

**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.*

Case No. 25-cv-03501

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**DECLARATION OF CELINA STEWART  
IN SUPPORT OF PLAINTIFFS’ MOTION FOR A STAY AND A PRELIMINARY  
INJUNCTION**

I, Celina W. Stewart, Esq., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Chief Executive Office of the League of Women Voters (“LWV”). I took this position starting in August 2024. I have been employed by the League of Women Voters of the United States since 2018.

2. I submit this declaration to describe LWV’s mission to empower voters through voter registration, education, and engagement, and to explain how LWV has been harmed by Defendants’ actions to transform the U.S. Citizenship and Immigration Services’ Systematic Alien Verification for Entitlements (“SAVE”) tool into a searchable national citizenship data system. It is my understanding that the overhauled SAVE system now draws on the Social Security Administration (“SSA”) systems of records and its incomplete and unreliable citizenship data—which, from publicly available information, I understand is particularly unreliable for naturalized citizens—and that the tool allows state and federal user agencies to run bulk searches of the citizenship or immigration status of potentially millions of individuals.

3. Because several states are, based on Defendants' encouragement and facilitation, currently using the overhauled SAVE tool for voter list maintenance, millions of eligible voters across the country are now at serious risk of being purged from rolls, and deprived of their right to vote in upcoming elections, due to inaccurate citizenship data in the SAVE system. By making substantial changes to the SAVE system without first publishing statutorily required information about the changes or following notice-and-comment procedures, Defendants' actions are directly harming LWV's core mission and its ability to educate and protect voters.

### **LWV Background**

4. The League of Women Voters is a nonprofit, nonpartisan, grassroots, community-based membership organization headquartered in Washington, D.C., that promotes political responsibility by encouraging Americans to participate in our representative democracy, through such means as the electoral process. Founded in 1920 as an outgrowth of the struggle to win voting rights for women, LWV now has more than a million members and supporters and is organized in more than 750 communities and in every state and the District of Columbia.

5. LWV comprises two entities: the League of Women Voters of the United States ("LWVUS") and the League of Women Voters Education Fund ("LWVEF"). LWVUS is a 501(c)(4) social welfare organization that encourages informed and active participation in government, works to increase understanding of major public policy issues, and influences public policy through education and advocacy. LWVEF is a 501(c)(3) organization and works to register and provide voters with election information through its election resource VOTE411.org, candidate forums, and debates.

6. LWV has affiliated local and state Leagues, like the League of Women Voters of Virginia and League of Women Voters of Louisiana. Members of local and state Leagues are also members of LWV. Some members are naturalized citizens.

**LWV's Mission and Voter Registration Activities**

7. LWV's core mission is to empower voters and defend democracy, including by registering voters and increasing voter participation. LWV seeks to increase the number of registered voters and voter participation in elections, and it accomplishes this mission by providing voter outreach, education, and assistance.

8. As part of its mission, LWV—with its state and local Leagues—operates one of the longest-running and largest volunteer-based nonpartisan voter registration efforts in the nation. Through its work, LWV registers many thousands of voters every election cycle and is instrumental in ensuring access to voter registration for all eligible voters, including naturalized and derived U.S. citizens, and U.S.-born citizens born before 1981.

9. LWV maintains—with its state and local Leagues—VOTE411.org, an award-winning nonpartisan, online resource committed to ensuring voters have the information they need to successfully participate in every election—local, state, and federal. VOTE411.org is an accessible, bilingual, user-friendly website that allows individuals across the nation to register to vote or update their voter registration. VOTE411.org provides extensive, state-by-state guides about a huge range of election issues for voters, such as how states' absentee ballot process work, how to cure ballots, where to vote, what ID is required, how to verify their voter registration, even what types of machines to expect at polling places.<sup>1</sup>

10. LWV also founded the Motor Voter Coalition in the 1980s and 1990s and served as national co-chair of the campaign to pass and implement the National Voter Registration Act

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<sup>1</sup> See, e.g., *Virginia*, Vote411, <https://www.vote411.org/virginia>.

(“NVRA”). LWV has been one of the foremost active defenders of the NVRA by notifying Secretaries of State of noncompliance, working with them to correct NVRA violations, and, when necessary, filing enforcement actions. LWV has filed lawsuits to enforce the NVRA in states including Alabama, Arizona, Florida, Georgia, Louisiana, Montana, North Carolina, Ohio, Pennsylvania, Tennessee, Texas, and Virginia. It also has filed litigation and participated as amicus in other challenges to restrictions on voter registration and the right to vote. Government bodies, journalists, and the public at large rely on LWV for its expertise in voter registration processes, which are different in every state.

