Exhibit G
January 14, 2014

By E-Mail
Celia R. Cangelosi
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P.O. Box 3036
Baton Rouge, Louisiana 70821-3036


Ms. Cangelosi:


Your letter stated: “We agree with you that, particularly in the context of the NVRA, requiring voter registration services with ‘each application for service or assistance, with each re-certification, renewal, or change of address form relating to such service or assistance . . . ‘does not include so called ‘remote transactions’ with the agencies.” (emphasis added). As a point of clarification, Plaintiffs did not, and have not, stated that the NVRA’s requirement of voter registration services under Section 7 does not extend to benefits applications made via remote means. On the contrary, as the Secretary is well aware, Plaintiffs have, throughout this litigation, maintained the contrary position, as is consistent with the text of the statute, all caselaw considering the question, as well as the Partial Summary Judgment ruling and Permanent injunction issued by the District Court in this case. Our letter dated December 13, 2013 was consistent with our position and the District Court’s rulings on this issue.

We are concerned, as we expressed in that letter, that the Secretary of State’s new Election Rules do not address the agencies’ voter registration responsibilities during remote transactions. See La. Admin. Code. tit. 31, § 401, et seq. (2013). This failure is particularly concerning because the Election Rules specifically state that they have been promulgated in an effort to comply with the District Court's Permanent Injunction—an injunction which makes patent the Court’s determination that Section 7’s requirements offer no carve out for remote transactions, and therefore must extend to all covered transactions without regard to the method in which the transactions take place. The Election Rules should, therefore, make clear what is required by the Court’s order.
Similarly, the Election Rules should also make clear that voter registration applications be distributed unless a client declines, in writing, to receive one. This is also consistent with the rulings and Permanent Injunction of the District Court.

Sincerely,

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Project Vote

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