



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

February 23, 2026

DHS Privacy Office, Mail Stop 0655
Department of Homeland Security
2707 Martin Luther King Jr. AVE SE
Washington, DC 20528-065

USCIS FOIA Officer
National Records Center, FOIA/PA Office
P. O. Box 648010
Lee's Summit, MO
64064-8010

Re: Freedom of Information Act Request

Dear FOIA Officer:

Citizens for Responsibility and Ethics in Washington ("CREW") submits this request for records pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and Department of Homeland Security ("DHS") regulations.

Specifically, CREW requests from January 20, 2025 to the date this request is processed:

1. Records sufficient to show all formal or informal data-sharing agreements providing access to personally identifiable information ("PII") to the following entities or individuals:
 - a. True the Vote;
 - b. Dr. John W. Richards Jr.;
 - c. Catherine Engelbrecht;
 - d. OPSEC Group LLC;
 - e. Election Integrity Network (EIN);
 - f. Cleta Mitchell;
 - g. EagleAI Network;
 - h. Rick Richards;
 - i. Voter Reference Foundation;
 - j. America First Policy Institute;
 - k. Public Interest Legal Foundation;
 - l. Hans von Spakovsky;
 - m. Logan Churchwell; and
 - n. Dhillon Law Group.

2. All communications between DHS officials and the following private entities or individuals:
 - a. True the Vote and emails associated with the domain truethevote.org;
 - b. Dr. John W. Richards Jr.;
 - c. Catherine Engelbrecht;
 - d. OPSEC Group LLC;
 - e. Election Integrity Network (EIN) and emails associated with the domain electionintegritynetwork.org;
 - f. Cleta Mitchell;
 - g. EagleAI Network;
 - h. Rick Richards;
 - i. Voter Reference Foundation and emails associated with the domain VoteRef.com;
 - j. America First Policy Institute;
 - k. Public Interest Legal Foundation;
 - l. Hans von Spakovsky;
 - m. Logan Churchwell;
 - n. Election Research Institute; and
 - o. Dhillon Law Group.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes, without limitation, all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records.

If it is your position any portion of the requested records is exempt from disclosure, CREW requests that you provide it with an index of those documents as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). If some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. See 5 U.S.C. § 552(b). If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document. See *Mead Data Central v. U.S. Dep't of the Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

Please be advised that CREW intends to pursue all legal remedies to enforce its rights under FOIA. Accordingly, because litigation is reasonably foreseeable, the agency should institute an agencywide preservation hold on all documents potentially responsive to this request.

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a)(4)(A) and agency regulations, CREW requests a waiver of fees associated with processing this request for records. The subject of this request concerns the operations of the federal government, and the disclosures likely will contribute to a better understanding of relevant government procedures by CREW and the general public in a significant way. *See id.* § 552(a)(4)(A)(iii). Moreover, the request primarily and fundamentally is for non-commercial purposes. *See, e.g., McClellan Ecological v. Carlucci*, 835 F.2d 1282, 1285 (9th Cir. 1987).

On March 25, 2025, President Trump signed Executive Order 14248 (“Elections Executive Order”), *Preserving and Protecting the Integrity of American Elections*, with the stated purpose of protecting “the franchise of American citizens and their right to participate in fair and honest elections.”¹ The Elections Executive Order purports to require states to share an unprecedented volume of sensitive voter data with the federal government. Among other things, it calls upon the Secretary of Homeland Security to review state voter records alongside federal immigration databases so that it may supply the U.S. Attorney General with “complete information on all foreign nationals who have indicated on any immigration form that they have registered or voted” in an election.²

Pursuant to the Elections Executive Order, DOJ has, since May 2025, contacted nearly every state and the District of Columbia to demand their full voter rolls.³ The requested voter data include voters’ highly sensitive PII such as full names, dates of birth, residential addresses, driver’s license numbers, and Social Security numbers, as well as politically sensitive data such as voter participation history and party affiliation.⁴ At least 11 states have either provided, or said they will provide, their full statewide voter registration list including PII. According to a recent amicus brief authored by seventeen former Civil Rights Division lawyers, DOJ is creating “a national voter roll” with this information.⁵

