Declaration of UCLA Data Scientists Dr. Matt Barreto and Mr. Michael Rios on DOJ/DHS Voter List

1. Pursuant to 28 U.S.C. section 1746, I, Matt Barreto, and my co-author, Michael Rios, declare as follows:

2. My name is Matt Barreto, and I am Professor of Political Science and Chicana/o Studies and Faculty Director of the UCLA Voting Rights Project. I previously filed a declaration in this matter on October 28, 2026 and my CV is attached to that report. For the past 12 years I have been appointed as Full Professor with tenure at UCLA and prior to this I was Associate Professor with tenure for 10 years at the University of Washington, Seattle. I have published four books and more than 90 articles related to voter analysis, including voter file matching methodology and issues related to voting rights litigation. I have testified in more than 50 state and federal trials and my testimony has been relied upon as credible.

3. I have extensive experience analyzing the California voter file, having published one of the first-ever peer-reviewed political science articles with voter file data in 2004 in the American Political Science Review, considered the premier flagship journal in the entire Political Science discipline. Since 2004, I have worked with the California voter file on an annual basis and have published numerous additional peer-reviewed studies, and relied on the California voter file in expert testimony in state and federal voting rights litigation.

4. I collaborated with Mr. Michael Rios, MPP, Senior Data Scientist at the UCLA Voting Rights Project in the analysis for this report. Mr. Rios has co-authored numerous expert reports in state and federal court and has also published social science peer-reviewed articles.

5. Since November 2020, my co-author Mr. Rios and I have a contract with the State of California, Office of the Secretary of State, to analyze voting trends using the California voter file. Over the past 25 years, I have extensive experience working with the California voter file, including processing, cleaning, and merging the California voter file for social science peer-review and standards established by state and federal courts.

6. UCLA VRP counsel Ms. Sonni Waknin received a thumbdrive containing a list from the United States Department of Justice at 6:03pm EDT on October 30, 2026, and provided that list to us for review in accordance with an order from this court.

7. In order to provide a prompt reply to this Court, we immediately conducted an analysis of the DOJ list to determine if entries on the CHIRLA members and clients naturalized citizen list matched the DOJ suspected ineligible voter list. We followed a rigorous methodology following published social science research on database matching, in line

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with our decades of experience, and have reached the following conclusions with respect to the DOJ list:

8. Based on scientific database matching methodology, I am certain that there at least 22 entries on the CHIRLA citizen list that fully match to the DHS ineligible list, using first name, last name, date of birth, and exact address, criteria even more stringent than that employed by the DOJ/DHS in their various expert declarations (e.g. Bartell and McLoughlin).

9. In addition, there are 66 entries on the CHIRLA citizen list that are near certain full matches the DHS ineligible list using first name, last name, and exact address, also criteria more stringent than that employed by the DOJ/DHS in their expert declaration.

10. In addition to this, there are hundreds or more cases that are highly likely matches from the CHIRLA citizen list and the DHS ineligible list using first name, last name, and date of birth – or first name, last name, and address, both criteria relied upon by the DOJ/DHS in their declarations.

11. Finally, using criteria the DOJ/DHS relied upon as probabilistic, using first name, last name and criteria such as birth *year*, street *name*, or zip code, there are 6,140 CHIRLA citizen entries at risk of investigation as highly probable matches on the DHS ineligible list.

12. Based on my experience using the California voter file and matching records using accepted methodology in the social sciences, I am certain there are entries on the CHIRLA citizen members and clients list that are on the DHS ineligible list of 20,930 names. In the attached tables in Appendix A, we include column variable headers from the DHS list on the left, and corresponding columns from CHIRLA list on the right. Due to instructions from court to protect sensitive data, the names and other data are redacted, similar to the process followed by DHS employee Bartell in his declaration in *U.S. v. CA*.

13. Without disclosing any sensitive personal identifying information, our match found CHIRLA citizen members and clients on the DHS ineligible list in counties that have given public quotes that are actively opening and checking the DHS lists including two matches in Santa Cruz county, where the Registrar of Voters told the Los Angeles Times[1] she received a list from the DOJ and told the media: "I'm looking at it and doing my due diligence."

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[1] https://www.latimes.com/california/story/2026-10-23/trump-administration-election-letters-california-counties

14. While I have utmost confidence in these matches, it is critical to point out that the DOJ/DHS list provided to UCLA counsel does not appear to be the full voter file list of variables they obtained and cleaned from the state of California. Most important, the list provided to me is missing the single most critical column for matching – California Voter ID number – which is certain to be present on the original California voter file obtained by the DOJ.

