

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DEMOCRACY FORWARD FOUNDATION,
P.O. Box 34553
Washington, D.C. 20043,

Plaintiff,

vs.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES

5900 Capital Gateway Dr.
Camp Springs, MD 20746

Defendant.

Case No. 26-cv-3035

COMPLAINT FOR INJUNCTIVE RELIEF

Plaintiff Democracy Forward Foundation (“DFF”) brings this action against Defendant U.S. Citizenship and Immigration Services (“USCIS”) to compel compliance with the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). Plaintiff alleges as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.
2. Venue is proper in this district pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1391(e)(1) because Defendant’s headquarters and the agency records at issue are situated in this District.

Parties

3. Plaintiff DFF is a national, not-for-profit organization that works to promote transparency and accountability in government, in part, by educating the public on government

actions and policies.

4. Defendant USCIS is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in this District. USCIS is in possession, custody, and control of records, which are located in this jurisdiction and to which Plaintiff seeks access.

DDF's FOIA Requests

5. On March 31, 2026, President Trump issued Executive Order (E.O.) 14399 directing federal agencies—including USCIS—to compile and provide states with lists of “verified” U.S. citizens eligible to vote in federal elections and establishing new requirements for mail-in and absentee ballots with the purported purpose of strengthening election integrity.¹

6. In 2025, the Trump-Vance Administration expanded the capabilities of USCIS’s Systematic Alien Verification for Entitlements (“SAVE”) system to review voter rolls, modifying the system to allow for bulk uploads and including data from the Social Security Administration and Department of State.²

7. The Department of Justice (“DOJ”) Civil Rights Division (“CRT”) has entered into a memorandum of understanding with USCIS to use SAVE for “voter registration” and “voter list maintenance” purposes, and has indicated that it intends to identify alleged ineligible voters for states to remove from the rolls.³ At least eighteen federal judges have rejected DOJ CRT’s efforts

¹ See Exec. Order No. 14399, Ensuring Citizenship Verification and Integrity in Federal Elections, 91 Fed. Reg. 17125 (Mar. 31, 2026), <https://perma.cc/9TML-S52E>.

² See, e.g., Jen Fifield, *Details of DHS Agreement Reveal Risks of Trump Administration’s Use of Social Security Data for Voter Citizenship Checks*, ProPublica (Oct. 30, 2025), <https://perma.cc/W9KF-JWME>; Yunion Rivas & Jim Saksa, *In Late, Obscure Notice, DHS Turbocharges Trump’s Voter Purge Database, Evading Privacy Protections*, Democracy Docket (Oct. 31, 2025), <https://perma.cc/WVJ8-FYWR>; DHS, *Privacy Impact Assessment for the Systematic Alien Verification for Entitlements “SAVE” Program*, Reference No. DHS/USCIS/PIA-006(d) (Oct. 31, 2025), <https://perma.cc/D3SD-4FWA>.

³ See SAVE Agency Search Tool, U.S. Citizenship and Immigr. Servs. (accessed May 20, 2026), <https://perma.cc/6D4S-6SLF>; see also, e.g., U.S. Dep’t of Just., Civ. Rts. Div., Confidential Memorandum of Understanding, <https://perma.cc/76C9-928V>.

to obtain state voter rolls.⁴

8. In July 2026, the Trump-Vance Administration claimed to have found more than 250,000 non-citizens on voter rolls across four states.⁵ The Administration did not provide detailed information regarding how it arrived at this figure, including either the sources of the underlying data or methods of analysis.⁶ Shortly after that claim, Secretary of Homeland Security Markwayne Mullin publicly indicated that the Trump-Vance Administration may pursue criminal charges against election officials who do not remove alleged non-citizens from voter lists.⁷

9. There is widespread evidence that many individuals identified by SAVE as alleged non-citizens are in fact citizens.⁸

10. Lawmakers have questioned whether the Trump-Vance Administration has lawfully obtained voter data and called for greater transparency.⁹

11. These public reports indicate that records responsive to Plaintiff's FOIA requests (described in further detail below) exist and that their disclosure would further important public interests. To shed light on USCIS's actions to create a purported state citizenship list, to access state voter rolls and seek to remove individuals from those rolls, to identify alleged non-citizens

⁴ See, e.g., Kaylie Martinez-Ochoa, Eileen O'Connor & Patrick Berry, *Tracker of Justice Department Requests for Voter Information*, Brennan Ctr. for Just. (updated July 24, 2026), <https://www.brennancenter.org/our-work/research-reports/tracker-justice-department-requests-voter-information>.

⁵ See, e.g., Melissa Quinn, *What to Know About the Trump Administration's Claim that 250K Noncitizens are Registered to Vote in 4 States*, CBS (July 18, 2026), <https://perma.cc/42ZH-QFLW>.

⁶ See, e.g., Tierney Sneed & Gabe Cohen, *Trump DHS Using Unverified Figures to Attack Election Officials on Non-Citizen Voting*, CNN (July 17, 2026), <https://perma.cc/5H4M-RAG9>.

⁷ See Myah Ward et al., *DHS Secretary Vows Fines — and Even Prison Time — for Election Officials That Don't Comply*, Politico (July 17, 2026), <https://perma.cc/SG27-H6VL>.

⁸ See, e.g., Ned Parker & Peter Eisler, *How Trump is Moving to Control U.S. Elections, One State at a Time*, Reuters (Apr. 27, 2026), <https://perma.cc/RWQ9-5REF>; Judd Legum & Rebecca Crosby, *The Federal Database That Could Upend the Midterm Elections*, Mother Jones (Apr. 9, 2026), <https://perma.cc/Q5SM-D3EX>; 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://perma.cc/G2ZU-LAW2>; Jen Fifield & Zach Despart, *A Federal Tool to Check Voter Citizenship Keeps Making Mistakes. It Led to Confusion in Texas*, Texas Trib. (Feb. 13, 2026), <https://perma.cc/QGL2-DPWA>.

⁹ See, e.g., Blake Jones & Lindsey Holden, *California Dems Seethe Over Trump's Voter Roll Attack*, Politico (July 17, 2026), <https://perma.cc/5QF2-TUYU>.

on those rolls, as well as USCIS's broader involvement in election administration in the lead-up to the midterm elections, DFF submitted the FOIA requests described below. In light of the approaching elections and the public interest generated by the actions described above, DFF sought expedited processing of those requests based on the urgent need to inform the public.

State Citizenship List Directives & Guidance (COW2026006460REQ, COW2026005476)

12. On June 17, 2026, DFF sent a FOIA request to USCIS seeking the following:

All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding the State Citizenship List,¹⁰ including, but not limited to, compilation of the List, updates to the List, state or local election officials' use of the List, and/or use of the List for non-election purposes.

13. DFF noted that available information indicated that a reasonable search should include, at a minimum, the Office of the Director of Immigration Records and Identity Services Directorate within USCIS.

14. This request sought records from March 31, 2026, until the date of the search.

15. Upon submission, this request was assigned agency control number COW2026006460REQ.

16. On July 20, 2026, DFF requested expedited processing of this request on the grounds that "there is an urgency to inform the public concerning actual or alleged Federal Government activity." 5 U.S.C. § 552(a)(6)(E)(v)(II).

17. On July 22, 2026, USCIS acknowledged this request, denied DFF's request for expedited processing, granted DFF's fee waiver, assigned it to the complex track, and changed its

¹⁰ DFF's FOIA request cited Exec. Order No. 14399, *supra* note 1 ("[T]he Secretary of Homeland Security, through the Director of United States Citizenship and Immigration Services and in coordination with the Commissioner of SSA, shall take appropriate action to compile and transmit to the chief election official of each State a list of individuals confirmed to be United States citizens who will be above the age of 18 at the time of an upcoming Federal election and who maintain a residence in the subject State (State Citizenship List).").

agency control number to COW2026005476. USCIS also informed Plaintiff that because of “unusual circumstances,” USCIS was invoking a 10-day extension for this request, as permitted by FOIA.

18. On July 22, 2026, in a separate email, USCIS again informed DFF that it had denied expedited processing for this request.

19. On July 24, 2026, DFF appealed USCIS’s denial of expedited processing. Exhibit A.

20. DFF has received no subsequent communication from USCIS regarding this FOIA request.

USCIS Officials’ Elections Communications (COW2026006505REQ, COW2026005487)

21. On June 18, 2026, DFF sent a FOIA request to USCIS seeking the following:

All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by any of the following USCIS officials and containing any of the following key terms:

USCIS Officials

- i. Joseph Edlow, Director
- ii. Angelica Alfonso-Royals, Deputy Director
- iii. Peter Holland, Chief of Staff
- iv. Larry DeNayer, Acting Associate Director, Immigration Records and Identity Services Directorate
- v. Brian Broderick, Acting Chief, Verification Division, Immigration Records and Identity Services Directorate

Key Terms

- a. vot*
- b. midterm*
- c. election*
- d. ballot*
- e. poll*
- f. 14399
- g. 14,399
- h. “State Citizenship List”

22. DFF noted its use of the asterisk (*) to designate the standard use of “wildcards” in the search for responsive records. For example, a search for “vot*” would return all of the following: vote, voter, voting, etc. DFF asked USCIS to advise if the agency is unable to search for wildcards, so that DFF could then specifically include variations for USCIS to search.

23. DFF further noted that in an effort to accommodate the agency and reduce the number of potentially responsive records to be processed and produced, DFF limited this request to email communications sent by the specified officials. But DFF clarified that it still requests complete email chains to be produced, displaying both sent and received messages. DFF explained this means, for example, that both a specified official’s response to an email and the initial received message are responsive to this request and should be produced.

24. This request sought records from March 15, 2026, until the date of the search.

25. Upon submission, this request was assigned agency control number COW2026006505REQ.

26. On June 29, 2026, USCIS acknowledged this request, granted DFF’s fee waiver, assigned it to the complex track, and changed its agency control number to COW2026005487. USCIS also informed Plaintiff that because of “unusual circumstances,” USCIS was invoking a 10-day extension for this request, as permitted by FOIA.

27. On July 20, 2026, DFF requested expedited processing of this request on the grounds that “there is an urgency to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II).

28. On July 22, 2026, USCIS denied DFF’s request for expedited processing.

29. On July 24, 2026, DFF appealed USCIS’s denial of expedited processing. Exhibit A.

30. DFF has received no subsequent communication from USCIS regarding this FOIA request.

Directives, Policies, Contracts & MOUs Concerning Mail-In & Absentee Ballot Datasets (COW2026006508REQ, COW2026005489)

31. On June 18, 2026, DFF sent a request to USCIS for the following:

1. All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding using or accessing U.S Postal Service (“USPS”) datasets from Mail-In and Absentee Ballot Participation Lists.¹¹
2. A complete copy (including any attachments) of all contracts or subcontracts, amendments, inter-governmental service agreements, memoranda of understanding, or other written agreements between USCIS and the USPS regarding using or accessing datasets from Mail-In and Absentee Ballot Participation Lists.¹²

32. DFF noted that available information indicated that a reasonable search should include, at a minimum, the Office of the Director, Immigration Records and Identity Services Directorate, and Verification Division.

33. This request sought records from April 1, 2026, until the date of the search.

34. Upon submission, this request was assigned agency control number COW2026006508REQ. The agency control number was later changed to COW2026005489.

35. On July 20, 2026, DFF requested expedited processing of this request on the grounds that “there is an urgency to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II).

¹¹ DFF’s FOIA request cited: Notice, *DSCC v. Trump*, No. 26-cv-01114 (CJN) (D.D.C. June 5, 2026), ECF No. 149, <https://perma.cc/89PT-D8S4> (“Moreover, DHS contemplates working with the United States Postal Service (USPS) to integrate USPS datasets from Mail-In and Absentee Ballot Participation Lists, once available, and in compliance with applicable law, the Privacy Act, SORNS, PIAs, and interagency agreements, to monitor mail-in and absentee ballot flows, identify anomalies that may suggest voter fraud or misuse, and generate authorized investigative leads.”).

¹² DFF’s FOIA request cited: Notice, *supra* note 11.

36. On July 22, 2026, USCIS denied DFF's request for expedited processing.

37. On July 24, 2026, DFF appealed USCIS's denial of expedited processing. Exhibit A.

38. On July 28, 2026, USCIS formally acknowledged this request, informed DFF again that it had denied expedited processing, granted DFF's fee waiver, assigned it to the complex track, and informed DFF that it changed its agency control number to COW2026005489. USCIS also informed Plaintiff that because of "unusual circumstances," USCIS was invoking a 10-day extension for this request, as permitted by FOIA.

