

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

LEAGUE OF WOMEN VOTERS, *et al.*,

Plaintiffs,

v.

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

Defendants.

No. 1:25-cv-03501-SLS

# **EXHIBIT 1**

**Declaration of Brian Broderick (Oct. 22, 2025)**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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Plaintiffs,

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

Defendants.

No. 1:25-cv-03501-SLS

**DECLARATION OF BRIAN BRODERICK**

1. My name is Brian J. Broderick. I serve as Acting Chief in the Verification Division within U.S. Citizenship and Immigration Services (USCIS). I have served in this position since May 12, 2025.

2. In my professional capacity as the Acting Chief in the Verification Division, I am responsible for overseeing the SAVE program, U.S. Citizenship and Immigration Services' core process for verifying U.S. citizenship and immigration status information for federal, state, local, territorial, and tribal agencies.

3. The following declaration is based on my personal knowledge and information that I acquired in my official capacity and in the performance of my official functions.

4. SAVE is an online service administered by USCIS that provides point in time immigration status and U.S. citizenship information to federal, state, local, territorial, and tribal agencies.

5. To register to participate in SAVE, a government agency user must submit electronic copies of all applicable legal authorities authorizing the agency to: (a) issue the stated benefit or license or engage in other activity; and (b) verify the citizenship or immigration status of its applicants before issuing the stated benefit or license or engaging in other activity. USCIS reviews the legal authorities to ensure that the agency's proposed verification is for a purpose authorized by law.

6. If the agency meets the eligibility criteria to participate in SAVE, the agency is required to execute a SAVE Memorandum of Agreement (MOA) with DHS/USCIS outlining the purpose and the responsibilities for participation in the program.

7. Approximately 1,300 agencies nationwide use SAVE to support their benefit eligibility and licensing determinations, voter registration and voter list maintenance, or other lawful purposes within the user agencies jurisdiction.

8. SAVE checks U.S. citizenship of individuals using information available through databases managed by DHS and other agencies.

9. SAVE is only able to verify information provided by registered users that relates to information found in the databases accessed by the system. Accordingly, SAVE will not be able to confirm the U.S. citizenship of an individual if the citizenship status has not been recorded in an accessed database.

10. On May 16, 2025, USCIS established integration between SAVE and the Social Security Administration's Enumeration System to assist USCIS in verifying the U.S. citizenship of individuals through SAVE.

11. SAVE only returns a response to a user agency based on an SSA record when: (1) the information matches an SSA record indicating U.S. Citizenship or (2) the information matches an SSA record indicating the individual is deceased.

12. If the information matches an SSA record indicating a citizenship/status other than U.S. Citizen and the individual is not deceased, SAVE captures the additional record information (full SSN, Alien number) and continues the automated query using the additional accessed databases.

13. For voting related cases, if the completed automated SAVE query determines additional verification is necessary (*e.g.*, due to conflicting data, issues locating the record electronically, etc.) or identifies a status other than U.S. citizen, the case is automatically escalated to manual review.

14. If the information provided does not match a record in the SAVE-accessed databases, SAVE informs the user agency to resubmit with an immigration enumerator or different information.

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

Executed this 22<sup>nd</sup> day of October, 2025 in Camp Springs, Maryland.

**BRIAN J  
BRODERICK** Digitally signed by  
BRIAN J BRODERICK  
Date: 2025.10.22  
10:00:34 -04'00'

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Brian Broderick  
Acting Chief, Verification Division  
Immigration Records and Identity Services Directorate  
United States Citizenship and Immigration Services