15. In our previous declaration dated October 28, 2026 we explain, at length, the methodological process by which database matching *should* occur and the importance of having a unique identifier key that is common across files. We explain the pitfalls of non-scientific matching and cutting corners. Not only has the 20,930 name file been compiled using non-scientific list matching methods and commercial databases, but they have removed the cipher – voter ID number – which goes against every basic principle of database matching, as outlined by numerous data scientists in published research (see Barreto declaration October 28, 2026).

16. If this file which was shared to UCLA counsel is the exact file shared to Los Angeles County, and to the State of California – missing voter ID number – it would be exceedingly difficult to successfully validate or eliminate names on the list. There is no question that the United States DOJ possesses additional columns on the voter file including California Voter ID number, as well as items such as date of first registration, phone number, and more, however they have obviously removed these columns in the file provided to us, most obviously because the file name itself is titled:

Copy of All_States_Voter_Results_3079346_Voter_Count_2026_09_23_reduced columns (005)

17. The suffix _reduced columns clearly implies that an additional file exists which contains more columns that would be useful for either Los Angeles County officials, or for CHIRLA, to be able to more precisely identify voters.

18. From other public declarations from DHS officials including Mr. Bartell and Mr. McLoughlin, we know for certain the DOJ has a voter file list that contains more columns. In a declaration filed on 10/26/2026 in the Central District of California Nicolas Bartell stated that he created a spreadsheet for the DOJ which contained many additional columns, 30 in total, and provided redacted screenshots of those columns in his Exhibit C:

    a. Clear/Fix
    b. Input_voterfirst_name
    c. Input_votermiddlename
    d. Input_voterlastname
    e. Voter_case_num

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f. voter_case
g. VoterFirstName
h. VoterMiddleName
i. VoterLastName
j. VoterProvidedDOB
k. VoterProvided
l. VoterProvided
m. VoterAddress
n. VoterPhone
o. VoterEmailAddress
p. VoterRegistrationDate
q. EarliestVotingDate
r. EarliestFederalElectionDate
s. LatestFederalElectionDate
t. PotentialPrimaryNum
u. SSN
v. Subject_match_Y_N
w. USC_Y_or_N
x. A_Number
y. Current_Status
z. Address
aa. referred_to_ICE
bb. date_referred_to_ICE
cc. Uscis_cob_set
dd. ca_voter_roll_cob

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19. In the file we received from DOJ, there were a total of only 8 columns, despite the declaration from Mr. Bartell stating that many of the 30 columns were "source data from the voter file" which must have been eliminated in the produced "_reduced columns" file we received.

20. Having more data columns (variables) to match against can lead to a more accurate match, especially if unique key identification columns are present such as Voter ID number which Mr. Bartell states he had access to, and relied upon, in his analysis.

21. The certain, highly-likely and probabilistic matches were found on the DHS ineligible list, against known eligible citizen voters, represent the tip of the iceberg of disenfranchisement in California, because we were only able to check against the CHIRLA member and client citizen list. In reality, California has 3.8 million naturalized citizen voters on the current voter file, and based on the CHIRLA member/client match rate to the DHS ineligible list, extrapolating to the full set of 3.8 million immigrant voters

would result in 3,743 certain incorrect matches, 7,486 highly likely incorrect matches, and as many as 348,238 probabilistic incorrect matches depending on the exact matching criteria, and list accuracy used by the DOJ/DHS.

22. Last, upon a full analysis of the the DOJ list of 20,930 names I conclude that their list contains extensive errors, duplications, is incomplete, has missing fields, and could result in more than three hundred and fifty thousand potential false positives matches of additional U.S. citizen voters in California, putting them at risk of being disenfranchised.

23. The file we received does not appear to be the identical file produced to Los Angeles County and the State of California for two reasons. First, the original file was produced on October 13, 2026. The Microsoft Excel file we received was a created-date of October 30, 2026 at 2:06pm. Further, the properties of the file list the author of the file as Ty Trejo, who is DOJ counsel in this case, and not a data scientist associated with analysis of the California voter file. If the original file was opened, and certain fields were then copied and pasted into a new Excel file and saved, this would give the resulting file a new save date, and a new author. My understanding is that UCLA counsel requested the exact file that was sent to Los Angeles County and the State of California and not a brand new file created by Mr. Trejo on October 30, 2026.

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24. It is also clear that the United States has altered the original California voter file and returned to plaintiffs a different file than exists on the voter file. We know this with certainty because we also have a copy of the California voter file, which we referenced in our October 28, 2026 declaration. For instance, the original California voter file contains the following 12 unique columns for address:

    a. AddressNumber
    b. HouseFractionNumber
    c. AddressNumberSuffix
    d. StreetDirPrefix
    e. StreetName
    f. StreetType
    g. StreetDirSuffix
    h. UnitType
    i. UnitNumber
    j. City
    k. State
    l. Zip

25. In the returned file from the DOJ, these 12 columns are combined into one single column called "VoterAddress" which is likely required by the Lexis-Nexis Accurint as an input

field to merge into a third party commercial database which DHS admits to using to "enhance" the file. However, by combining as many as 12 fields into one single field, the DHS process has actually made it more difficult to find, validate, and match records. They have altered the underlying original data as it appeared on the California voter file.

