

BLANKROME

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November 1, 2024

BY E-MAIL

The Honorable Anthony G. Brown
State of Maryland, Office of the Attorney General
200 St. Paul Place
Baltimore, MD 21202

Re: Cease and Desist Letter

Dear Attorney General Brown:

I am outside counsel to the Voter Participation Center (VPC) and the Center for Voter Information (CVI). This letter is in response to correspondence from your office received on October 31, 2024, and released by your office to the news media.

Enclosed you will find the four Get Out the Vote (GOTV) letters that VPC and CVI have sent this fall in Maryland. It is troubling that you would characterize these very standard GOTV messages, using typical “social pressure” language, as “threatening” and “intimidating.” There is nothing in the content of these letters that constitutes a violation of Maryland or Federal law. It is not “intimidating” or “threatening” to promote voting by discussing neighborhood participation rates and stating that the records will be reviewed after the election to determine whether the recipient joined their neighbors in voting.

What is more disturbing than this effort to suppress constitutionally protected GOTV activity is the use of quoted statements that are **not** from VPC or CVI mail or text messages. Neither VPC nor CVI has sent text messages in Maryland, or elsewhere, during this General Election season. It is reckless and disparaging to state, without a basis in fact, that VPC or CVI sent mail or text messages with the statements “go to the polls to cast a vote; or vote by any other means” and “We’ll be sharing a report after the election of those who didn’t vote.” Your letter also relied on an “implication” that VPC and CVI are planning to publicize information that identifies particular voters and their voting history. That is simply false. That is not something that VPC or CVI has ever done, or would do in the future. To conjecture otherwise is irresponsible. Based on a fair assessment of the actual facts, we expect that you will correct the record and withhold taking any legal action.

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Attorney General Anthony G. Brown
November 1, 2024
Page 2

VPC and CVI do not have any current plans for additional mailings into Maryland for this election cycle. However, all of the organizations' GOTV mail has not landed in Maryland homes yet. VPC and CVI will continue to encourage voting in a constitutionally protected and legal manner.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Thomas", is positioned above the typed name.

Scott E. Thomas
Partner/Senior Principal

Enclosure

Center for Voter Information
700 E Main St #730
Richmond, VA 23219

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S230 *****AUTO**ALL FOR AADC 230
F4R1-0000007A 314/9319/38637
JANE Q SMITH
700 E MAIN ST # 730
RICHMOND, VA 23219-2619



CVI24_053 | | DOS_C053_W04A_AAA_MD | SEED62

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Voting Report Card for Jane Q Smith

Dear Jane,

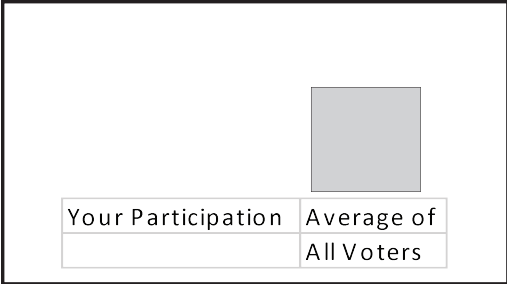
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There is an important election on **Tuesday, November 5, 2024**. Our democracy depends on people like you exercising their right to vote. If you already voted, thank you!

This report card provides a helpful summary of how often you have voted and how your voting participation compares to others in Maryland.

Voting record for
Jane Q Smith*

- 2024 General Election: Vote
- 2022 General Election: No Vote
- 2020 General Election: No Vote
- 2018 General Election: No Vote
- 2016 General Election: No Vote



Your voting score is:
BELOW AVERAGE

Voting Options for the November 5, 2024 General Election

- Early In-Person:** From October 24–31, or Absentee In-Person through November 5.
- Election Day In-Person:** Polls open from 7AM–8PM.
- By Mail:** Your ballot must be postmarked by November 5.



Visit Elections.Maryland.gov to check your registration status and find polling locations, times, and other information on how to vote.

Remember, who you vote for is private, but whether or not you voted is public record. We look forward to seeing that you voted in this election by **Tuesday, November 5, 2024**.

Sincerely,

Gail L. Kitch, Board Chair
Center for Voter Information

*In your voting record above, Voted means public records suggest you voted in that election; No Vote means they suggest you may not have; and N/A means you either were not registered at this location or were not eligible or there wasn't enough publicly available data. Your participation score was calculated by the Center for Voter Information using data from publicly available state voter files.

If you wish to be removed from our mailing list, call 866-377-7396 or email this code: SEED62 to unsubscribe@centerforvoterinformation.org. This information is provided to you by the Center for Voter Information, a 501(c)(4) nonprofit organization, centerforvoterinformation.org.

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CVI24_054



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Voting Report Card for Jane Q Smith

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Dear Jane,

Public records indicate that you are eligible to vote in the upcoming election on Tuesday, November 5, 2024. Remember, who you vote for is private, but whether or not you voted is public record.

