

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

CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON,

Plaintiff,

v.

The U.S. DEPARTMENT OF HOMELAND
SECURITY and U.S. CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendants.

Civil Action No. 26-cv-3393 (BAH)

JOINT STATUS REPORT

Pursuant to the Court’s September 30, 2026, Minute Order, Plaintiffs Citizens for Responsibility and Ethics in Washington (“CREW”) and Defendants the U.S. Department of Homeland Security (“DHS”) and U.S. Citizenship and Immigration Services (“USCIS”) (collectively, the Parties) respectfully submit this Joint Status Report.

Defendant USCIS has undertaken an initial search and identified a low volume of responsive records in custody of USCIS’s Fraud Detection and National Security (“FDNS”) Directorate. USCIS anticipates processing and disclosing this initial batch of responsive records by October 9, 2026, and no later than October 16, 2026.

Given the low volume output of its initial search, USCIS intends to continue its search efforts and expects a search to be completed in two weeks’ time. USCIS requires this time to ensure that its search is complete and covers all custodians and locations likely to have responsive records, including by identifying gaps in its results or additional USCIS personnel whose records may need to be searched. USCIS has made processing Plaintiff’s request a

priority. The parties agree to check-in during the course of USCIS's search to discuss the status of the search and the volume of any additional records, if any.

In the interest of the resolving of this matter, Defendant DHS has agreed to undertake a search and disclose any non-exempt, responsive records. DHS has made processing Plaintiff's FOIA request a priority, and its search efforts are ongoing. DHS has identified at least its Office of Public Affairs ("OPA") and Office of Homeland Security Statistics ("OHSS"), and Office of the Deputy Assistant Secretary for Election Integrity as potentially having responsive records and is undertaking a search of those components. DHS is conferring with USCIS to identify other DHS components that may have responsive records.

The Parties' Proposal:

The Parties continue to work together to avoid the need for unnecessary briefing. They request that this Court continue to stay briefing and consideration of Plaintiff's Motion for a Preliminary Injunction, ECF No. 3, until further report from the Parties.

The Parties shall file a Joint Status Report on Wednesday, October 7, 2026. That Joint Status Report will detail the status of DHS's ongoing search efforts and the preliminary results of DHS's completed searches of OPA and OHSS. The Parties shall apprise the Court of the parties continuing efforts to agree to a production schedule and processing rate.

Dated: October 5, 2026.

Respectfully submitted,

*/s/Lauren C. Bingham*_____

Lauren C. Bingham (D.C. Bar No. 90043462)

Samantha M. Creighton (D.C. Bar No. 90043959)*

Kayvan Farchadi (D.C. Bar No. 1672753)

John B. Hill (D.C. Bar No. 90044825)

Nikhel S. Sus (D.C. Bar No. 1017937)

CITIZENS FOR RESPONSIBILITY

AND ETHICS IN WASHINGTON

P.O. Box 14596 Washington, DC 20044

(202) 408-5565

lbingham@citizensforethics.org

screighton@citizensforethics.org

kfarchadi@citizensforethics.org

jhill@citizensforethics.org

nsus@citizensforethics.org

**admitted pro hac vice*

BRETT A. SHUMATE

Assistant Attorney General

/s/ Elizabeth J. Shapiro

ELIZABETH J. SHAPIRO

Deputy Director

Federal Programs Branch