November 9, 2026

Via regulations.gov

Department of Defense, Office of the Director of Administration and Management
Oversight and Compliance Directorate, Regulatory Division
4800 Mark Center Drive, Mailbox #24, Suite 05F16
Alexandria, VA 22350-1700

Re: Federal Post Card Application
Federal Register Document No. 2026–18479

To Whom It May Concern:

We, the Attorneys General for the States of California, Nevada, Washington, Arizona, Colorado, Connecticut, Delaware, the District of Columbia, Illinois, Maine, Maryland, Michigan, Minnesota, New Jersey, New Mexico, New York, Oregon, Rhode Island, Vermont, and Virginia, write in opposition to the revision to the Federal Post Card Application (FPCA) that the Department of Defense (DOD) implemented on an emergency basis and has now noticed for public comment. 91 Fed. Reg. 57,576 (Sept. 10, 2026). Specifically, we oppose the removal of the checkbox in Section 1 that read, "I am a U.S. citizen living outside the country, I have never lived in the United States." Without it, the FPCA cannot expressly identify U.S. citizens who have never resided in the United States ("never-resided" citizens) and who want to register to vote.

Removing the checkbox harms voters and states. States have the constitutional role of determining whether to allow never-resided citizens to vote, and many states have chosen to

enfranchise them. Never-resided citizens have relied on the FPCA for years, and removing the box will confuse some voters as to whether their eligibility to vote has changed. States will also be harmed: states that allow never-resided citizens to vote will have to work to combat the disenfranchising confusion caused by the change; conversely, states that do not allow never-resided citizens to vote will find it harder to identify ineligible applicants to reject their applications. And all states will be harmed by losing access to the information this checkbox provided, leading to higher administrative costs, greater legal risk, and a diminished ability to accurately register voters.

Moreover, DOD's removal of the checkbox for never-resided U.S. citizens constitutes arbitrary and capricious agency action. DOD's explanation for the change is inadequate. DOD entirely ignored the voters' and states' reliance on the FPCA. Nor is there any evidence or analysis supporting DOD's argument that the checkbox caused confusion or any other harm; it is the emergency implementation and inconsistent guidance that have created uncertainty for voters and election officials.

For these reasons, DOD should withdraw the revised form and restore the checkbox that identifies never-resided citizens.[1]

I. Background

The Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA), Pub. L. No. 99-410, 100 Stat. 924 (1986) (codified as amended at 52 U.S.C. §§ 20301–20311; 39 U.S.C. § 3406; 18 U.S.C. §§ 608–609), requires states to let absent servicemembers and other overseas voters cast

[1] DOD similarly changed the Federal Write-In Absentee Ballot (FWAB), *see* Proposed Collection; Comment Request, 91 Fed. Reg. 57577 (Sept. 10, 2026), and many of the same problems discussed in this comment apply equally to that change. At least one state expressly requires some never-resided citizens to use the FWAB, Ariz. Rev. Stat. § 16-103(E), and never-resided citizens in other states use it as well. DOD should also reverse to the change to the FWAB.

absentee ballots in federal elections. To that end, it tasks a presidentially designated official with developing "an official post card form[]" that states must use "for simultaneous voter registration application and absentee ballot application." 52 U.S.C. §§ 20301(b)(2), 20302(a)(4). Executive Order No. 12,642 designated the Secretary of Defense as the official with primary responsibility for the federal government's duties under UOCAVA. Exec. Order No. 12642, 53 Fed. Reg. 21975 (June 8, 1988), *reprinted as amended in* 52 U.S.C. § 20301. DOD carries out those duties through its Federal Voting Assistance Program (FVAP).[2]

The FPCA asks overseas voters to check a box describing their residency and affiliation. This form has changed over time. In 2005, the form included three statuses: "(a) A member of the Uniformed Services or Merchant Marine on active duty, or an eligible spouse or dependent[;] (b) A U.S. citizen residing outside the U.S. temporarily[; and] (c) A U.S. citizen residing outside the U.S. indefinitely[.]"