The Trump administration confirmed that DOJ is sharing state voter information with DHS in an effort to “scrub aliens from voter rolls.”⁶ While the Administration has not described how DHS will use the voter rolls to search for noncitizens, DHS operates a program that can identify the immigration or citizenship status of individuals: SAVE. Congress established SAVE to verify whether noncitizens are entitled to certain government benefits. However, between April and August 2025, DHS “overhauled” SAVE by transforming it into what the agency calls “a single, reliable source for verifying immigration status and

¹ 90 Fed. Reg. 14005 (Mar. 25, 2025).

² Exec. Order No. 14248, 90 Fed. Reg. 14005 (Mar. 25, 2025).

³ Assistant Attorney General Harmeet Dhillon (@AAGDhillon), X (Dec. 5, 2025, 1:02 PM), <https://perma.cc/M7EU-7MT9>.

⁴ Kaylie Martinez Ochoa, Eileen O’Conner, & Patrick Berry, *Tracker of Justice Department Requests for Voter Information*, Brennan Ctr. for Just. (last updated Jan. 16, 2026), <https://tinyurl.com/ypf63y95>; *see also, e.g.*, Letter from Harmeet K. Dhillon, Assistant Att’y Gen., to Shenna Bellows, Me. Sec’y of State (Aug. 18, 2025), <https://perma.cc/Z8QQ-3DAR>.

⁵ Jim Saksa, *The Trump administration is building a ‘national voter roll’, former DOJ lawyers warn*, Democracy Docket (Jan. 5, 2026), <https://tinyurl.com/y5yndkhj>.

⁶ Jonathan Shorman, *DOJ is sharing state voter roll lists with Homeland Security*, Stateline (Sept. 12, 2025), <https://tinyurl.com/4fhfyx67>.

U.S. citizenship nationwide.”⁷ SAVE now allows states to “bulk” upload and check their *entire* voter registration lists against federal databases—including those held by the Social Security Administration (“SSA”)—to identify potential noncitizen voters. DHS is vigorously “encourag[ing] *all* federal, state, and local agencies to use the SAVE program,”⁸ despite knowledge that the program routinely produces inaccurate results.⁹

Among the many concerns about DHS’s search for noncitizens in a federal “national voter roll” is data confidentiality—specifically, rumors that the administration is sharing voters’ PII with third parties. DOJ is reportedly considering whether to share state voter data with organizations such as the Election Integrity Network and EagleAI.¹⁰ A proposed Memorandum of Understanding (“MOU”) that DOJ reportedly urged Wisconsin to execute contained a provision that would have entitled the agency to disclose voter PII to a private “contractor.”¹¹ And according to a recent court filing, two members of the SSA Department of Government Efficiency (“DOGE”) Team signed a “Voter Data Agreement” with a political advocacy group whose “stated aim was to find evidence of voter fraud and to overturn election results in certain States.”¹²

While the identity of the political advocacy organization remains unknown, there is evidence to suggest that it may be True the Vote. The organization’s co-founder Gregg Phillips, who now works as a top DHS official at the Federal Emergency Management Agency (“FEMA”), said on a podcast, “Since that executive order came out, I’ve been in contact with people at DHS..The Department of Homeland Security now wants to partner with us to help uncover all of this stuff.”¹³ At the time, Phillips was not a federal employee and remained highly active with True the Vote.¹⁴ He assumed his DHS role in December 2025.¹⁵

CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the public’s right to be aware of the activities of government officials, to ensuring the integrity of those officials, and to

⁷ Press Release, DHS, *DHS, USCIS, DOGE Overhaul Systematic Alien Verification for Entitlements Database* (April 22, 2025), <https://perma.cc/Y8A5-YX3M>.

