No. 25-1017

In the

Supreme Court of the United States

REPUBLICAN NATIONAL COMMITTEE,
Petitioner,
v.
MI FAMILIA VOTA, ET AL.,
Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

BRIEF OF *AMICUS CURIAE* THE LEAGUE OF WOMEN VOTERS IN SUPPORT OF RESPONDENTS

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INTEREST OF *AMICUS CURIAE*[1]

The League of Women Voters (the "League") is a nonprofit, nonpartisan, grassroots membership organization committed to protecting voting rights, empowering voters, and defending democracy. Through advocacy, education, mobilization, and litigation, the League works to ensure that all voters have the information and opportunity to exercise their right to vote. Founded in 1920 as an outgrowth of the struggle to win voting rights for women, the League now has more than one million members and supporters in nearly 800 communities across all states and the District of Columbia. For more than 100 years, the League has been at the forefront of nationwide efforts to register voters, operating one of the longest-running and largest voter registration efforts in the nation.

The League played a central role in shaping and supporting the National Voter Registration Act of 1993 ("NVRA"). The League supported the NVRA's goal of making voter registration easier and more accessible across the country. The League helped spearhead the "Motor Voter" coalition to build a grassroots campaign in favor of legislation to make voter registration systems more accessible. President Clinton celebrated the League and the Motor Voter coalition as "fighters for freedom" during remarks upon the signing of the NVRA.

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[1] No counsel for any party authored this brief in whole or in part, and no party or counsel made a monetary contribution to the preparation or submission of this brief. No person other than *amicus curiae*, its members, or its counsel made a monetary contribution to the preparation or submission of this brief.

Multiple League presidents provided testimony to Congress while the NVRA was under consideration, in part to highlight the strain that a patchwork of outdated and inefficient registration systems across states and localities had on the League's mission to register as many eligible voters as possible. In 1989, League President Nancy M. Neuman testified, "[O]rganizations that wish to register voters residing in different states must sort through a maze of variable practices just to begin their work." *Voter Registration: Hearing Before the Subcomm. on Elections of the Comm. on H. Admin.,* 101st Cong. 147 (1989). In 1993, League President Becky Cain testified about the systemic hurdles that prevented the League from realizing its voter registration goals: "We speak from practical experience when we say that the current system of voter registration does not and cannot meet the needs [of] our mobile society." *Voter Registration: Hearing Before the Subcomm. on Elections of the Comm. on H. Admin.,* 103d Cong. 140 (1993).

The League also provided input and testimony to Congress regarding list maintenance sections of the NVRA. The League was concerned about how systematic purges of voter rolls near elections could disenfranchise eligible voters and undermine the work and mission of voter registration groups. League President Susan S. Lederman testified about a League-conducted nationwide survey of voter registration laws that found "many examples of arbitrary purging practices," including "one jurisdiction [where] purging [was] done in September . . . at least in part, based on lists of allegedly unqualified voters supplied by political

parties." *Hearing Before the Senate Rules Comm. on S. 250 The National Voter Registration Act*, 102nd Cong. (1991). League President Nancy Neuman's Congressional testimony made specific reference to a mass purge in New York City, where the removal of 350,000 names from the rolls just before the April 1988 presidential primary negated the accomplishments of a city-wide voter registration drive that had added 350,000 new registrants: "Although the League of Women Voters appreciates the importance of maintaining the accuracy of lists of eligible voters, it is concerned about 'purging procedures' used in many states. . . Administrative convenience should not prevail over a basic right." *Voter Registration: Hearing Before the Subcomm. on election of the Comm. on H. Admin.,* 101st Cong. 149-150 (1989). Early versions of the NVRA did not contain any provisions preventing states and localities from purging voters from their rolls in the lead up to an election. *See National Voter Registration Act of 1989, H.R. 15*, 101st Cong. (1989). As list maintenance provisions were added to the proposed bill, the League and the Motor Voter Coalition brainstormed adding a corresponding "quiet period" during which systemic list maintenance would be prevented. This led to the development of the prohibition on systematic voter purges within 90 days of federal elections. 52 U.S.C. § 20507(c)(2)(A). The insertion of this quiet period into the NVRA assuaged the League's concerns about purges undermining its work registering voters and causing confusion and chaos.