39. DFF has received no subsequent communication from USCIS regarding this FOIA request.

DOJ CRT SAVE Queries (COW2026006685REQ, COW2026005504)

40. On June 24, 2026, DFF sent a request to USCIS for the following:

1. Records sufficient to identify the number of queries made to Systematic Alien Verification for Entitlements ("SAVE") by the Department of Justice ("DOJ") Civil Rights Division ("CRT"), and the number of records DOJ CRT included in each query.
2. Records sufficient to identify the citizenship indicator responses for all SAVE queries made by DOJ CRT.
3. Records sufficient to identify the error rate and/or error count for all SAVE queries made by DOJ CRT.

41. DFF noted that it does not seek, and this request specifically excludes, all personally identifiable information from SAVE queries, such as names or social security numbers. DFF specifically seeks aggregated data regarding DOJ CRT SAVE queries and responses.

42. DFF further noted that to the extent USCIS maintains this data in aggregated form, such as in a spreadsheet or within a database or other format that can be readily exported to a spreadsheet, DFF requests responsive data in such format.

43. This request sought records from January 1, 2026, until the date of the search.

44. Upon submission, this request was assigned agency control number COW2026006685REQ. The agency control number was later changed to COW2026005504.

45. On July 20, 2026, DFF requested expedited processing of this request on the grounds that there is an “urgency to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II).

46. On July 22, 2026, USCIS denied DFF’s request for expedited processing.

47. On July 24, 2026, DFF appealed USCIS’s denial of expedited processing. Exhibit A.

48. On July 28, 2026, USCIS formally acknowledged this request, informed DFF again that it had denied expedited processing, granted DFF’s fee waiver, assigned it to the complex track, and informed DFF that it changed its agency control number to COW2026005504. USCIS also informed Plaintiff that because of “unusual circumstances,” USCIS was invoking a 10-day extension for this request, as permitted by FOIA.

49. DFF has received no subsequent communication from USCIS regarding this FOIA request.

Voter Roll Review Planning Documents, Reports & Memoranda (COW2026006688REQ, COW2026005508)

50. On June 24, 2026, DFF sent a FOIA request to USCIS seeking the following:

All formal and informal planning documents, reports, and/or memoranda created by, issued to, or otherwise provided to USCIS regarding the use of any USCIS database, resource, or service that is not the Systematic Alien Verification for Entitlements (“SAVE”) service for reviewing voter rolls. This includes, but is not limited to, the Person Centric Query Service (“PCQS”), including modifying PCQS to allow for bulk submissions.

51. DFF noted that available information indicated that a reasonable search should include, at a minimum, the Office of the Director, Immigration Records and Identity Services Directorate, and Verification Division.

52. This request sought records from July 1, 2025, until the date of the search.

53. Upon submission, this request was assigned agency control number COW2026006688REQ. The agency control number was later changed to COW2026005508.

54. On July 20, 2026, DFF requested expedited processing of this request on the grounds that there is an “urgency to inform the public concerning actual or alleged Federal Government activity.” 5 U.S.C. § 552(a)(6)(E)(v)(II).

55. On July 22, 2026, USCIS denied DFF’s request for expedited processing.

56. On July 24, 2026, DFF appealed USCIS’s denial of expedited processing. Exhibit A.

57. On July 28, 2026, USCIS formally acknowledged this request, informed DFF again that it had denied expedited processing, granted DFF’s fee waiver, assigned it to the complex track, and informed DFF that it changed its agency control number to COW2026005508. USCIS also informed Plaintiff that because of “unusual circumstances,” USCIS was invoking a 10-day extension for this request, as permitted by FOIA.

58. DFF has received no subsequent communication from USCIS regarding this FOIA request.

Exhaustion of Administrative Remedies

59. As of the date of this Complaint, Defendant has failed to notify DFF of determinations regarding DFF’s requests.

60. Through Defendant's failure to respond within the time limits required by law, DFF has constructively exhausted administrative remedies. USCIS's denial of DFF's expedited processing request for the FOIA requests described herein does not require administrative exhaustion. *See* 5 U.S.C. § 552(a)(6)(E)(iii) ("Agency action to deny or affirm denial of a request for expedited processing . . . shall be subject to judicial review"); *Citizens for Resp. & Ethics in Wash. v. DOJ*, 436 F. Supp. 3d 354, 359 (D.D.C. 2020) (requestors denied expedited processing are not required to exhaust administrative remedies); *Al-Fayed v. CIA*, No. 00-2092, 2000 WL 34342564, at *2 (D.D.C. Sept. 20, 2000) ("[n]othing in the statute or its legislative history" indicates that administrative appeal of denial of expedited processing is required before judicial review). DFF, nevertheless, administratively appealed USCIS's expedited processing denial more than ten days ago. *See* 5 U.S.C. § 552(a)(6)(E)(ii)(II) (requiring expedited consideration of expedited processing appeals).

CLAIMS FOR RELIEF

Count 1 (Violation of FOIA, 5 U.S.C. § 552, Failure to Respond with Determinations)

48. Plaintiff incorporates by reference the foregoing paragraphs as though fully set forth herein.

49. By failing to respond to Plaintiff's FOIA requests with determinations within the statutorily mandated time period, Defendant has violated its duties under 5 U.S.C. § 552, including but not limited to, its duties to conduct a reasonable search for responsive records, to take reasonable steps to promptly release all nonexempt information, and to not withhold responsive records.

Count 2 (Violation of FOIA, Failure to Grant Expedited Processing, 5 U.S.C. § 552(a)(6)(E)(v)(II))

50. Plaintiff incorporates by reference the foregoing paragraphs as though fully set

forth herein.

51. By failing to grant expedited processing under 5 U.S.C. § 552(a)(6)(E)(v)(II), Defendant has violated the FOIA for this matter involving actual or alleged Federal Government activity about which there is an urgent need to inform the public, made by an entity which is primarily engaged in disseminating information.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff requests that this Court:

1. Order Defendant to conduct adequate searches for any and all responsive records to Plaintiff's FOIA requests using search methods reasonably calculated to lead to discovery of all responsive records;
2. Order Defendant to produce, on an expedited basis and by a date certain, any and all non-exempt responsive records and a *Vaughn* index of any responsive records withheld under a claim of exemption;
3. Enjoin Defendant from continuing to withhold any and all non-exempt responsive records;
4. Award Plaintiff its costs, attorneys' fees, and other disbursements for this action; and
5. Grant any other relief this Court deems appropriate.

Dated: August 4, 2026

Respectfully submitted,

/s/ Amy C. Vickery

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Exhibit A



July 24, 2026

VIA Electronic Delivery

U.S. Citizenship and Immigration Services
FOIA Appeals
National Records Center
foiapaquestions@uscis.dhs.gov

**Re: Appeal of Expedited Processing Denial for Freedom of Information Act Requests
#COW2026006460REQ / COW2026005476, COW2026006505REQ / COW2026005487,
COW2026006506REQ / COW2026005488, COW2026006508REQ / COW2026005489,
COW2026005504 / COW2026006685REQ, COW2026005508 / COW2026006688REQ**

Dear FOIA Appeal Officer:

We write to appeal the U.S. Citizenship and Immigration Services' ("USCIS") denial of Democracy Forward Foundation's ("DFF") request for expedited processing based on the second standard (or prong ii) and fourth standard (or prong iv) of the attached Freedom of Information Act ("FOIA") requests. As this is an appeal of an expedited processing denial, DFF also seeks expedited consideration of this appeal itself.

Request COW2026006460REQ / COW2026005476 sought directives regarding the State Citizenship List. Specifically, the request sought from March 31, 2026, through the date the search is conducted:

All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding the State Citizenship List,¹ including, but not limited to, compilation of the List, updates to the List, state or local election officials' use of the List, and/or use of the List for non-election purposes.

DFF believes your office is in the best position to identify where responsive records are

¹ See Exec. Order No. 14399, *Ensuring Citizenship Verification and Integrity in Federal Elections*, 91 Fed. Reg. 17125 (Mar. 31, 2026), available at <https://www.federalregister.gov/documents/2026/04/03/2026-06601/ensuring-citizenship-verification-and-integrity-in-federal-elections>. "[T]he Secretary of Homeland Security, through the Director of United States Citizenship and Immigration Services and in coordination with the Commissioner of SSA, shall take appropriate action to compile and transmit to the chief election official of each State a list of individuals confirmed to be United States citizens who will be above the age of 18 at the time of an upcoming Federal election and who maintain a residence in the subject State (State Citizenship List)."

likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director and Immigration Records and Identity Services Directorate.

Request COW2026006505REQ / COW2026005487 sought communications regarding the midterm elections. Specifically, the request sought from March 15, 2026, through the date the search is conducted:

All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by any of the following USCIS officials and containing any of the following key terms.

USCIS Officials

- i. Joseph Edlow, Director
- ii. Angelica Alfonso-Royals, Deputy Director
- iii. Peter Holland, Chief of Staff
- iv. Larry DeNayer, Acting Associate Director, Immigration Records and Identity Services Directorate
- v. Brian Broderick, Acting Chief, Verification Division, Immigration Records and Identity Services Directorate

Key Terms

- a. vot*
- b. midterm*
- c. election*
- d. ballot*
- e. poll*
- f. 14399
- g. 14,399
- h. "State Citizenship List"

Please note that DFF is using the asterisk (*) to designate the standard use of "wildcards" in the search for responsive records. For example, a search for "vot*" would return all of the following: vote, voter, voting, etc. If your agency is unable to search for wildcards, please advise so that we may specifically include the variations that we would like searched.

In an effort to accommodate your agency and reduce the number of potentially responsive records to be processed and produced, we have limited this request to email communications sent by the specified officials. To be clear, however, DFF still requests that complete email chains be produced, displaying both sent and received messages.

This means, for example, that both a specified official's response to an email and the initial received message are responsive to this request and should be produced.

Request COW2026006506REQ / COW2026005488 sought communications with federal officials working on election integrity matters. Specifically, the request sought from October 1, 2025, through the date the search is conducted:

1. All email communications (including email messages, complete email chains, email attachments, calendar invitations) between any of the following USCIS officials and any of the following external individuals or entities (including the listed domains).

USCIS Officials

- i. Joseph Edlow, Director
- ii. Angelica Alfonso-Royals, Deputy Director
- iii. Peter Holland, Chief of Staff
- iv. Larry DeNayer, Acting Associate Director, Immigration Records and Identity Services Directorate
- v. Brian Broderick, Acting Chief, Verification Division, Immigration Records and Identity Services Directorate
- vi. Timothy Benz, Verification Division, Immigration Records and Identity Services Directorate
- vii. Andrew Davidson, former Acting Director
- viii. Paul Gleason
- ix. Kimberley Vogt
- x. William Richards

External Individuals and Entities

- a. Heather Honey (heather.honey@hq.dhs.gov)
- b. Kurt Olsen
- c. White House (who.eop.gov)

2. All text messages (including complete text message threads or conversations) and messages on messaging platforms (such as Signal and WhatsApp) between any of the officials listed above in part 1 and any of the external individuals listed below.

External Individuals

- a. Heather Honey
- b. Kurt Olsen

DFF is not in a position to provide a phone number for the listed individuals. If the listed officials are unable to provide them, please use the individuals' names as search terms. For example, a search for text messages between Director Edlow and Heather Honey would be conducted by searching Edlow's text messages using the terms "Heather" and "Honey" to identify potentially responsive records.

The search should include messages from officials' personal accounts as well as those from their official accounts.

Request COW2026006508REQ / COW2026005489 sought directives and agreements regarding using USPS datasets. Specifically, the request sought from April 1, 2026, through the date the search is conducted:

1. All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding using or accessing U.S Postal Service ("USPS") datasets from Mail-In and Absentee Ballot Participation Lists.²
2. A complete copy (including any attachments) of all contracts or subcontracts, amendments, inter-governmental service agreements, memoranda of understanding, or other written agreements between USCIS and the USPS regarding using or accessing datasets from Mail-In and Absentee Ballot Participation Lists.³

DFF believes your office is in the best position to identify where responsive records are likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director, Immigration Records and Identity Services Directorate, and Verification Division.

Request COW2026005504 / COW2026006685REQ sought data regarding SAVE. Specifically, the request sought from January 1, 2026, through the date the search is conducted:

1. Records sufficient to identify the number of queries made to Systematic Alien Verification for Entitlements ("SAVE") by the Department of Justice ("DOJ") Civil Rights Division ("CRT"), and the number of records DOJ CRT included in each query.

² Notice, DSCC v. Trump, No. 26-cv-01114 (CJN) (D.D.C. June 5, 2026), ECF No. 149, available at <https://www.democracydocket.com/wp-content/uploads/2026/04/149-2026-06-05-DOJs-notice.pdf>. "Moreover, DHS contemplates working with the United States Postal Service (USPS) to integrate USPS datasets from Mail-In and Absentee Ballot Participation Lists, once available, and in compliance with applicable law, the Privacy Act, SORNS, PIAs, and interagency agreements, to monitor mail-in and absentee ballot flows, identify anomalies that may suggest voter fraud or misuse, and generate authorized investigative leads."

