UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CITIZENS FOR RESPONSIBILITY AND ETHICS IN WASHINGTON,

Plaintiff,

v.

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

Defendants.

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

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JOINT STATUS REPORT

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 to apprise the Court of their efforts to resolve the pending motion for preliminary injunction in this action brought under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and request that the Court enter the attached proposed order.

USCIS has almost completed the processing of records identified in response to Plaintiff's FOIA request. About five additional pages of responsive records remain to be processed, non-exempt portions of which will be produced to Plaintiff on or before October 30, 2026. USCIS will undertake additional searches or processing as needed based on any consults from DHS.

DHS has processed 13,000 pages of records obtained in a search of the Office of the Deputy Assistant Secretary for Election Integrity (the "Office of the DAS for Election Integrity") and

determined that most of these records are unresponsive. About 19,000 pages of records remain to be processed. DHS has completed its search of the Office of Public Affairs and identified 20 pages of responsive records. DHS will produce the non-exempt portions of the responsive records from those offices on or before October 30, 2026.

Plaintiff's motion for preliminary injunction sought a processing rate of 1000 pages per week, with weekly rolling disclosures accompanied by a *Vaughn* Index, if appropriate. Irrespective of the merits of Plaintiff's motion, Defendants are processing records as soon as practicable at the rate Plaintiff sought. USCIS has nearly completed processing, as described above. DHS is processing no fewer than 1,000 pages of potentially responsive records per week and will produce any non-exempt responsive records on a rolling basis every week until all non-exempt responsive records have been released.

The Parties propose that the Court enter the attached order.

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Dated: October 23, 2026.

Respectfully submitted,

/s/ Lauren C. Bingham
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