

Exhibit B

From: [Breckenridge, Tillman J.](#)
To: vagraharkar@acluva.org; [Davenport, Jae K.](#); [Saini, Ajay P.](#)
Cc: eheilman@acluva.org; [Amadi, Brittany](#); [Werle, Nick](#); jared.davidson@protectdemocracy.org; [Harper, Adam Ellis](#)
Subject: RE: King v. Youngkin
Date: Wednesday, May 20, 2026 8:04:28 AM
Attachments: [image001.png](#)

EXTERNAL SENDER

Good morning. I wanted to let you know we've received your letter. While we appreciate the information you've provided to us to this point, we do not believe further engagement on the topics in your letter would be constructive at this time.

Kind Regards,
Tillman



Tillman J Breckenridge | Solicitor General
Office of the Attorney General
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Richmond, Virginia 23219
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From: Vishal Agraharkar <vagraharkar@acluva.org>
Sent: Monday, May 18, 2026 4:21 PM
To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>; Saini, Ajay P. <ASaini@oag.state.va.us>
Cc: Eden Heilman <eheilman@acluva.org>; Amadi, Brittany <brittany.amadi@wilmerhale.com>; Werle, Nick <nick.werle@wilmerhale.com>; Jared Davidson <jared.davidson@protectdemocracy.org>; Harper, Adam Ellis <adam.harper@wilmerhale.com>
Subject: Re: King v. Youngkin

Counsel:

Please see the attached correspondence from Plaintiffs. We look forward to your response. Best,

Vishal

Vishal Agraharkar (he/him)

Senior Supervising Attorney

ACLU of Virginia

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From: Vishal Agraharkar <vagraharkar@acluva.org>

Date: Thursday, May 14, 2026 at 11:49 AM

To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>, Davenport, Jae K. <JKDavenport@oag.state.va.us>, Saini, Ajay P. <ASaini@oag.state.va.us>

Cc: Eden Heilman <ehelman@acluva.org>, Amadi, Brittany <brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared Davidson <jared.davidson@protectdemocracy.org>, Harper, Adam Ellis <adam.harper@wilmerhale.com>

Subject: Re: King v. Youngkin

Tillman,

Attached is a revised spreadsheet adding a column identifying the Hessick report exhibit on which each offense appears, where applicable. I'm also attaching for your convenience her expert report and exhibits.

Best,
Vishal

Vishal Agraharkar (he/him)

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From: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>

Date: Thursday, May 14, 2026 at 9:02 AM

To: Vishal Agraharkar <vagraharkar@acluva.org>, Davenport, Jae K. <JKDavenport@oag.state.va.us>, Saini, Ajay P. <ASaini@oag.state.va.us>

Cc: Eden Heilman <eheilman@acluva.org>, Amadi, Brittany <brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared Davidson <jared.davidson@protectdemocracy.org>, Harper, Adam Ellis <adam.harper@wilmerhale.com>

Subject: RE: King v. Youngkin

Vishal,

Per our discussion yesterday, it would be helpful to evaluating your list for you to identify your expert's determination (yes, no, maybe) for each statute you highlight in red.

Kind regards,

Tillman

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From: Vishal Agraharkar <vagraharkar@acluva.org>
Sent: Wednesday, May 13, 2026 9:49 PM
To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>; Saini, Ajay P. <ASaini@oag.state.va.us>
Cc: Eden Heilman <eheilman@acluva.org>; Amadi, Brittany <brittany.amadi@wilmerhale.com>; Werle, Nick <nick.werle@wilmerhale.com>; Jared Davidson <jared.davidson@protectdemocracy.org>; Harper, Adam Ellis <adam.harper@wilmerhale.com>
Subject: Re: King v. Youngkin

Tillman,

Thank you again for the discussion yesterday. As discussed, we are sharing the attached spreadsheet reflecting our review of the Commonwealth's list of offenses. Our analysis is informed by Professor Hessick's submissions to the Court, including her categorization of offenses as qualifying or non-qualifying. At a minimum, we believe that the highlighted offenses should be removed from the list based on that analysis. The attached reflects our current views based on the record available to date and the need to proceed on an accelerated timeline, and we hope it is useful as you continue refining the list. However, we continue to reserve all rights with respect to the Commonwealth's final list and implementation approach, including the ability to raise additional concerns as appropriate.

