



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

October 2, 2024

Dear Secretary Nelson,

As our offices continue our cooperative efforts on the critical issue of election integrity, my office has identified information maintained by the Secretary of State that will facilitate our efforts to prevent non-U.S. Citizens from casting illegal votes in Texas elections and to investigate potential voter fraud.

To that end, I formally request that you provide to my office each record in the statewide voter registration database (TEAM) for which the Secretary of State does not have a State of Texas issued driver's license or identification card number for that individual. This information is requested as a voluntary intergovernmental transfer of information between governmental bodies that may be exchanged without waiving exceptions to the public disclosure of that information. See Attorney General Opinion JM-590 (1986); Open Records Decision Nos. 655 (1997), 567 (1990), 561 (1990), 516 (1989). These decisions reflect the well-settled policy of this state that governmental agencies should cooperate with each other in the interest of the efficient and economical administration of their statutory duties. See ORD 516.

In the event this information cannot be made available through an intergovernmental transfer, the same information is formally requested pursuant to the Public Information Act ("PIA"). This alternative request includes all such information releasable under the PIA including but not limited to, name, address, date of birth, and VUID, all of which must be disclosed pursuant to Texas Election Code chapter 18.

This request is also made under Chapter 18 of the Texas Election Code. As your office has previously confirmed, dates of birth must be provided in response to requests for a list of voters.<sup>1</sup>

As soon as possible, but no later than this Friday, October 4, 2024, please advise my office concerning whether an intergovernmental transfer of information is possible. My office stands ready to assist in facilitating this transfer, and I look forward to continuing to work with you to strengthen the security of Texas elections.

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<sup>1</sup> <https://www.sos.state.tx.us/elections/laws/address-confidentiality.shtml>

Sincerely,

*Ken Paxton*

Ken Paxton  
Attorney General