INTRODUCTION AND SUMMARY OF ARGUMENT

For three decades, the NVRA has done what Congress designed it to do. It has streamlined registration while keeping the voter rolls accurate. Congress paired the NVRA's registration-efficiency and modernization provisions with list-maintenance safeguards so that this intended balance would hold. As a result, the NVRA remains a staple of the modern American election system that makes voter registration easier, more accessible, and more precise.

Petitioners now ask this Court to upset that balance by narrowing the NVRA's list-maintenance protections, letting states purge voters with little warning and less process. Congress rejected that approach once before. Prior to the NVRA, a patchwork of inconsistent state registration and purge practices swept eligible voters off the rolls, even on the eve of an election. The League of Women Voters lived that history, and its advocacy helped persuade Congress to replace the patchwork with predictable rules, including quiet-period protections against purges close to an election.

That legislative action rests on firm constitutional footing. The Elections Clause gives Congress broad authority to regulate the registration process, and courts have consistently upheld the NVRA against constitutional challenges in the thirty years since its enactment.

The NVRA has worked in practice. It has driven registration rates higher nationwide, while providing for predictable list-maintenance rules and robust enforcement by the federal government. The League,

and other advocacy organizations have brought successful litigation under the NVRA to stop the kind of severely flawed mass purges that prompted Congress to act in the first place.

Weakening the NVRA's protections now would invite the same chaos and disenfranchisement that led Congress to enact the statute. The decision below should be affirmed.

ARGUMENT

I. The NVRA was Designed to Improve Access to the Ballot While Maintaining Accurate Voter Rolls

In the 1990s Congress set out to address the low turnout that plagued the elections of the 70s and 80s. To do so, it struck a balance between streamlined voter registration and maintenance of the voter rolls. Because that balancing sits comfortably within Congress's Elections Clause authority, this Court should not disturb it.

A. Barriers to voter registration and aggressive purges of eligible voters necessitated the enactment of the NVRA

The voter registration regime of the 1970s and 80s was characterized by a chaotic lack of uniformity. States varied widely in what they demanded of prospective voters and individual county and local registrars differed widely in whether and how they enforced those requirements. Alexander Keyssar, *The Right to Vote: The Contested History of Democracy in the United States* 253-4 (2000); *Voter Registration: Hearing Before the Subcomm. on Elections of the*

Comm. on H. Admin., 103d Cong. 135 (1993). The effect of this was predictable. Contemporary estimates suggested that restrictive voter registration laws reduced turnout in the 1972 presidential election by approximately nine percentage points. Rosenstone, Steven J., and Raymond E. Wolfinger, *The Effect of Registration Laws on Voter Turnout*, 72 Am. Pol. Sci. Rev. 22 (1978); *see also* National Municipal League, A Model Election System 1 (1973) ("[T]he problem of non-voting in America is directly related to the machinery states have created for registering voters and administering elections").

This impact was further exacerbated by the discretionary purging of eligible voters from the voter rolls. Certain states, for instance, purged voters from the rolls without notice merely because they failed to vote in a previous election. *See* Arnold I. Menchel, *Election Laws: The Purge for Failure to Vote*, 7 Conn. L. Rev. 372, 373-78 (1975). In other states, aggressive voter caging[2] efforts led to thousands of eligible voters having their registrations challenged in the weeks leading up to elections. *See, e.g., Democratic Nat. Comm. v. Republican Nat. Comm.*, 671 F. Supp. 2d 575, 579 (D.N.J. 2009), *aff'd*, 673 F.3d 192 (3d Cir.