We will follow up shortly with more specific concerns and some suggestions as the Commonwealth continues to develop its implementation approach. As we discussed yesterday, we would also be happy to assist in developing or reviewing updated guidance or other voter-facing materials.

With the June 1 deadline approaching, we reiterate that we have increasing concerns about whether the current approach will fully comply with the Court's order in practice. We believe that timely resolution of the issues identified above—particularly with respect to the scope of the list—is critical to the Commonwealth's ability to meet the June 1 deadline. Based on our discussion yesterday, we believe it remains possible to reach an acceptable and workable path forward within that timeframe, and we are committed to working constructively with you toward that end.

Best,

Vishal

Vishal Agraharkar (he/him)

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From: Vishal Agraharkar <vagraharkar@acluva.org>

Date: Monday, May 11, 2026 at 10:43 AM

To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>, Davenport, Jae K. <JKDavenport@oag.state.va.us>

Cc: Eden Heilman <eheilman@acluva.org>, Amadi, Brittany <brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared Davidson <jared.davidson@protectdemocracy.org>, Harper, Adam Ellis <adam.harper@wilmerhale.com>

Subject: Re: King v. Youngkin

Thanks, Tillman. 2 pm tomorrow works — we'll send around a call link today.

Vishal Agraharkar (he/him)

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From: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>

Date: Monday, May 11, 2026 at 9:49 AM

To: Vishal Agraharkar <vagraharkar@acluva.org>, Davenport, Jae K. <JKDavenport@oag.state.va.us>

Cc: Eden Heilman <eheilman@acluva.org>, Amadi, Brittany <brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared Davidson <jared.davidson@protectdemocracy.org>, Harper, Adam Ellis <adam.harper@wilmerhale.com>

Subject: RE: King v. Youngkin

Thank you, Vishal. Tomorrow at 2 works best for us, but if that doesn't work for you all anymore, we also can go with Thursday at 9.

Best,

Tillman

From: Vishal Agraharkar <vagraharkar@acluva.org>

Sent: Friday, May 8, 2026 3:46 PM

To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>

Cc: Eden Heilman <eheilman@acluva.org>; Amadi, Brittany <brittany.amadi@wilmerhale.com>; Werle, Nick <nick.werle@wilmerhale.com>; Jared Davidson <jared.davidson@protectdemocracy.org>; Harper, Adam Ellis <adam.harper@wilmerhale.com>

Subject: Re: King v. Youngkin

Tilman:

A critical mass of us can be available at the following times next week if there's a time here that works for you.

Monday at 9am, 12pm

Tuesday at 9am, 2pm, 4pm

Thursday at 9am, 2pm

Best,

Vishal

Vishal Agraharkar (he/him)

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From: Vishal Agraharkar <vagraharkar@acluva.org>

Date: Friday, May 8, 2026 at 10:07 AM

To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>, Davenport, Jae K. <JKDavenport@oag.state.va.us>

Cc: Eden Heilman <ehelman@acluva.org>, Amadi, Brittany

<brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared Davidson <jared.davidson@protectdemocracy.org>

Subject: Re: King v. Youngkin

Okay, we'll send around times for early next week.

Vishal Agraharkar (he/him)

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From: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>

Date: Friday, May 8, 2026 at 10:05 AM

To: Vishal Agraharkar <vagraharkar@acluva.org>, Davenport, Jae K.