In 2011, the form included five options for applicants to choose among: (1) "I am a member of the Uniformed Services or Merchant Marine on active duty OR [(2)] I am their spouse or dependent"; (3) "I am a U.S. citizen residing outside the U.S., and I intend to return"; (4) "I am a U.S. citizen residing outside the U.S., and I do not intend to return"; and (5) "I am a U.S. citizen otherwise granted military/overseas voting rights under State law (check the Voting Assistance Guide)."

In 2013, in response to requests from state election officials and overseas voting advocates, DOD revised the checkbox options "for usability and consistency." Proposed Collection; Comment Request, 78 Fed. Reg. 19465, 19465 (Apr. 1, 2013). The only change relevant here was

[2] In the interest of consistency and clarity, this comment refers only to DOD—even when DOD is acting through FVAP—except in citations.

that the fourth option was revised to read "I am a U.S. citizen living outside the country, I have never lived in the United States." With that revision, the FPCA included boxes for: (1) active-duty servicemembers and eligible spouses or dependents; (2) U.S. citizens residing outside the country who intend to return; (3) U.S. citizens residing outside the country whose return is uncertain; and (4) U.S. citizens who have never resided in the country. *Voter Registration and Absentee Ballot Request*, U.S. State Dep't (as revised January 2023) (FPCA), https://tinyurl.com/57njzexu; *see OMB Control Number History: 0704-0503*, Off. of Mgmt. & Budget, https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0704-0503 [https://perma.cc/J84W-MMTK] (captured Sept. 26, 2026) (collecting links related to past form versions).

There are three categories of never-resided citizens. First, children born abroad to at least one U.S. citizen parent are generally U.S. citizens at birth, subject to certain conditions. *See* 8 U.S.C. § 1401(c)–(d), (g). If those children remain abroad, they will qualify as natural-born never-resided citizens when registering to vote.

Second, children born abroad can acquire citizenship if, before they reach age 18, they are adopted by U.S. citizens or a parent naturalizes. *See* 8 U.S.C. § 1431(a)–(b). Although typically these children must also establish residency in the United States, they need not do so if their parents are servicemembers or federal workers stationed overseas. *Id.* § 1431(c). If these children of federal employees remain abroad, they will qualify as derived never-resided citizens on the FPCA.

Third, certain family members of U.S. citizens and nonprofit employees can naturalize without residing in the United States. Children with at least one U.S. citizen parent who do not acquire citizenship by operation of § 1431 can apply for naturalization without establishing residency. 8 U.S.C. § 1433(a), (c)–(d) (requiring children of U.S. citizen parents residing abroad

to show only "temporar[y] presen[ce] in the United States pursuant to a lawful admission" and exempting children of servicemembers even from temporary presence requirement). Spouses of U.S. citizen servicemembers stationed overseas can similarly naturalize without residing in the country under certain conditions. *Id.* § 1430(e). And parents, spouses, and children of U.S. citizen servicemembers who die during active duty are likewise exempt from residence and physical presence requirements when naturalizing. *Id.* U.S.C. § 1430(d). Some employees of the U.S. government and other designated organizations and spouses of U.S. citizens working overseas can also naturalize without establishing residency if they are physically present in the United States at the time of naturalization and declare "an intention to take up residence within the United States immediately upon termination of such employment." 8 U.S.C. § 1430(b)–(c). If these family members and nonprofit workers still reside abroad when registering to vote, they will qualify as naturalized never-resided citizens.