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[2] Voter caging is the practice of sending mail to addresses on the voter rolls, compiling a list of the mail that is returned undelivered, and using that list to purge or challenge registrations on the grounds that the voters on the list do not legally reside at their registered addresses. Justin Levitt, *A Guide to Voter Caging*, Brennan Center (June 29, 2007), https://www.brennancenter.org/our-work/research-reports/guide-voter-caging.

2012) (recounting voter caging effort in 1981). It also led to armed confrontations at polling sites. *Id.*

This history was not lost on Congress. The legislative record is chock-full of discussions about the "complicated maze of local laws and procedures . . . which eligible citizens had to navigate in order to exercise their right to vote," H.R. Rep. No. 103-9, at 3 (1993), as well as the aggressive and "selective" purging of voter rolls that forced citizens to navigate those laws time and again. *See generally* S. Rep. No. 103-6, at 3 (1993); *Voter Registration: Hearing Before the Subcomm. on Elections of the Comm. On H. Admin.*, 101st Cong. 149 (1989).

B. The NVRA's purpose and legislative history reflect efforts to balance increased voter registration with predictable, uniform list maintenance rules

It was against that backdrop that Congress struck a delicate balance. It expressly recognized that "discriminatory and unfair registration laws and procedures can have a direct and damaging effect on voter participation in elections for Federal office and disproportionately harm voter participation by various groups, including racial minorities." And it resolved to "assist in reducing barriers, particularly government-imposed barriers, to applying for registration wherever possible," H.R. Rep. No. 103-9, at 3, while still "[e]nsuring that expanding the opportunities to register would in no way weaken the validity of the registration rolls." *Id.* at 5.

The NVRA, accordingly, did just that. Its stated goals were twofold. First, to establish procedures that

would increase the number of citizens who register and vote. 52 U.S.C. § 20501(b)(1)-(2). And second, it sought to maintain accurate voter rolls and a secure election process while doing so. 52 U.S.C. § 20501(b)(3)-(4). To achieve its first objective, the NVRA established a streamlined voter registration process, including a uniform federal form and opportunities to register through motor-vehicle agencies and by mail. 52 U.S.C. § 20504-5. To achieve the second—while avoiding the aggressive purging that had routinely knocked eligible voters from the rolls prior to its enactment—the NVRA prescribed safeguards that states must follow as they monitor the accuracy of their voter rolls. A state must, for instance, make a reasonable effort to remove the names of voters who have died or moved. 52 U.S.C. § 20507(a)(4). At the same time, a state must not systematically remove ineligible voters from the rolls within 90 days of an election. 52 U.S.C. § 20507(c)(2)(A).

The new interpretation of this 90-day provision advanced by Petitioners and the United States—that it does not apply to removals based on suspected lack of citizenship—cannot be reconciled with the NVRA's legislative history. Congress explained that the 90-day quiet period applies to any systematic program to "confirm voting lists." H.R. Rep. No. 103-66, at 20. Including removals on grounds other than suspected change in residence or death. H.R. Rep. No. 103-9, at 16 (noting that the 90-day provision would apply to canvassing efforts). Accordingly, the provision, while limited in time, is sweeping in scope. Its text reflects that breadth. It bars "any program" that

systematically removes ineligible voters from the list of eligible voters. 52 U.S.C. § 20507(c)(2)(A).

This approach is reasonable and true to the statutory text, particularly when viewed in light of its historical context and purpose. The 90-day provision permits the continuing removal of ineligible voters based on individualized inquiries while protecting eligible voters from being swept up in systematic purges without sufficient time to reregister. *See Arcia v. Fla. Sec'y of State*, 772 F.3d 1335, 1346 (11th Cir. 2014) ("Eligible voters removed days or weeks before Election Day will likely not be able to correct the State's errors in time to vote."). It would blow a hole in the provision to allow systematic removals for any reason, including suspected lack of citizenship, because such purges can—and do—sweep in eligible voters just as easily as systematic removals based on suspected change of residence or death. A fact that has been borne out in *Arcia* and more than a decade of subsequent litigation. *See, e.g., Fish v. Kobach,* 840 F.3d 710 (10th Cir. 2016)*; Va. Coal. for Immigrant Rts. v. Beals,* 803 F. Supp. 3d 454, 461 (E.D. Va. 2025)*; LULAC v. Whitley,* No. SA-19-CA-074-FB, 2019 WL 7938511 (W.D. Tex. Feb. 27, 2019).

