

# Exhibit K

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

COMMON CAUSE, *et al.*,

Plaintiffs,

vs.

Case No. 1:26-cv-01352-SLS

U.S. DEPARTMENT OF JUSTICE, *et al.*,

Defendants.

**DECLARATION OF ALEX DOE**

I, Alex Doe, declare as follows:

1. I am over 18 years old and a member of Common Cause 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.

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. In order to register to vote in Texas, I provided my name; date of birth; residential address; driver's license number or last four digits of my SSN; and telephone number. 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.

**Department of Homeland Security's Expanded SAVE System Led to the Cancellation of My Voter Registration and Other Burdens on My Voting Rights**

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 email address purportedly belonging to

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.

**The Department of Justice Is Collecting, Disclosing, and Repurposing My Personal Data Without My Consent, Causing Me Distress and Risking Burdening My Fundamental Right to Vote**

15. I later learned more about DHS’s SAVE system and the Department of Justice (“DOJ”) efforts to compile every state’s and Washington D.C.’s voter rolls in service of creating a nationwide voter roll list and using states’ voter tolls to conduct voter roll list maintenance.

16. 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.<sup>1</sup> 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 referred those individuals to Texas counties to determine their eligibility to vote.<sup>2</sup> 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.

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<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>.

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

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

18. 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 either my driver's license number or last four digits of my 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.

19. It is my understanding that the Texas Secretary of State, after executing a Memorandum of Understanding with DOJ similarly provided DOJ with Texas's entire voter registration list as part of the DOJ's efforts to compile voter data from all 50 states and the District of Columbia. It is my understanding that the voter list Texas sent to DOJ included information such as my name, date of birth, address, and driver's license number or last four digits of my SSN.

20. I have not consented to, and do not consent to, the Texas Secretary of State disclosing the information about me that her office shared with DOJ. I provided that information for use by state and local Texas officials, not to be uploaded into a national voter database at DOJ or national citizenship database housed at DHS. I expected that information—especially my driver's license number and SSN—to remain private and protected by state and local Texas officials.

21. It is my understanding that DOJ intends to disclose the voter registration lists it

collects from the states—including Texas—to DHS so that it can run the data through the SAVE system. It is my understanding that the DOJ MOU requires Texas to remove any voters DOJ identifies as ineligible to vote from Texas’s voter roll. I also have not consented to, and do not consent to, DOJ disclosing that information with DHS through the SAVE system.

22. It is also my understanding that the DOJ MOU allows the DOJ to disclose personally identifiable information (“PII”) to private contractors to assist with list maintenance verification. It is not clear to me what “list maintenance verification procedures” are, or who these contractors might be. I never consented to, nor do I consent to, DOJ sharing my personal information with anyone outside of the government.

23. I am disturbed, uneasy, anxious, and frustrated 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 voters. I am also worried that DOJ may be seeking to create a new, comprehensive list of voters who were born abroad in order to target, surveil, or simply make life harder for foreign-born American citizens. This makes me feel like I am living in a surveillance state where government actors can access my most private information at will. 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 voter database.

24. I am also concerned that by collecting voter data from many different states, DOJ is incentivizing hackers or bad actors to try to gain access to data that is otherwise maintained in a decentralized manner by each individual state. My concerns are amplified by my knowledge of the current administration’s history of misusing and failing to protect personal data.

25. Because DOJ intends to share my sensitive personal information across federal

agencies and with private contractors, I am also deeply worried 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 information such as my full name, date of birth, address, and driver's license number or last four digits of my SSN, because the exposure of those data elements in tandem creates a heightened risk of identity theft and fraud. This fear is especially heightened by the DOJ's purported authority to share such sensitive personal information with third-party contractors outside of the government, as outlined in its MOU with Texas.

26. I deeply value and cherish my right to vote. I am greatly concerned that I will be purged from the voter rolls again based on Texas sharing my voter data with DOJ and the statements in the DOJ MOU suggesting Texas is required to "clean" its voter rolls based on DOJ identifying purported voter list maintenance issues, insufficiencies, inadequacies, deficiencies, anomalies, or concerns. I am also greatly concerned that I will be wrongly investigated by DOJ or other federal agencies based on DOJ's review of Texas's voter rolls.

27. I am particularly worried because DOJ intends to rely on or is already relying on SAVE and SSA citizenship data, which I have personally confirmed is inaccurate and out of date for me.

28. Texas has already incorrectly misidentified me as a noncitizens once using that inaccurate information. It is my understanding that DOJ is referring the purported noncitizen voters it identifies to Homeland Security Investigations, and I am extremely worried about being wrongly investigated because of DOJ relying on inaccurate information that wrongly suggests I am a noncitizen voter.

29. When Texas wrongly misidentified me as a noncitizen because of the State's use

of SAVE, 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.

30. Being wrongly misidentified as a noncitizen and threatened with removal from the voter rolls caused 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.

31. 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.

32. 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 such sensitive documents, 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.

33. 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.

34. These fears were only heightened when I learned that the Texas Secretary of State recently executed the DOJ MOU to share Texas's voter registration data with DOJ and to surrender its voter list maintenance responsibilities to the federal government.

35. I am also worried that, even though I recently provided my county with documentary proof of citizenship and my voter registration was reinstated, DOJ will continue to wrongly identify me as a non-citizen based on faulty underlying data when DOJ 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.

36. 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 feel compelled to regularly check my voter registration status to ensure that it is not wrongly cancelled.

37. The privacy of my personal information—including the data contained in my

voter file—is very important to me. From a young age, my parents instilled in me the importance of protecting the confidentiality of my personal information such as my SSN and driver’s license number, and so I have always treated my Social Security card and driver’s license as ultra sensitive documents. 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 the federal government for unlawful or undisclosed purposes.

38. 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.

39. 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 or other improper purposes.

40. 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.

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

Executed on May 15, 2026, in Texas.

A handwritten signature in blue ink that reads "A. Doe". The signature is written in a cursive, slightly stylized font.

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Alex Doe\*

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

**EXHIBIT 1**

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



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



10 [Redacted] 2025  
Date