⁸ Press Release, USCIS, *USCIS Enhances Voter Verification Systems* (Nov. 3, 2025), <https://perma.cc/9LN5-SEDU> (“USCIS Enhances Voter Verification Systems”).

⁹ DHS, *Privacy Impact Assessment for the Systematic Alien Verification Entitlements “SAVE” Program*, DHS Ref. No. DHS/USCIS/PIA-006(d), at 1 (Oct. 31, 2025), <https://perma.cc/G92U-LYPM> (“2025 SAVE PIA”).

¹⁰ Abby Vesoulis & Ari Berman, *Your Private Data Is Building Trump’s Voter Purge Machine*, Mother Jones (Dec. 5, 2025), <https://perma.cc/W8UC-XHRS> (quoting employee of EagleAI, a mass voter registration challenge system, as stating “[w]e demonstrated the software to the DOJ. . . I am in conversation with them about letting us have a task, a federal task, to bring their data into what we’re doing and then be able to use the federal data, SAVE data, Social Security data, other data in here as well.”).

¹¹ Civil Rights Division, DOJ, Proposed Wisconsin Memorandum of Understanding, at 7, <https://perma.cc/R5F5-QAXF>.

¹² Notice of Correction to the Record at 5, *American Federation of State, County and Municipal Employees, AFL-CIO v. Social Security Administration*, No. 1:25-cv-00596-ELH (D. Md. Jan. 16, 2026).

¹³ Yunion Rivas & Jim Sakas, *Leading election denier claimed DHS ‘wants to partner with us’ on voter roll checks. Now he’s a top official there*, Democracy Docket (Jan. 29, 2026), <https://tinyurl.com/5xeuky8w>.

¹⁴ *Id.*

¹⁵ *Id.*

highlighting and working to reduce the influence of money on politics. CREW uses a combination of research, litigation, and advocacy to advance its mission. CREW intends to analyze the information responsive to this request and to share its analysis with the public through reports, press releases, or other means. In addition, CREW will disseminate any documents it acquires from this request to the public through its website, www.citizensforethics.org. The release of information obtained through this request is not in CREW's financial interest.

CREW further requests that it not be charged search or review fees for this request pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) because CREW qualifies as a member of the news media. See *Nat'l Sec. Archive v. U.S. Dep't of Defense*, 880 F.2d 1381, 1386 (D.C. Cir. 1989) (holding non-profit a "representative of the news media" and broadly interpreting the term to include "any person or organization which regularly publishes or disseminates information to the public").

CREW routinely disseminates information obtained through FOIA to the public in several ways. For example, CREW's website receives hundreds of thousands of page views every month. The website includes blog posts that report on and analyze newsworthy developments regarding government ethics, corruption, and money in politics, as well as numerous reports CREW has published to educate the public about these issues. These reports frequently rely on government records obtained through FOIA. CREW also posts the documents it obtains through FOIA on its website.

Under these circumstances, CREW satisfies fully the criteria for a fee waiver.

Expedited Processing Request

CREW requests expedited processing of this request, pursuant to 5 U.S.C. § 552 and 6 C.F.R. § 5.5(e). CREW is entitled to expedited processing because (1) there is "[a]n urgency to inform the public about an actual or alleged Federal Government activity" and CREW is "primarily engaged in disseminating information," 6 C.F.R. § 5.5(e)(1)(ii), and (2) these same facts raise possible questions, in "[a] matter of widespread and exceptional media interest involving questions about the Government's integrity which affect public confidence." *Id.* at § 5.5(e)(1)(iv).

First, there is a particularly urgent need to inform the public about the scope of coordination between DHS and third-party organizations, such as the proponents of election conspiracies identified here, who may have access to voters' PII.