Since long before the NVRA's enactment, states have raised concerns about inaccurate voter rolls and fraud. But then, as now, the League and others explained the impact of aggressive purging and needless and demanding registration requirements on eligible voters. The NVRA balanced both of those concerns consistent with Congress's authority under the Elections Clause.

C. The NVRA has a strong constitutional basis

While the Elections Clause gives states the initial authority to regulate the time, place, and manner of elections, it vests in Congress supervisory authority to alter those regulations or supplant them altogether. Art. 1 § 4, Cl. 1; *U.S. Term Limits, Inc. v. Thornton*, 514 U.S. 779, 804-805 (1995). Congress's power under the Elections Clause is, at its core, the power to preempt. Thus, when it legislates pursuant to this authority "it necessarily displaces some element of a pre-existing legal regime erected by the States." *Arizona v. Inter Tribal Council of Arizona, Inc.*, 570 U.S. 1, 14 (2013). The scope of this power is broad, as James Madison explained, the clause employs "words of great latitude." 2 RECORDS OF THE FEDERAL CONVENTION OF 1787 at 240. Accordingly, this Court has long understood that supervisory authority to extend to regulations related to "registration." *See Smiley v. Holm*, 285 U.S. 355, 366 (1932); *Ex parte Siebold*, 100 U.S. 371 (1879). It is little surprise, therefore, that courts rejected constitutional challenges to the NVRA following its enactment. *See, e.g., Ass'n of Cmty. Organizations for Reform Now (ACORN) v. Edgar*, 56 F.3d 791 (7th Cir. 1995); *Voting Rts. Coal. v. Wilson*, 60 F.3d 1411 (9th Cir. 1995); *Ass'n of Cmty. Organizations for Reform Now v. Miller*, 129 F.3d 833 (6th Cir. 1997). This strong constitutional footing has ensured the NVRA's lasting impact.

II. The NVRA has Successfully Balanced the Goals of Improving Access to the Ballot with the Need for Accurate Voter Rolls and List Maintenance

Data confirms that the NVRA has effectively fulfilled its purposes as set forth by Congress. In 1995—the year in which most states implemented the NVRA—the Federal Election Commission ("FEC") reported that states covered by the NVRA saw a total of 41,452,428 voter registration applications. Out of those applications, a significant percentage came from sources that the League championed, including 13.7 million in registration at motor vehicle offices, 12.3 million in registration by mail, and another 10.8 million from organized registration drives, deputy registrars, and in-person registrations. Fed. Election Comm'n, *The Impact of the National Voter Registration Act of 1993 on the Administration of Elections for Federal Office 1995-1996*, at 12-13 (1997). In total, the new avenues of voter registration created by the NVRA accounted for more than 30.6 million voter registration applications and registration updates.

Data shows that the NVRA has helped make voter registration easier for eligible U.S. citizens over the years. Upon its enactment, the percentage of registered voters was estimated to be around sixty to sixty-one percent of eligible voters. See H.R. Rep. No. 103-9, at 3 (1993), (citing Congressional Research Service figures showing "only slightly over 60 percent of the eligible voters are registered"); S. Rep. No. 103-6, at 2 (1993) (citing Congressional Research Service figures showing "only approximately 61 percent of

those eligible to vote are registered"). Since then, the Election Assistance Commission's ("EAC") Election Administration and Voting Survey (EAVS) has tracked a rise in the registration rate of the citizen voting age population from 73.6% in 2006 to 87.5% in 2024. U.S. Election Assistance Comm'n, EAVS Data Interactive (last updated Sept. 10, 2026), https://www.eac.gov/research-and-data/studies-and-reports/eavs-data-interactive (last visited Oct. 15, 2026). As registration has grown more accessible across the country, the League and its state and local affiliates have registered more than 1.5 million voters nationwide since 2016.

