

**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-03501-SLS

DECLARATION OF JOYCE LEBOMBARD

I, Joyce LeBombard, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the President of the League of Women Voters of Texas (“LWVTX” or the “League”). I have served in this role since June 2022.

2. I submit this declaration to describe the League’s mission to empower Texan voters through voter registration, education, and engagement, and to explain how the League and its members have been harmed by Defendants’ actions to transform the U.S. Citizenship and Immigration Services’ Systematic Alien Verification for Entitlements (“SAVE”) system into a searchable national citizenship data system for conducting mass “voter verification” checks.

3. It is my understanding that the overhauled SAVE system now draws on Social Security Administration (“SSA”) systems of records and its incomplete and unreliable citizenship data—which, from publicly available information, I understand is particularly unreliable for naturalized and derived citizens—and that the overhauled system allows local, state, and federal user agencies to run bulk searches of the citizenship or immigration status of many thousands of individuals.

4. Because the Texas Secretary of State’s office is using the overhauled SAVE system for voter list maintenance and has run the state’s entire list through the system, thousands of eligible Texas voters are now at serious risk of being erroneously purged from the voter rolls and deprived of their right to vote in upcoming elections. The Texas Secretary of State has already announced that, through use of the overhauled SAVE system, her office has identified over 2,700 registered voters suspected of being noncitizens and is investigating these individuals in conjunction with Texas counties¹—with Texas creating a list of registered voters suspected of being noncitizens, and counties sending out notices to those voters informing them that they must provide documentary proof of citizenship (“DPOC”) within 30 days or have their voter registration cancelled.² They have plowed forward with these actions, at Defendants’ encouragement and pursuant to Defendants’ rules and processes for using the overhauled SAVE system, even though SAVE’s faulty citizenship data means that U.S. citizens in Texas are being and will be forced to needlessly provide DPOC and are having and will have their voter registration wrongfully cancelled or denied.

5. The overhauled SAVE system’s unlawful pooling of information, including incomplete and unreliable SSA citizenship data, thus directly harms the League’s voter registration and voter empowerment mission and its members. With local primaries in Texas taking place in March and May 2026, general election races taking place in November 2026, and registration deadlines for these elections on the horizon,³ time is of the essence to protect our mission.

¹ Press Release, Tex. Sec’y of State, *Texas Completes Citizenship Verifications in the SAVE Database* (Oct. 20, 2025), <https://perma.cc/9WZ2-XVDA>.

² Tex. Sec’y of State, *Notice to Registered Voter for Proof of Citizenship (USCIS Verification)* (Oct. 2025), <https://perma.cc/WM6Q-P48N>.

³ *Upcoming Texas Election Dates*, Vote411, <https://www.vote411.org/upcoming/66/events>.

6. With elections looming, League members who are naturalized or derived U.S. citizens, and naturalized and derived citizens in Texas whom the League has engaged with as part of its voter education and participation work, reasonably fear they will be wrongly purged from voter rolls and unable to exercise their right to vote, or that they will be criminally investigated for their lawful voting. The League has heard these fears firsthand, including from those who have received SAVE non-citizenship notices, and they impair our ability to facilitate voter registration and voting in Texas.

7. The League has also heard firsthand from members who did not consent to the aggregation and misappropriation of their sensitive data by Defendants and are extremely disturbed by and concerned about how the federal government's overhaul of the SAVE system is making their sensitive SSA information readily available to DHS and various state and local election officials.

8. For all these reasons, the League and its members need judicial relief.

LWVTX Background

9. The League of Women Voters of Texas, formed under Section 501(c)(3) of the Internal Revenue Code, is a nonpartisan, nonprofit, grassroots organization that seeks to encourage informed and active participation in the democratic process and government. Nonpartisanship is fundamental to LWVTX, and LWVTX thus does not support or oppose any candidate or political party.

10. LWVTX is a state League of the League of Women Voters, which was founded in 1920 as an outgrowth of the struggle to win voting rights for women, has more than a million members and supporters, and is organized in more than 750 communities and in all fifty states and the District of Columbia.

11. LWVTX was established in October 1919 and consists of 34 chapters across Texas. Each local League is a member of LWVTX, all members of the local Leagues are members of LWVTX, and all LWVTX members are members of the national League of Women Voters.

12. LWVTX has approximately 3,500 members across Texas. These individuals share in its mission to educate and engage eligible voters and encourage all residents to actively participate in Texas's political process. Some of those members are naturalized and derived citizens, and others are U.S.-born citizens.