26. Last, as data scientists with extensive experience with the California voter file, we attempted to match the entire 20,930 names which the DOJ purports to be taken from the California voter file in the first place, against the full 23.2 million names on the current voter file. In our previous declaration of October 28, 2026 we relied on the voter file we obtained in June 2026. In analyzing the DHS ineligible list, we were shocked that only 4,350 of the 20,930 fully matched as being on the voter file using first name, middle name, last name, exact address and date of birth (20.7%) and an additional 7,700 of the 20,930 matched when using first name, middle name, last name, and date of birth (excluding address) which is 36.8%. This means that 8,880 names – or 42% – on the DOJ list were not anywhere to be found on the current California voter file. Had the voter registration ID number been included, matching could have been more precise, however this field, along with 20 others were "reduced" in the file provided to Los Angeles County and to us.

27. I declare under penalty of perjury the foregoing is true to the best of my personal knowledge.

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Matt A. Barreto, Ph.D.
Washington, DC
October 31, 2026

Appendix A:

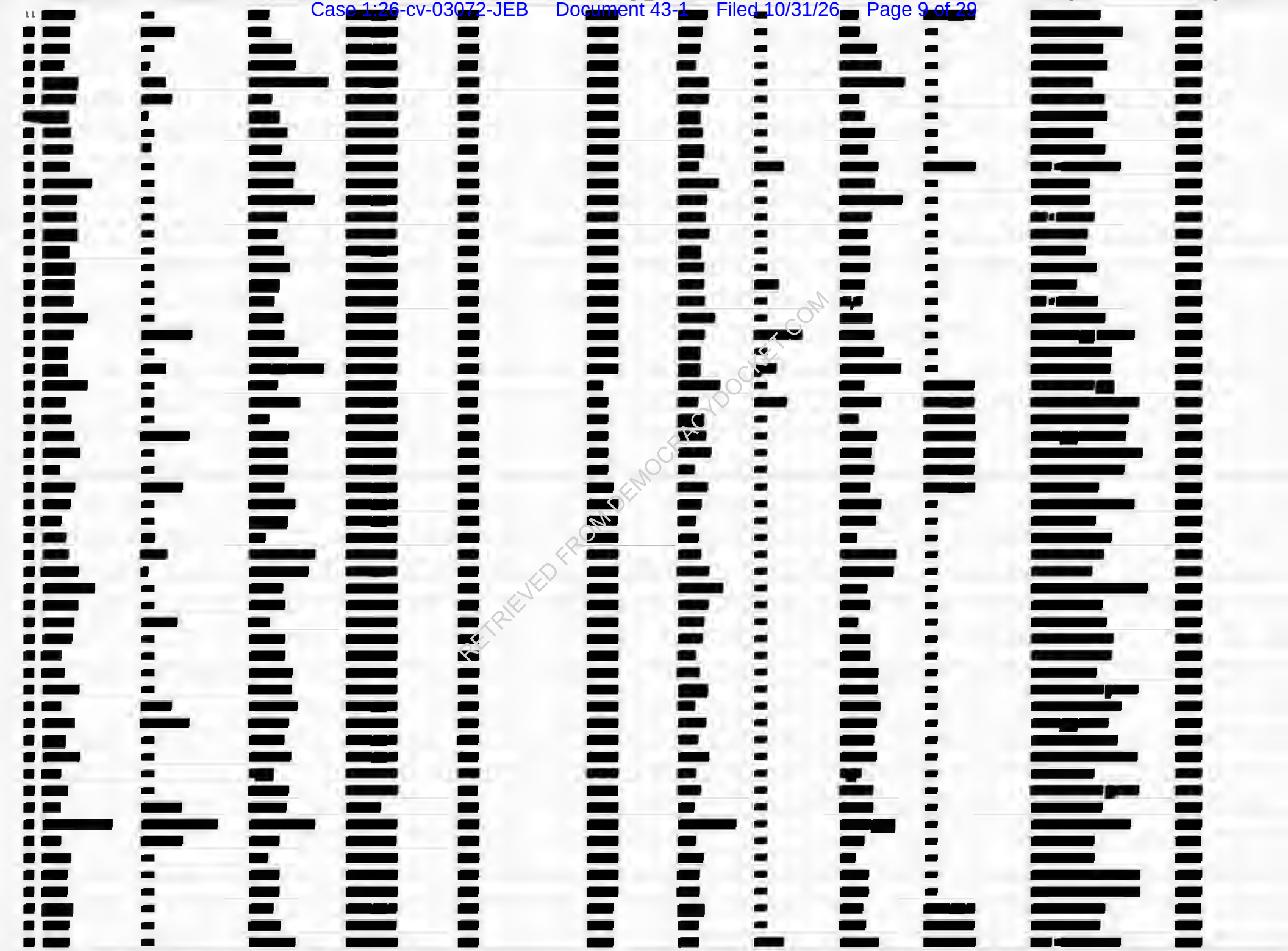
In Camera Tables of CHIRLA entries matched to DHS list