The Constitution assigns states, not the federal government, the role of determining eligibility for federal and state elections. *See* U.S. Const. art. I, § 2; *id.* amend. XVII. Thirty-seven states extend the right to vote to never-resided citizens. *See Never Resided in the U.S.?*, Fed. Voting Assistance Program, https://www.fvap.gov/citizen-voter/reside [https://perma.cc/W82P-LEJP] (captured May 31, 2026) (collecting state standards). For example, California allows citizens who are born outside of the U.S. and have never resided in the U.S. to vote via absentee ballot if the citizen's parent/legal guardian was a resident of California when the parent/legal guardian last lived within the United States. Cal. Elec. Code §§ 321(b)(2), 300(b)(2). These states use the FPCA to register and process absentee voting requests from these U.S. citizens living overseas. *See* 52 U.S.C. § 20302(a)(4).

In August, DOD removed the "never resided" checkbox from the FPCA without notice and comment. On August 13, DOD sent a request to the Office of Management and Budget (OMB) that, among other things, proposed eliminating the "never resident" checkbox because "[v]oters may be confused by the language on the form." Letter from Sean O'Keefe, Deputy Under Sec'y of [Def.] for Pers. and Readiness, to Dominic Mancini, Deputy Adm'r of Off. of Info. and Regul. Affs. (Aug. 13, 2026), https://perma.cc/Z6ET-ARF4 ("August 13 Emergency Processing Letter"). When that request was unsuccessful, DOD submitted a second request for emergency revisions on August 28 which incorporated much of the same reasoning. *See* Letter from Sean O'Keefe, Deputy Under Sec'y of [Def.] for Pers. and Readiness, to Dominic Mancini, Deputy Adm'r of Off. of Info. and Regul. Affs. (Aug. 28, 2026), https://perma.cc/54PP-N5DB ("August 28 Emergency Processing Letter"). OMB approved that request on August 31. *See ICR-OIRA Conclusion: 202608-0704-009*, Off. of Mgmt. & Budget, https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202608-0704-009.

DOD has provided little guidance to voters about the change. On the contrary: when comparing different versions of voting assistance materials, it becomes apparent that DOD has *deleted* information regarding citizens who have never lived in the United States from its 2026-2027 Voting Assistance Guide. *Compare 2026-27 Voting Assistance Guide*, FVAP (Oct. 2025), https://perma.cc/8A38-NVE3 (captured Sept. 25, 2026) (information regarding citizens that have never lived in the U.S. does *not* appear in the state-specific eligibility information section), *with 2026-27 Voting Assistance Guide*, FVAP (Oct. 2025), https://perma.cc/H2QW-YKWP (captured May 31, 2026) (information regarding citizens that have never lived in the U.S. does appear in the state-specific eligibility information section). What little information DOD has provided about the checkbox's elimination has been ad hoc, late, and inconsistent. We understand that DOD has

advised the Association of Americans Resident Overseas that these applicants can write a statement about their never-resided status in the "Additional Information" FPCA box. Ass'n of Ams. Resident Overseas, *Special Voting Alert! Last Minute Changes to Federal Forms and Websites* 4 (Oct. 1, 2026), https://tinyurl.com/2f2dub7t (*AARO Voting Alert*); *see also* FPCA at 1 (§ 6). But that instruction appears in no official guidance, let alone on the form. DOD has also said that states may process previous versions of the form (which included the checkbox), but that guidance is inconsistent with DOD's website, which as of the date of this comment states that "[p]revious editions are obsolete." *Compare AARO Voting Alert* at 4, *with* FPCA at 1 (available at https://www.fvap.gov/uploads/FVAP/Forms/fpca.pdf).