13. These members, including naturalized-citizen and derived-citizen members, are registered voters, have records in various federal databases, including SSA, and have not consented to SSA's provision of their records to the overhauled SAVE tool. Although some may have had their SSA records updated to account for the fact that, after they applied for a Social Security Number and card, they became naturalized or derived citizens, many others have not.

LWVTX's Mission and its Members

14. LWVTX's mission is to empower eligible Texans to vote and defend the democratic process in Texas. LWVTX believes that every eligible Texan voter should be able to effectively register to vote and cast their ballot. LWVTX encourages the informed and active participation of all citizens in Texas through participation in the democratic process. LWVTX strives for a democracy where every person has the desire, the right, the knowledge, and the confidence to participate in the electoral process

15. LWVTX is comprised of dues-paying members who provide voter services to Texans. LWVTX has an executive director and a small staff who work for the organization; however, the majority of LWVTX's work is done by volunteers.

16. Helping eligible citizens register to vote and voter assistance in all of its forms are core components of the League's work and are vital to implementing its mission to ensure that all eligible voters should participate in Texas's democracy. The League works to ensure that all eligible individuals have the opportunity and the information needed to register and vote, with a particular focus on traditionally underrepresented and underserved communities who benefit the most from additional education and assistance. LWVTX believes it is especially important to encourage the more than 2 million naturalized and derived citizens in Texas⁴ to vote and educate them about the American and Texan democratic processes.⁵

17. To further its mission, LWVTX provides regular training and guidance materials to its local Leagues, their members, their volunteers, voter services teams, and nonpartisan partners to assist voters in getting registered and staying registered.

18. LWVTX also helps maintain, together with the national League and other state and local Leagues, VOTE411.org, an award-winning nonpartisan, online resource committed to ensuring voters have the information they need to successfully participate in every election—local, state, and federal. VOTE411.org is an accessible, bilingual, user-friendly website that allows individuals across the nation to register to vote or update their voter registration. VOTE411 provides extensive, state-by-state guides about a huge range of election issues for voters, such as how states' absentee ballot process work, how to cure ballots, where to vote, what ID is required, how to verify their voter registration, even what types of machines to expect at polling places.⁶

⁴ See, e.g., Texas, Migration Pol'y Inst., <https://www.migrationpolicy.org/data/state-profiles/state/demographics/TX> (last visited TK).

⁵ See *Naturalized Citizens & Voter Registration*, League of Women Voters of Texas, <https://lwvtx.clubexpress.com/naturalized-citizens-voter-registration#gsc.tab=0> (last visited TK).

⁶ See *Texas, Vote411*, <https://www.vote411.org/texas>.

19. Finally, as part of its voting-rights mission, LWVTX is dedicated to ensuring the privacy of the personal information of its members and the Texas citizens that it serves, so that they are able to exercise their right to vote and do so without fear or burden.

LWVTX's Voter Registration Activities

20. LWVTX actively works to register eligible Texans to vote and ensure that they cast a ballot that actually counts.

21. LWVTX and its local Leagues, through their voter services and public services programs, host public events on civic education, including providing information and assistance with the voter registration process and with confirming a voter's registration status.

22. LWVTX voter services and programs span across Texas and cover a diverse array of locations in order to reach potential Texan voters, register them to vote, and help them re-register or remain registered, if necessary. Such locations include schools, community centers, and public events. LWVTX members and volunteers bring tents, tables, printed voter registration forms, computers for access to the Texas Secretary of State voter website and VOTE411.org, voting information, pens, clipboards, papers, and any other supplies needed to further assist and facilitate voters to engage in the democratic process. In addition, members host a number of nonpartisan candidate forums for local and state offices and engage directly with voters there, and they also engage with voters at other types of voting events, such as Get-Out-The-Vote events.

23. LWVTX and their local Leagues have conducted voter registration activities around the state so far this year, including in local high schools, libraries, and community events.

24. At LWVTX and local League registration drives and other events, volunteers typically guide applicants through the voter registration process, answer questions, and ensure that

applications are completed correctly. LWVTX volunteers then ensure that the applications are submitted correctly in accordance with Texas law.

