

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LEAGUE OF WOMEN VOTERS, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

Case No. 25-cv-3501-SLS

[PROPOSED] ORDER

Upon consideration of Plaintiffs' motion for summary judgment, Defendants' cross-dispositive motion, and the entire record in this case, it is hereby

ORDERED that Plaintiffs' motion for summary judgment is **GRANTED**; it is further

ORDERED that Defendants' cross-dispositive motion is **DENIED**; it is further

DECLARED that that Defendants' overhaul of the Systematic Alien Verification for Entitlements ("SAVE") system¹ violates the Administrative Procedure Act and the constitutional separation of powers; it is further

ORDERED that Defendants' overhaul of the SAVE system is **VACATED** and **SET ASIDE**; it is further

ORDERED that Defendants shall take the following actions to undo their unlawful overhaul of the SAVE system within 14 days of entry of this Order:

- (1) Revert the SAVE system to its prior operational state before Defendants unlawfully overhauled it in 2025, including but not limited to disabling any functionality that

¹ As used in this Order, "overhauled SAVE system," "SAVE overhaul," or similar language refers to Defendants' expansion of SAVE in 2025 to allow bulk searches, using non-DHS unique identifiers, of systems of record that are housed outside of DHS and include information on U.S.-born citizens, as memorialized in Defendants' May 15, 2025, letter agreement (DHS-AR-420-431), the 2025 SAVE SORN (DHS-AR-114), and the 2025 SSA Master File SORN (SSA-AR-206).

allows SAVE users to conduct bulk searches, using non-DHS unique identifiers, of systems of record that are housed outside of DHS and include information on U.S.-born citizens;

- (2) Delete, disentangle, and unlink all records, data, or information unlawfully linked, incorporated, connected, or otherwise made available through the overhauled SAVE system;
- (3) Instruct SAVE user agencies to delete, disentangle, and unlink all records, data, or information unlawfully linked, incorporated, connected, or otherwise made available to them through the overhauled SAVE system; and
- (4) Terminate all memoranda of agreement, computer matching agreements, or other agreements permitting agencies outside of the Department of Homeland Security to access, use, query or in any way rely upon the overhauled SAVE system or data obtained through the system; it is further

ORDERED that Defendants are **PERMANENTLY ENJOINED** and prohibited from operating SAVE with its overhauled functionalities absent statutory authorization; it is further

ORDERED that Defendants shall publish all statutorily required matching-agreement information concerning the overhauled SAVE system in the Federal Register within 14 days of entry of this Order; it is further

ORDERED that Defendants shall file a status report within 16 days of entry of this Order outlining the steps they have taken to comply with this Order; it is further

ORDERED that the Court retains jurisdiction over this matter to ensure compliance with this Order.

SO ORDERED.

SPARKLE L. SOOKNANAN
United States District Judge

DATED: _____