

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

LEAGUE OF WOMEN VOTERS OF THE
UNITED STATES, *et al.*,

Plaintiffs,

v.

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

Defendants.

Case No. 25-cv-03501-SLS

**CONSENT MOTION OF CAMPAIGN LEGAL CENTER FOR LEAVE TO FILE BRIEF
AS *AMICUS CURIAE* IN SUPPORT OF PLAINTIFFS' MOTION FOR STAY AND
PRELIMINARY INJUNCTION**

INTERESTS OF *AMICUS CURIAE*

Amicus Curiae Campaign Legal Center (“CLC”) is a leading nonpartisan, nonprofit organization that has been working for more than 20 years to advance democracy through law. CLC engages in litigation, policy development, and advocacy to protect voting rights and ensure broad and equal access to the ballot. CLC currently represents clients challenging Executive Order No. 14,248 (the “Elections EO”), which, among other things, directs the Department of Homeland Security (“DHS”) to provide state and local officials access to government systems for verifying citizenship and directs DHS to coordinate with the Department of Government Efficiency to review various data sources “for consistency with federal requirements.” 90 Fed. Reg. 14005, § 2(b)(ii) (Mar. 25, 2025); *see also LULAC v. Exec. Off. of the President*, No. 25-0946 (D.D.C. 2025). Acting in concert with Executive Orders 14,158 and 14,243, the Elections EO is a dramatic intrusion of the Executive Branch into election administration that threatens the right to vote of millions of Americans. CLC has an interest in this case because it concerns DHS’s implementation of the Elections EO and because its resolution will affect the voting rights of countless American citizens.

No person or entity other than CLC or its counsel authored or made a monetary contribution to this brief’s preparation or submission. Plaintiffs’ counsel and Defendants’ counsel consent to this motion.

ARGUMENT

Whether to permit a third party to submit an *amicus* brief is “solely within the court’s discretion to determine.” *Jin v. Ministry of State Sec.*, 557 F. Supp. 2d 131, 136 (D.D.C. 2008). “An *amicus* brief should normally be allowed” when either (1) the *amicus* is not adequately represented by the existing parties, (2) “the *amicus* has an interest in some other case that may be affected by the decision in the present case,” or (3) “the *amicus* has unique information or

perspective that can help the court beyond the help that the lawyers for the parties are able to provide.” *Id.* at 137. Under any of those standards, CLC should be granted leave to file its proposed *amicus* brief.

First, CLC’s interests in the pending motion for a stay or preliminary injunction are not adequately represented by the existing parties. CLC is committed to the democratic and constitutional allocation of government power; it is therefore particularly concerned by the separation of powers issues posed by DHS’s conduct. That particularized concern is more fully addressed with the contributions of CLC’s *amicus* brief.

Second, CLC has interests in other cases that may be affected by the decision in the present case. DHS’s overhaul of the SAVE system is part of a larger effort to consolidate election administration and voter registration list maintenance functions under the Executive Branch. That broader effort is subject to related litigation where CLC is involved. Indeed, the conduct challenged in this case is expressly part of DHS’s implementation of Executive Order 14,248.¹ Currently, CLC represents a group of plaintiffs challenging the legality of Executive Order 14,248. *See LULAC v. Exec. Off. of the President*, No. 25-0946 (D.D.C. 2025); *see also* Exec. Order 14,248, 90 Fed. Reg. 13681 § 2(b)(ii) (Mar. 25, 2025). DHS’s efforts to compile a centralized repository of data on American voters is also related to recent efforts by the Department of Justice to obtain voter registration lists from states, including lawsuits filed by DOJ seeking to compel certain states to turn over those lists. *See, e.g., United States v. Bellows*, No. 25-cv-00468-LEW (D. Me. 2025); *see also United States v. Simon*, No. 25-cv-0376-KMM-EMB (D. Minn. 2025). At this time, CLC

¹ *See* Letter Agreement Providing for Information Sharing Between the Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS) and the Social Security Administration (SSA) Regarding Citizenship, at pg. 2, May 15, 2025, available at: https://www.ssa.gov/foia/resources/proactivedisclosure/2025/May%2015,%202025%20SSA-DHS-USCIS%20Agreement_Redacted.pdf.

represents an organization in its motion to intervene in one of those suits and is monitoring others. *See* Mot. to Intervene, ECF No. 18, *Bellows*, 25-cv-00468-LEW (D. Me. Sept. 29, 2025). The separation of powers issues raised by DHS’s expansion of the SAVE system are also implicated by related litigation over these other Executive Branch intrusions into election administration.

Third, CLC provides distinct subject-matter expertise on voting rights and election administration. CLC is a leading nonpartisan, nonprofit organization that has been working for more than 20 years to advance democracy through law. That expertise is complemented by CLC’s direct involvement in challenges to Executive Order No. 14,248 and DOJ’s efforts to compel states to turn over voter registration lists. As a result of this combination of decades of experience alongside contemporary involvement in related litigation, CLS is uniquely situated to provide valuable insights to inform the Court’s consideration of the separation of powers issues raised in this case.

REQUEST FOR RELIEF

By this motion, *amicus curiae* Campaign Legal Center requests leave to file the attached brief. A proposed order granting leave to file is also attached hereto.

WHEREFORE, *amicus curiae* respectfully requests that the Court grant this Motion and permit the filing of the accompanying brief of *amicus curiae*.

Dated: October 24, 2025

Respectfully submitted,

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**Admitted to practice only in New York. Practice
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