25. Throughout LWVTX's programming, many of the voters who are submitting applications to register to vote or who have questions about the process are naturalized or derived citizens. And at voter registration drives, naturalized and derived citizens frequently ask questions about their eligibility to vote, and League members answer those questions, help them to determine if they are eligible to register to vote and to register if they are eligible, and emphasize why it is important for new American citizens to participate in the democratic process, just like citizens born in the United States.

26. Aside from holding registration events, the League helps its own members and other registered voters update their registrations, double-check that they remain registered, remain on the rolls or be reinstated, and contact local election officials for assistance.

27. LWVTX also helps Texas voters by developing and distributing, by paper and online, various voter guides and other educational materials to ensure that they are informed about how to register, check their voter registration, and ensure that their right to vote is protected. LWVTX, and its local Leagues, also mails postcards to thousands of Texans, and post on various social media platforms, to encourage them to vote and provide them with voting information. Additionally, in response to voting issues facing particular communities, such as the Hispanic community, League members conduct interviews with local newspapers, radio stations, and digital media sources to address the questions about voter registration and elections in Texas.

28. In short, the League conducts an array of activities to further its mission of registering eligible voters, including naturalized and derived citizen voters, and ensuring they can exercise their right to vote. Through its work, LWVTX works with and helps register thousands

of Texas voters every year, in furtherance of its core mission to ensure that all eligible Texas voters are registered to vote, have a plan to vote, and can and actually do vote.

The Overhauled SAVE System’s Harmful Effects on LWVTX’s Voter-Registration Mission and Activities

29. The overhauled SAVE system harms LWVTX and its members in several ways, particularly in advance of the upcoming 2026 elections in Texas.

30. First, when voters are unlawfully and erroneously purged from Texas voter rolls, it decreases the number of Texas voters, directly undermining the League’s mission of increasing the number of registered voters and voter participation. And when voters are intimidated or must take additional steps to register, remain registered, or re-register, it directly harms the League’s mission of ensuring that the ballot box is accessible for all eligible voters in Texas.

31. The overhauled SAVE system imposes these very harms because it creates a serious risk that naturalized-citizen and derived-citizen Texans who are eligible to vote will nonetheless be purged from the voter rolls. The purges, as well as the threat of criminal prosecution against individuals wrongly believed to be non-citizen voters, are already underway.

32. In June 2025, the Texas Secretary of State announced she had “referred to the Office of [the Texas] Attorney General for investigation the names of 33 potential noncitizens who voted in the November 2024 General Election,” based on information obtained from the overhauled SAVE system.⁷ That same month, the Texas Attorney General confirmed that he had opened investigations of the 33 potential noncitizen voters referred by the Secretary of State, and

⁷ Press Release, *After Gaining Access to SAVE Database, Secretary Nelson Refers Potential Noncitizen Voting Cases for Investigation*, Texas Sec’y of State (June 5, 2025), <https://perma.cc/WZ3C-FUXL>.

he likewise credited the overhauled SAVE system.⁸ It is my understanding from public reporting at the time that Texas’s early use of SAVE resulted in an error rate of at least 17 percent.⁹

33. Then, on October 20, 2025, the Texas Secretary of State’s office announced in a press release that it had “run[] the entire Texas voter list with more than 18 million voters through the SAVE database,” to conduct “a full comparison of the state’s voter registration list against citizenship data” in SAVE.¹⁰ It explained that SAVE had identified “2,724 potential non-citizens who are registered to vote in Texas,” and that, “[l]ast week those voter files were provided to Texas counties, who will now conduct their own investigations into the eligibility of these voters” and then have “individuals who are deemed non-citizens that voted in a Texas election will be referred to the Office of the Attorney General.”¹¹

34. The Texas Secretary of State’s Office has created a template notice for county voter registrars to require documentary proof of citizenship (“DPOC”) for voters identified as potential non-citizens by the overhauled SAVE system. That notice informs voters 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,” and that they must provide one of four forms of DPOC, including a U.S.

⁸ Press Release, Attorney General Ken Paxton Opens Investigations into 33 Noncitizens for Illegally Voting in the 2024 Election, Att’y Gen. of Texas (June 17, 2025), <https://perma.cc/MC8L-6RJ4>.

⁹ Natalia Contreras, *As Texas Embraces Federal Immigration Database to Verify Voter Citizenship, Some Experts are Worried*, The Texas Tribune (July 22, 2025), <https://perma.cc/39FY-UVEK>.

