

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LEAGUE OF WOMEN VOTERS, *et al.*,

Plaintiffs,

vs.

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

Defendants.

Case No. 1:25-cv-3501-SLS

DECLARATION OF ALEX DOE

I, Alex Doe, declare as follows:

1. I am over 18 years old and a member of the League of Women Voters of Texas and the Electronic Privacy Information Center. The statements made in this declaration are based on my personal knowledge, information, and belief. I submit this declaration in support of Plaintiffs' motion for summary judgment.

2. I have been a United States citizen for over a decade.

3. I was born in South America. I immigrated to the United States with my parents when I was a toddler.

4. I was issued a Social Security Number (SSN) and card in the early 2010s, when I was in elementary school. At the time I applied for an SSN, I was a lawful permanent resident.

5. My parents became naturalized U.S. citizens in the 2010s. I automatically became a U.S. citizen when my father naturalized.

6. I was issued a U.S. passport, confirming my U.S. citizenship. It was most recently updated in the last five years.

7. When my parents became U.S. citizens, they instilled in me the power and importance of voting. Ever since, I have taken my responsibility to vote seriously. I consider it to be one of the primary ways we as Americans can express ourselves, our needs, and our desires in order to inform the government and improve our communities. I understand that to vote is to have a voice in society.

8. After turning 18, I registered to vote, and I regularly vote in state and federal elections in Texas. I'm proud that I have voted in nearly every election in the past six years.

9. I currently live in and am registered to vote in Texas. I have not been disqualified from voting due to a felony conviction or a judgment of legal incompetence.

10. I recently voted on the first day of early voting in Texas' primary election, and I intend to vote in the November midterm elections in Texas this year.

11. Last October, I received a letter from my County Elections Administrator/Voter Registrar, titled "Notice to Registered Voter for Proof of Citizenship (USCIS Verification)." A true and correct copy of the letter, with certain private information redacted, is attached hereto as Exhibit 1.

12. I did not open the letter for a while. I am busy working toward a postgraduate degree and the envelope looked like it was unofficial. The envelope did not indicate that it was official election mail, that it was urgent, or that any action was required from me to stay registered to vote. It looked like junk mail, or even a scam.

13. I eventually opened the letter. It said that the government did not think I was a U.S. citizen, and that I would be dropped from the voting rolls unless I provided proof of my U.S. citizenship by emailing a photo of my passport to a random email address for the County Elections Department. At that point, I only had a week until the deadline.

14. Because the process seemed so informal, I was still skeptical that this was an official government process. I even emailed the County Elections Department to confirm that sending a picture of my passport to a random email address was the expectation. Ultimately, I did email a scan of my passport to the County Elections Office in order to preserve my right to vote.

15. Throughout the process, I felt a mix of emotions. The government questioning my citizenship, my right to be here, and my right to vote made me feel like they were questioning my entire identity. I was surprised, confused, upset, and offended that I had to confirm my citizenship. I'm here legally; I've voted in every election since I was 18; I've never been in trouble with the law. I didn't—and still don't—understand why my vote came into question.

16. I was also a little bit disturbed. Prior to this experience, I had certain expectations that the government was functional and organized. I always assumed that the government had correct information about me and that it was taking measures to keep my data secure. Learning firsthand that the government's information about me is so disorganized and inaccurate, and that they are using my information so haphazardly, has been disappointing and made me lose a little bit of faith in our institutions.

17. The process of sending in my passport photo also made me feel anxious. My partner works in cybersecurity, and I understand that emailing sensitive documents as attachments is not typically considered to be safe. If the government needed me to submit something that included my Social Security number, I would have expected that it would take steps to protect my information and ensure enhanced security, like requiring that I upload the passport to a secure portal.

18. I have since learned that the Social Security Administration (SSA) is sharing my

personal records with the Department of Homeland Security (DHS) and with Texas. That makes me feel violated and uneasy, and it makes me lose further trust in the government. I did not expect my personal information could be used in a massive, national citizenship database, especially when I myself do not even know what is in my file with the SSA. I also never consented to, nor do I consent to, Texas or the United States federal government disclosing information about me to each other in order to run citizenship checks.

