; Knapp, Howard <[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)>  
**Cc:** Gates, Michael (CRT) <[Michael.Gates2@usdoj.gov](mailto:Michael.Gates2@usdoj.gov)>  
**Subject:** [External] Request for telephone meeting with Mr. Gates...

Mr. Nicholson, as my previous email explained I will be the DOJ Contact for the requested call. Wednesday is better for me. Please let me know when you would like to discuss.

Thank you

Maureen Riordan

Maureen S. Riordan

United States Department of Justice

Senior Counsel

Acting Chief, Voting Section

Civil Rights Division

150 M Street NE

Washington, D.C. 20002

[Maureen.riordan2@usdoj.gov](mailto:Maureen.riordan2@usdoj.gov)

(202)-702-6110

August 20, 2025

Harmeet K. Dhillon  
Assistant Attorney General  
U.S. Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530

RE: NVRA Records Request

Dear Assistant Attorney General Dhillon:

We received your letter dated August 14, 2025, updating the earlier letter written by Deputy Assistant Attorney General Michael E. Gates, dated August 6, 2025.

Initially the Department of Justice (DOJ) had requested from the State Election Commission (SEC) an electronic copy of South Carolina's statewide voter registration list made pursuant to 52 U.S.C. § 20507(i)(1), the public disclosure provision of the National Voter Registration Act. Your letter of August 14th clarified that the DOJ is requesting the voter list in electronic format with fields to include each voter's full name, date of birth, residential address, and driver's license number, or the last four digits of the voter's social security number. In addition to the NVRA's public disclosure provision, your letter states that the request is also presented on authority of various provisions of the Help America Vote Act (HAVA), and Title III of the Civil Rights Act of 1960.

You have requested that the voter list be provided by August 21, 2025. I am writing to request a sixty-day extension from that date. The State Election Commission is composed of five members, presided over by the Honorable Dennis W. Shedd, a former Circuit Judge for the United States Court of Appeals for the Fourth Circuit. The purpose of the requested extension is to provide time for Commission members and Judge Shedd to consider the request, the state and federal law that may apply, and to schedule and hold a meeting where the Commission will discuss the matter and decide on its reply.

I, and the Commission, will appreciate your grant of this extension so that the Commission may fully review the DOJ's request before its reply.

Sincerely,



Howard M. Knapp  
Executive Director

**COMMISSIONERS**

HON. DENNIS W. SHEDD  
Chairman

JOANNE DAY

CLIFFORD J. EDLER

LINDA MCCALL

SCOTT MOSELEY

HOWARD M. KNAPP  
Executive Director

1122 Lady Street  
Suite 500  
Columbia, SC 29201

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Columbia, SC 29250

803.734.9060  
Fax: 803.734.9366  
www.sevotes.gov



U.S. Department of Justice

Civil Rights Division

---

Office of the Assistant Attorney General

Washington, D.C. 20530

August 14, 2025

Via Mail and Email

The Honorable Howard Knapp  
Executive Director, State Election Commission  
1122 Lady Street, Suite 500  
Columbia, SC 29201  
[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov)  
[elections@elections.sc.gov](mailto:elections@elections.sc.gov)

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

Executive Director Knapp:

We understand that the time the Justice Department has provided your state to respond to the request for a statewide voter registration list ("VRL") and other information has not reached its deadline.

Given responses from other states thus far, we want to clarify that the Justice Department's request to provide an electronic copy of the statewide VRL should contain *all fields*, which means, your state's VRL must include 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 South Carolina'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).

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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 DOJ be able to conduct an independent review of each state's list. Any statewide prohibitions are clearly preempted by federal law.

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).

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 South Carolina’s complete and current VRL. The purpose of the request is to ascertain South Carolina’s compliance with the list maintenance requirements of the NVRA and HAVA.

When providing the electronic copy of the statewide VRL, South Carolina must ensure that it contains *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 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.

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);

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<sup>2</sup> 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 clearly preempted by federal law.

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.