¹⁰ Press Release, *supra* n.1

¹¹ *Id.*

passport or birth certificate, within 30 days to their county registrar's office or have their voter registration cancelled.¹²

35. It is my understanding that Texas counties have been sending the SAVE non-citizenship notices to Texans since October 2025, some without investing any time or apparent effort to verify the results of SAVE system searches relayed by the Texas Secretary of State's office. For example, I am aware from public reporting that Denton County sent out notices within two days of receiving SAVE results and one day of receiving the template notice by email from the Texas Secretary of State.¹³ And I am aware from public information that the SAVE results of purported non-citizen registered voters that Travis County received had demonstrably faulty citizenship information, since about 25 percent of the voters had already proven citizenship at the time they registered to vote, and an additional 40 percent had already previously had their citizenship status cross-checked.¹⁴

36. It is my understanding, based on publicly available information, that the overhauled SAVE system creates a serious risk of error because it includes citizenship data from SSA, which has inaccurate and unreliable citizenship data, especially for naturalized and derived citizens. These data issues are discussed at length in Plaintiffs' Amended Complaint and System of Record Notice Comments to both DHS and SSA, which I am familiar with and have reviewed.¹⁵

¹² Tex. Sec'y of State, Notice to Registered Voter for Proof of Citizenship (USCIS Verification) (Oct. 2025), <https://perma.cc/WM6Q-P48N>.

¹³ Email from Tex. Sec'y of State to Voter Registrars/Election Administrators (Oct. 21, 2025), <https://perma.cc/X9MN-ZTVJ>; Camila Gonzalez, *Denton County has 84 possible non-citizens registered to vote, state says. Most have never voted*, Denton Record-Chronicle (Oct. 23, 2025), <https://perma.cc/M6X7-MK2Z>.

¹⁴ Comment to DHS by Travis County Clerk, Travis County Tax Assessor-Collector, and Travis County, at 7 (Dec. 1, 2025), <https://tinyurl.com/3wrn29dv>.

¹⁵ See First Am. & Suppl. Compl. ¶¶ 87, 96, 110-30, *LWV et al., v DHS et al.*, No. 25-cv-3501 (D.D.C. Jan. 21, 2026) (citing, *inter alia*, Comment to DHS by League of Women Voters, the League of Women Voters of Louisiana, the League of Women Voters of Virginia, and the League

37. It is my understanding from publicly available information that Defendants’ overhauled SAVE system and the rules and processes governing its use for bulk voter verification authorize SAVE user agencies to use SAVE citizenship results—which, again, are especially unreliable for naturalized and derived citizens and may wrongfully identify them as actual or potential non-citizens—to require SAVE-identified individuals to provide DPOC or have their registration cancelled or denied.¹⁶ And it is my understanding that Texas, in using the overhauled SAVE system for bulk voter verification and contacting those identified in SAVE results as non-citizens or potential non-citizens to require them to provide DPOC within 30 days in order to stay registered to vote, are acting in accordance with Defendants’ published rules and processes for the overhauled system and using it in exactly the manner envisioned and authorized by Defendants.¹⁷

38. I know from my work with LWVTX and from publicly available information that requiring DPOC significantly burdens the right to vote for millions of American citizens, including those in Texas. Many do not have DPOC or easy access to DPOC, let alone the ability to access DPOC in time for upcoming election or registration deadlines or within 30 days,¹⁸ and others may

of Women Voters of Texas at 7-9 (Nov. 26, 2025), <https://tinyurl.com/3hx8auzb> [hereinafter LWV DHS Comment], and Comment to SSA by League of Women Voters, the League of Women Voters of Louisiana, the League of Women Voters of Virginia, and the League of Women Voters of Texas, at 4, 11-17 (Dec. 12, 2026), <https://tinyurl.com/yc6wm2rj>).

¹⁶ The publicly available documents discussing the use of the overhauled SAVE system by SAVE user agencies, including those in Texas, are summarized in Plaintiffs’ amended complaint, *see id.* ¶¶ 98-109 ; accordingly, I will not belabor them here.

¹⁷ LWVTX is particularly concerned about Defendants’ actions because they occur despite Texas’s demonstrated and well-documented history of wrongfully identifying eligible Texas voters as “non-citizens.” *See, e.g.*, Letter from League of Women Voters et al. to Texas Secretary of State Jane Nelson (Aug. 28, 2024), <https://tinyurl.com/2mmfnb8a>.