We're sending this mailing to you and your neighbors to share who does and does not vote in an effort to promote election participation. While we have hidden the name and street number of your neighbors to protect their privacy, these are their true voting records.*

Table with 6 columns: Name, Address, 2016 General Election, 2018 General Election, 2020 General Election, 2022 General Election. Rows include Jane Q Smith and two redacted neighbors.

We will be reviewing these records after the election to determine whether or not you joined your neighbors in voting.

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Early In-Person: From October 24-31, or Absentee In-Person through November 5.

Election Day In-Person: Polls open from 7AM-8PM.

By Mail: Your ballot must be postmarked by November 5.

Visit Elections.Maryland.gov to check your registration status and find polling locations, times, and other information on how to vote.

We hope you find this information useful. If you already voted, thank you!

Sincerely,

Gail L. Kitch (handwritten signature)

Gail L. Kitch, Board Chair
Center for Voter Information

*This data comes from publicly available state voter files. If you wish to be removed from our mailing list, call 866-377-7396 or email this code: SEED26 to unsubscribe@centerforvoterinformation.org.

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JANE Q SMITH
700 E MAIN ST # 730
RICHMOND, VA 23219-2619



CVI24_052



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Dear Jane,

There is an important election on **Tuesday, November 5, 2024.**

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Here are a few reminders about voting:

Your ballot is secret. No one is allowed to see your vote choice.

Voting booths provide a private place for you to fill out your ballot. You place your ballot into a locked voting machine or ballot box without anyone else looking at it.

Voting is free of intimidation of any kind. A set of rules is enforced at each voting location to ensure that voters are comfortable casting their ballots for whomever they prefer. Poll workers are not permitted to ask how you voted.

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Election Day In-Person: Polls open from 7AM–8PM.

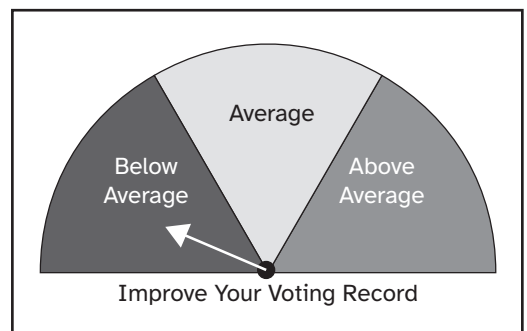
By Mail: Your ballot must be postmarked by November 5.

Visit Elections.Maryland.gov to check your registration status and find polling locations, times, and other information on how to vote.

We hope you find this information useful. If you already voted, thank you!

Remember, who you vote for is private, but whether or not you voted is public record.

Compared to other voters in your state, your voting record is **BELOW AVERAGE**.*



Sincerely,

Gail L. Kitch, Board Chair
Center for Voter Information

P.S. To better understand why people do or do not vote, we may call you after the election to discuss your voting experience.

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*Your participation score was calculated by the Center for Voter Information using data from publicly available state voter files. If you wish to be removed from our mailing list, call 866-377-7396 or email this code: SEED61 to unsubscribe@centerforvoterinformation.org. This information is provided to you by the Center for Voter Information, a 501(c)(4) nonprofit organization, centerforvoterinformation.org.



Center for Voter Information
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You know what your community needs. Vote November 5, 2024.

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RICHMOND, VA 23219-2619



CVI24_056



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Dear Jane,

There is an important election on **Tuesday, November 5, 2024.**

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You don't need to know everything about the candidates for your vote to be valuable. Research shows voters often make decisions based on what they already know, feel, or can quickly learn.

Many voters decide which candidate to vote for based on who aligns most with their values. Many also decide by looking at the candidates' positions on the one or two issues that are most important to them. **You know your community and your family's needs best, and your voice deserves to be heard.**

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By Mail: Your ballot must be postmarked by November 5.

Visit Elections.Maryland.gov to check your registration status and find polling locations, times, and other information on how to vote.

We hope you find this information useful. If you already voted, thank you!

Remember, who you vote for is private, but whether or not you voted is public record. Compared to other voters in your state, your voting record is **NEW**.*

Sincerely,

Gail L. Kitch, Board Chair
Center for Voter Information

P.S. Voters often make voting decisions based on what they already know, feel, or can quickly learn, so remember that you know enough! Please note that we may reach out to you after the election to learn more about your voting experience. **Vote November 5, 2024!**

*Your participation score was calculated by the Center for Voter Information using data from publicly available state voter files. If you wish to be removed from our mailing list, call 866-377-7396 or email this code: SEED63 to unsubscribe@centerforvoterinformation.org. This information is provided to you by the Center for Voter Information, a 501(c)(4) nonprofit organization, centerforvoterinformation.org.

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