

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

LEAGUE OF WOMEN VOTERS, *et al.*,

Plaintiffs,

vs.

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

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

Defendants.

DECLARATION OF CORY DOE

I, Cory Doe, declare as follows:

1. I am over 18 years old and a member of the League of Women Voters of Texas.

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.

Background

2. I have been a United States citizen since July 2012.

3. I was born in Venezuela in 1996. I immigrated to the United States with my parents when I was six years old.

4. I was issued a Social Security Number ("SSN") and card in October 2011, when I was fifteen years old. When I applied for an SSN, I was a lawful permanent resident.

5. My parents became naturalized U.S. citizens in July 2012, when I was sixteen years old. I automatically became a U.S. citizen when my parents naturalized.

6. I have a valid U.S. passport that was issued to me in March 2019. This was not the first U.S. passport issued to me; my first U.S. passport was issued in September 2012.

7. To my knowledge, the Department of Homeland Security (“DHS”) has never issued me a Certificate of Citizenship; nor have I ever applied for one.

8. After becoming a U.S. citizen, I knew I would be entitled to vote when I turned 18 and felt that it was important to vote because it is a fundamental right of U.S. citizenship. I believe it is important to be informed and participate in the political process.

9. After turning 18, I registered to vote and began voting in state and federal elections in Texas. I regularly vote in elections.

10. 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.

11. I voted in the March primary, and I intend to vote in the November midterm elections in Texas this year.

DHS’s Expanded SAVE System Led to Burdens on My Voting Rights

12. After voting in the November 2025 election (during the early voting period), I received a letter from my county elections office, dated late October 2025, titled “Notice to Registered Voter for Proof of Citizenship (USCIS Verification).” A true and correct copy of the letter, with certain identifying information redacted, is attached hereto as Exhibit 1.

13. The letter states in part that 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.” It then instructs: “[t]o maintain your active voter registration status, please provide proof that you are a United States citizen.” The letter lists several types of documents that will be accepted as proof of U.S. citizenship, and notes that copies of the documents can be delivered by hand, mail, fax, email, or any other method of transmission.

14. The letter further states: “Please provide proof of U.S. citizenship within (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.”

15. The exterior of the envelope in which the letter was enclosed did not indicate it was official election mail, that the enclosed letter had any bearing on my voter registration, or that it contained a notice on an urgent matter.

16. I was also concerned that I was being directed to send sensitive personal information—a copy of my U.S. passport—to a random email address.

17. Upon reading the October letter, I was shocked and confused to learn that DHS’s SAVE system indicated I was not a U.S. citizen. As stated above, I have been a U.S. citizen with a U.S. passport since 2012. I was frustrated and in disbelief that I was being accused of being a non-citizen. I was worried that the letter was part of a voter suppression effort that was pushing boundaries and discouraging Texans from exercising their right to vote, which I found deeply troubling as someone who cares about the right to vote.

18. In November 2025, I submitted a copy of my U.S. passport to my county elections office via email.

SAVE is Collecting, Disclosing, and Repurposing My Personal Data Without My Consent and Causing Me Distress

19. After receiving the letter questioning my citizenship and asking me to prove my citizenship, I learned more about DHS’s SAVE system and Texas’s use of the system to conduct citizenship checks of registered voters. I learned this information from materials publicly released by DHS and the Texas Secretary of State.

20. I learned that, in 2025, DHS expanded the SAVE system by allowing bulk searches of Americans’ personal data housed at the Social Security Administration (“SSA”),

using only a name, date of birth, and SSN.¹ I also learned that the Texas Secretary of State had announced in a press release on October 20, 2025, that her office had used this new functionality to run Texas’s entire voter registration list with more than 18 million voters through the expanded SAVE system, that they identified “2,724 potential noncitizens” who were registered to vote in Texas, and that they had referred those individuals to Texas counties (including my county) to determine their eligibility to vote.² The Secretary further stated that once the counties complete this process, “individuals who are deemed noncitizens that voted in a Texas election will be referred to the Office of the Attorney General” for investigation.

21. Based on the Texas Secretary of State’s October 20 press release and the October letter I received from my county, it is my understanding that I am one of the “2,724 potential noncitizens” identified through DHS’s expanded SAVE system.

22. It is my understanding that, as part of the process of bulk uploading Texas’s entire voter registration list into SAVE, the Texas Secretary of State disclosed, at a minimum, my name, date of birth, and full nine-digit SSN to DHS, and that this information will be retained in SAVE for at least 10 years. It is my understanding that after the Texas Secretary of State uploaded my voter registration information into DHS’s SAVE system, DHS disclosed that information to SSA so that SSA could match it against its own records about me.

23. I have not consented to, and do not consent to, the Texas Secretary of State disclosing the information about me that her office uploaded into SAVE to DHS, SSA, or any other federal agency to run citizenship checks. I provided that information for use by state and

¹ <https://www.uscis.gov/save/current-user-agencies/guidance/voter-registration-and-voter-list-maintenance-fact-sheet>; <https://www.federalregister.gov/documents/2025/10/31/2025-19735/privacy-act-of-1974-system-of-records>.

² <https://www.sos.state.tx.us/about/newsreleases/2025/102025.shtml>.

local Texas officials, not to be uploaded into a national citizenship database run by DHS. I expected that information—especially my full nine-digit SSN—to remain private and protected by state and local Texas officials.

24. It is my understanding that, based on the SAVE search of my personal information run by the Texas Secretary of State, SSA returned a response to DHS that included my SSN, name, date of birth, an indicator of my citizenship status, and other information that SSA collected when I applied for a Social Security card in 2011. It is my understanding that my personal SSA data will be retained in DHS's SAVE system for at least 10 years.