³ *Id.*

2. Records sufficient to identify the citizenship indicator responses for all SAVE queries made by DOJ CRT.
3. Records sufficient to identify the error rate and/or error count for all SAVE queries made by DOJ CRT.

To be clear, DFF does not seek, and this request specifically excludes, all personally identifiable information from SAVE queries, such as names or social security numbers. We specifically seek aggregate data regarding DOJ CRT SAVE queries and responses.

To the extent USCIS maintains this data in aggregated form, such as in a spreadsheet or within a database or other format that can be readily exported to a spreadsheet, DFF requests responsive data in such format.

Request COW2026005508 / COW2026006688REQ sought memoranda or planning documents regarding the use of non-SAVE USCIS resources for reviewing voter rolls. Specifically, the request sought from July 1, 2025, through the date the search is conducted:

All formal and informal planning documents, reports, and/or memoranda created by, issued to, or otherwise provided to USCIS regarding the use of any USCIS database, resource, or service that is not the Systematic Alien Verification for Entitlements (“SAVE”) service for reviewing voter rolls. This includes, but is not limited to, the Person Centric Query Service (“PCQS”), including modifying PCQS to allow for bulk submissions.

DFF believes your office is in the best position to identify where responsive records are likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director, Immigration Records and Identity Services Directorate, and Verification Division.

On June 22, 2026, USCIS responded to DFF’s expedition request by denying it on the basis that DFF’s “request does not meet the criteria for expedited processing.”

USCIS must reverse this determination on appeal because DFF’s request for expedited processing provided an exhaustive amount of information warranting the grant of expedited processing of these requests. DFF’s expedition request cited 20 unique news articles concerning the matter of the request, USCIS involvement in maintaining voter rolls, spanning across 15

different state, national, and beat-focused outlets.⁴ Courts have found “widespread and

⁴ See, e.g., Jen Fifield, *Details of DHS Agreement Reveal Risks of Trump Administration’s Use of Social Security Data for Voter Citizenship Checks*, ProPublica (Oct. 30, 2025), <https://www.propublica.org/article/dhs-social-security-data-voter-citizenship-trump>; Yuniior Rivas & Jim Saksa, *In Late, Obscure Notice, DHS Turbocharges Trump’s Voter Purge Database, Evading Privacy Protections*, Democracy Docket (Oct. 31, 2025), <https://www.democracymocket.com/news-alerts/in-late-obscure-notice-dhs-turbocharges-trumps-voter-purge-database-evading-privacy-protections/>; Jude Joffe-Block, *A Federal Judge Finds a Trump Data System to Verify Voters is Unlawful*, NPR (June 22, 2026), <https://www.npr.org/2026/06/22/nx-s1-5866719/save-voter-data-trump-judge-unlawful>; Dion Nissenbaum & Natalia Contreras, *Federal Judge Blocks Trump Administration’s Overhaul of SAVE Database*, Votebeat (June 22, 2026), <https://www.votebeat.org/national/2026/06/22/judge-rules-against-trump-overhaul-save-database-noncitizen-voters/>; Alison Durkee, *Judge Kills Trump’s Voter Database Plan—Says Administration ‘Trampled’ on Americans’ Privacy*, Forbes (June 22, 2026), <https://www.forbes.com/sites/alisondurkee/2026/06/22/judge-kills-trumps-voter-database-plan-says-administration-trampled-on-americans-privacy/>; Jim Saksa, *In Blow to Trump, Federal Judge Blocks DHS from Using Citizenship Database to Purge Voters*, Democracy Docket (June 22, 2026), <https://www.democracymocket.com/news-alerts/in-blow-to-trump-federal-judge-blocks-dhs-from-using-citizenship-database-to-purge-voters/>; Ali Swenson & Fatima Hussein, *Judge Blocks Use of Federal Database to Check Citizenship, Saying It Could Wrongly Purge Voters*, AP (June 22, 2026), <https://apnews.com/article/trump-elections-noncitizens-voting-save-lawsuit-a9612cffa40c938e67b99f265c9e817>; Luc Cohen, *Judge Blocks Trump’s Use of Revamped Immigration Database for Voter Checks*, Reuters (June 22, 2026), <https://www.reuters.com/world/judge-blocks-trumps-use-revamped-immigration-database-voter-checks-2026-06-22/>; Ned Parker and Peter Eisler, *How Trump is Moving to Control U.S. Elections, One State at a Time*, Reuters (Apr. 27, 2026), <https://www.reuters.com/investigations/how-trump-is-moving-control-us-elections-one-state-time-2026-04-27/>; Judd Legum & Rebecca Crosby, *The Federal Database That Could Upend the Midterm Elections*, Mother Jones (Apr. 9, 2026), <https://www.motherjones.com/politics/2026/04/save-database-errors-faulty-state-voter-rolls-lists-trump-administration-on-doj-ice-2026-midterm-elections/>; 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://www.npr.org/2025/12/10/nx-s1-5588384/save-voting-data-us-citizens>; Jen Fifield & Zach Despart, *A Federal Tool to Check Voter Citizenship Keeps Making Mistakes. It Led to Confusion in Texas*, Texas Trib. (Feb. 13, 2026), <https://www.texastribune.org/2026/02/13/save-voter-citizenship-tool-mistakes-confusion/>; Natalia Contreras, *Texas Secretary of State Raised Concerns About the Federal Tool Used to Flag Potential Noncitizen Voters*, Votebeat (July 16, 2026), <https://www.votebeat.org/texas/2026/07/16/jane-nelson-concerns-save-data-voter-citizenship-uscis>; Nicholas Kerr & Elise Spenner, *System That DHS is Urging States to Use to Assess Voter Rolls Known to Return Faulty Results: Reports*, ABC (July 19, 2026), <https://abcnews.com/Politics/system-dhs-urging-states-assess-voter-rolls-return/story?id=134863557>; Melissa Quinn, *What to Know About the Trump Administration’s Claim that 250K Noncitizens are Registered to Vote in 4 States*, CBS (July 18, 2026), <https://www.cbsnews.com/news/trump-markwayne-mullin-non-citizens-registered-voters-california-new-jersey-nevada-pennsylvania/>; Tierney Sneed & Gabe Cohen, *Trump DHS Using Unverified Figures to Attack Election Officials on Non-Citizen Voting*, CNN (July 17, 2026), <https://www.cnn.com/2026/07/17/politics/election-officials-voting-mullin-save>; Blake Jones & Lindsey Holden, *California Dems Seethe Over Trump’s Voter Roll Attack*, Politico (July 17, 2026), <https://www.politico.com/news/2026/07/17/california-democrats-trump-voter-roll-claim-01002724>; Yuniior Rivas, *Trump DOJ Took a Victory Lap in Connecticut. Then It Became Their 16th Straight Loss*, Democracy Docket (July 17, 2026), <https://www.democracymocket.com/news-alerts/trump-doj-took-a-victory-lap-in-connecticut-then-it-became-their-16th-straight-voter-roll-loss/>; Myah Ward et al., *DHS Secretary Vows Fines — and Even Prison Time — for Election Officials That Don’t Comply*, Politico (July 17, 2026), <https://www.politico.com/news/2026/07/17/dhs-secretary-vows-fines-and-even-prison-time-for-election-officials-tha-t-dont-comply-01003116>; Nick Corasaniti & Dustin Volz, *Trump’s Homeland Security Chief Threatens Election*

exceptional media interest” warranting expedited processing under 28 C.F.R. §16.5 (e)(1)(iv) where there is much less extensive coverage across a broad range of media outlets than is present here. *See ACLU v. Dep’t of Just.*, 321 F. Supp. 2d 24, 32 (D.D.C. 2004) (“*ACLU P*”) (finding “only a handful of articles” in “a variety of publications” enough); *Am. Oversight v. U.S. Dep’t of Just.*, 292 F. Supp. 3d 501, 505 (D.D.C. 2018) (noting DOJ’s concession that five articles sufficed); *Democracy Forward Found.*, 2025 WL 3268245, at *6 (being “hard pressed to think of stronger evidence” for “widespread and exceptional media interest” than “dozens of articles” in “a range of prominent newspapers ... and well-known broadcast outlets”). The expedition request explained the numerous questions about the integrity of the government’s actions implicated by this matter and discussed in the extensive media coverage of the Trump administration’s actions. *See Expedition Request* at 8-11, attached herein in Appendix 2. This is not a close call.

Furthermore, since our initial expedited processing applications were filed, there has been extensive additional news coverage of this matter, underscoring the urgency of the matter and raising further questions regarding the federal government’s integrity which affect public confidence.

On July 21, 2026, New Jersey Governor Mikie Sherrill announced that approximately 6,600 non-citizens were unknowingly registered to vote in the state from 2023 to 2024.⁵ The error reportedly arose as a result of a software error, as individuals had indicated that they were not U.S. citizens while registering for driver’s licenses and identification cards, but they were nevertheless transmitted to the Division of Elections as registered voters.⁶ Governor Sherrill stated that the individuals were being removed from voter registration lists, and there was no evidence that election results were impacted by the error.⁷

Despite voting rights advocates and New Jersey officials confirming that this error did not affect election outcomes and the erroneously registered voters made up just 0.1% of the entire voter

Officials With Prison Time, N.Y. Times (July 17, 2026),

<https://www.nytimes.com/2026/07/17/us/politics/markwayne-mullin-election-officials-threats-trump.html>.

⁵ *See, e.g.*, Dareh Gregorian & Jane C. Timm, *6,600 Noncitizens Were Registered to Vote in N.J. Because of a ‘Software Error,’ Governor Says*, NBC (July 21, 2026),

<https://www.nbcnews.com/politics/2026-election/6600-noncitizens-registered-vote-nj-software-error-governor-says-rcna588524>.

⁶ *See, e.g.*, Ken Thomas & Louise Radofsky, *New Jersey Removes Thousands of Noncitizens from Voter Rolls*, Wall Street J. (July 21, 2026),

<https://www.wsj.com/politics/policy/new-jersey-removes-6-600-noncitizens-from-voter-rolls-after-software-error-9a6c2492>.

⁷ *See, e.g.*, Joey Fox & Daniel Han, *Thousands of Non-Citizens Registered to Vote in NJ Due to Software Error, Governor Says*, Politico (July 21, 2026),

<https://www.politico.com/news/2026/07/21/thousands-of-non-citizens-registered-to-vote-in-nj-due-to-software-error-governor-says-01006373>.

registration list,⁸ the Trump administration has used this incident to promote disproven claims about voter fraud and to justify federal involvement in elections.⁹ President Trump inflated the number of people who had mistakenly been registered to more than 35,000 individuals and incorrectly stated that they had all registered to vote as Democrats,¹⁰ and DOJ has floated the possibility of criminal prosecutions and deportations as a result of New Jersey's error, illustrating the gravity of the matter.¹¹

The Department of Homeland Security ("DHS") has continued to make unproven allegations of "non-citizen voting," announcing just last week that it had determined that there were more than 250,000 noncitizens on voter rolls in at least four states, including New Jersey.¹² Governor Sherill has stated that New Jersey has asked for evidence of DHS's claim, but has "heard nothing back."¹³ This echoes concerns about transparency from other elected officials, including California Governor Gavin Newsom and Senator Alex Padilla,¹⁴ as DHS failed to even identify which voters were alleged noncitizens.¹⁵ The Trump administration's lack of engagement with state officials to verify these claims underscores the urgent need to obtain the records described in DFF's FOIA requests.

⁸ See, e.g., Leila Fadel, *Software Glitch Allowed About 400 Noncitizens to Vote in New Jersey, Governor Says*, NPR (July 22, 2026), <https://www.npr.org/2026/07/22/nx-s1-5902283/software-glitch-allowed-about-400-noncitizens-to-vote-in-new-jersey-governor-says>.

⁹ See, e.g., Yuni Rivas, *Trump Allies Seize on New Jersey Registration Error to Advance Anti-Voting Agenda*, Democracy Docket (July 21, 2026), <https://www.democracymarket.com/news-alerts/trump-allies-seize-on-new-jersey-registration-error-to-advance-anti-voting-agenda/>; Emily Goodin, *White House Takes Victory Lap Over New Jersey's Confession About Thousands of Non-Citizen Voters*, N.Y. Post (July 21, 2026), <https://nypost.com/2026/07/21/us-news/white-house-takes-victory-lap-over-new-jerseys-confession-about-thousands-of-non-citizen-voters/>.

