

**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 LORRAINE KISSELBURGH

I, Lorraine Kisselburgh, declare as follows:

1. I am over eighteen years old, of sound mind, and fully competent to make this declaration. I also have personal knowledge of the factual statements contained herein.

2. I am a United States citizen.

3. I currently live in and am registered to vote in Tippecanoe County, Indiana.

4. I am an active voter. I participate in elections frequently, and I intend to vote in the November midterm election in Indiana this year.

5. I am a former professor, and current faculty fellow and lecturer at Purdue University, in West Lafayette, Indiana, where I specialize in technology, society, and privacy.

6. I am also a twenty-year member of the Association for Computing Machinery (ACM) U.S. Technology Policy Committee; inaugural Chair of ACM's Global Technology Policy Council; and Past Chair of the Board of Directors for the Center for AI and Digital Policy.

7. Given my expertise, I've submitted, with colleagues, numerous comments to

federal agencies to advocate for enhanced privacy protections, including on how to balance privacy and accessibility in voting systems.¹

8. The Electronic Privacy Information Center (EPIC) is a non-profit, public interest research center established in 1994 to focus public attention on emerging privacy and civil liberties issues. Central to EPIC's mission is oversight of government activities that impact individual privacy, free expression, and democratic values.

9. I am a member of EPIC because I contribute to the advancement of the mission of EPIC and have been recognized and registered as a member by EPIC by virtue of paying dues.

10. I became an EPIC member because I am concerned about protecting privacy, freedom of expression, and democratic values in the information age. As an academic with longstanding research interest in privacy, EPIC's work on these issues is of special importance to me.

11. I obtained a Social Security card in California from the Social Security Administration ("SSA") when I was sixteen years old in order to qualify for employment, verify eligibility for taxes, and access benefits.

12. It is my understanding that the Department of Homeland Security ("DHS") is now

¹ See, e.g., Ass'n for Computing Machinery U.S. Tech. Pol'y Comm. (hereinafter "ACM USTPC"), *Comments in Response to U.S. Office of Mgmt. & Budget Request for Information on Privacy Impact Assessments* (Apr. 1, 2024), <https://perma.cc/N4R9-6HQQ>; ACM USTPC, *Comment Letter on RFI Regarding Promoting Access to Voting (Docket 210608-0123)* (July 16, 2021), <https://perma.cc/MVA7-FU33>; ACM USPTC, *Comments on "Developing a Privacy Framework" (Docket 181101997-8997-01)* (Jan. 14, 2019), <https://perma.cc/JCB9-J4KD>; ACM USTPC, *Comment Letter on "Developing the Administration's Approach to Consumer Privacy"* (Nov. 8, 2018), <https://perma.cc/8DGA-WZ3E>; EPIC, *Comment Letter on Request for Information on Update to the 2016 Nat'l Artificial Intelligence Research and Development Strategic Plan (83 FR 48655)* (Oct. 26, 2018), <https://perma.cc/6FUH-7X45>.

creating a portal through which state election officials will be able and encouraged to download personal data concerning my and others' citizenship status.

13. It is my understanding that SSA is disclosing personal data to DHS for states to access through this portal, including my SSN and other personal information.

14. It is my understanding that the Department of State ("DOS") is disclosing personal data to DHS for states to access through this portal, including my own personal information.

15. It is my understanding that, in addition to a portal, DHS is creating consolidated lists of citizens and residents of each state based on personal data obtained from SSA, DOS, and DHS's own records.

16. It is my understanding that DHS intends to provide states access to the portal and consolidated state citizenship lists as soon as September 4, 2026 for use in the November 2026 election.

17. It is my understanding, based on publicly available information, that Indiana is one of the states that intends to voluntarily use DHS's new portal.

18. I have not consented to, and do not consent to, SSA disclosing my personal information from SSA records to DHS or any other federal, state, or local agency to construct state citizenship lists, to run citizenship checks for voter list maintenance, or for any other purpose. When I received my SSN, I expected that my sensitive personal information would be kept confidential and protected by the federal government and my places of employment. I understood that my personal information would be in the federal government system for the limited purposes of determining eligibility for SSA benefits or work authorization. I never thought this information could be disclosed to DHS or any other federal, state, or local agency for use in a massive national citizenship database, for the construction of state citizenship lists, or for voter eligibility checks.

19. I have not consented to, and do not consent to, DOS disclosing my personal information to DHS or any other federal, state, or local agency to construct state citizenship lists, to run citizenship checks for voter list maintenance, or for any other purpose. I expected that data to remain private within DOS and be used only for purposes consistent with why DOS collected the data. I never expected my personal information held by DOS to be disclosed to DHS or any other federal, state, or local agency for use in a massive national citizenship database, for the construction of state citizenship lists, or for voter eligibility checks.

20. I have not consented to, and do not consent to, DHS collecting my personal information or disclosing it to any other federal, state, or local agency as part of the dissemination of state citizenship lists, to run citizenship checks for voter list maintenance, or for any other purpose. I never expected my personal information held by DHS to be disclosed to any other federal, state, or local agency as part of a national citizenship database, for the construction of state citizenship lists, or for voter eligibility checks.

21. The sharing of my private information without my knowledge, expectation, or consent is highly intrusive and offensive and makes me concerned and even angry that the government is carelessly sharing my personally identifiable information without appropriate consent. I understood federal agencies to be bound by laws that would keep them from disclosing my personal information to other agencies and entities for unrelated purposes.² I did not consent to the sharing of this highly sensitive information with multiple other agencies for unlawful or undisclosed purposes.

22. I take my personal data security seriously. As an expert on the risks associated with

² These laws include, for example, the Privacy Act of 1974, 5 U.S.C. § 552a, and the Social Security Act, 42 U.S.C. § 301 *et seq.*

the disclosure or aggregation of data beyond its intended purposes, I understand the importance of securing three pieces of personal information: name, SSN, and date of birth. However, in the wrong hands, these three pieces of information together, provide an (empirically tested) opportunity³ for bad actors to steal identities, create fake IDs, and commit credit card fraud, among other bad actions. Importantly, having these three pieces of personal information serves as a critical key to authenticate and duplicate my identity in multiple platforms and contexts, putting me at risk for significant harm, financially, reputationally, and physically.

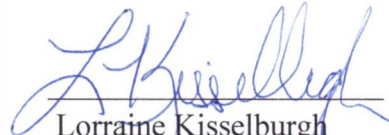
23. With this understanding, I strongly believe in clearly defined and limited data disclosures and that data should only be used for the limited purpose for which it is collected. I take steps to secure and protect this information in my personal life, and minimize the information I provide in all aspects of my life—even at the doctor’s office—to limit my risk exposure.

24. I feel violated that the government is misusing my personal data and betraying my trust by repurposing my personal information—without my consent—to create a national database and list of U.S. citizens.

25. I feel especially violated and afraid because I did not consent to data sharing for these other purposes, and I have no insight into what steps, if any, the federal, state, and local actors involved have taken to transfer, use, and store my data in a secure manner. For the reasons described above, I fear that the unsecured storage or transfer of files containing my full name, date of birth, and SSN will increase my vulnerability to data theft and security breaches.

³ See, e.g., Latanya Sweeney, *Weaving Technology and Policy Together to Maintain Confidentiality*, 25 J. L., Med. & Ethics 98, 98–110 (June 1997) (demonstrating that one’s identity can be reconstructed from as few as two critical pieces of information, such as a birth date and zip code).

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


Lorraine Kisselburgh

Executed on September 2, 2026, in Indiana.