Along with expanding access to voter registration, the NVRA has achieved its other goals: providing states with predictable guidelines to conduct list maintenance, while limiting the severe impact of flawed voter purges. An integral part of achieving the balance that the NVRA sought has been the successful enforcement efforts by the federal government and private organizations, including the League. These enforcement efforts have prevented the chaos or remedied the harm of voter purges close to the election that Congress sought to address. *See e.g., Ala. Coal. for Immigrant Justice v. Allen*, 2:24-CV-1254-AMM, 2024 WL 4510476 (N.D. Ala. Oct. 16, 2024) (enjoining Alabama's purge of 3,251 voters eighty-four days before the November 2024 election); Stipulation of Facts and Consent Order, *United States v. Bd. of Election Comm'rs for St. Louis*, No. 4:02-cv-01235 (E.D. Mo. Aug. 14, 2002), ECF No. 4. (consent decree stipulating to revised list maintenance procedures after the City of St. Louis had removed 54,000 voters from the rolls without proper notice, causing the

Board of Elections downtown office to be overwhelmed on Election Day as voters attempted to remedy their registration).

In sum, the voter registration environment under the NVRA resembles the well-balanced system Congress intended: widespread, increasing access to voter registration, regularized list maintenance, and robust enforcement from public and private actors.

III. Removing the NVRA's Protections Against Voter Purges Would Spur Litigation and Disenfranchisement

The NVRA's 90-day quiet period is essential to preventing disenfranchisement of eligible and lawful voters. Weakening the NVRA would be felt across a wide range of voters, including low-income voters of all races and backgrounds who lack documentary proof of citizenship, women who have changed their name after marriage, rural voters without easy access to elections and other governmental offices, and recently naturalized citizens. Ian Vandewalker, Brennan Ctr. for Just., *The Effects of Requiring Documentary Proof of Citizenship to Register to Vote* (July 19, 2017). Gutting these protections would inevitably increase, not decrease, election litigation. The League knows this well. It has relied on these provisions to prevent the disenfranchisement of Alabama, Georgia, and Kansas voters who lacked readily available proof of citizenship, and it continues to do so. *See Fish v. Kobach*, 840 F.3d 710 (10th Cir. 2016); *LWV v. Newby*, 838 F.3d 1 (D.C. Cir. 2016). Were the NVRA's protections and rules to fall away, courts would be forced to wade into murkier constitutional waters, including through eleventh-hour litigation in the

middle of ongoing elections. *See, e.g., Anderson v. Celebrezze,* 460 U.S. 780 (1983); *Burdick v. Takushi*, 504 U.S. 428 (1992); *Va. Coal. for Immigrant Rts. v. Beals*, No. 24-2071, 2024 WL 4601052 (4th Cir. Oct. 27, 2024), *stayed*, 2024 WL 4608863 (U.S. Oct 30, 2024). *See also People Not Politicians v. Onder*, 26A388, 2026 WL 2883222 (U.S. Sept. 25, 2026); *Republican Nat'l. Comm. v. Democratic Nat'l. Comm.*, 589 U.S. 424 (2020) ("This Court has repeatedly emphasized that lower federal courts should ordinarily not alter the election rules on the eve of an election. *See Purcell v. Gonzalez*, 549 U.S. 1 (2006) (*per curiam*)."). The Elections Clause was designed precisely to allow Congress to prevent such chaos. Through the NVRA, it has done so.

CONCLUSION

The decision below should be affirmed.

Respectfully submitted,

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