II. Removing the Checkbox Harms Citizens Who Have Relied on the Forms

A. U.S. citizens may be deterred from voting by this change.

Never-resided citizens' ability to vote in states where they are eligible is essential for them because U.S. policies affect them even if they have never resided in the United States. For example, a U.S. citizen who lives in Canada, which is the country with the largest number of U.S. citizen expatriates and one of our major trading partners, will be affected by U.S. economic policies that are likely to impact everyday goods. *See* FVAP, *2024 Report to Congress* 16 (2025), https://www.fvap.gov/uploads/FVAP/Reports/RTC_2024.pdf. And these citizens generally must pay U.S. income taxes and (if male) register for the Selective Service, giving them a direct stake in governance even if they do not live within the United States' borders. *See Frequently asked questions about international individual tax matters*, IRS, https://www.irs.gov/individuals/international-taxpayers/frequently-asked-questions-about-international-individual-tax-matters (last visited Nov. 6, 2026); Selective Service System, *Who Needs to Register* 1 (2026), https://www.sss.gov/wp-content/uploads/2026/07/WhoNeedstoRegister.Final.pdf.

However, the change to these forms is likely to deter never-resided citizens from registering to vote and voting. For example, they may feel like they cannot use these new forms because of the deletion of a checkbox that describes their citizenship and residence. They may also think that there was a change of law that rescinded their right to vote. Other never-resided citizens may be hesitant to use these forms—which must be signed under penalty of perjury—and check one of the other checkboxes as that might give the incorrect impression they are lying about their citizenship and residence. As a result, they may refrain from registering to vote and voting, despite being eligible to do so under state law, and therefore lose their say in government policies that affect them.

B. This change creates yet another unnecessary obstacle for overseas citizens when registering to vote and submitting their ballot.

Overseas citizens are already less likely to vote than U.S. citizens living in the United States. For example, in 2022 midterm election, about 11% of eligible overseas voters returned a ballot, compared to 76.1% of domestic voters. FVAP, *2024 Report to Congress* 18 (2025). DOD acknowledges that this gap is an effect of the real and perceived obstacles overseas citizens face. *Id.* at 18-19. Most of the respondents to a survey of overseas citizens who did not vote reported that difficulties completing the process prevented them from returning their absentee ballot. *Id.* at 18. The most frequently reported challenges of this group were figuring out how to vote, knowing what address they can use, and feeling that the process was too complicated. *Id.* In fact, DOD identified reducing obstacles to the voting process as one of its three goals for the 2026 election. *Id.* at 7. Instead, DOD's change has created *additional* obstacles to voting by creating confusion about overseas citizens' eligibility to vote and potentially eliminating their ability to use the forms to register altogether.

III. The Changes Harm the States Who Rely on the Forms to Facilitate Overseas Voting

As explained above, most states allow never-resided citizens to vote in at least some of their elections; others bar voting by never-resided citizens. UOCAVA requires DOD to facilitate the registration of some overseas voters, but neither it nor any other law disqualifies never-resided citizens enfranchised by state law or prohibits the federal government from helping never-resided citizens to vote.

The FPCA has—until now—reflected this division, giving election officials the information they need to assess an applicant's eligibility under both federal and state law. Although the FPCA is a federal form, it has long accommodated state-specific requirements. For example, the form instructs applicants to provide a full Social Security number only for the states that require it for overseas voters (New Mexico, Tennessee, and Virginia). FPCA at 1 (§ 6). It also still retains checkboxes asking applicants to indicate whether they intend to return to the United States, *id.* at 1 (§ 1), a distinction that matters under some states' laws but not under UOCAVA.[3] These features reflect a design in which a single federal form collects information because certain states' laws make that information relevant, not necessarily because UOCAVA requires it.

The never-resided checkbox did the same work. It told election officials, on the face of the application, which applicants have never resided in the United States—a fact relevant to eligibility under state law. The remaining categories that applicants can check do not convey this same information. The checkbox also allowed the form to keep pace with state law: a state that expands

[3] Compare Nevada, which sends a full state and federal ballot to all covered voters under its Uniformed Military and Overseas Absentee Voters Act, *see* Nev. Rev. Stat. § 293D.210, with, for example, Illinois, which provides a federal only ballot to those whose intent to return is uncertain, *see* 10 Ill. Comp. Stat. 5/20-1(4); *id.* 5/20-2.2.

or narrows eligibility for never-resided citizens can apply its new rule to applicants the form already identifies, rather than waiting for DOD to revise the form or building its own workaround.