25. I have not consented to, and do not consent to, SSA disclosing and verifying my personal information from SSA records to DHS or any other federal, state, or local agency to run citizenship checks for voter list maintenance or any other purpose. I expected that data to remain private within SSA and be used only for purposes consistent with why SSA collected the data, such as to determine eligibility for SSA benefits or authorization to work in the U.S. I never expected my personal SSA information to be disclosed to DHS or any other federal, state, or local agency for use in a massive national citizenship database for voter eligibility checks.

26. I am worried about SAVE's reliance on my SSA citizenship data. In February 2026, I called SSA, and the SSA employee that I spoke with told me they have no record of my U.S. citizenship. I called SSA a second time to determine what specific immigration status was on file for me. The employee confirmed that whatever immigration status I had when I first applied for a Social Security card would be the status that they currently have on file, unless I had updated it with SSA. But the SSA employee did not appear to review the citizenship status on file for me while we were on the phone. As mentioned above, I obtained a Social Security card in 2011, the year before I became a U.S. citizen, when I was a Legal Permanent Resident.

To my knowledge, there is no requirement for me to update my citizenship status with SSA, and I have not done so.

27. I am distressed by the fact that the government has repurposed my sensitive SSA data without my consent to determine my eligibility to vote, when the information is not suitable for that purpose and was never intended to be used in that way.

28. It is my understanding, based on the Texas Secretary of State's October 20 press release and my county's October 2025 letter to me, that SAVE could not confirm my U.S. citizenship due to outdated, inaccurate SSA citizenship data accessed by SAVE using my SSN, as well as SAVE's new functionality allowing bulk queries of state voter rolls. As a result, my understanding is that SAVE returned my case to the Secretary to seek documentary proof of citizenship directly from me. This led to my county demanding that I provide documentary proof of citizenship within 30 days to remain on the voter rolls. Absent the SAVE expansion and its new bulk search-by-SSN functionality, it is my understanding that these events would not have occurred.

29. I am also worried that, even though I provided my county elections office with documentary proof of citizenship, DHS's SAVE system will continue to wrongly identify me as a non-citizen based on faulty underlying data when the Secretary of State runs bulk voter roll searches in the future, and that I will again be forced to prove my citizenship status in order to retain my voter registration. Being caught in such a cycle, with my voting rights on the line, is distressing to me.

30. After this experience, I have begun checking my voter registration status more regularly to ensure that it is not wrongly cancelled, and I will continue to do so as long as Texas continues to use the expanded SAVE system and its unreliable data.

31. The privacy of my personal information is very important to me. My parents always told me that it was critical to keep my SSN safe and confidential. I believe that not doing so runs a risk of identity theft or other negative consequences. I treat my Social Security card as an ultra-sensitive document. Moreover, because I pay taxes and plan to retire and receive Social Security benefits in the future, SSA has personal information about me that I consider highly sensitive. I have trusted SSA and Texas election officials to keep my information private and only use it for lawful purposes. I understood them to be bound by laws that would keep them from sharing this information across government agencies for completely unrelated purposes. I did not consent to them sharing this highly sensitive information with other agencies for unlawful or undisclosed purposes.

32. I am frustrated, angry, disturbed, and anxious that the government has violated my trust by collecting, disclosing, matching, and repurposing my personal information without my consent in an effort to create a national database of U.S. citizens. I am also worried that DHS is using personal data to target, surveil, or simply make life harder for foreign-born American citizens. This makes me feel distrustful of the government, especially when they do not follow any required processes. I expected the United States to respect all of its citizens' privacy, but instead I am opposing government efforts to create a centralized profile on me, including my sensitive information, for a national citizenship database. The government's actions have disturbed the safety and security I used to feel as a U.S. citizen.

33. Because the expanded SAVE system has enabled my sensitive personal information to be moved across multiple federal, state, and local agencies, I am also very concerned that my data will be stored or transferred in an unsecured manner, exposing me to a data breach and identity theft and fraud. I am especially concerned about the unsecured storage

or transfer of files containing my full name, date of birth, and SSN, because the exposure of those three data elements in tandem creates a heightened risk of identity theft and fraud.

34. I am requesting to file this declaration under a pseudonym because I fear retaliation from the current administration for speaking up. Given the countless actions this administration has taken against individuals who oppose it, I fear that the government will retaliate against me. I have concerns that my status as a naturalized citizen will be used against me unless I can submit this declaration under a pseudonym.

35. I fear, given the memo published by the Department of Justice indicating they are going to pursue denaturalizing citizens as a punishment, that if I were to identify myself as a naturalized citizen publicly opposing the administration's policies then the administration would take retaliatory action against me or my naturalized family members, including investigating us to seek denaturalization. Finally, I have family members (who are also naturalized) currently living in a state that, by my understanding, is using SAVE to purge voter rolls and open criminal investigations.

36. It is extremely concerning that so many people across all levels of government have access to my personal data without my consent. I am skeptical of any unauthorized national database, but especially one that contains my private data and lets government officials access and utilize it in a way that can be used against me and others similarly situated.

I declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on March 10 2026, in Texas.

/s/ Cory Doe
Cory Doe*

*Out of fear of retaliation and harassment, Cory Doe submits this declaration under pseudonym. Counsel hereby certifies that they have an unaltered signed copy of the foregoing document available for inspection by the Court.

Exhibit 1

[Redacted]
Elections Administrator

Fax [Redacted]

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

Cert#: [Redacted]

Dear Voter:

As the voter registrar for [Redacted] County, 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] (phone number).

[Redacted]

Signature of Voter Registrar

10/ [Redacted] /2025

Date