¹⁸ *See, e.g.*, LWV DHS Comment at 11; Comment to DHS by Texas Civil Rights Project at 4-5 (Nov. 18, 2025), <https://tinyurl.com/4zs3dd6e>. For example, passports are not free and often require months to apply for and receive them by mail. Replacing a birth certificate or driver’s license also comes with financial costs. As a result, voters facing DPOC requirements need to plan many months ahead of registration deadlines to receive the documentation necessary to register to

fear providing DPOC to government officials, including to avoid attracting attention to family members who are not citizens.¹⁹

39. For all these reasons, Defendants' SAVE overhaul burdens and threatens the voter registration and thus right to vote for scores of eligible Texans—particularly the millions of naturalized and derived citizens in the state and the thousands who have already received SAVE non-citizenship notices. And it subjects them to the emotional toll of having their sensitive SSA information disclosed, aggregated, misused, and potentially mishandled through the overhauled SAVE system without proper authorization or consent, and with the reputational harm of being falsely identified to third-party SAVE users as potential non-citizen registered voters.

40. One Texan who has suffered these voting and privacy harms is Anthony Nel, a LWVTX member, derived U.S. citizen, and resident of Denton County, Texas. Overhauled SAVE incorrectly identified him as having a non-citizen status to the Texas Secretary of State based on outdated data, leading to his voter registration being wrongfully cancelled in late 2025.²⁰ Another LWVTX member, Bailey Doe, likewise had their voter registration cancelled for the same reason in late 2025, and was in fact prevented from voting in the March 2026 Texas primary election.²¹

vote, in addition to committing the time required to travel to the offices responsible for issuing official documents.

¹⁹ LWVTX expects that many of its naturalized-citizen and derived-citizen members and those it seeks to register to vote will face onerous barriers to obtaining and providing the proof of citizenship necessary to provide DPOC in time to resolve any SAVE-related error. Specifically, it expects that a number of them do not currently possess common forms of proof of citizenship reflecting their current name. LWVTX further expects that these individuals will face significant financial and logistical hurdles in attempting to obtain proof of citizenship and may not be able to do so at all.

²⁰ See Declaration of Anthony Nel.

²¹ See Declaration of Bailey Doe.

41. Naturalized and derived citizen LWVTX members also have been or reasonably fear being purged from voter rolls, and they also reasonably fear and are emotionally distressed by the unauthorized and nonconsensual disclosure, matching, and repurposing of their SSA data for purposes of determining their citizenship status and eligibility to vote, and by their identification or potential identification as possible non-citizen registered voters to the Texas Secretary of State.²²

42. The purging of “non-citizen” voters from voter rolls, based on bad citizenship data from SAVE shared through unauthorized and nonconsensual inter-governmental pooling of sensitive information, has sowed fear, confusion, and distrust in the electoral process and thus hindered the counseling LWVTX can provide to its members and thousands of other Texans about the voter rolls, the safeguards in place to prevent the purging of their registration prior to an election, and the lawful administration of elections and safety of voter data. The overhauled SAVE tool therefore has directly interfered with the League’s mission to increase voter participation and turnout and will continue to do so.

43. It is inevitable that, because of the overhauled SAVE system and its faulty citizenship data, some Texas voters, including some registered by the League and some League members, will have their voter registration cancelled or be denied registration, will not be able to correct any faulty citizenship data in time to maintain their voter registration or to register or re-register, will choose to take their name off the registration list out of fear, or will choose not to vote or be unable to vote. Again, Texans like Anthony Nel substantiate that SAVE’s harmful impact on voter registration is *already* well underway and ongoing.

²² See Declarations of Anthony Nel, Alex Doe, Bailey Doe, and Cory Doe.

44. The downsides of registering to vote because of Defendants' actions—where SAVE's flaws create the serious risk that naturalized and derived citizens will be identified as non-citizens, forced to potentially take costly and time-intensive steps to prove their citizenship, and potentially even criminally investigated for their lawful voting—are simply too burdensome for many of these citizens. As a result, the overhauled SAVE system has and will continue to directly interfere with LWVTX's efforts to register voters, keep eligible voters on the rolls, accurately inform these voters about the process, and effectively promote civic engagement and voting across Texas.