19. I was so confused that I tried calling the SSA to see what information they had on me. I was surprised to learn that the agency did not have information on my citizenship status one way or the other, even though they should--they told me that my citizenship status in their records was "unknown". This made me even more confused and anxious. With everything going on, sometimes I fear DHS may even show up at my door, even though I am a U.S. citizen, because they are relying on inaccurate and incomplete information about me.

20. The inaccuracy of the data made me worried that Texas will continue to wrongly identify me as ineligible to vote. As a result, even though I have voted many times before, I was nervous about voting in the most recent primary election in a way that I have not been before. Even though I had confirmed my voter registration when I submitted my passport at the end of last year, I still re-checked my voter registration the week before voting because I was paranoid that the government may have messed up my information and gone through with their threat to purge me from the voter rolls. For the first time, I brought my passport when I went to vote just in case my citizenship or eligibility was questioned. Throughout the process of voting, paranoia about my ability to vote was in the back of my mind.

21. I fear that I will be forced to prove my citizenship status again and am distressed that I have to remain vigilant about my voter registration status. I plan to continue voting

regularly, and now will feel compelled to regularly check my voter registration status to ensure that it is not wrongly cancelled.

22. In addition to my right to vote, the privacy of my personal information is also very important to me. My parents taught me to keep my SSN safe and confidential. I am careful what information I share about myself publicly. I have even deleted my social media accounts.

23. But I now understand that the Social Security Administration has shared with DHS various information that SSA had about me when I obtained a social security number, including my name, date of birth, social security number, and the citizenship status that SSA had on file for me at the time. It is my understanding that that SSA data will be retained by DHS in their SAVE system for at least 10 years. And that information has been shared with the Texas Secretary of State, giving state election officials information that wrongly implies I am not eligible to vote.

24. Beyond feeling violated by the disclosure of my personal information, I also feel scared. As described above, I question how secure my information is. I do not know who can access my data, and I fear that my information may be weaponized against me for political retribution, especially because I live in a state that does not align with my political affiliation.

25. I am submitting this declaration under a pseudonym to protect myself and my school from possible retaliation. This administration (and state leaders in Texas) is vindictive about going after perceived political enemies, and I worry that I could be a target by participating in a lawsuit that threatens their voter purge efforts. The Trump administration has threatened to try and denaturalize people who oppose the administration's policies, and has targeted universities for taking actions the administration doesn't agree with. I fear that the Trump administration could take similar steps towards me or my university if it knows my identity.

EXHIBIT 1

21-50
Prescribed by Secretary of State
Section 16.033, Texas Election Code
10/2025

[REDACTED]
ELECTIONS ADMINISTRATION

NOTICE TO REGISTERED VOTER FOR PROOF OF CITIZENSHIP (USCIS VERIFICATION)

Dear [REDACTED]

As the voter registrar for [REDACTED] I am writing to notify you of important information regarding your voter registration.

You are currently registered to vote in this county. We have received information from the Texas Secretary of State reflecting that you might not be a United States citizen. A comparison of the information in your voter registration records with the United States Citizenship and Immigration Services SAVE records show that you were not a United States citizen at the time of the comparative process. Although you can obtain United States and state government identity documents as a non-United States citizen, only United States citizens are eligible to vote.

To maintain your active voter registration status, please provide proof that you are a United States citizen. Proof of United States citizenship can be established by presenting a copy of any of the following documents:

- U.S. birth certificate or a Consular Report of Birth Abroad of a Citizen of the United States issued by the United States Department of State;
- United States passport;
- Certificate of Naturalization or Certificate of Citizenship; or
- Your parent's Certificate of Naturalization along with your birth certificate if you became a U.S. citizen as a result of your parent's naturalization.

There are several ways to provide proof of U.S. citizenship to my office. You can deliver it by hand, or you can send it by mail, fax, electronic mail, or any other method of transmission. My office's contact information is listed at the top of this letter.

Please provide proof of U.S. citizenship within thirty (30) days from the date of this letter. If we do not receive a response from you within thirty (30) days, your voter registration will be cancelled. In the event that your registration is cancelled, you can still be immediately reinstated by providing proof of U.S. citizenship to my office or at your polling location, even if the thirty (30)-day period has already passed. You may also request a hearing to challenge your cancellation, even if you do not possess one of the above forms, by contacting my office.

If you have any questions regarding this notice or your voter registration, please contact my office at [REDACTED]

[REDACTED]
10 [REDACTED] 2025
Date