11. Providing education and assistance to both its state and local members and the general public about voter registration is a critical activity of LWV that supports its core mission to ensure every eligible citizen is registered and can participate in our democracy.

12. Through its work, LWV and its state and local Leagues help tens of thousands of voters register to vote every election cycle and are instrumental in ensuring access to voter registration for all eligible citizens. LWV believes it is especially important to encourage naturalized citizens to vote and educate them about the American democratic processes. LWV specifically provides voter outreach and education to assist naturalized citizens with voter registration and in checking their voter registration status.

**The Overhauled SAVE System and its Harmful Effects on LWV**

13. It is my understanding that the SAVE system is administered by the U.S. Citizenship and Immigration Services (“USCIS”) and, in recent years, election officials in some states have used the SAVE system to verify the citizenship of voter registrants and registered voters.

14. It is my understanding that, until recently, the SAVE system only permitted users to verify the citizenship and immigration status of immigrants, nonimmigrants, and certain naturalized and derived U.S. citizens. It is my understanding that the SAVE system did *not* permit users to verify the citizenship of natural-born U.S. citizens.

15. It is my understanding that, until recently, the SAVE system did not permit users to conduct searches using Social Security Numbers (“SSNs”).

16. It is my understanding that earlier this year, USCIS and the Department of Homeland Security (“DHS”) announced an overhaul of the SAVE system. As a result, for the first time the overhauled SAVE system now permits users to search using SSNs, verify the citizenship status of U.S.-born citizens, and run bulk searches of up to millions of individuals at one time.

17. It is my understanding that, despite overhauling the SAVE System, to date, USCIS, DHS, and SSA have not complied with the requirements of the Privacy Act of 1974 for establishing or revising a System of Records, including failing to provide the opportunity for notice and comment and failing to publish a System of Records Notice (“SORN”).

18. It is my understanding that SSA’s citizenship data is incomplete and often unreliable, particularly for naturalized citizens.

19. It is my understanding that numerous states, including Virginia and Louisiana, have announced that they are using the overhauled SAVE system to conduct voter roll list maintenance,

remove alleged noncitizens from their voter rolls, and investigate alleged noncitizens who were on their voter rolls, imperiling the right to vote of naturalized citizens and others for whom SSA maintains stale, inaccurate citizenship data. Voters across the country, therefore, are now at serious risk of being purged or have already been purged from the rolls and deprived of their right to vote in upcoming elections, based on inaccurate citizenship data in SAVE.

20. There are elections rapidly approaching across the country, including in Virginia and Louisiana. Many states will also begin to hold primary elections for 2026 elections in the spring, in preparation for nationwide midterm elections in fall of 2026.

21. When voters are unlawfully purged from voter rolls in any of the 50 states or the District of Columbia with League chapters and members (including Virginia and Louisiana), it decreases the number of registered voters (although the number of eligible voters is unchanged), unnecessarily intimidates voters, forces eligible voters to take additional steps to re-register or remain registered, and generally makes the ballot box less accessible for all eligible voters in Virginia, Louisiana, and every other state and D.C. Those phenomena are even more injurious when voters are unlawfully purged from voter rolls close to elections.

22. Because the overhauled SAVE system utilizes SSA citizenship data that SSA itself has acknowledged is incomplete and unreliable, it threatens many naturalized citizen voters—potentially millions—with erroneous disenfranchisement, additional obstacles to voting, and baseless criminal investigations into their lawful voting. The overhauled SAVE system's unreliable citizenship data risks impairing eligible naturalized citizens' ability and willingness to register and vote.

23. LWV's ability to educate and protect voters is directly impeded by DHS's and SSA's failure to provide statutorily required SORN information, including but not limited to the

exact parameters of the overhauled SAVE system's uses for voter roll verification; the sources of the data pooled in that system; the policies and practices for records retrieval; the procedures for voters to access records contained in the system and contest or correct their contents; and other steps voters can take to ensure their government records are accurate, up-to-date, and secure. Without this and other basic information about the overhauled SAVE system, LWV is kept in the dark about exactly how voters' information has been pooled across agencies and the magnitude of the risks to eligible both naturalized and U.S.-born citizen registrants and voters. As a result, LWV cannot properly educate the public, its members, or local League chapters about the overhauled SAVE system, the attendant risks, and how to mitigate them. If LWV had this information, it would disseminate it to the public through [lwv.org](https://www.lwv.org)<sup>2</sup> and [VOTE411.org](https://www.vote411.org),<sup>3</sup> where it routinely posts election-related explainers and updates about emerging issues. LWV also would share this information through its collaborative partnerships with civic organizations across the country<sup>4</sup> and via direct education of the public.

