



**STATE OF KANSAS
OFFICE OF THE ATTORNEY GENERAL**

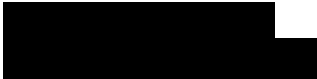
KRIS W. KOBACH
ATTORNEY GENERAL

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September 25, 2026

Marlene Merrill, President
League of Women Voters of Kansas
PO Box 2366
Topeka, Kansas 66601

Via email to:



***Re: League of Women Voters unlawful payments for voter
registration***

Dear Ms. Merrill:

The Office of the Attorney General has received information that in May 2026 the League of Women Voters of Leavenworth County distributed gift cards to individuals in exchange for registering to vote. You are directed to cease and desist from this practice immediately.

Under federal law, it is a crime to knowingly pay a person “either for registration to vote or for voting.” 52 U.S.C. § 10307(c). There is no de minimis exception and all payments of any amount are prohibited. Violations are punishable by a fine of up to \$10,000 and imprisonment of up to five years. Under state law, it is a crime to offer any benefit to induce a person to vote. K.S.A. 25-2409. The conduct which the League of Women Voters is alleged to have engaged in appears to violate both federal and state law.

These prohibitions are essential to ensuring the integrity of state and federal elections. Beyond the direct corruption of the election, paying people to register destroys public confidence in elections, which is essential to the functioning of our participatory democracy. *See Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 197 (2008). The Attorney General’s Office takes the violation of federal and state election laws very seriously.

Accordingly, you are directed to:

- 1) Immediately cease offering cash, gift cards, or any other item of value in connection with voter registration or voting;
- 2) Preserve all records, including electronic records, relating to this activity, including all financial records and registration forms collected;
- 3) Identify all instances, including the date and location, in which the League of Women Voters has engaged in any similar practice in Kansas involving distribution of cash, gift cards, or any other items of value in exchange for voter registration or voting; and
- 4) Respond to this letter in writing, within 30 days, with the above information and stating whether your apparently unlawful election practices have ceased.

This matter is being referred to the United States Attorney for the District of Kansas for investigation and review. The State reserves the right to bring any appropriate enforcement action following further investigation.

Sincerely,

A handwritten signature in black ink, reading "Kris W. Kobach". The signature is written in a cursive, flowing style.

Kris W. Kobach
Kansas Attorney General