

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

ELECTRONIC PRIVACY INFORMATION
CENTER,

Plaintiff,

v.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES, *et al.*,

Defendants.

Case No. 8:26-cv-03457-PX

DECLARATION OF JOHN B. HILL

I, John B. Hill, declare as follows:

1. I am Senior Litigation Counsel at Citizens for Responsibility and Ethics in Washington (“CREW”) and counsel for Plaintiff in the above-captioned action.

2. In a February 2, 2026, interview on the Dan Bongino Show, President Trump said “[t]he Republicans should say we want to take over, we should take over the voting, and at least many, 15 places the Republicans ought to nationalize the voting.” A true and correct video of that interview, Roll Call Factbase, *Interview: Dan Bongino Interviews Donald Trump on His Podcast - February 2, 2026*, at 14:24 (Vimeo, Feb. 3, 2026), is available here: <https://vimeo.com/1161365870>.

3. In a February 3, 2026, press conference, President Trump was asked “Mr. President, what exactly did you mean when you said that you should nationalize elections?” President Trump responded “I want to see elections be honest. And if a state can’t run an election, I think the people behind me should do something about it because, you know, if you think about it, a state is an agent for the federal government in elections. I don’t know why the federal

government doesn't do them anyway." A true and correct video of that press conference, C-SPAN, *President Trump on Nationalizing Elections: "I want to see elections be honest..."* (YouTube, Feb. 3, 2026), is available here: <https://www.youtube.com/watch?v=xcEw3TCktIw>.

4. A true and correct copy of the June 8, 2026 memorandum from USCIS Director Joseph B. Edlow regarding the implementation of Executive Order 14399, Memorandum from Joseph B. Edlow, Director, U.S. Citizenship and Immigration Services ("USCIS") for the DHS Secretary, Executive Order 14399 Implementation (June 8, 2026), is attached hereto as Exhibit A.

5. A true and correct copy of Executive Order No. 14399, *Ensuring Citizenship Verification and Integrity in Federal Elections*, 91 Fed. Reg. 17125 (March 31, 2026) is attached hereto as Exhibit B.

6. A true and correct copy of an August 18, 2025 Truth Social post from the account @realDonaldTrump, Donald J. Trump (@realDonaldTrump), Truth Social (Aug. 18, 2025, at 7:17 AM ET), is available here <https://truthsocial.com/@realDonaldTrump/posts/115049485680941254> and attached hereto as Exhibit C.

7. A true and correct copy of an August 18, 2025 Truth Social post from the account @realDonaldTrump, Donald J. Trump (@realDonaldTrump), Truth Social (Aug. 18, 2025, at 4:48 PM ET), is available here <https://truthsocial.com/@realDonaldTrump/posts/117118475271319244> and attached hereto as Exhibit D.

8. A true and correct copy of the White House's web page for the SAVE America Act, *Save Our Elections*, White House (last visited Sep. 2, 2026), captured on September 2, 2026, is available here, <https://perma.cc/Z4RQ-EWBT> and attached hereto as Exhibit E.

9. A true and correct copy of Executive Order No. 14248, *Preserving and Protecting the Integrity of American Elections*, 90 Fed. Reg. 14005 (Mar. 25, 2025) is attached hereto as Exhibit F.

10. I serve as counsel for Plaintiffs in *League of Women Voters v. DHS*, No. 25-cv-3501-SLS, 2026 WL 1784297 (D.D.C.). In that case, Defendants Department of Homeland Security and Social Security Administration produced the following documents as a part of the Administrative Record, a true and correct copy of which are attached hereto:

- DHS, *Privacy Impact Assessment for the Systematic Alien Verification for Entitlements "SAVE" Program* (Oct. 31, 2025) - attached as Exhibit G;
- DHS, *SAVE Program Optimization Privacy Threshold Analysis (PTA) Final Adjudication* (July 17, 2025) - attached as Exhibit H;
- DHS, *SAVE Program Optimization Privacy Threshold Analysis (PTA) Final Adjudication* (Sept. 11, 2025) - attached as Exhibit I;
- DHS Priv. Off., *Narrative Statement for SORN Update*(Feb. 2025) - attached as Exhibit J;
- Dep't of Treasury, *Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity, SSA-DHS-USCIS* (May 15, 2025) - attached as Exhibit K;
- Dep't of Treasury, *Agreement Between Federal Program Agencies for Intragovernmental Reimbursable, Buy/Sell Activity. SSA-DHS-USCIS* (Aug. 2025) - attached as Exhibit L; and
- Maya Bernstein, former Senior Advisor for Priv. at Dep't of Health & Hum. Servs., *Comments on SSA SORN* Published Oct. 31, 2025 (Dec. 12, 2025) - attached as Exhibit M.