24. LWV is further harmed by DHS's and SSA's failure to follow notice-and-comment procedures in overhauling the SAVE system. LWV routinely submits statements and comments to government entities on issues relevant to LWV's mission. Just last month, LWV submitted

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<sup>2</sup> See generally Blog, League of Women Voters, <https://www.lwv.org/blog>; see also "Use it or Lose It" Purges Threaten College Students' Right to Vote, League of Women Voters (Sept. 5, 2025), <https://www.lwv.org/blog/use-it-or-lose-it-purges-threaten-college-students-right-vote>.

<sup>3</sup> See, e.g., Make a Voting Plan, VOTE411, <https://www.vote411.org/make-your-plan> (last accessed Oct. 6, 2025).

<sup>4</sup> See, e.g., Press Release, *LWV Announces Collaboration with the School Superintendents Association (AASA) to Support Student Voters* (Sept. 30, 2025), <https://www.lwv.org/newsroom/press-releases/lwv-announces-collaboration-school-superintendents-association-aasa-support>; *A Guide To Civic Collaboration*, League of Women Voters & American Library Association (Aug. 18, 2025), <https://www.ala.org/sites/default/files/2025-07/RVR%20LWV%20Civic%20Collaboration%20Guide%20-%20screens.pdf>.

testimony to Congress regarding voting after a natural disaster.<sup>5</sup> And in March, LWV submitted a comment to the U.S. Election Assistance Commission regarding voter registration-related issues stemming from proposed action in response to the President’s Executive Order of March 25, 2025 titled “Preserving and Protecting the Integrity of American Elections.”<sup>6</sup>

25. By overhauling the SAVE system without following notice-and-comment procedures, Defendants deprived LWV of the opportunity to raise critical concerns about the accuracy of the SSA citizenship data now being pooled into the system and to offer recommendations to ensure eligible voters are not wrongfully intimidated, purged from voter rolls, or investigated based on inaccurate SSA data. As LWV would have pointed out, SSA’s citizenship data is objectively unreliable and incomplete, and it was not collected for purposes of verifying individuals’ eligibility to vote. Because LWV was deprived of the opportunity to comment, it could not point out these facts to Defendants.

26. Had it not been deprived of its notice-and-comment rights, LWV would have also offered extensive data to refute the main reason Defendants provided for overhauling SAVE: the claim that noncitizen voting in the United States is widespread. That premise is false. As LWV and I have made clear in public communications, noncitizen voting is extremely rare and easily addressed by current election procedures that are expressly designed for the task.<sup>7</sup> Similarly, the

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<sup>5</sup> LWVUS Submits Testimony on Voting After Natural Disaster (Sept. 16, 2025), <https://www.lwv.org/expanding-voter-access/lwvus-submits-testimony-voting-after-natural-disaster>.

<sup>6</sup> League of Women Voters Comment to Elections Assistance Commission, *The Commission is Not Authorized to Implement Executive Order on Preserving and Protecting the Integrity of American Elections* (March 27, 2025), <https://www.brennancenter.org/sites/default/files/2025-03/letter-to-eac-regarding-executive-order-on-elections.pdf>. LWV is also a plaintiff in litigation challenging the same Executive Order. *See League of Women Voters Education Fund, et al. v. Donald J. Trump, et al.*, No. 25-cv-00955 (D.D.C. 2025).

<sup>7</sup> *See, e.g., LWVUS Joins Letter to House Opposing the SAVE Act*, League of Women Voters (March 28, 2025), <https://www.lwv.org/fighting-voter-suppression/lwvus-joins-letter-house-opposing-save-act>; Celina Stewart, *What Is the SAVE Act? The Trump Admin's Attempt to Strip Voting Rights From Women and Young People*, Teen Vogue (April 8, 2025),

Heritage Foundation's database of confirmed fraud cases list fewer than 100 examples of noncitizens voting going back to the 1980s.<sup>8</sup> Because LWV was deprived of the opportunity to comment, it could not point out these facts to Defendants.

27. Had Defendants followed notice-and-comment procedures, LWV would have also encouraged its members, voters, and other stakeholders to submit comments as well.

I declare under penalty of perjury as prescribed in 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on October 06, 2025,  
in Washington, D.C.



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Celina W. Stewart, Esq.

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<https://www.teenvogue.com/story/what-is-the-save-act-trump-voting-rights>.

<sup>8</sup> *The Truth about False Claims of Noncitizen Voting*, Voting Rights Lab (March 13, 2024), <https://votingrightslab.org/report/the-truth-about-false-claims-of-noncitizen-voting/>.