Recent reporting shows that True the Vote co-founder Gregg Phillips publicly admitted that his organization—one known for promoting election conspiracies and helping "mainstream the modern election denial movement"¹⁶—has been in contact with DHS.¹⁷

¹⁶ Dhruv Mehrotra, *Flaw in Right-Wing 'Election Integrity' App Exposes Voter-Suppression Plan and User Data*, WIRED (Nov. 5, 2024), <https://tinyurl.com/wxn5ad5x>.

¹⁷ Yunion Rivas & Jim Saksa, *Leading election denier claimed DHS 'wants to partner with us' on voter roll checks. Now he's a top official there*, Democracy Docket (Jan. 29, 2026), <https://www.democracymarket.com/analysis/leading-election-denier-claimed-dhs-wants-to-partner-with-us-on-voter-roll-checks-now-hes-a-top-official-there/>.

Phillips now works at DHS as the head of FEMA's Office of Response and Recovery. Concerns that Phillips, or other DHS employees, are leveraging their role in the federal government to advance disproven theories of widespread election fraud is only furthered by the fact that the Trump administration has shown a willingness to share voter PII with private organizations advancing such theories, such as the Election Integrity Network and EagleAI.

Similarly, DHS appointed Heather Honey—"a leading election conspiracy theorist"—as the agency's "deputy assistant secretary for elections integrity in the department's Office of Strategy, Policy, and Plans."¹⁸ Before joining the administration, Honey was a strong voice for election conspiracy theories and founded multiple organizations that advanced those beliefs, including Pennsylvania Fair Elections, a state partner of the Election Integrity Network, and the Election Research Institute.¹⁹

Further underscoring the urgency here, agencies across the administration recently have been connected to third-party election conspiracy organizations. In a filing last month, DOJ admitted that a DOGE team member had signed a "Voter Data Agreement," in his capacity as a federal employee, with a "political advocacy group" whose "stated aim was to find evidence of voter fraud and to overturn election results in certain States."²⁰ And other public reporting has shown that the administration is "considering sharing Americans' personal data with outside election denial groups. Rick Richards, a retired physician from Georgia with no experience as an election official, has met with [DOJ officials] and marketed his mass voter registration challenge system called EagleAI . . . to the DOJ."²¹

The public needs immediate clarity about whether their sensitive data is being improperly shared with third parties, particularly in light of impending elections. Primary elections begin in March in some states, last until September, and the general election is in November; at each stage, voters need to understand if and how their data is being shared—for example, whether it is being given to organizations facilitating data purges or challenges to voters. "Given the ongoing election cycle" and "widespread concern" about voter data, this request plainly concerns "a matter of current exigency to the American public." *CREW v. U.S. Dep't of Justice*, No. 25-4426 (CKK), 2026 WL 472589, at *10 (D.D.C. Feb. 19, 2026).

Phillips' and Honey's appointments and past statements also raise urgent concerns about the confidentiality and security of sensitive voter information. Voters' data is protected by the Privacy Act of 1974—which establishes "certain safeguards for an individual against an invasion of personal privacy by" the federal government.²² Failure to promptly release the requested records could allow potentially unlawful practices to continue without public scrutiny.

¹⁸ Matt Cohen, Leading Election Conspiracy Theorist Appointed to DHS Leadership Position, Democracy Docket (Aug. 25, 2025), <https://tinyurl.com/56c2d38r>.

¹⁹ *Id.*

²⁰ Notice of Corrections to the Record, *Am. Fed. of State, County, and Munic. Employees, AFL-CIO v. Social Security Administration*, No. 25-cv-596 (D. Md. Jan. 16, 2026).

²¹ DOJ: Abby Vesoulis & Ari Berman, Your Private Data Is Building Trump's Voter Purge Machine, Mother Jones (Dec. 5, 2025), <https://perma.cc/W8UC-XHRS>.

²² Privacy Act of 1974 § 2(b).