States that extend eligibility to never-resided citizens relied on that FPCA checkbox. Most strikingly, several states have incorporated the form directly into state statute as the exclusive way to request an overseas ballot[4] and one way for such voters to register.[5] The FPCA is thus built into how the states administer their own elections and eligibility laws. The checkbox was how never-resided citizens identified themselves so that officials knew to evaluate the application by reference to the parent's or guardian's last domicile rather than the applicant's own residence history. Without it, officials may evaluate an application as though the address given in Section 2 were the applicant's own, for example by looking for the applicant's prior registration or proof of residence at that address and reject or question an application that state law requires be accepted.

The rule also undermines states' sovereign duty to ensure that every eligible citizen who wishes to vote is able to do so. As discussed above, states that permit voting by never-resided citizens, and those citizens themselves rely on the FPCA for voter registration. Eliminating the checkbox with no explanation will disenfranchise some never-resided citizens by creating confusion as to whether they are still eligible to vote.

In addition, these states face new costs and potential legal risk without the checkbox. Election officials are caught between statutes (some of which expressly incorporate the FPCA) that require them to accept never-resided applicants, and a federal form that no longer clearly conveys this information. This will cause confusion among election officials who process these

[4] *See, e.g.*, Nev. Rev. Stat. § 293D.300(1)–(2).

[5] *See, e.g.*, Nev. Rev. Stat. § 293D.230(1); N.J. Stat. Ann. § 19:59-4(b); *cf.* Wash. Admin. Code § 434-235-020(1)(b).

forms and require additional training, increased manual review, and new responses to applicant and voter inquiries. Any inconsistent treatment of similarly situated applicants, whether through rejection, misclassification, or disparate handling of old and new forms, could lead to claims under both state law and federal law.

The change is equally harmful for states that do *not* permit never-resided citizens to register or vote. For these states, an applicant who used the FPCA and marked the checkbox conveyed to the state at a glance that the application could not be accepted, and the state could decline it without further inquiry. DOD has itself recognized that "[i]f the never resided citizen submits [a FPCA] with this information to a State that does not allow for never resided citizens to vote, the FPCA is likely to be rejected." FVAP, *Never Resided Voters: A Policy Brief* 3 (Spring 2017), https://tinyurl.com/s7rsesm8 ("FVAP 2017 Policy Brief").

Removing the checkbox will likely lead to confusion and create administrative burdens for these states. Without a never-resided checkbox, a never-resided citizen may choose another category that seems to fit their situation best, such as an uncertain intent to return, and thereby inadvertently and incorrectly be deemed an eligible applicant. Officials must then use additional resources to determine eligibility, such as reviewing addresses and dates or corresponding with applicants, or risk registering people who are ineligible under state law. DOD claims that removing the checkbox will "avoid the use of the form by those who are ineligible under UOCAVA," August 28 Emergency Processing Letter, *supra*, at 3, but for these states the change does not keep ineligible applicants off the form. It only shifts the work of identifying them from the applicants themselves to the state.

And on a more basic level, there is no good reason to deny states useful information that has long been available to them. Consider a state that narrows its eligibility so that never-resided

citizens can no longer vote. The FPCA's historical record of which citizens checked the never-resided box when registering would provide substantial utility: armed with that information, the state could reach out directly to those voters to confirm they should be taken off the registration list. Without the checkbox, the state will have to start from scratch.

Along the same lines, all states will be harmed by DOD's inadequate guidance. DOD's deleting its guidance for never-resided applicants, *see supra* Part I, will likely lead to some applicants in states that enfranchise them wrongly concluding they are ineligible and not applying, while applicants in states that do not allow them to vote may apply anyway. And states will either have to expend resources educating overseas U.S. citizens on the deleted checkbox or risk that the change will be misinterpreted by FPCA users.