¹⁰ See, e.g., Sam Levine, *Trump Seizes on New Jersey Election Error to Boost Misleading Fraud Claims*, Guardian (July 23, 2026), <https://www.theguardian.com/us-news/2026/jul/23/new-jersey-noncitizen-republicans-election-fraud>; Editorial Board, *New Jersey's Illegal Votes Aren't Evidence of Systemic Fraud*, Wash. Post (July 22, 2026), <https://www.washingtonpost.com/opinions/2026/07/22/new-jerseys-illegal-votes-arent-evidence-systemic-fraud/>; Aaron Blake, *New Jersey's Non-Citizen Voting Reveal Isn't All It Seems*, CNN (July 22, 2026), <https://www.cnn.com/2026/07/22/politics/new-jersey-non-citizen-voting>.

¹¹ See, e.g., Daniel Han, *Noncitizens Voting in New Jersey Could Face Criminal Prosecution, DOJ Official Says*, Politico (July 23, 2026), <https://www.politico.com/news/2026/07/23/new-jersey-noncitizen-voting-01009141>.

¹² See, e.g., Nick Corasaniti & Alexandra Berzon, *Trump Again Makes Unverifiable Claims of Noncitizen Voting*, N.Y. Times (July 16, 2026), <https://www.nytimes.com/2026/07/16/us/politics/trump-again-makes-unfounded-claims-of-noncitizen-voting.html>.

¹³ See Dareh Gregorian & Jane C. Timm, *6,600 Noncitizens Were Registered to Vote in N.J. Because of a 'Software Error,' Governor Says*, NBC (July 21, 2026), <https://www.nbcnews.com/politics/2026-election/6600-noncitizens-registered-vote-nj-software-error-governor-says-rcna588524>.

¹⁴ See, e.g., Joe Garofoli, *Trump Accuses California of Registering Thousands of Noncitizen Voters; Newsom Scoffs*, S.F. Chronicle (July 16, 2026), <https://www.sfchronicle.com/politics/article/trump-california-noncitizen-voters-22348856.php>.

¹⁵ See, e.g., Sam Levine, *Trump Seizes on New Jersey Election Error to Boost Misleading Fraud Claims*, Guardian (July 23, 2026), <https://www.theguardian.com/us-news/2026/jul/23/new-jersey-noncitizen-republicans-election-fraud>.

Finally, legal challenges to Executive Order 14399 “Ensuring Citizenship Verification and Integrity in Federal Elections,” which gives USCIS unprecedented control over which voters are eligible to receive mail ballots, have continued to escalate in recent days—U.S. District Court Judge Indira Talwani stated on July 23, 2026 that “disenfranchisement as to the upcoming election is plausibly likely and imminent.”¹⁶

Expedition is especially warranted because DFF can “identify a specific end point at which the information’s value drops off altogether.” Mem. Op., *Heritage Found. v. U.S. EPA*, Case No. 23-748 (JEB), 2023 WL 2954418 at *4 (D.D.C. Apr. 14, 2023). Here, there is great risk that eligible voters may be blocked from voting as a result of USCIS’s involvement in elections; as such, it is critical that DFF obtain these records in advance of the midterm elections.

For these reasons, DFF’s request to expedite the processing of these FOIA requests under the second standard (or prong ii) and the fourth standard (or prong iv) is justified. We ask you to consider the further information provided here and to reverse the agency’s denial of DFF’s requests for expedited processing. We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Daniel A. McGrath

Daniel A. McGrath

Special Counsel, Oversight

On behalf of

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

Appendix 1. Submitted Requests

Appendix 2. Submitted Expedition Request

Appendix 3. USCIS Denials of Expedition Request

¹⁶ See Jim Saksa, *Judge Says Trump’s Attack on Mail Voting is ‘Unconstitutional,’ Legal Challenge Can Continue*, Democracy Docket (July 23, 2026), <https://www.democracydocket.com/news-alerts/judge-says-trumps-attack-on-mail-voting-is-unconstitutional-legal-challenge-can-continue/>.

Appendix 1

Submitted Requests



June 17, 2026

VIA Electronic Delivery

U.S. Citizenship and Immigration Services
Department of Homeland Security
National Records Center, FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO. 64064
Via Online Portal

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552, Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the U.S. Citizenship and Immigration Services ("USCIS") produce the following within twenty (20) business days:

All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding the State Citizenship List,¹ including, but not limited to, compilation of the List, updates to the List, state or local election officials' use of the List, and/or use of the List for non-election purposes.

DFF believes your office is in the best position to identify where responsive records are likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director and Immigration Records and Identity Services Directorate.

¹ See Exec. Order No. 14399, *Ensuring Citizenship Verification and Integrity in Federal Elections*, 91 Fed. Reg. 17125 (Mar. 31, 2026), available at <https://www.federalregister.gov/documents/2026/04/03/2026-06601/ensuring-citizenship-verification-and-integrity-in-federal-elections>. "[T]he Secretary of Homeland Security, through the Director of United States Citizenship and Immigration Services and in coordination with the Commissioner of SSA, shall take appropriate action to compile and transmit to the chief election official of each State a list of individuals confirmed to be United States citizens who will be above the age of 18 at the time of an upcoming Federal election and who maintain a residence in the subject State (State Citizenship List)."

This request seeks records created, issued, or in effect from March 31, 2026 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, Democracy Forward Foundation requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees when "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is

not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, see *id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of how federal agencies are implementing the executive order “Ensuring Citizenship Verification and Integrity in Federal Elections.”² When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.³

² See, e.g., Jacob Knutson & Jim Saksa, *Postal Service Moves Forward with Trump’s Attack on Mail Voting*, Democracy Docket (May 29, 2026), <https://www.democracymatters.com/news-alerts/postal-service-trump-attack-mail-voting-proposed-rule/>.

³ See, e.g., Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz and Jack Gillum, “Happy to Do It”: Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>;

Hamid Aleaziz, *Emails Show US Border Officials Didn’t Receive “Zero Tolerance” Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba;

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>; David Ingram et al., *U.S. Marshals Waived Training Rules for Musk's Armed DOGE Security, Emails Show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

Skye Perryman

President & CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043



June 18, 2026

VIA Electronic Delivery

U.S. Citizenship and Immigration Services
Department of Homeland Security
National Records Center, FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO. 64064
Via Online Portal
foiapaquestions@uscis.dhs.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552, Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the U.S. Citizenship and Immigration Services ("USCIS") produce the following within twenty (20) business days:

All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by any of the following USCIS officials and containing any of the following key terms.

USCIS Officials

- i. Joseph Edlow, Director
- ii. Angelica Alfonso-Royals, Deputy Director
- iii. Peter Holland, Chief of Staff
- iv. Larry DeNayer, Acting Associate Director, Immigration Records and Identity Services Directorate
- v. Brian Broderick, Acting Chief, Verification Division, Immigration Records and Identity Services Directorate

Key Terms

- a. vot*
- b. midterm*

- c. election*
- d. ballot*
- e. poll*
- f. 14399
- g. 14,399
- h. "State Citizenship List"

Please note that DFF is using the asterisk (*) to designate the standard use of "wildcards" in the search for responsive records. For example, a search for "vot*" would return all of the following: vote, voter, voting, etc. If your agency is unable to search for wildcards, please advise so that we may specifically include the variations that we would like searched.

In an effort to accommodate your agency and reduce the number of potentially responsive records to be processed and produced, we have limited this request to email communications sent by the specified officials. To be clear, however, DFF still requests that complete email chains be produced, displaying both sent and received messages. This means, for example, that both a specified official's response to an email and the initial received message are responsive to this request and should be produced.

This request seeks records from March 15, 2026 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, Democracy Forward Foundation requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees when "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a "demonstrated . . . ability to disseminate the requested information," *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to "a reasonably broad audience of persons interested in the subject" of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require "pointless specificity"; all that is necessary is for a requester to adequately demonstrate its "ability to publicize disclosed information." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, see *id.*, or whether the requester has a history of "contacts with any major news[] companies" that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public's understanding of how USCIS is implementing Executive Order 14399 "Ensuring Citizenship

Verification and Integrity in Federal Elections.”¹ When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.²

¹ See, e.g., Yuniur Rivas, *Trump Admin Approves Plan to Check Voters’ Citizenship using Federal Databases*, Democracy Docket (June 5, 2026), <https://www.democracymarket.com/news-alerts/trump-admin-approves-plan-check-voters-citizenship-using-federal-databases/>.

² See, e.g., Matt Bracken, *DOGE pitched AI-fueled ‘regulation extermination’ tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniur Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. Marshals Waived Training Rules for Musk’s Armed DOGE Security, Emails Show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump’s Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump appointee inspired by conservative media outlet to push for probe of Democratic congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz and Jack Gillum, *“Happy to Do It”: Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn’t Receive “Zero Tolerance” Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *‘Just answer the question and kill this story’: In internal emails, Heather Nauert criticized Rex Tillerson’s refusal to deny reports that he called Trump a ‘moron,’* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-ke>

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

Skye Perryman
President & CEO
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

[eps](#); Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-fundin-g-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.



June 18, 2026

VIA Electronic Delivery

U.S. Citizenship and Immigration Services
Department of Homeland Security
National Records Center, FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO. 64064
Via Online Portal
foiapaquestions@uscis.dhs.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552, Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the U.S. Citizenship and Immigration Services ("USCIS") produce the following within twenty (20) business days:

1. All email communications (including email messages, complete email chains, email attachments, calendar invitations) between any of the following USCIS officials and any of the following external individuals or entities (including the listed domains).

USCIS Officials

- i. Joseph Edlow, Director
- ii. Angelica Alfonso-Royals, Deputy Director
- iii. Peter Holland, Chief of Staff
- iv. Larry DeNayer, Acting Associate Director, Immigration Records and Identity Services Directorate
- v. Brian Broderick, Acting Chief, Verification Division, Immigration Records and Identity Services Directorate
- vi. Timothy Benz, Verification Division, Immigration Records and Identity Services Directorate
- vii. Andrew Davidson, former Acting Director

- viii. Paul Gleason
- ix. Kimberley Vogt
- x. William Richards

External Individuals and Entities

- a. Heather Honey (heather.honey@hq.dhs.gov)
- b. Kurt Olsen
- c. White House (who.eop.gov)

2. All text messages (including complete text message threads or conversations) and messages on messaging platforms (such as Signal and WhatsApp) between any of the officials listed above in part 1 and any of the external individuals listed below.

External Individuals

- a. Heather Honey
- b. Kurt Olsen

DFF is not in a position to provide a phone number for the listed individuals. If the listed officials are unable to provide them, please use the individuals' names as search terms. For example, a search for text messages between Director Edlow and Heather Honey would be conducted by searching Edlow's text messages using the terms "Heather" and "Honey" to identify potentially responsive records.

The search should include messages from officials' personal accounts as well as those from their official accounts.

This request seeks records from October 1, 2025 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how

that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, Democracy Forward Foundation requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees when "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a "demonstrated . . . ability to disseminate the requested information," *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to "a reasonably broad audience of persons interested in the subject" of its work. *Carney v. U.S. Dep't of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require "pointless specificity"; all that is necessary is for a requester to adequately demonstrate its "ability to publicize disclosed information." *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, see *id.*, or whether the requester has a history of "contacts with any major news[] companies" that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had

failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public's understanding of how USCIS is implementing Executive Order 14399 "Ensuring Citizenship Verification and Integrity in Federal Elections."¹ When DFF obtains materials through FOIA requests that are of significant public interest, DFF's communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.²

¹ See, e.g., Yunior Rivas, *Trump Admin Approves Plan to Check Voters' Citizenship using Federal Databases*, Democracy Docket (June 5, 2026), <https://www.democracymarket.com/news-alerts/trump-admin-approves-plan-check-voters-citizenship-using-federal-databases/>.

² See, e.g., Matt Bracken, *DOGE pitched AI-fueled 'regulation extermination' tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yunior Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymarket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. Marshals Waived Training Rules for Musk's Armed DOGE Security, Emails Show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump appointee inspired by conservative media outlet to push for probe of Democratic congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018),

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

Skye Perryman

President & CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.



June 18, 2026

VIA Electronic Delivery

U.S. Citizenship and Immigration Services
Department of Homeland Security
National Records Center, FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO. 64064
Via Online Portal
foiapaquestions@uscis.dhs.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552, Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the U.S. Citizenship and Immigration Services ("USCIS") produce the following within twenty (20) business days:

1. All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding using or accessing U.S. Postal Service ("USPS") datasets from Mail-In and Absentee Ballot Participation Lists.¹
2. A complete copy (including any attachments) of all contracts or subcontracts, amendments, inter-governmental service agreements, memoranda of understanding, or other written agreements between USCIS and the USPS regarding using or accessing datasets from Mail-In and Absentee Ballot Participation Lists.²

DFF believes your office is in the best position to identify where responsive records are

¹ Notice, DSCC v. Trump, No. 26-cv-01114 (CJN) (D.D.C. June 5, 2026), ECF No. 149, available at <https://www.democracydocket.com/wp-content/uploads/2026/04/149-2026-06-05-DOJs-notice.pdf>. "Moreover, DHS contemplates working with the United States Postal Service (USPS) to integrate USPS datasets from Mail-In and Absentee Ballot Participation Lists, once available, and in compliance with applicable law, the Privacy Act, SORNS, PIAs, and interagency agreements, to monitor mail-in and absentee ballot flows, identify anomalies that may suggest voter fraud or misuse, and generate authorized investigative leads."