Further, as explained above, CREW is “primarily engaged in disseminating information” to the public. *See, e.g., CREW v. DOJ*, 2026 WL 472589, at *10. CREW’s primary purpose is to inform and educate the public about the activities of government officials and agencies. To that end, CREW uses statutes like the FOIA to gather information the public needs to hold public officials accountable and disseminates this information through social media and its website, www.citizensforethics.org, which receives tens of thousands of views every month.²³

Finally, DHS communications with third-parties—such as the proponents of election conspiracies identified above— concern quintessential federal government activity.

Second, the same alleged facts raise possible questions, in “[a] matter of widespread and exceptional media interest involving questions about the Government’s integrity which affect public confidence.” 28 C.F.R. § 16.5(e)(1)(iv). DHS’s involvement in voter verification efforts has already drawn national attention, including the potential for misapplication of immigration databases in the context of elections, underscoring public concern about federal overreach and data misuse.²⁴ There are also growing questions about the transparency and legality of the agency’s coordination with third parties, especially those not within the federal government, particularly given SAVE’s acknowledged limitations and the security risks inherent to sharing data across multiple entities. Such sharing could violate federal laws as well as the terms of states’ MOUs with DHS. And coordination with election conspiracy theorists may itself impugn DHS’s integrity and undermine public confidence in DHS. It is urgent that the public receive clarification on this matter, as it relates to its most sensitive personal information given to government agencies in confidence.

The undersigned certifies that the representations in this expedited processing request are true and correct to the best of his knowledge and belief.

²³ *See, e.g., Citizens for Responsibility and Ethics in Washington*, N.Y. Times, <https://tinyurl.com/4bt6nuja> (last visited Nov. 20, 2024) (list of New York Times articles referencing CREW spanning over a decade); Ed Pilkington and Dharna Noor, *Top US ethics watchdog investigating Trump over dinner with oil bosses*, The Guardian (May 15, 2024), <https://perma.cc/BH6K-5UWA> (referring to CREW as “Top US ethics watchdog”).

²⁴ *Saksa*, *supra* n. 5; Shorman, *supra* n. 6; Abby Vesoulis & Ari Berman, *supra* n. 10; Yunior Rivas & Jim Sakas, *supra* n. 13; Vittoria Elliott, *DHS’s Data Grab Is Getting Citizens Kicked Off Voter Rolls, New Complaint Says*, WIRED (Jan. 22, 2026), <https://tinyurl.com/2ynenz5v>; Kaylie Martinez-Ochoa, Eileen O’Connor, & Patrick Berry, *Tracker of Justice Department Requests for Voter Information*, Brennan Center for Justice, <https://tinyurl.com/45x47csf> (last visited Feb. 11, 2026); Fredreka Schouten, *Trump’s push to audit voter rolls is already snaring US citizens*, CNN (Feb. 9, 2026), <https://tinyurl.com/3jfnebvp>; Sam Levine, *Alarm as Trump DoJ pushes for voter information on millions of Americans*, The Guardian (Jan. 15, 2026), <https://tinyurl.com/26yyds39>; Jen Fifiield, *Details of DHS Agreement Reveal Risks of Trump Administration’s Use of Social Security Data for Voter Citizenship Checks*, ProPublica (Oct. 20, 2025), <https://tinyurl.com/2nhyamnc>; Jude Joffe-Block, *Trump’s SAVE tool is looking for noncitizen voters. But it’s flagging U.S. citizens too*, NPR (Dec. 10, 2025), <https://tinyurl.com/4x4ahadp>.

Conclusion

If you have any questions about this request or foresee any problems in fully releasing the requested records, please email me at [REDACTED] and foia@citizensforethics.org or call me at [REDACTED]. Also, if CREW's request for a fee waiver is denied, please contact our office immediately upon making such a determination.

Where possible, please produce records in electronic format. Please send the requested records to [REDACTED] and foia@citizensforethics.org or by mail to Kayvan Farchadi, Citizens for Responsibility and Ethics in Washington, PO Box 14596, Washington, D.C. 20004.

Sincerely,

/s/ Kayvan Farchadi