

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LEAGUE OF WOMEN VOTERS OF MASSACHUSETTS, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, *et al.*,

Defendants.

Case No. 1:26-cv-11549-IT

STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, *et al.*,

Defendants.

Case No. 1:26-cv-11581-IT

NOTICE

Federal Defendants in the above-captioned matters respectfully submit the following notice regarding recent developments in this matter:

On June 4, 2026, the Department of Homeland Security (DHS) approved a recommendation from the United States Citizenship and Immigration Services (USCIS) regarding implementation of Executive Order 14,399, including the creation of State Citizenship Lists as contemplated in § 2 of Executive Order 14,399.

Specifically, DHS endorses a USCIS proposal for a two-part course of action: The first part is implementation of a SAVE-based State Voter Roll Verification, whereby state election officials

can submit their entire voter roll records to the USCIS Systematic Alien Verification for Entitlements program (SAVE) system for verification. The second part is implementation of a registry whereby state election officials would securely access citizenship-related data from USCIS, Social Security Administration, and the Department of State for voter citizenship verification, but where the underlying data would remain in each agency's respective system. Both parts are proposed to be operational by June 30, 2026.

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.

Dated: June 5, 2026

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

ERIC J. HAMILTON
Deputy Assistant Attorney General
Civil Division

JOSEPH E. BORSON
Assistant Branch Director
Federal Programs Branch

/s/ Esam K. Al-Shareffi
STEPHEN M. PEZZI
Chief Litigation Counsel (FL Bar 1041279)
ESAM K. AL-SHAREFFI
Trial Attorney (D.C. Bar 90010174)
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20530
Telephone: (202) 598-7367
E-mail: esam.k.al-shareffi@usdoj.gov

Counsel for Federal Defendants