45. To summarize, when Texas voters are unlawfully purged or denied from Texas voter rolls, as the overhauled SAVE system inevitably facilitates, that decreases the number of registered Texas voters—inherently frustrating the League's core mission of increasing participation in our elections, including the participation of naturalized and derived citizens. And when Texas citizens' voting eligibility is questioned through use of the overhauled system, they unfairly must take additional steps to register or remain registered—just as SAVE's rules and processes envision—and, as a result, may be caused to distrust the electoral process and are discouraged from voting. This too directly impairs LWVTX's mission of ensuring that the ballot box is accessible for all eligible voters in Texas.

The Overhauled SAVE System is Forcing LWVTX to Expend Greater Resources to Fulfill its Mission-Critical Functions

46. LWVTX has expended scarce resources, beyond normal operational levels, in response to the SAVE overhaul to counteract its harmful effects and will be forced to continue doing so going forward.

47. To begin with, LWVTX has had to spend approximately 65 extra staff and volunteer hours to understand the multifaceted nature of the SAVE overhaul and the grave risks it

poses to Texas voters—especially naturalized and derived citizen voters—so that it can effectively serve these voters, assist its local Leagues in doing so, and counteract the confusion and alarm generated by SAVE-based voter-registration targeting.²³

48. LWVTX has undertaken extensive efforts to both identify, educate, and assist eligible Texas voters who may have been adversely impacted by the SAVE overhaul, to ensure they remain registered to vote—or know how to seek reinstatement if already purged—and are not discouraged from voting.

49. Several counties have provided responses to public records requests identifying the thousands of individuals who received Texas SAVE non-citizenship notices requiring that they provide DPOC to avoid cancellation of their voter registration. Based on those responses, which LWVTX reviewed, LWVTX has mailed letters to over 2,400 Texas voters who received SAVE non-citizenship notices to help them ensure they remain registered if they are eligible, and to provide guidance if they have been wrongly removed from the voter rolls.

50. LWVTX also provided phone and email contact information, so that impacted individuals could reach out if they needed assistance, and some voters who were sent non-citizenship notices have been contacting LWVTX.

51. LWVTX also spent time translating the letters to Spanish and including the Spanish version in its mailings, to ensure that Spanish-speaking U.S. citizens who have received SAVE non-citizenship notices have the information and assistance they need to protect their right to vote.

52. LWVTX estimates that six of its staff members and two of its volunteers have devoted approximately 65 hours to these efforts to identify and contact affected Texas voters, and

²³ Defendants have compounded this confusion and alarm, which LWVTX has heard for months from citizens and local Leagues across the state, by developing and rolling out the overhauled SAVE system in an opaque process, without advanced notice. *See* LWV DHS Comment at 3-4.

that it has spent over \$7,000 to mail the letters to these voters. These human, time, and other resource expenditures go beyond LWVTX's ordinary resource expenditures for carrying out voter registration activities in the ordinary course. So long as the Texas Secretary of State continues to use the overhauled SAVE system for voter registration and voter list maintenance, LWVTX will be forced to continue expending these additional resources to identify, contact, and assist affected Texan voters and protect their right to remain registered and vote.

53. LWVTX has already spent approximately 65 staff/volunteer hours engaging directly with non-citizenship notice recipients—providing them with counseling and information so that they can take the steps necessary to protect their right to vote. LWVTX additionally estimates that it will be forced to divert \$5,000 to \$10,000 in organizational resources each year to address the use of a flawed system used for voter list maintenance by the state.

54. LWVTX has expended, and anticipates continuing to expend, additional time and resources in response to, and directly as a result of, the impact of the SAVE overhaul on its core voter-assistance and voter-engagement mission. This includes all forms of programming and communications LWVTX engages in, as described above. It is creating social media posts to educate Texas voters; developing educational materials for local chapters and their personnel; coordinating communications with local chapters and their staff so that they can assist voters calling to receive registration assistance after receiving non-citizenship notices and being purged from the voter rolls; assisting voters who have received non-citizenship notices; creating a handout on citizenship information for volunteer deputy registrants to use; creating a one-page document related to the SAVE overhaul for community partners to use; and doing media interviews to

educate Texas voters.²⁴ It is also working to update VOTE411 and their website with SAVE-related information, including information for voters who have been affected by the use of the overhauled system in Texas. All of this work is ongoing; so far, LWVTX estimates that 3 of its staff members and volunteers have devoted approximately 5 hours to these efforts, and that LWVTX will spend approximately \$200.

