

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

CITIZENS FOR RESPONSIBILITY
AND ETHICS IN WASHINGTON,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, et al.,

Defendants.

Case No. 1:26-cv-03393

I, LAUREN C. BINGHAM, hereby declare as follows:

1. I am Senior Litigation Counsel at Citizens for Responsibility and Ethics in Washington (“CREW”) and counsel for CREW in the above-captioned action. I make this declaration based on my personal knowledge, through consultation with my colleagues at CREW, and review of CREW’s files.

2. CREW, a non-profit, non-partisan organization organized under section 501(c)(3) of the Internal Revenue Code, is committed to protecting the rights of citizens to be informed about the activities of government officials and agencies, ensuring the integrity of government officials and agencies, and empowering citizens to have an influential voice in government decisions and in the government decision-making process through the dissemination of information about public officials and their actions.

3. To advance its mission, CREW uses a combination of research, litigation, and advocacy. As part of those efforts, CREW uses government records it obtains under the Freedom of Information Act (“FOIA”).

4. CREW disseminates information to the public obtained through FOIA in several ways. CREW reviews and analyzes the records it receives in relation to newsworthy developments

regarding, among others, government ethics, corruption, and the influence of money in politics. CREW uses these records to create editorial content, such as reports and commentary, to educate the public about these issues. CREW publishes the aforementioned educational content on its website that receives hundreds of thousands of page views per month.

5. CREW has submitted FOIA requests to the Department of Homeland Security (“DHS”) in the past and intends to submit additional requests to DHS in the future.

6. On August 14, 2026, CREW submitted expedited FOIA requests to DHS and its component United States Citizenship and Immigration Services (“USCIS”) for records from March 1, 2026 to the date the request is processed sufficient to show the methodology, criteria, and analytical process used to generate the numerical claims made publicly by DHS and the President on or about July 16 and 17, 2026 regarding non-citizens registered to vote. CREW sought expedited processing under two provisions: (1) 6 C.F.R. § 5.5(e)(1)(ii), “because there is an ‘urgency to inform the public concerning actual or alleged Federal Government activity,’ and CREW ‘is primarily engaged in disseminating information,’” and (2) 6 C.F.R. § 5.5(e)(1)(iv), “because there is ‘[a] matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence.’” A true and correct copy of the DHS Request is attached as Exhibit A. A true and correct copy of the USCIS Request is attached as Exhibit B.

7. On August 25, 2026, USCIS acknowledged receipt of CREW’s request and assigned it the control number COW2026005878. The email granted a fee waiver, denied expedited processing, and invoked the ten-business day extension pursuant to 5 U.S.C. § 552(a)(6)(B) due to “the scope and nature” of the request. A true and correct copy of the USCIS acknowledgement is attached as Exhibit C.

8. On September 23, 2026, DHS sent CREW an email acknowledging the request, and assigned it reference number 2026-HQFO-03605. The email stated that DHS “determined that this is a matter under the purview of the U.S. Citizenship & Immigration Services, another DHS component;” and that “therefore, [DHS is] transferring your request to the FOIA Officer for processing and direct response to you.” A true and correct copy of the DHS acknowledgement is attached as Exhibit D.

9. To date, Defendants have provided no further response to CREW’s expedited processing or FOIA requests.

10. CREW has been working on and intends in the future to continue working on issues regarding voter data and voter rolls. For example, CREW has been publishing records obtained through FOIA about the Department of Justice’s efforts to obtain confidential voter information from state voter rolls. *See CREW sues DOJ for failing to produce records on voter data collection*, CREW (Dec. 19, 2025), <https://perma.cc/Z8V9-XPRM>. In addition, CREW has been informing the public about the Department of Homeland Security’s and USCIS’s “overhaul” of the SAVE system “into a new tool for conducting citizenship checks to determine eligibility to vote . . . and substantially changes the way benefits eligibility is assessed.” *See Adam Smith, SSA flooded with public comments opposing data abuse*, CREW (Jan. 16, 2026), <https://perma.cc/KDC9-3SZZ>; *see also Adam Smith, Americans overwhelmingly reject Trump-Vance administration’s illegal national citizenship database*, CREW (Dec. 8, 2025), <https://perma.cc/Q6LA-LHJG>; *Lawsuit challenges Trump administration’s illegal national citizenship database*, CREW (last updated Jan. 21, 2026), <https://perma.cc/WJY3-LY8P>.

11. The records CREW receives in response to the FOIA requests that are the subject of this litigation are directly relevant to this ongoing work.

12. Consistent with its regular practice, CREW intends to disseminate records it receives in response to the FOIA requests that are the subject of this litigation to the public.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 29, 2026

A handwritten signature in cursive script, appearing to read "Lauren Bingham", written in dark ink.

Lauren C. Bingham