² *Id.*

likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director, Immigration Records and Identity Services Directorate, and Verification Division.

This request seeks records created, issued, or in effect from April 1, 2026 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, Democracy Forward Foundation requests a waiver of all fees associated with processing records for this request.

FOIA requires documents to be furnished to requesters at no fee or reduced fees when “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, see *id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of how USCIS is implementing Executive Order 14399 “Ensuring Citizenship Verification and Integrity in Federal Elections.”³ When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.⁴

³ See, e.g., Yuniior Rivas, *Trump Admin Approves Plan to Check Voters’ Citizenship using Federal Databases*, Democracy Docket (June 5, 2026), <https://www.democracydocket.com/news-alerts/trump-admin-approves-plan-check-voters-citizenship-using-federal-databases/>.

⁴ See, e.g., Matt Bracken, *DOGE pitched AI-fueled ‘regulation extermination’ tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniior Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracydocket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>;

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request and disclosed will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for

David Ingram et al., *U.S. Marshals Waived Training Rules for Musk's Armed DOGE Security, Emails Show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump appointee inspired by conservative media outlet to push for probe of Democratic congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron.'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

Skye Perryman

President & CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043



June 24, 2026

VIA Electronic Delivery

U.S. Citizenship and Immigration Services
Department of Homeland Security
National Records Center, FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO. 64064
Via Online Portal
foiapaquestions@uscis.dhs.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552, Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the U.S. Citizenship and Immigration Services ("USCIS") produce the following within twenty (20) business days:

1. Records sufficient to identify the number of queries made to Systematic Alien Verification for Entitlements ("SAVE") by the Department of Justice ("DOJ") Civil Rights Division ("CRT"), and the number of records DOJ CRT included in each query.
2. Records sufficient to identify the citizenship indicator responses for all SAVE queries made by DOJ CRT.
3. Records sufficient to identify the error rate and/or error count for all SAVE queries made by DOJ CRT.

To be clear, DFF does not seek, and this request specifically excludes, all personally identifiable information from SAVE queries, such as names or social security numbers. We specifically seek aggregate data regarding DOJ CRT SAVE queries and responses.

DFF-DHS-USCIS-26-0982

To the extent USCIS maintains this data in aggregated form, such as in a spreadsheet or within a database or other format that can be readily exported to a spreadsheet, DFF requests responsive data in such format.

This request seeks records from January 1, 2026 until the date of the search.

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, Democracy Forward

Foundation requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees when “if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a “demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, see *id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of how USCIS is using citizenship data to assist with cleaning voter rolls.¹ When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.²

¹ See Press Release, *USCIS Enhances Voter Verification Systems*, USCIS (Nov. 3, 2025), <https://www.uscis.gov/newsroom/news-releases/uscis-enhances-voter-verification-systems>.

² See, e.g., Matt Bracken, *DOGE pitched AI-fueled ‘regulation extermination’ tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniior Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracydocket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr.

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request will be disclosed at no cost.

15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. Marshals Waived Training Rules for Musk's Armed DOGE Security, Emails Show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump's Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump appointee inspired by conservative media outlet to push for probe of Democratic congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz and Jack Gillum, *"Happy to Do It": Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn't Receive "Zero Tolerance" Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *'Just answer the question and kill this story': In internal emails, Heather Nauert criticized Rex Tillerson's refusal to deny reports that he called Trump a 'moron,'* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges*, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents*, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, emails reveal Trump appointees' war to end HHS teen pregnancy program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-advisor-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

Skye Perryman

President & CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043



June 24, 2026

VIA Electronic Delivery

U.S. Citizenship and Immigration Services
Department of Homeland Security
National Records Center, FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO. 64064
Via Online Portal
foiapaquestions@uscis.dhs.gov

Re: Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552, Democracy Forward Foundation submits this request for records.

Records Requested

Democracy Forward Foundation ("DFF") requests that the U.S. Citizenship and Immigration Services ("USCIS") produce the following within twenty (20) business days:

All formal and informal planning documents, reports, and/or memoranda created by, issued to, or otherwise provided to USCIS regarding the use of any USCIS database, resource, or service that is not the Systematic Alien Verification for Entitlements ("SAVE") service for reviewing voter rolls. This includes, but is not limited to, the Person Centric Query Service ("PCQS"), including modifying PCQS to allow for bulk submissions.

DFF believes your office is in the best position to identify where responsive records are likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director, Immigration Records and Identity Services Directorate, and Verification Division.

This request seeks records created, issued, or in effect from July 1, 2025 until the date of the search.

DFF-DHS-USCIS-26-0985

Scope of Search

FOIA requires agencies to disclose information, with only limited exceptions for information that would harm an interest protected by a specific exemption or where disclosure is prohibited by law. 5 U.S.C. § 552(a)(8)(A). In the event that any of the requested documents cannot be disclosed in their entirety, we request that you release any material that can be reasonably segregated. *See* 5 U.S.C. § 552(b). Should any documents or portions of documents be withheld, we further request that you state with specificity the description of the document to be withheld and the legal and factual grounds for withholding any documents or portions thereof in an index, as required by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973). Should any document include both disclosable and non-disclosable material that cannot reasonably be segregated, we request that you describe what proportion of the information in a document is non-disclosable and how that information is dispersed throughout the document. *Mead Data Cent., Inc. v. U.S. Dep't of Air Force*, 566 F.2d 242, 261 (D.C. Cir. 1977).

If requested records are located in, or originated in, another agency, department, office, installation or bureau, please refer this request or any relevant portion of this request to the appropriate entity.

To the extent that the records are readily reproducible in an electronic format, we would prefer to receive the records in that format. However, if certain records are not available in that format, we are willing to accept the best available copy of each such record.

Please respond to this request in writing within 20 working days as required under 5 U.S.C. § 552(a)(6)(A)(i). If all of the requested documents are not available within that time period, we request that you provide us with all requested documents or portions of documents that are available within that time period. If all relevant records are not produced within that time period, we are entitled to a waiver of fees for searching and duplicating records under 5 U.S.C. § 552(a)(4)(A)(viii)(I).

Request for Fee Waiver

Pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's regulations, Democracy Forward Foundation requests a waiver of all fees associated with processing records for this request. FOIA requires documents to be furnished to requesters at no fee or reduced fees when "if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester." 5 U.S.C. § 552(a)(4)(A).

In determining whether a fee waiver is appropriate, courts consider whether a requester has a

“demonstrated . . . ability to disseminate the requested information,” *Cause of Action v. F.T.C.*, 799 F.3d 1108, 1116-17 (D.C. Cir. 2015), and whether the requester regularly disseminates records obtained through FOIA to “a reasonably broad audience of persons interested in the subject” of its work. *Carney v. U.S. Dep’t of Justice*, 19 F.3d 807, 814-15 (2d Cir. 1994). FOIA does not require a requester to describe exactly how it intends to disseminate the information requested, as that would require “pointless specificity”; all that is necessary is for a requester to adequately demonstrate its “ability to publicize disclosed information.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1314 (D.C. Cir. 2003). In evaluating a fee waiver request, courts consider how a requester actually communicates information collected through FOIA to the public, including press releases or a website where documents received are made available, see *id.*, or whether the requester has a history of “contacts with any major news[] companies” that suggest an ability to disseminate materials of interest through the press. *Larson v. C.I.A.*, 843 F.2d 1481, 1483 (D.C. Cir. 1988) (upholding a denial of a fee waiver to a requester who had failed to identify his relationships with newspaper companies that could disseminate documents).

DFF has a demonstrated ability to disseminate information of public interest requested through FOIA, and intends to publicize records DFF receives that contribute significantly to the public’s understanding of how USCIS is using citizenship data to assist with cleaning voter rolls.¹ When DFF obtains materials through FOIA requests that are of significant public interest, DFF’s communications staff regularly works to ensure that these materials and their contents are featured in press articles educating the public about the operation of government; many articles feature additional commentary and analysis from DFF staff about those materials and their relevance to policy issues of public interest. Indeed, records received by DFF have previously formed the basis of news reports.²

¹ See Press Release, *USCIS Enhances Voter Verification Systems*, USCIS (Nov. 3, 2025), <https://www.uscis.gov/newsroom/news-releases/uscis-enhances-voter-verification-systems>.

² See, e.g., Matt Bracken, *DOGE pitched AI-fueled ‘regulation extermination’ tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniur Rivas, *Exclusive: New records show paper trail of DOGE voter data pact with election deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracydocket.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. Marshals Waived Training Rules for Musk’s Armed DOGE Security, Emails Show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump’s Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump appointee inspired by conservative media outlet to push for probe of Democratic congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why did right-wing troll Charles C. Johnson meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019),

Democracy Forward Foundation is not filing this request to further any commercial interest, and any information obtained by Democracy Forward Foundation as a result of this request will be disclosed at no cost.

If the request for a waiver is denied, we are willing to pay all reasonable fees incurred for searching and duplicating records in responding to this request, up to \$100. If the costs of responding to this request should exceed that amount, please contact us before incurring costs exceeding that amount.

<https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz and Jack Gillum, “Happy to Do It”: Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, Emails Show US Border Officials Didn’t Receive “Zero Tolerance” Guidance Until After the Policy Was Enacted, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment, Huffpost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, ‘Just answer the question and kill this story’: In internal emails, Heather Nauert criticized Rex Tillerson’s refusal to deny reports that he called Trump a ‘moron,’ Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, A year after Vegas shooting, ATF emails reveal blame, alarm over bump stocks, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, Ivanka Trump was more than complicit in Obama equal pay rollback-she had a hand in it, watchdog alleges, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, Exclusive: Former for-profit college executive shaped Education Department policy that could benefit former employers: Documents, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, Notes, emails reveal Trump appointees’ war to end HHS teen pregnancy program, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, Trump Advisor Denies He Cheered End of Tunnel Funding Deal, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-advisor-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, Interior Department tapped wildfire preparedness funds for Ryan Zinke helicopter tour, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

Conclusion

If you need clarification as to the scope of the request, have any questions, or foresee any obstacles to releasing fully the requested records within 20 business days, please contact me as soon as possible at foia@democracyforward.org.

We appreciate your assistance and look forward to your prompt response.

Sincerely,

/s/ Skye Perryman

Skye Perryman

President & CEO

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

Appendix 2

Submitted Expedition Request



July 20, 2026

VIA Electronic Delivery

U.S. Citizenship and Immigration Services
Department of Homeland Security
National Records Center, FOIA/PA Office
P.O. Box 648010
Lee's Summit, MO. 64064
Via Online Portal
foiapaquestions@uscis.dhs.gov

Senior Director of FOIA Operations
Privacy Office
U.S. Department of Homeland Security
245 Murray Lane SW STOP-0655
Washington, DC 20598
privacy@dhs.gov
DHSFOIAPublicLiaison@hq.dhs.gov

**Re: Request for Expedited Processing for FOIA Requests COW2026006460REQ,
COW2026006505REQ / COW2026005487, COW2026006506REQ / COW2026005488,
COW2026006508REQ / COW2026005489, COW2026005504 / COW2026006685REQ,
COW2026005508 / COW2026006688REQ**

Dear FOIA Officer:

Democracy Forward Foundation ("DFF") is writing to request U.S. Citizenship and Immigration Services ("USCIS") expedite the processing of the above-referenced (and attached) Freedom of Information Act ("FOIA") requests seeking vital records concerning, broadly speaking, USCIS's efforts to identify alleged non-citizens on voter rolls and to otherwise influence or control who is eligible to vote in federal elections. The fast-approaching midterm elections have heightened the urgent need to inform the public about these activities. DFF seeks the records it has requested as soon as is practicable in order to disseminate information about USCIS's work to the public.

Request COW2026006460REQ sought directives regarding the State Citizenship List. Specifically, the request sought from March 31, 2026, through the date the search is conducted:

All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding the State

Citizenship List,¹ including, but not limited to, compilation of the List, updates to the List, state or local election officials' use of the List, and/or use of the List for non-election purposes.

DFF believes your office is in the best position to identify where responsive records are likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director and Immigration Records and Identity Services Directorate.

