

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 3:12-CV-00069
v.)	
)	
THE TERRITORY OF THE VIRGIN)	
ISLANDS; VIRGIN ISLANDS JOINT)	
BOARDS OF ELECTIONS; BOARD OF)	
ELECTIONS, ST. CROIX DISTRICT;)	
BOARD OF ELECTIONS, ST. THOMAS/)	
ST. JOHN DISTRICT; AND JOHN)	
ABRAMSON, JR., VIRGIN ISLANDS)	
SUPERVISOR OF ELECTIONS,)	
in his official capacity,)	
)	
Defendants.)	
)	
)	

JOINT MOTION AND BRIEF REQUESTING EXPEDITED

ENTRY OF CONSENT DECREE

Plaintiff United States of America and Defendants, through their undersigned counsel, respectfully request this Court to enter the accompanying Consent Decree. The Complaint in this action, alleging a violation of the Uniformed and Overseas Citizens Absentee Voting Act (“UOCAVA”), 42 U.S.C. §§ 1973ff to 1973ff-7, was filed by the United States earlier today. The violation arises from the failure of the Territory of the Virgin Islands to transmit absentee ballots to military and overseas voters at least 45 days before the September 8, 2012 Federal primary election and the November 6, 2012 Federal general election, as required by UOCAVA. The Defendants have authority over the administration of elections in the Territory of the Virgin Islands. The United States and the Defendants have negotiated in good faith and have agreed to

entry of this Consent Decree as a necessary and appropriate resolution of the claims alleged.

Expedited consideration and entry of the Consent Decree is necessary to timely implement the agreed upon remedies in advance of the September 8, 2012 Federal primary election.

WHEREFORE, the parties request that the accompanying Consent Decree be entered by this Court.

For the Plaintiff:

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