To that end, please provide the requested electronic Voter Registration List<sup>3</sup> to the Justice Department by the date set for your delivery by our original letter, or by August 21, 2025, whichever is later.

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,



Harmet K. Dhillon  
Assistant Attorney General  
Civil Rights Division

<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

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

August 6, 2025

Via Mail and Email

The Honorable Howard Knapp  
Executive Director, State Election Commission  
1122 Lady Street, Suite 500  
Columbia, SC 29201  
[hknapp@elections.sc.gov](mailto:hknapp@elections.sc.gov); [elections@elections.sc.gov](mailto:elections@elections.sc.gov)

Dear Executive Director Knapp:

We write to you as the chief election official for the State of South Carolina to request South Carolina's statewide voter registration list and information regarding South Carolina'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.* On July 2, we contacted you about obtaining an electronic copy of the statewide voter registration list for purposes of enforcing the NVRA and the Help America Vote Act, 52 U.S.C. § 20901 *et seq.*, and we are renewing our request for that information today.

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. *See* 52 U.S.C. § 20510.

The plain text of § 20507(i) requires disclosure. The phrase "all records" envisions an expansive application and includes the registration information of cancelled records and accompanying voter history. *Project Vote/Voting for Am, Inc. v. Long*, 682 F.3d 331, 336 (4th Cir. 2012); *see also Voter Reference Foundation, LLC v. Torrez*, 727 F.Supp.3d 1014, 1212 (D. N.M. 2024) (finding "all records" includes voter list). Similarly, "programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters" encompasses a broad range of state programs, including the removal of non-citizens from voter rolls. *Id.* The capacious language of the Public Disclosure Provision has been found to "set[] a floor, not a ceiling" to the types of records that must be disclosed. *Public Interest Legal Foundation, Inc. v. Matthews*, 589 F.Supp.3d 932, 941 (C.D. Ill. 2022) (citing *Project Vote/Voting for Am., Inc.*, 682 F.3d at 337). The request for the statewide voter registration list sits firmly above that floor. Courts have continuously found that Section 8(i) requires the disclosure of voter registration records. *See, e.g., Public Interest Legal Foundation v. Boockvar*, 431 F.Supp.3d 553, 556 (M.D. Pa. 2019) (permitting disclosure of documents regarding "all

registrants who were identified as potentially not satisfying the citizenship requirement”); *Project Vote/Voting for Am, Inc.*, 682 F.3d at 333 (4th Cir. 2012) (requiring disclosure of voter registration applications for “any individual” who timely completed an application) (emphasis added); *Project Vote, Inc. v. Kemp*, 208 F.Supp.3d 1320, 1344 (N.D. Ga. 2016) (holding that “Section 8(i) requires the disclosure of individual voter registration records”).

Congress passed the NVRA in an effort to “protect the integrity of the electoral process” and “ensure that accurate and current voter registration rolls are maintained.” NVRA § 20501. This intention is achieved through the public disclosure provision, which Congress created to establish external checks on potential administrative oversights or inefficiencies regarding ineligible voters appearing on voter rolls. *See Project Vote/Voting for Am, Inc.*, 682 F.3d at 334-35. State laws are not a bar to providing this information. If the NVRA, a federal act, and state law “do not operate harmoniously in a single procedural scheme for federal voter registration, then Congress has exercised its power to ‘alter’ the state’s regulation, and that regulation is superseded.” *Gonzalez v. Arizona*, 677 F.3d 383, 394 (9th Cir. 2012) (en banc), *aff’d sub nom. Arizona v. Inter Tribal Council of Arizona, Inc.* (“ITCA”), 570 U.S. 1 (2013).

Please also provide a list of the election officials who are responsible for implementing South Carolina’s general program of voter registration list maintenance from November 2022 through receipt of this letter, 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, and when those steps were taken, to ensure that the State’s list maintenance program has been properly carried out in full compliance with the NVRA.

Please provide this information within 14 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,



Michael E. Gates  
Deputy Assistant Attorney General  
Civil Rights Division

Maureen Riordan  
Acting Chief, Voting Section  
Civil Rights Division