55. LWVTX, as a member of the Election Protection Texas coalition, also has expended organizational resources to discuss and coordinate with other non-profits on how to effectively address the effects of the overhauled SAVE system and its impacts on voter registration in Texas. As a non-profit with limited funds and resources, partnerships and coalitions that provide voter assistance to local communities across the state are essential to our operations and accomplishing our missions. Our members have attended and are still attending several hours of coalition meetings each week to, in part, address the harms of the overhauled SAVE system.

56. From its engagement with partners, League members, and voters, LWVTX anticipates that it will be more difficult and costly to register new voters who reasonably fear and are extremely disturbed by the operation of DHS's overhauled SAVE system and concerned about how the federal government's overhaul of the SAVE system is making their sensitive SSA information readily available to DHS and various state and local election officials for bulk voter

²⁴ LWVTX has and will continue to have to encourage a broad swath of eligible Texas voters to check their registration regardless of their particular circumstances, including those that have previously voted and, since voting, have not had any life changes that would prompt changes to their registration status. LWVTX has determined that casting this type of wide net, and devoting even more time and resources to communications and engagement with voters to encourage them to check their voter registration and assist them with registration problems, is necessary to counteract the fact that use of the overhauled SAVE system is affecting Texas voters who have already provided DPOC to Texas. *See, e.g.,* Natalia Contreras, *Texas Flagged Some Voters As 'Potential Concitizens' But They Had Already Provided Proof of Citizenship*, VoteBeat (Dec. 18, 2025), <https://www.votebeat.org/texas/2025/12/18/texas-voter-roll-citizens-investigation-save-database-travis-county/>.

verification. That means that LWVTX may need to further retool its critical voter registration efforts and messaging to account for these privacy concerns, and it is already considering how to do so.

57. LWVTX's various ongoing efforts have delayed LWVTX's work to implement its mobilization software and new website. It has also forced staff and volunteers to work overtime to complete work on other mission-critical work, like producing its voter guides and reviewing county election websites for election-related information. And, if the League did not have to spend its money, time, and effort on the activities described above to counteract the harmful effects of the SAVE overhaul, it would be able to help more Texans with the many additional challenges that Texas citizens face in accessing the ballot and participating as informed and active voters in the democratic process, through more of its other core activities. That includes, *inter alia*, more voter registration, candidate forums, Get-Out-The-Vote events, and other related activities—all of which LWVTX has been able to do less of, and anticipates being able to do less of in the future, in light of the resources it has had to devote and will continue to have to devote to counteracting the SAVE overhaul's harmful effects.

The Overhauled SAVE System's Harmful Effect on LWVTX Members

58. Finally, as discussed, our members are being directly harmed by the Defendants' SAVE overhaul.

59. As explained, the Texas Secretary of State has bulk-uploaded its entire voter roll data into the overhauled SAVE system, which has resulted in DHS, through the system, querying SSA systems to (1) verify each registered Texas voter's SSN, and (2) access information about these voters' citizenship statuses as reflected in SSA records. Then, the overhauled SAVE system provides Texas with (1) verification of each voter's SSN, and (2) information about each voter's

citizenship status, as reflected in some combination of DHS and SSA records. And, as explained, the information supplied to Texas—and, in turn, to Texas counties—has falsely indicated that particular Texans are or may be non-citizens who are unlawfully registered to vote.

60. The League’s members include Texas voters who, by virtue of the overhauled SAVE system and its use in Texas, have had precisely these actions taken with respect to them, resulting in injuries to their voting and privacy rights.

61. First, as discussed, LWVTX members such as Anthony Nel, Alex Doe, Bailey Doe, and Cory Doe now must constantly re-check their voter registration status; may need to provide additional citizenship documentation to both state and federal agencies or face other burdens in order to exercise their right to vote; may have difficulty obtaining this additional citizenship documentation; and are intimidated by the overhauled SAVE system and the threat of unwarranted investigation and prosecution and may be discouraged from registering or voting.

62. Second, LWVTX members such as Anthony Nel, Alex Doe, Bailey Doe, and Cory Doe reasonably fear and are emotionally distressed by the unauthorized inter-governmental disclosure, aggregation, misuse, and potential mishandling of their sensitive personal data through the overhauled SAVE system. Their personal information was uploaded into SAVE using its new bulk upload and search-by-SSN functionalities, resulting in the unauthorized disclosure, matching, and repurposing of their SSA NUMIDENT data without their consent for purposes of determining their citizenship and eligibility to vote.