Request COW2026006505REQ / COW2026005487 sought communications regarding the midterm elections. Specifically, the request sought from March 15, 2026, through the date the search is conducted:

All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by any of the following USCIS officials and containing any of the following key terms.

USCIS Officials

- i. Joseph Edlow, Director
- ii. Angelica Alfonso-Royals, Deputy Director
- iii. Peter Holland, Chief of Staff
- iv. Larry DeNayer, Acting Associate Director, Immigration Records and Identity Services Directorate
- v. Brian Broderick, Acting Chief, Verification Division, Immigration Records and Identity Services Directorate

Key Terms

- a. vot*
- b. midterm*
- c. election*
- d. ballot*
- e. poll*
- f. 14399
- g. 14,399
- h. "State Citizenship List"

¹ See Exec. Order No. 14399, *Ensuring Citizenship Verification and Integrity in Federal Elections*, 91 Fed. Reg. 17125 (Mar. 31, 2026), available at <https://www.federalregister.gov/documents/2026/04/03/2026-06601/ensuring-citizenship-verification-and-integrity-in-federal-elections>. "[T]he Secretary of Homeland Security, through the Director of United States Citizenship and Immigration Services and in coordination with the Commissioner of SSA, shall take appropriate action to compile and transmit to the chief election official of each State a list of individuals confirmed to be United States citizens who will be above the age of 18 at the time of an upcoming Federal election and who maintain a residence in the subject State (State Citizenship List)."

Please note that DFF is using the asterisk (*) to designate the standard use of “wildcards” in the search for responsive records. For example, a search for “vot*” would return all of the following: vote, voter, voting, etc. If your agency is unable to search for wildcards, please advise so that we may specifically include the variations that we would like searched.

In an effort to accommodate your agency and reduce the number of potentially responsive records to be processed and produced, we have limited this request to email communications sent by the specified officials. To be clear, however, DFF still requests that complete email chains be produced, displaying both sent and received messages. This means, for example, that both a specified official’s response to an email and the initial received message are responsive to this request and should be produced.

Request COW2026006506REQ / COW2026005488 sought communications with federal officials working on election integrity matters. Specifically, the request sought from October 1, 2025, through the date the search is conducted:

1. All email communications (including email messages, complete email chains, email attachments, calendar invitations) between any of the following USCIS officials and any of the following external individuals or entities (including the listed domains).

USCIS Officials

- i. Joseph Edlow, Director
- ii. Angelica Alfonso-Royals, Deputy Director
- iii. Peter Holland, Chief of Staff
- iv. Larry DeNayer, Acting Associate Director, Immigration Records and Identity Services Directorate
- v. Brian Broderick, Acting Chief, Verification Division, Immigration Records and Identity Services Directorate
- vi. Timothy Benz, Verification Division, Immigration Records and Identity Services Directorate
- vii. Andrew Davidson, former Acting Director
- viii. Paul Gleason
- ix. Kimberley Vogt
- x. William Richards

External Individuals and Entities

- a. Heather Honey (heather.honey@hq.dhs.gov)

- b. Kurt Olsen
 - c. White House (who.eop.gov)
2. All text messages (including complete text message threads or conversations) and messages on messaging platforms (such as Signal and WhatsApp) between any of the officials listed above in part 1 and any of the external individuals listed below.

External Individuals

- a. Heather Honey
- b. Kurt Olsen

DFF is not in a position to provide a phone number for the listed individuals. If the listed officials are unable to provide them, please use the individuals' names as search terms. For example, a search for text messages between Director Edlow and Heather Honey would be conducted by searching Edlow's text messages using the terms "Heather" and "Honey" to identify potentially responsive records.

The search should include messages from officials' personal accounts as well as those from their official accounts.

Request COW2026006508REQ / COW2026005489 sought directives and agreements regarding using USPS datasets. Specifically, the request sought from April 1, 2026, through the date the search is conducted:

- 1. All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding using or accessing U.S Postal Service ("USPS") datasets from Mail-In and Absentee Ballot Participation Lists.²
- 2. A complete copy (including any attachments) of all contracts or subcontracts, amendments, inter-governmental service agreements, memoranda of understanding, or other written agreements between USCIS and the USPS regarding using or accessing datasets from Mail-In and Absentee Ballot Participation Lists.³

DFF believes your office is in the best position to identify where responsive records are

² Notice, DSCC v. Trump, No. 26-cv-01114 (CJN) (D.D.C. June 5, 2026), ECF No. 149, available at <https://www.democracydocket.com/wp-content/uploads/2026/04/149-2026-06-05-DOJs-notice.pdf>. "Moreover, DHS contemplates working with the United States Postal Service (USPS) to integrate USPS datasets from Mail-In and Absentee Ballot Participation Lists, once available, and in compliance with applicable law, the Privacy Act, SORNS, PIAs, and interagency agreements, to monitor mail-in and absentee ballot flows, identify anomalies that may suggest voter fraud or misuse, and generate authorized investigative leads."

³ *Id.*

likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director, Immigration Records and Identity Services Directorate, and Verification Division.

Request COW2026005504 / COW2026006685REQ sought data regarding SAVE. Specifically, the request sought from January 1, 2026, through the date the search is conducted:

1. Records sufficient to identify the number of queries made to Systematic Alien Verification for Entitlements (“SAVE”) by the Department of Justice (“DOJ”) Civil Rights Division (“CRT”), and the number of records DOJ CRT included in each query.
2. Records sufficient to identify the citizenship indicator responses for all SAVE queries made by DOJ CRT.
3. Records sufficient to identify the error rate and/or error count for all SAVE queries made by DOJ CRT.

To be clear, DFF does not seek, and this request specifically excludes, all personally identifiable information from SAVE queries, such as names or social security numbers. We specifically seek aggregate data regarding DOJ CRT SAVE queries and responses.

To the extent USCIS maintains this data in aggregated form, such as in a spreadsheet or within a database or other format that can be readily exported to a spreadsheet, DFF requests responsive data in such format.

Request COW2026005508 / COW2026006688REQ sought memoranda or planning documents regarding the use of non-SAVE USCIS resources for reviewing voter rolls. Specifically, the request sought from July 1, 2025, through the date the search is conducted:

All formal and informal planning documents, reports, and/or memoranda created by, issued to, or otherwise provided to USCIS regarding the use of any USCIS database, resource, or service that is not the Systematic Alien Verification for Entitlements (“SAVE”) service for reviewing voter rolls. This includes, but is not limited to, the Person Centric Query Service (“PCQS”), including modifying PCQS to allow for bulk submissions.

DFF believes your office is in the best position to identify where responsive records are likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director, Immigration Records and Identity Services Directorate, and

Verification Division.

Request for Expedited Processing

DFF’s requests merit expedited processing because “there is an urgency to inform the public concerning actual or alleged Federal Government activity,” *see* 5 U.S.C. § 552(a)(6)(E)(v)(ii).

DFF’s Dissemination Activities and Eligibility for Expedited Processing

DFF—as a not-for-profit organization that works to promote transparency and accountability in government—is primarily engaged in disseminating information to the public, such that we are eligible to receive expedited processing under 5 U.S.C. § 552(a)(6)(E)(v)(ii). DFF is an organization primarily engaged in “disseminating information to the public,” as evidenced by the

previous use of public records obtained by DFF in numerous news reports.⁴ In addition, DFF

⁴ See, e.g., Natalia Contreras, *Texas Secretary of State Raised Concerns About the Federal Tool Used to Flag Potential Noncitizen Voters*, Votebeat (July 16, 2026), <https://www.votebeat.org/texas/2026/07/16/jane-nelson-concerns-save-data-voter-citizenship-uscis/>; Michael Scherer et al., *Hegseth, Rubio, and Caine Had an Auto-Deleting Signal Chat*, Atlantic (June 29, 2026), <https://www.theatlantic.com/national-security/2026/06/trump-administration-signal-chat-marco-rubio/687735/>; Brittany Gibson, *Exclusive: ICE Obtains Local Voter Files*, Axios (June 13, 2026), <https://www.axios.com/2026/06/13/ice-voter-files-texas-north-carolina>; Josh Kovensky & Emine Yücel, *How the Trump Administration Tried to Turn Foreign Aid Funds Into Deportation Cash*, Talking Points Memo (May 12, 2026), <https://talkingpointsmemo.com/news/how-the-trump-admin-tried-to-turn-foreign-aid-funds-into-deportation-cash>; Matt Bracken, *DOGE pitched AI-fueled ‘regulation extermination’ tool to HUD*, FedScoop (May 11, 2026), <https://fedscoop.com/doge-pitched-ai-fueled-regulation-extermination-tool-to-hud/>; Yuniors Rivas, *Exclusive: New Records Show Paper Trail of DOGE Voter Data Pact with Election Deniers*, Democracy Docket (Apr. 29, 2026), <https://www.democracymemo.com/news-alerts/exclusive-new-records-show-paper-trail-of-doge-voter-data-pact-with-election-deniers/>; Freddy Brewster et al., *Trump Officials Built AI-Powered Regulation Exterminator*, Lever News (Apr. 21, 2026), <https://www.levernews.com/trump-officials-built-ai-powered-regulation-exterminator/?action=subscribe&success=true>; Anna Kramer, *How the Trump Administration Diverted Resources to Support Mass Deportations*, NOTUS (Apr. 15, 2026), <https://www.notus.org/immigration/trump-administration-diverted-resources-mass-deportations-prison>; David Ingram et al., *U.S. Marshals Waived Training Rules for Musk’s Armed DOGE Security, Emails Show*, NBC News (Apr. 6, 2026), <https://www.nbcnews.com/tech/elon-musk/elon-musk-trump-government-doge-security-rcna266088>; Bethany McLean, *The Man Behind Trump’s Attack on the Fed*, The Free Press (Jan. 20, 2026), <https://www.thefp.com/p/the-man-behind-trumps-fed-attack>; Chris Prentice et al., *Exclusive: Trump Appointee Inspired by Conservative Media Outlet to Push for Probe of Democratic Congressman*, Reuters (Dec. 22, 2025), <https://www.reuters.com/business/finance/trump-appointee-inspired-by-conservative-media-outlet-push-probe-democratic-2025-12-20/>; Alexander Nazaryan, *Why Did Right-Wing Troll Charles C. Johnson Meet with Commerce Secretary Wilbur Ross?*, Yahoo News (May 14, 2019), <https://news.yahoo.com/why-did-rightwing-troll-charles-c-johnson-want-to-meet-with-commerce-secretary-wilbur-ross-090000636.html>; Derek Kravitz and Jack Gillum, *“Happy to Do It”: Emails Show Current FAA Chief Coordinated With Ex-Lobbyist Colleagues on Policy*, ProPublica (Mar. 27, 2019), <https://www.propublica.org/article/dan-elwell-current-faa-chief-coordinated-with-ex-lobbyist-colleagues-on-policy>; Hamid Aleaziz, *Emails Show US Border Officials Didn’t Receive “Zero Tolerance” Guidance Until After the Policy Was Enacted*, BuzzFeed News (Feb. 28, 2019), <https://www.buzzfeednews.com/article/hamedaleaziz/zero-tolerance-policy-guidance-dhs-family-separation>; Jonathan Cohn and Jeffrey Young, *Emails Show Trump Administration Was Told Obamacare Ad Cuts Could Hurt Enrollment*, HuffPost (Dec. 17, 2018), https://www.huffingtonpost.com/entry/trump-verma-obamacare-advertising-cut_us_5c115061e4b084b082ff8dba; Madison Pauly, *When the Biggest Prison Company Complained About a California Sanctuary Law, ICE Listened*, Mother Jones (Dec. 7, 2018), <https://www.motherjones.com/politics/2018/12/geo-memo-private-prison-california-immigration/>; Eliza Rellman, *‘Just Answer the Question and Kill This Story’: In Internal Emails, Heather Nauert Criticized Rex Tillerson’s Refusal to Deny Reports That He Called Trump a ‘Moron,’* Business Insider (Nov. 2, 2018), <https://www.businessinsider.com/heather-nauert-rex-tillerson-trump-moron-2018-11>; Rebecca Klein, *Lawsuit Accuses Betsy DeVos And Her Deputies Of Being Motivated By Sexism*, HuffPost (Oct. 31, 2018), https://m.huffpost.com/us/entry/us_5bd9ff6ee4b01abe6a1ad4a9; Nick Penzenstadler, *A Year After Vegas Shooting, ATF Emails Reveal Blame, Alarm Over Bump Stocks*, USA Today (Oct. 1, 2018), <https://www.usatoday.com/story/news/2018/10/01/year-after-vegas-shooting-atf-emails-reveal-blame-alarm-over-bump-stocks/1432137002/>; Jessica Kwong, *Ivanka Trump Was More Than Complicit in Obama Equal Pay Rollback—She Had a Hand in It*, Watchdog Alleges, Newsweek (Aug. 29, 2018), <https://www.newsweek.com/ivanka-trump-equal-pay-complicit-obama-1093833>; Vera Bergengruen, *New Emails Show What Happens When The Pentagon Has To Scramble To Catch Up To Trump*, BuzzFeed News (July 25, 2018), <https://www.buzzfeednews.com/article/verabergengruen/these-emails-show-what-happens-when-the-white-house-keeps>; Erin Dooley, *Exclusive: Former For-Profit College Executive Shaped Education Department Policy That Could*

uses information gathered through FOIA to educate the public via numerous other means—including press releases, reports, blog posts, and social media.⁵ DFF’s social media platforms reach hundreds of thousands⁶ of people—and its website in 2025 earned 3.5 million views. Indeed, the federal government has conceded that DFF meets the standard of being primarily engaged in disseminating information for the purposes of expedited processing under FOIA. *See Democracy Forward Found. v. Off. of Mgmt. & Budget*, 780 F. Supp. 3d 61, 73 (D.D.C. 2025).