IV. DOD Failed to Adequately Explain Its Changes

Under the Administrative Procedure Act, agency action is unlawful if the agency "failed to present an adequate basis and explanation" for its decision. *Motor Vehicle Mfrs. Ass'n of the U.S. v. State Farm Mut. Ins. Co.*, 463 U.S. 29, 34 (1983). And an explanation is inadequate if, when changing positions, an agency does not consider the "serious reliance interests" engendered by the status quo. *Dep't of Homeland Sec. v. Regents of the Univ. of Cal.*, 591 U.S. 1, 30, 33 (2020).

Here, the "emergency" change does not even acknowledge the harm to citizens who have previously relied on the existing forms and guidance documents. Never-resided citizens have relied on the FPCA to register to vote and to update their registration. While states may offer alternative ways for never-resided citizens to register, the FPCA is the most visible and easily accessible form by dint of its being offered by the federal government. In addition, never-resided citizens may reasonably believe, given their unique situation, that they must use a federal form to register for federal elections, even though federal voter eligibility is in fact determined by states.

In its initial emergency application to change the forms, DOD referred to the definition of eligible voters under UOCAVA as a person qualified to vote in the last place "the person was domiciled before leaving the United States" and stated that "[i]ndividuals who have never resided in the United States are not within the class of voters specifically defined by UOCAVA and therefore may not be able to use the FPCA or the FWAB. Voters may be confused by the language on the form, and individuals outside of UOCAVA's scope may believe they are eligible to use the forms to register and vote." August 13 Emergency Processing Letter, *supra*, at 3. The letter then mentions two previous times the forms were revised (omitting an interim third time), and states clarification of the forms "will ensure that State and local election officials are aware of Federal registration requirements and will facilitate compliance with federal law." *Id.* In the second attempt to justify this change on August 28, DOD restated the definition of UOCAVA and its contention that citizens born abroad "*may* not be able to use" the forms and "*may* be confused." August 28 Emergency Processing Letter, *supra*, at 3 (emphasis added). It added that "[t]he elimination of this checkbox will reduce confusion and avoid the use of the form by those who are ineligible under UOCAVA." *Id.*

The problem is that DOD ignores the fact that never-resided citizens have used the FPCA for years without issue. DOD's speculation—without any citation of statute, regulation or judicial precedent—that these voters "may not be able to use" the forms is entirely divorced from that reality. And while the agency allegedly made these changes to reduce voter confusion, it completely failed to consider any impact of this change on actual current voters. Neither the August 13 letter nor the nearly identical August 28 Emergency Processing Letter mention current voters' reliance, potential harm from the change, or the significant impact on these voters. And the removal

of the checkbox has been paired with other changes, like the deletion of information on which states allow never-resided citizens to vote, *see supra* Part I, that will exacerbate voter confusion.

The unexplained change in the forms and the unacknowledged deletion of this guidance information provides voters with no information at all about even the existence of this change, much less any information to address and ameliorate any resulting confusion. DOD does not acknowledge this removal of past guidance and the voters' reliance on that information in either version of its August 28 Emergency Processing Letter, much less mention voters' more general reliance on the previous version of the forms. By ignoring the serious reliance interests that voters had in the checkbox and ignoring the confusion these changes will cause, DOD has acted arbitrarily and capriciously. *Regents of the Univ. of Cal.*, 591 U.S. at 30, 33.

DOD's explanation also ignores the states' reliance interests. DOD fails to grapple with the fact that many states have drafted their laws, forms, and procedures around the existence of the checkbox. Nor does DOD appear to have considered less disruptive alternatives, such as clarifying the language or directing applicants to state-specific guidance. *See id.* at 30 (agency rescinding a prior policy "must consider the alternatives that are within the ambit of the existing policy" (cleaned up)).

