

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 (Apr. 2, 2026)**

**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

**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 1,350 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 agency's 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. For SAVE to initiate a query to verify an individual's U.S. citizenship or immigration status, the SAVE user agency must submit the individual's biographic information, including: (1) first and last name; (2) date of birth; and (3) a government-issued enumerator permitted by SAVE.

11. Once a query is submitted through SAVE, SAVE first performs initial verification, which is an automated search of various systems accessible to DHS for matching records. The design of the SAVE initial (automated) verification process allows USCIS to respond quickly to each user agency's specific request. SAVE will provide an automated electronic response adding the applicant's class of admission and a narrative description of the applicant's current citizenship (for U.S. citizens) or immigration status, usually within a few seconds.

12. If U.S. citizenship or immigration status cannot be confirmed through the initial verification process or if the user agency or applicant has a concern about the verification response, the verification process continues to additional (manual) verification.

13. 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.

14. 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.

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

16. Additional verification includes a case review completed by a USCIS Status Verification Analyst within the Verification Division under the Immigration Records and

Identity Services (IRIS) directorate. A USCIS Status Verification Analyst conducts a variety of manual searches in DHS-accessed systems, including physical records as necessary, to verify the U.S. citizenship or immigration status and provide a final SAVE response.

17. 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.

18. USCIS recently implemented significant improvements to the SAVE verification process:

- a. On April 15, 2025, USCIS eliminated fees for States associated with voter verification (effective April 1, 2025).
- b. On May 1, 2025, USCIS implemented a feature that allows user agencies to initiate multiple individual SAVE cases in a single bulk upload using a CSV-delimited file. As a result, there is now no limit to how many SAVE cases may be included in each bulk upload, and some SAVE users have successfully submitted bulk requests for verification relating to millions of individuals at one time.
- c. On May 1, 2025, USCIS implemented a feature increasing the user agency's ability to audit, view, and download case information.
- d. On May 16, 2025, USCIS implemented the ability to create cases based on a first and last name, date of birth, and nine-digit Social Security number.
- e. On May 16, 2025, USCIS established a connection between SAVE and Social Security Administration (SSA) systems that allowed SAVE to verify

U.S. citizenship using queries of SSA records. Accordingly, SAVE can now verify citizenship for most U.S. citizens, including U.S. citizens born in the United States.

- f. On July 11, 2025, USCIS implemented an “error file” download feature, which enables user agencies to identify errors and resubmit queries.
- g. On July 11, 2025, USCIS implemented a “file history retrieval dashboard,” which helps improve file retrieval for bulk uploads.
- h. On July 11, 2025, USCIS implemented bulk escalation capability, allowing states to escalate numerous cases to additional (manual) verification at the same time.
- i. On August 15, 2025, USCIS implemented the capability to create SAVE cases using first and last name, date of birth, and a partial (*i.e.*, last four digits) Social Security number.
- j. On August 15, 2025, USCIS implemented automatic escalation to additional (manual) verification for all voter verification queries that resulted in a status other than U.S. citizen. This capability results in all voter verification queries returning an initial verification status other than U.S. citizen undergoing manual review by a USCIS Status Verification Analyst prior to a final response being returned to the user agency.
- k. On August 28, 2025, USCIS established processes to utilize Department of State systems to verify U.S. citizenship using U.S. passport records during additional (manual) verification.

1. On December 5, 2025, USCIS established a connection between SAVE and the Department of State systems to verify U.S. citizenship using U.S. passport records during initial (automated) verification.

19. In fiscal year 2024, SAVE completed 24.7 million verifications for all purposes. In fiscal year 2025, SAVE completed 198.9 million verifications for all purposes.

20. SAVE has been used for voter-verification purposes since 2005.

21. As of April 1, 2026, officials in the following 27 States have registered with DHS to use SAVE for voter verification: Alabama, Arizona, Arkansas, Colorado, Florida, Georgia, Idaho, Indiana, Iowa, Kansas, Louisiana, Michigan, Mississippi, Missouri, Montana, Nebraska, North Carolina, North Dakota, Ohio, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, West Virginia, and Wyoming.

22. From January 1, 2025 to April 1, 2026, SAVE processed 59.7 million voter verification queries.

23. Since 2017, SAVE has been fully structured as a “front-end” single-record comparison system, comparing information about a single individual with data in DHS-accessed federal record systems and files to verify limited citizenship and immigration status information. SAVE does not determine or make recommendations regarding benefit eligibility.

24. Although SAVE users may now submit requests in bulk, SAVE still proceeds by individual verification of one individual record at a time, with each individual record processed as a separate SAVE case.

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 2<sup>nd</sup> day of April 2026 in Camp Springs, Maryland.

**BRIAN J**  
**BRODERICK**

Digitally signed by  
BRIAN J BRODERICK  
Date: 2026.04.02  
16:06:38 -04'00'

---

BRIAN J. BRODERICK  
Acting Chief, Verification Division  
Immigration Records and Identity Services Directorate  
United States Citizenship and Immigration Services