63. None of them consented to this inter-governmental collection, consolidation, disclosure, and matching of their personal information held by SSA and DHS, including disclosure to third-party SAVE users in Texas, for voter verification purposes or other broad-ranging purposes. Rather, they interacted in confidence with SSA to obtain a Social Security number and

card for limited purposes relating to work authorization and SSA benefits and reasonably expected that the privacy of their sensitive SSA information would be protected by the explicit guarantees of the Privacy Act and the Social Security Act, and by SSA policy treating SSN information as highly sensitive and not subject to disclosure to DHS.

64. Because of the overhauled SAVE system, LWVTX members such as Anthony Nel, Alex Doe, Bailey Doe, and Cory Doe have lost their statutory privacy rights; have had their private data misused and repurposed in unauthorized ways; had their private data shared with unauthorized third parties with no lawful right to access it through unsecured means; have been disturbed and fearful about the examination and transmission of their sensitive data by those who have accessed and will access it, including to subject them to unwarranted investigations or impede their right to vote; and faced increased vulnerability of their data to theft and security breaches.

65. LWVTX members such as Anthony Nel, Alex Doe, Bailey Doe, and Cory Doe have suffered reputational harm based on the dissemination of false or misleading citizenship information about them to Texas state and local officials.

66. As a result of these various voting and privacy harms to its members, LWVTX additionally is compelled to challenge Defendants' SAVE overhaul.

Defendants' Failure to Consider LWVTX Organizational and Member Harms and the Defects of Their SAVE Overhaul

67. None the above-described harms stemming from, and defects regarding, Defendants' SAVE overhaul should come as a surprise to Defendants. LWVTX, alongside the national LWV organization and the Louisiana and Virginia LWV chapters, submitted System of Records Notice ("SORN") comments to both DHS and SSA.

68. In its SORN comments, LWVTX extensively discussed the litany of reasons why Defendants' SAVE overhaul (1) harms its interests and mission; (2) was undertaken with a SORN and SORN comment period that were untimely and woefully insufficient; (3) lacks any statutory or constitutional authority; (4) utilizes SSA citizenship data that is unreliable, cannot be easily linked to DHS data, and will lead to wrongfully targeting naturalized citizens, barriers to voting, and unlawful purging as Defendants push Texas and other election officials to use the system without mitigating against known risks to voters; (5) rests on a debunked and harmful myth of widespread noncitizen voting; and (6) involves a new routine use for disclosure of SAVE records that violates the Privacy Act's compatibility requirement by authorizing the mass repurposing of millions of Americans' protected data in ways fundamentally incompatible with the reasons for which that data was collected.

69. My understanding from publicly available information is that Defendants did not, and could not possibly, properly consider LWVTX's SORN comments because they overhauled the SAVE system in May 2025,²⁵ published the DHS and SSA SORNs and accepted comments on them from LWVTX and others in October and November 2025,²⁶ and, throughout this period, continued to operate the overhauled SAVE system and still operate it in its overhauled state today. In other words, Defendants decided to overhaul SAVE and engaged in the SORN comment process as an afterthought; they predetermined they would overhaul SAVE and did so in spite of any SORN comments.

70. As a result, Defendants wrongly disregarded LWVTX's SORN comments. They did not properly consider them as part of the required SORN process, since they overhauled SAVE

²⁵ See, e.g., Press Release, USCIS, *USCIS Deploys Common Sense Tools to Verify Voters* (May 22, 2025), <https://perma.cc/HBZ5-RW2E>

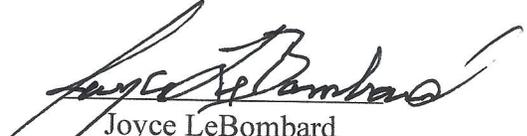
²⁶ See 90 Fed. Reg. 48948; 90 Fed. Reg. 50879.

before undertaking that process and continued their operation of the overhauled system during and after the SORN processes and LWVTX submitted its SORN comment.

71. The deprivation of LWVTX's ability to have its SORN comments properly considered has harmed it for all the reasons discussed above. If Defendants had properly considered its comments (and, for that matter, the comments of the range of other groups and individuals who pointed out the same or similar issues), they would not, reasonably, have undertaken the SAVE overhaul as they have done and, in turn, harmed the voting rights and privacy rights of LWVTX members and the voting population LWVTX serves.

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

Executed on March 11, 2026, in Leander, Texas.


Joyce LeBombard