Relatedly, DOD did not consider what impact the change would have on the state officials who administer the FPCA nor seek their input. Emergency processing requires "all practicable steps to consult with interested agencies and members of the public," 5 C.F.R. § 1320.13(c), yet DOD's request identifies no consultation with the states and asserts that no additional steps were necessary. August 28 Emergency Processing Letter, *supra*, at 3. That is also at odds with DOD's broader directive to maintain contact with state election officials. 32 C.F.R. § 233.6(a)(3). Had

DOD consulted the states, the confusion, burden, and disruption the change has caused could have been avoided or reduced.

DOD also failed to give a reasoned basis for removing the checkbox. *See State Farm Mut. Ins. Co.*, 463 U.S. at 43 (explaining that an agency must "examine the relevant data and articulate a satisfactory explanation for its action"). It says the change was made to eliminate voter confusion, August 28 Emergency Processing Letter, *supra*, at 3, but to date it has not identified any data or analysis suggesting that the checkbox caused confusion or was otherwise detrimental.

DOD's emergency request added that never-resided citizens fall outside UOCAVA's definition of overseas voters. *Id.* But that is no reason to remove the checkbox. DOD's own 2017 policy brief acknowledged that UOCAVA "does not specifically address never resided citizens," leaving each state to determine their eligibility, and that the state laws on the subject vary. FVAP 2017 Policy Brief, *supra*, at 3, 6. DOD nonetheless kept a checkbox for these applicants for years. The information asked for by the FPCA is not limited to UOCAVA requirements. *Compare* 52 U.S.C. § 20301(b)(2), *with* FPCA at 1. That UOCAVA does not itself require states to enfranchise never-resided citizens is no more a reason to remove this checkbox than it is a reason to remove the Social Security number instruction or the intent-to-return checkboxes as described above. Both of those relate to state-specific requirements, not UOCAVA, yet DOD has retained both. *See supra* Part III. And because states, not UOCAVA, determine eligibility, a form that no longer elicits information on which state eligibility determinations depend has less "practical utility" to the officials who process it, a factor the Paperwork Reduction Act directs agencies to consider. *See* 44 U.S.C. § 3506(c)(2)(A)(i).

V. Conclusion

For those reasons, DOD should revert the FPCA to the previous version, which included the checkbox for never-resided citizens.

Sincerely,



ROB BONTA
Attorney General
State of California



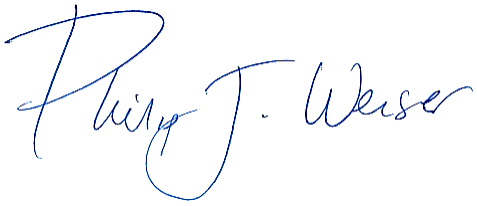
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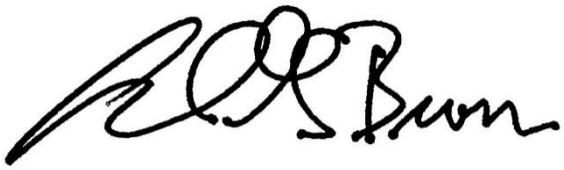
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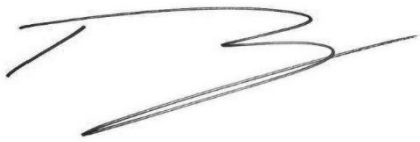
DANA NESSEL
Attorney General
State of Michigan



KEITH ELLISON
Attorney General
State of Minnesota



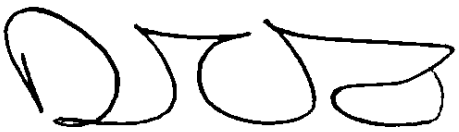
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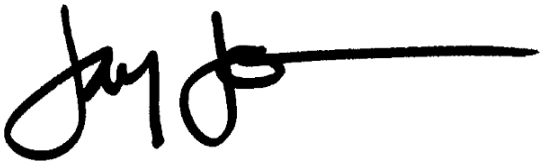
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