<JKDavenport@oag.state.va.us>

Cc: Eden Heilman <eheilman@acluva.org>, Amadi, Brittany <brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared Davidson <jared.davidson@protectdemocracy.org>

Subject: RE: King v. Youngkin

I've tried to get on, but it says the host has another meeting in progress. In any event, can we reschedule? The redistricting opinion just came in, so we have to deal with that

From: Vishal Agraharkar <vagraharkar@acluva.org>

Sent: Monday, May 4, 2026 4:48 PM

To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Davenport, Jae K.

<JKDavenport@oag.state.va.us>

Cc: Eden Heilman <eheilman@acluva.org>; Amadi, Brittany <brittany.amadi@wilmerhale.com>;
Werle, Nick <nick.werle@wilmerhale.com>; Jared Davidson
<jared.davidson@protectdemocracy.org>

Subject: Re: King v. Youngkin

Good afternoon, Tillman:

Thank you for providing this list. We will review closely and be in touch. Based on an initial review, however, this looks far broader than we anticipated and it's not clear to us why some of the listed offenses are included. Can the Commonwealth identify, for each offense on the list, the specific common law felony in the court's judgment that encompasses it?

Looking forward to chatting on Friday.

Best,

Vishal

Vishal Agraharkar (he/him)

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From: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>
Date: Friday, May 1, 2026 at 3:23 PM
To: Vishal Agraharkar <vagraharkar@acluva.org>, Davenport, Jae K. <JKDavenport@oag.state.va.us>
Cc: Eden Heilman <eheilman@acluva.org>, Amadi, Brittany <brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared Davidson <jared.davidson@protectdemocracy.org>
Subject: RE: King v. Youngkin
Good afternoon. Per our stipulation, I've attached our list of statutory crimes matching 1870 common law felonies. Looking forward to talking next Friday.

Kind regards,
Tillman



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From: Vishal Agraharkar <vagraharkar@acluva.org>
Sent: Tuesday, April 28, 2026 10:43 AM
To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>
Cc: Eden Heilman <eheilman@acluva.org>; Amadi, Brittany <brittany.amadi@wilmerhale.com>; Werle, Nick <nick.werle@wilmerhale.com>; Jared Davidson <jared.davidson@protectdemocracy.org>
Subject: Re: King v. Youngkin

Thanks, Tillman. We'll get these on file. Best,

Vishal

From: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>
Date: Tuesday, April 28, 2026 at 9:45 AM
To: Vishal Agraharkar <vagraharkar@acluva.org>, Davenport, Jae K. <JKDavenport@oag.state.va.us>
Cc: Eden Heilman <eheilman@acluva.org>, Amadi, Brittany <brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared

Davidson <jared.davidson@protectdemocracy.org>

Subject: RE: King v. Youngkin

These are both fine for me. Thanks.

From: Vishal Agraharkar <vagraharkar@acluva.org>

Sent: Monday, April 27, 2026 4:44 PM

To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>

Cc: Eden Heilman <heilman@acluva.org>; Amadi, Brittany <brittany.amadi@wilmerhale.com>; Werle, Nick <nick.werle@wilmerhale.com>; Jared Davidson <jared.davidson@protectdemocracy.org>

Subject: Re: King v. Youngkin

Tillman:

As discussed, we have prepared a proposed joint stipulation and proposed order requesting that the Court extend the implementation deadline set forth in the Court's Final Order. They are attached here for your review and sign off.

The stipulation seeks a limited extension of the implementation deadline to permit completion of outstanding technical and administrative steps, while confirming that Defendants will continue implementation efforts during the extension period. The stipulation also reflects the parties' understanding regarding ongoing meet-and-confer discussions, including Defendants' anticipated provision of a draft list of convictions they contend are disqualifying under the Final Order, and continued work on necessary VERIS updates, inter-agency coordination, and related guidance.

We would, of course, be happy to confer regarding the drafts or to discuss any proposed revisions. Given the current timeline, we would appreciate completing that process promptly, as we are hoping to file before Friday's deadline.

Best regards,

Vishal

Vishal Agraharkar (he/him)

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