



**OFFICE OF THE ATTORNEY GENERAL
STATE OF ILLINOIS**

Lisa Madigan
ATTORNEY GENERAL

October 28, 2016

Via E-mail

Heidi K. Abegg
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Re: Delivery of Vote by Mail Applications to County Election Authorities

Dear Ms. Abegg:

I am following up on your letter sent this morning (dated October 27). In your letter, you ask for additional information about the nature of this Office's concerns and the reasoning for the requests made by this Office.

Our interest continues to be, as we have discussed, that ballot applications be promptly delivered to the relevant clerk's offices so that voters are ultimately able to vote. We also have an interest in ensuring compliance with all applicable state laws. Despite your assurances that applications will be promptly delivered, we are receiving conflicting information from the local clerks as to receipt of ballot applications. For instance, although you stated that 1,177 applications have been delivered to the Will County Clerk's Office, that office has no record of receiving those applications from the Will County Vote by Mail Center. Your letter states that the applications were left at that office with Nancy Shutz and Jack, but the Will County Clerk's Office does not have an employee named Jack. We have also asked for confirmation that you have, in fact, delivered the applications in Illinois Opportunity Project's possession to the Cook County Clerk's Office and the Lake County Clerk's Office, but you have not done so. We have also asked you for a status of applications in Kankakee County, but you have not provided one.

Given the issues identified, it is incumbent on the Office of the Attorney General to ensure that voters of any party are not being potentially disenfranchised. This office has been contacted by county clerks and confused constituents, and both groups have expressed concern about these mailings. The fact that the mailings identify themselves as "_____ County Vote by Mail Center" has confused the constituents about the source of the mailings. That has, in turn,

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frustrated the county clerks who have received complaints from constituents who have received IOP's mailings.

Further, you have not responded to our Office's request for basic information that is not burdensome. For example, you have not identified the seventh county impacted by your mailings, you have not provided a sample mailing for each county, you have not identified the relevant post office boxes, and you have not identified dates and counties for past or future mailers. You have not provided any explanation as to why production of this requested information is burdensome, nor have you objected to its production before this letter.

Please let me know if you do not intend to comply with my earlier requests for information. I look forward to hearing from you regarding these matters.

Sincerely,

For the State of Illinois,

LISA MADIGAN
Attorney General

By: /s/ Cara Hendrickson

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