The Urgent Need to Inform the Public

There is an urgency to inform the public about USCIS’s work to identify alleged non-citizens on voter rolls pursuant to 5 U.S.C. § 552(a)(6)(E)(v)(ii), and the requested public records very likely contain information that is desperately needed to sufficiently understand how voters’ status will be impacted for the midterm elections.

USCIS has been integral to the Trump administration’s efforts to become involved in state election administration. The Trump administration has dramatically expanded the capabilities of USCIS’s Systematic Alien Verification for Entitlements (“SAVE”) system for the purpose of reviewing voter rolls,⁷ modifying the system to allow for bulk uploads and including data from

Benefit Former Employers: Documents, ABC News (May 15, 2017), <https://abcnews.go.com/US/exclusive-profit-college-executive-shaped-education-department-policy/story?id=55108981>; Heidi Przybyla, *Notes, Emails Reveal Trump Appointees’ War to End HHS Teen Pregnancy Program*, NBC News (Mar. 20, 2018), <https://www.nbcnews.com/politics/politics-news/notes-emails-reveal-trump-appointees-war-end-hhs-teen-pregnancy-n857686>; Dominic Holden, *Documents Show The Trump Administration Approved Bump Stocks Before It Opposed Them*, BuzzFeed News (Mar. 22, 2018), <https://www.buzzfeednews.com/article/dominicholden/trump-administration-bump-stocks>; Bernard Condon, *Trump Advisor Denies He Cheered End of Tunnel Funding Deal*, Associated Press (Feb. 13, 2018), available at <https://www.usnews.com/news/business/articles/2018-02-13/trump-adviser-denies-he-cheered-end-of-tunnel-funding-deal>; Celeste Katz, *Interior Department Tapped Wildfire Preparedness Funds for Ryan Zinke Helicopter Tour*, Newsweek (Dec. 29, 2017), <https://www.newsweek.com/ryan-zinke-interior-department-helicopters-wildfires-757857>.

⁵ *Democracy Forward Obtains Records Regarding FHFA’s Politicized Investigations of Public Officials*, Democracy Forward (Oct. 30, 2025), <https://democracyforward.org/news/press-releases/pulte-lawsuit/>; *Using AI for Governance and Personnel Decisions*, Democracy Forward (updated February 13, 2026), <https://democracyforward.org/work/investigations/using-ai-for-governance-and-personnel-decisions-without-proper-guardrails/>; *Demanding Accountability: Democracy Forward’s Investigations in the First Year of the Trump-Vance Administration*, Democracy Forward (Mar. 13, 2026), <https://democracyforward.org/work/research/demanding-accountability/>; Democracy Forward (@democracyforward.org), *Thread regarding FOIAs about ICE facial recognition* (Feb. 13, 2026), <https://bsky.app/profile/democracyforward.org/post/3meqqefmoic2s>.

⁶ Democracy Forward currently has approximately 105,800 followers on Bluesky (<https://bsky.app/profile/democracyforward.org>, last visited May 18, 2026), 117,000 followers on Instagram (<https://www.instagram.com/democracyforward/>, last visited May 18, 2026), and 17,300 followers on X (<https://x.com/DemocracyFwd>, last visited May 18, 2026).

⁷ *See, e.g., Jen Fifield, Details of DHS Agreement Reveal Risks of Trump Administration’s Use of Social Security Data for Voter Citizenship Checks*, ProPublica (Oct. 30, 2025), <https://www.propublica.org/article/dhs-social-security-data-voter-citizenship-trump>; Yunior Rivas & Jim Saksa, *In*

the Social Security Administration and Department of State.⁸ In June 2026, a federal judge found USCIS's overhaul of SAVE to be unlawful on the basis that it could wrongly purge voters and infringe upon peoples' privacy rights, blocking the use of SAVE to review voter rolls in all but four states.⁹

Indeed, there has been widespread evidence that Trump administration efforts to conduct voter list maintenance have been flawed and states' use of SAVE has resulted in U.S. citizens being removed from the voter rolls.¹⁰ States using SAVE for voter list maintenance have raised

Late, Obscure Notice, DHS Turbocharges Trump's Voter Purge Database, Evading Privacy Protections, Democracy Docket (Oct. 31, 2025), <https://www.democracydocket.com/news-alerts/in-late-obscure-notice-dhs-turbocharges-trumps-voter-purge-database-evading-privacy-protections/>.

⁸ See Privacy Impact Assessment for the Systematic Alien Verification for Entitlements "SAVE" Program, Reference No. DHS/USCIS/PIA-006(d), Department of Homeland Security (October 31, 2025), <https://www.dhs.gov/sites/default/files/2025-10/Systematic%20Alien%20Verification%20for%20Entitlements%20Program%20-%20October%202025.pdf>.

⁹ See, e.g., Jude Joffe-Block, *A Federal Judge Finds a Trump Data System to Verify Voters is Unlawful*, NPR (June 22, 2026), <https://www.npr.org/2026/06/22/nx-s1-5866719/save-voter-data-trump-judge-unlawful>; Dion Nissenbaum & Natalia Contreras, *Federal Judge Blocks Trump Administration's Overhaul of SAVE Database*, Votebeat (June 22, 2026), <https://www.votebeat.org/national/2026/06/22/judge-rules-against-trump-overhaul-save-database-noncitizen-voters/>; Alison Durkee, *Judge Kills Trump's Voter Database Plan—Says Administration 'Trampled' on Americans' Privacy*, Forbes (June 22, 2026), <https://www.forbes.com/sites/alisondurkee/2026/06/22/judge-kills-trumps-voter-database-plan-says-administration-trampled-on-americans-privacy/>; Jim Saksa, *In Blow to Trump, Federal Judge Blocks DHS from Using Citizenship Database to Purge Voters*, Democracy Docket (June 22, 2026), <https://www.democracydocket.com/news-alerts/in-blow-to-trump-federal-judge-blocks-dhs-from-using-citizenship-database-to-purge-voters/>; Ali Swenson & Fatima Hussein, *Judge Blocks Use of Federal Database to Check Citizenship, Saying It Could Wrongly Purge Voters*, AP (June 22, 2026), <https://apnews.com/article/trump-elections-noncitizens-voting-save-lawsuit-a9612cffa40c938e67b99f265c9e817>; Luc Cohen, *Judge Blocks Trump's Use of Revamped Immigration Database for Voter Checks*, Reuters (June 22, 2026), <https://www.reuters.com/world/judge-blocks-trumps-use-revamped-immigration-database-voter-checks-2026-06-22/>.

¹⁰ See Ned Parker and Peter Eisler, *How Trump is Moving to Control U.S. Elections, One State at a Time*, Reuters (Apr. 27, 2026), <https://www.reuters.com/investigations/how-trump-is-moving-control-us-elections-one-state-time-2026-04-27/>, ("More recently, the state's top election official, Republican Secretary of State Denny Hoskins, disclosed in February that his office had shared publicly available voter-roll data with federal authorities so the names could be screened against citizenship databases. The federal government returned a list of individuals flagged as potential noncitizens, which Hoskins' office then asked county clerks to review. But clerks in several of Missouri's largest counties, including St. Louis and St. Charles, said most individuals flagged by the federal screening were U.S. citizens."); Judd Legum & Rebecca Crosby, *The Federal Database That Could Upend the Midterm Elections*, Mother Jones (Apr. 9, 2026), <https://www.motherjones.com/politics/2026/04/save-database-errors-faulty-state-voter-rolls-lists-trump-administration-doj-ice-2026-midterm-elections/>, ("SAVE is an incomplete and flawed database that has been shown to produce a massive number of false positives, incorrectly identifying American citizens as aliens."); 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://www.npr.org/2025/12/10/nx-s1-5588384/save-voting-data-us-citizens> ("Voting experts have warned that known accuracy issues with SAVE will lead to eligible voters like Anthony Nel being wrongly flagged by the system and potentially disenfranchised . . . [one official] is worried about the possibility of voter suppression efforts ahead of midterm elections and sees this process with SAVE as a test."); Jen Fifield & Zach Despart, *A Federal Tool*

concerns to USCIS about the quality of data, as SAVE has wrongfully identified numerous citizens as non-citizens.¹¹ Despite these concerns, the Trump administration has continued to expand its use of SAVE for election purposes. The Department of Justice (“DOJ”) Civil Rights Division (“CRT”) has entered into a memorandum of understanding with USCIS to use SAVE for voter registration and voter list maintenance purposes;¹² DOJ CRT has indicated that it intends to identify alleged ineligible voters for states to remove from the rolls.¹³ It is critical to obtain the records specified in these FOIA requests to better understand which voters may be impacted by USCIS’s efforts to conduct voter list maintenance, to ensure that no eligible voter loses their ability to exercise their right to vote this year, and to understand the wider ramifications of USCIS’s actions with respect to voter rolls.

Recent developments have substantially increased the urgent need for this information to inform the public. Last week, just before a presidential address on purported election integrity matters, the Department of Homeland Security (“DHS”) claimed to have found more than 250,000 non-citizens on voter rolls across California, Pennsylvania, New Jersey, and Nevada.¹⁴ However, the administration has not verified this claim nor provided any information on how it arrived at that figure, including the source of the underlying data or methods of analysis.¹⁵ Lawmakers have expressed a need for additional information from the administration on this matter, with Senator Alex Padilla stating that DHS’ “lack of transparency also raises serious questions about whether it violated state law to obtain California’s voter registration records.”¹⁶ Responses to DFF’s FOIA requests would provide needed context on DHS and USCIS’s efforts to review voter rolls for citizenship status, including whether the administration lawfully obtained voter data. Sixteen

to Check Voter Citizenship Keeps Making Mistakes. It Led to Confusion in Texas, Texas Trib. (Feb. 13, 2026), <https://www.texastribune.org/2026/02/13/save-voter-citizenship-tool-mistakes-confusion/> (“SAVE has made persistent mistakes”).

¹¹ See, e.g., Natalia Contreras, *Texas Secretary of State Raised Concerns About the Federal Tool Used to Flag Potential Noncitizen Voters*, Votebeat (July 16, 2026), <https://www.votebeat.org/texas/2026/07/16/jane-nelson-concerns-save-data-voter-citizenship-uscis>; Nicholas Kerr & Elise Spenner, *System That DHS is Urging States to Use to Assess Voter Rolls Known to Return Faulty Results: Reports*, ABC (July 19, 2026), <https://abcnews.com/Politics/system-dhs-urging-states-assess-voter-rolls-return/story?id=134863557>.

¹² See *SAVE Agency Search Tool*, U.S. Citizenship and Immigration Services (accessed May 20, 2026), https://www.uscis.gov/save/about-save/save-agency-search-tool?type_of_agency%5B%5D=3&benefit_category%5B%5D=97&benefit_category%5B%5D=98&items_per_page=100.

¹³ See *Confidential Memorandum of Understanding*, U.S. Department of Justice Civil Rights Division, https://www.brennancenter.org/media/15064/download/alaska_12.22.2025_executed-mou.pdf?inline=1.

¹⁴ See, e.g., Melissa Quinn, *What to Know About the Trump Administration’s Claim that 250K Noncitizens are Registered to Vote in 4 States*, CBS (July 18, 2026), <https://www.cnn.com/2026/07/17/politics/election-officials-voting-mullin-save>.

¹⁵ See, e.g., Tierney Sneed & Gabe Cohen, *Trump DHS Using Unverified Figures to Attack Election Officials on Non-Citizen Voting*, CNN (July 17, 2026), <https://www.cnn.com/2026/07/17/politics/election-officials-voting-mullin-save>.