11. A true and correct copy of a July 13, 2023 letter from the Social Security Administration Office of General Counsel to Fair Elections Center, Letter from Nancy Morales Gonzalez, Assoc. Gen. Couns., SSA, to Jon Sherman, Litig. Dir. & Senior Couns., Fair Elections Ctr., Re: Application for Records and Testimony of a Social Security Administration(SSA) Employee in a Federal Civil Case (July 13, 2023), is available here,

<https://fairelectionscenter.org/wp-content/uploads/2025/07/SSA-Touhy-Decision-letter.July-13-2023-signed.pdf> and attached hereto as Exhibit N.

12. A true and correct copy of the Soc. Sec. Admin., Off. of the Inspector Gen., No. A-08-06-26100, *Congressional Response Report: Accuracy of the Social Security Administration's Numident File* (2006), is available here, https://oig-files.ssa.gov/audits/full/A-08-06-26100_0.pdf and attached hereto as Exhibit O.

13. A true and correct copy of the following article, Nick Corasaniti & Dustin Volz, *Trump's Homeland Security Chief Threatens Election Officials With Prison Time*, N.Y. Times (July 17, 2026), is available here, <https://www.nytimes.com/2026/07/17/us/politics/markwayne-mullin-election-officials-threats-trump.html> and attached hereto as Exhibit P.

14. Since Plaintiff filed its complaint on August 31, 2026, DHS has taken down the website domain it secured for the State Citizenship Lists Portal. An archived version of the website is available here <https://perma.cc/7N5H-WRS7?type=standard> and attached hereto as Exhibit Q.

15. A true and correct copy of the following article, Jen Fifield & Zach Despart, “*Not Ready for Prime Time.*” *A Federal Tool to Check Voter Citizenship Keeps Making Mistakes*, ProPublica & Texas Tribune (Feb. 13, 2026) is available here, <https://perma.cc/PR4Q-67NR> and attached hereto as Exhibit R.

16. A true and correct copy of Defendants’ application for a stay in *Trump v. California*, No. 26A124, 2026 WL 2170485 (U.S. July. 27, 2026), is attached hereto as Exhibit S.

17. A true and correct copy of the following article, Judd Legum & Rebecca Crosby, *The Federal Database That Could Upend the Midterm Elections*, Mother Jones (Apr. 9, 2026) is available here, <https://perma.cc/8YXC-WU7U> and attached hereto as Exhibit T.

18. A true and correct copy of the Off. of Mgmt. & Budget, Exec. Off. of the President, OMB Circular No. A-108, *Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act* (2016) is available here, <https://perma.cc/N9QK-SDLE> and attached hereto as Exhibit U.

19. A true and correct copy of the Soc. Sec. Admin., Programs Operations Manual System, GN 03325.002 *Disclosure and Verification of Social Security Numbers (SSN) Without Consent* (2023) is available here, <https://perma.cc/PE44-2QBK> and attached hereto as Exhibit V.

20. A true and correct copy of the Soc. Sec. Admin., Programs Operations Manual System, GN 03313.095 *Disclosure to the Department of Homeland Security (DHS)* (2025) is available here, <https://perma.cc/NZR7-MVB7> and attached hereto as Exhibit W.

21. A true and correct copy of USCIS, *Voter Registration and Voter List Maintenance Fact Sheet* (Aug. 27, 2025), is available here, <https://perma.cc/Q5F7-YBCA> and is attached hereto as Exhibit X.

22. A true and correct copy of Defendants' Statement of Undisputed Facts in *League of Women Voters v. Trump*, No. 26-cv-11581-IT (D. Mass. May 7, 2026), is attached hereto as Exhibit Y.

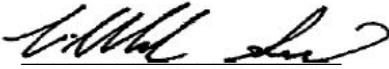
23. A true and correct copy of Treasury Inspector Gen. for Tax Admin., *Additional Actions Are Needed To Reduce Undeliverable Mail*, Rep. No. 2019-40-074 (2019), is available here, <https://perma.cc/5R66-8HSP> and attached hereto as Exhibit Z.

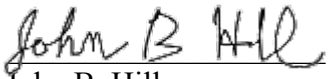
24. On September 2, 2026, counsel for Defendants emailed counsel for Plaintiffs stating: "The commitment we make with respect to [the Implementation Memo's deadline for the State Citizenship Lists and Portal going live on] September 4 is (a) The DHS citizenship data portal will not go live September 4 and (b) We will give plaintiffs 48 hours' notice before it does." That

email is attached hereto as Exhibit AA.

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

Executed on September 3, 2026, in Pennsylvania.


Nikhel S. Sus


John B. Hill
(signed by Nikhel S. Sus with
permission of John B. Hill)