¹⁶ See Blake Jones & Lindsey Holden, *California Dems Seethe Over Trump’s Voter Roll Attack*, Politico (July 17, 2026), <https://www.politico.com/news/2026/07/17/california-democrats-trump-voter-roll-claim-01002724>.

federal judges have rejected DOJ efforts to obtain state voter rolls, consistently affirming that the federal government does not have a legitimate role in maintaining state's voter registration lists.¹⁷

Furthermore, the Trump administration has intensified their push for election officials to use USCIS resources to maintain voter registration lists in advance of the midterm elections. Last week, Secretary of Homeland Security Markwayne Mullin stated that

“If the election officials, once we gave them the information they need to secure their elections—and they chose not to—then those individuals can also be held accountable by fines, by penalties, and even, depending on how far it goes, prison time.”¹⁸

As the Trump administration considers pursuing criminal charges against election officials for failing to remove alleged non-citizens from voter lists, despite widespread evidence that many individuals identified by SAVE as alleged non-citizens have proven to be citizens, it is imperative that records showing the basis for such actions be released to the public.¹⁹ Secretary Mullin's threat that election officials may be jailed demonstrates the administration's own urgency about this matter, and underscores the urgent need to inform the public through records from DFF's FOIA requests.

In sum, the release of federal records related to this matter are of critical importance. The public seeks and deserves to understand how USCIS is identifying alleged non-citizens on voter rolls or otherwise involved in election administration in advance of the midterm elections. Given the compelling need for prompt disclosure of such information, Democracy Forward Foundation seeks expedited processing of these requests.

I certify to the best of my knowledge and belief that the above is accurate and expedited processing is warranted in this matter.

Sincerely,

/s/ Daniel A. McGrath

¹⁷ See, e.g., Yuniior Rivas, *Trump DOJ Took a Victory Lap in Connecticut. Then It Became Their 16th Straight Loss*, Democracy Docket (July 17, 2026), <https://www.democracymarket.com/news-alerts/trump-doj-took-a-victory-lap-in-connecticut-then-it-became-their-16th-straight-voter-roll-loss/>.

¹⁸ See Myah Ward et al., *DHS Secretary Vows Fines — and Even Prison Time — for Election Officials That Don't Comply*, Politico (July 17, 2026), <https://www.politico.com/news/2026/07/17/dhs-secretary-vows-fines-and-even-prison-time-for-election-officials-that-dont-comply-01003116>.

¹⁹ See, e.g., Nick Corasaniti & Dustin Volz, *Trump's Homeland Security Chief Threatens Election Officials With Prison Time*, N.Y. Times (July 17, 2026), <https://www.nytimes.com/2026/07/17/us/politics/markwayne-mullin-election-officials-threats-trump.html>;

Daniel A. McGrath
Special Counsel, Oversight
On behalf of
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

Appendix 1. Submitted Requests

Appendix 3

USCIS Denials of Expedition Request

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
National Records Center
P.O. Box 648010
Lee's Summit, MO 64064-8010



U.S. Citizenship
and Immigration
Services

Control Number: COW2026005476

July 22, 2026

SKYE PERRYMAN
DEMOCRACY FORWARD FOUNDATION
P.O. BOX 34553
WASHINGTON, DC 20043

Dear SKYE PERRYMAN:

We received your request for information on June 17, 2026. Your request asked for:

"Democracy Forward Foundation ("DFF") requests that the U.S. Citizenship and Immigration Services ("USCIS") produce the following within twenty (20) business days: All formal and informal final directives, guidance, memoranda, protocols, and/or policies created by, issued to, or otherwise provided to USCIS regarding the State Citizenship List, including, but not limited to, compilation of the List, updates to the List, state or local election officials' use of the List, and/or use of the List for non-election purposes. DFF believes your office is in the best position to identify where responsive records are likely to reside, but believes a reasonable search should include, at a minimum, the Office of the Director and Immigration Records and Identity Services Directorate. This request seeks records created, issued, or in effect from March 31, 2026 until the date of the search."

We may need to contact you at a later date to discuss the scope of your request.

Your request is being handled under the provisions of the Freedom of Information Act (5 U.S.C. § 552). It has been assigned the following control number: COW2026005476. Please cite this number in all future correspondence about your request.

We respond to requests on a first-in, first-out basis and on a multi-track system. Your request has been placed in the complex track (Track 2).

Based on the information you provided, we have determined that expedited processing of your request is not warranted. The Department of Homeland Security Freedom of Information Act regulation at 6 C.F.R. § 5.5(e)(1) requires that you demonstrate that your request warrants expedited treatment because it involves:

- (i) Circumstances in which the lack of expedited processing could reasonably be expected to pose an imminent threat to the life or physical safety of an individual;
- (ii) An urgency to inform the public about an actual or alleged federal government activity, if made by a person who is primarily engaged in disseminating information;
- (iii) The loss of substantial due process rights; or
- (iv) A matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity which affect public confidence.

Additionally, 6 C.F.R. § 5.5(e)(3) requires that a requester who seeks expedited processing must submit a statement, certified to be true and correct, explaining in detail the basis for making the request for expedited processing. Furthermore, requests for expedited processing that are based on paragraph (e)(1)(iv) of this section must be submitted to the Senior Director of FOIA Operations, the Privacy Office, U.S. Department of Homeland Security, 245 Murray Lane SW STOP-0655, Washington, D.C. 20598-0655. If you can demonstrate any further showing as to the nature and degree of (i), (ii), or (iii) of the

COW2026005476

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above categories, please submit this additional information to this office for reconsideration.

You have the right to file an administrative appeal within 90 days of the date of this letter. By filing an appeal, you preserve your rights under FOIA and give the agency a chance to review and reconsider your request and the agency's decision. You may file an administrative FOIA appeal by mail to USCIS FOIA/PA Appeals Office, 150 Space Center Loop, Suite 500, Lee's Summit, MO 64064-2139. Both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal."

If you would like to discuss our response before filing an appeal to attempt to resolve your dispute without going through the appeals process, you may contact our USCIS FOIA Public Liaison by email at FOIAPAQuestions@uscis.dhs.gov.

A USCIS FOIA Public Liaison is an agency official to whom FOIA requesters can raise concerns about the service the requester has received from the agency's FOIA Office. USCIS FOIA Public Liaisons are responsible for assisting in reducing delays, increasing transparency, and understanding of the status of requests, and assisting in the resolution of disputes.

If you are unable to resolve your FOIA dispute through our USCIS FOIA Public Liaison, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001; email ogis@nara.gov; telephone 202-741-5770; toll free 877-684-6448; or facsimile 202-741-5769.

Your request for a fee waiver has been granted.

Consistent with 6 C.F.R. § 5.5(a) of the Department of Homeland Security (DHS) FOIA regulations, USCIS processes FOIA requests according to their order of receipt. Although USCIS' goal is to respond within 20 business days of receipt of your request, FOIA does permit a 10 business day extension of this time period in certain circumstances. Due to the increasing number of FOIA requests received by this office, we may encounter some delay in processing your request. Additionally, due to the scope and nature of your request, USCIS will need to locate, compile, and review responsive records from multiple offices, both at headquarters and in the field. USCIS may also need to consult with another agency or other component of the Department of Homeland Security that have a substantial interest in the responsive information. Due to these unusual circumstances, USCIS will invoke a 10 business day extension for your request pursuant to 5 U.S.C. § 552(a)(6)(B). Please contact our office if you would like to limit the scope of your request or to agree on a different timetable for the processing of your request. We will make every effort to comply with your request in a timely manner.

The National Records Center (NRC) has the responsibility to ensure that personally identifiable information (PII) pertaining to U.S. Citizenship and Immigration Services (USCIS) clients is protected. In our efforts to safeguard this information, we may request that additional information be provided to facilitate and correctly identify records responsive to your request. Though submission of this information is voluntary, without this information, your request may be delayed while additional steps are taken to ensure the correct responsive records are located and processed. Further, if we are unable to positively identify the subject of the record we may be unable to provide records responsive to your FOIA request.

How to Check the Status of Your Request

You may check the status of your FOIA request online at first.uscis.gov/#/check-status. If you have any questions concerning your pending FOIA/PA request, or to check the status of a pending application or petition, please call the USCIS Contact Center at 800-375-5283 (TTY 800-767-1833).

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How to submit Questions or Changes

Questions concerning this FOIA/PA request may be emailed to FOIAPAQuestions@uscis.dhs.gov. All FOIA/PA related requests, including address changes must be submitted in writing, and signed by the requester. Please include the control number listed above on all correspondence. For more information regarding the USCIS FOIA Program, please visit the USCIS website at www.uscis.gov/FOIA. If you email us and want to provide personal information (such as A-number, social security number or passport number) so we can better assist you, please include it in the body of your email and not in the subject line. Including personal information in the subject line may violate our privacy guidelines.

Sincerely,

A handwritten signature in blue ink that reads "Jarrod Panter". The signature is fluid and cursive, with the first name "Jarrod" and last name "Panter" clearly distinguishable.

Jarrod T Panter

Acting Chief FOIA Officer

Freedom of Information Act & Privacy Act Unit



FOIA Requests <foia@democracyforward.org>

Request for Expedited Processing for FOIA Requests COW2026006460REQ, COW2026006505REQ / COW2026005487, COW2026006506REQ / COW2026005488, COW2026006508REQ / COW2026005489, COW2026005504 / COW2026006685REQ, COW2026005508 / COW2026006688REQ

FOIAPAQuestions <foiapaquestions@uscis.dhs.gov>
To: "foia@democracyforward.org" <foia@democracyforward.org>

Wed, Jul 22, 2026 at 2:09 PM

Good afternoon,

This email responds to your request for expedited processing of your Freedom of Information Act (FOIA) requests COW2026006460REQ, COW2026006505REQ / COW2026005487, COW2026006506REQ / COW2026005488, COW2026006508REQ / COW2026005489, COW2026005504 / COW2026006685REQ, COW2026005508 / COW2026006688REQ, received on Monday, July 20, 2026.

After careful review, your request for expedited processing has been denied. Under Department of Homeland Security regulations (6 CFR § 5.5(d)), expedited processing may be granted when a requester demonstrates a compelling need, such as:

- Imminent threat to the life or physical safety of an individual; or
- Urgency to inform the public about an actual or alleged federal government activity, and the request is made by a person primarily engaged in disseminating information.

Based on the information provided, we have determined that your request does not meet the criteria for expedited processing. Your FOIA request will be processed in the order in which it was received.

If you disagree with this determination, you may appeal by submitting a written appeal within 90 days of the date of this email to:

FOIA Appeals
U.S. Citizenship and Immigration Services
National Records Center
Email: foiapaquestions@uscis.dhs.gov

Please reference your FOIA request numbers in any correspondence regarding this matter.

If you have any questions, please contact the USCIS FOIA office.

Respectfully,

Public Liaison
Customer and Support Team, FOIA
National Records Center
U.S. Citizenship and Immigration Services

From: FOIA Requests <foia@democracyforward.org>
Sent: Monday, July 20, 2026 4:18 PM
To: FOIAPAQuestions <foiapaquestions@uscis.dhs.gov>
Subject: Request for Expedited Processing for FOIA Requests COW2026006460REQ, COW2026006505REQ / COW2026005487, COW2026006506REQ / COW2026005488, COW2026006508REQ / COW2026005489, COW2026005504 / COW2026006685REQ, COW2026005508 / COW2026006688REQ

CAUTION: This email originated from outside of the Federal Government. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact the USCIS Security Operations Center with questions or click the "Report

7/24/26, 11:46 AM

Democracy Forward Mail - Request for Expedited Processing for FOIA Requests COW2026006460REQ, COW2026006505REQ / COW202600...

Case 8:26-cv-03035-DKC Document 1 Filed 08/04/26 Page 73 of 73

Phishing" button to report it as a phishing attempt.

[Quoted text hidden]

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Democracy Forward Foundation

(b) County of Residence of First Listed Plaintiff District of Columbia
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Amy C. Vickery, Daniel McGrath, Ronald A. Fein, Robin F. Thurston;
Democracy Forward Foundation; P.O. Box 34553 Washington, D.C. 20043;
(202) 448-9090

DEFENDANTS

U.S. Citizenship and Immigration Services

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated or Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit (15 USC 1681 or 1692) ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☒ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
5 U.S.C. § 552 (Freedom of Information Act)

Brief description of cause:
Compel compliance with the Freedom of Information Act ("FOIA")

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

08/04/2026

/s/ Amy C. Vickery

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Case 8:26-cv-03035-DKC Document 1-1 Filed 08/04/26 Page 2 of 2
INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

District of Maryland

Civil Action No. 26-cv-3035

To: *(Defendant's name and address)* U.S. Citizenship and Immigration Services
5900 Capital Gateway Dr.
Camp Springs, MD 20746

Signature of Clerk or Deputy Clerk

Civil Action No. 26-cv-3035

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

Civil Action No. 26-cv-3035

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