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	VoterFirstName	VoterMiddleName	VoterLastName	VoterProvidedDOB	VoterProvidedDOBYear	CHIRLA_ID__c	FirstName	MiddleName	LastName	Birthdate	MailingStreet	MailingPostalCode
1	[redacted]											
7	[redacted]											

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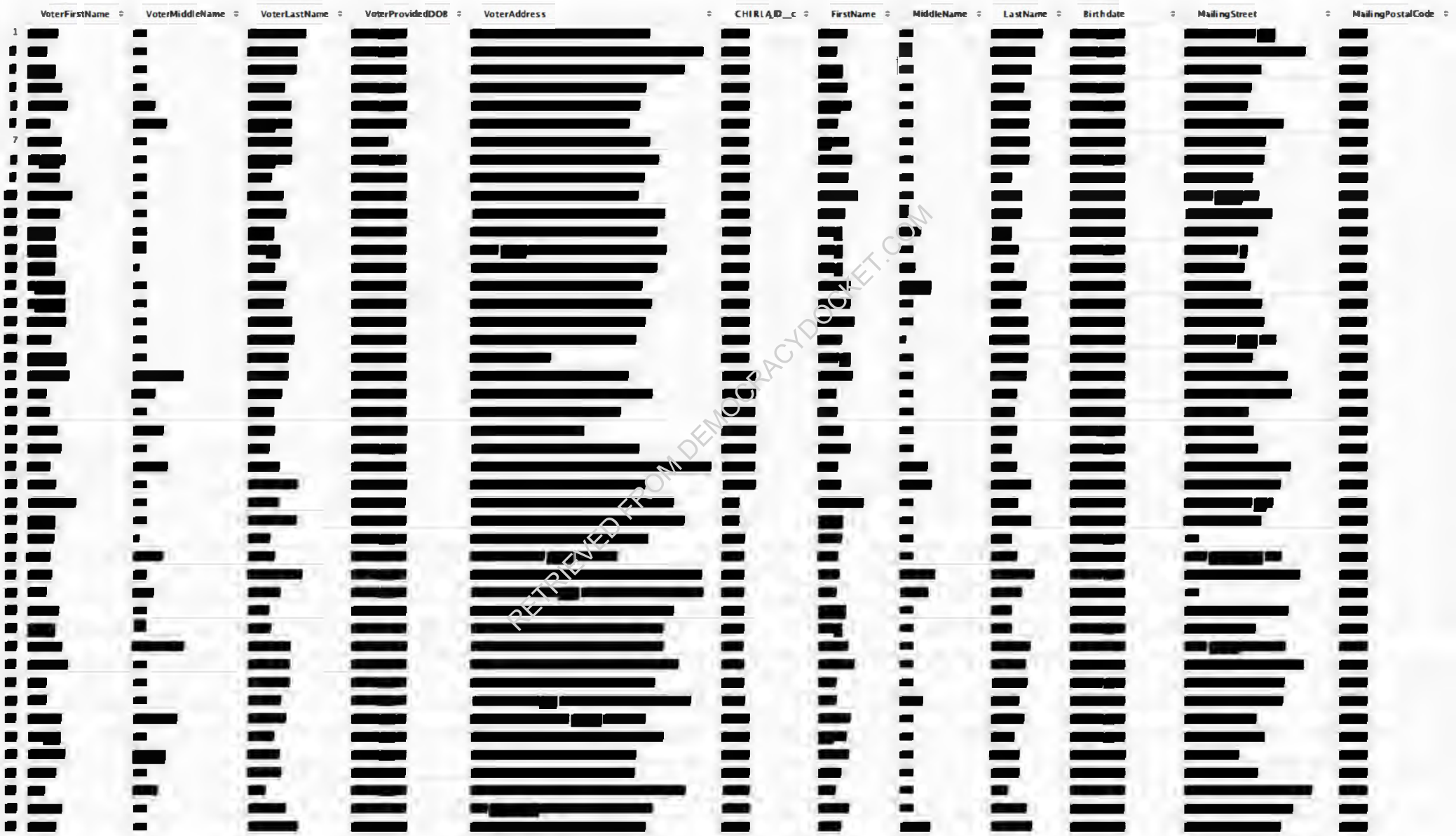
Showing 1 to 56 of 66 entries, 12 total columns



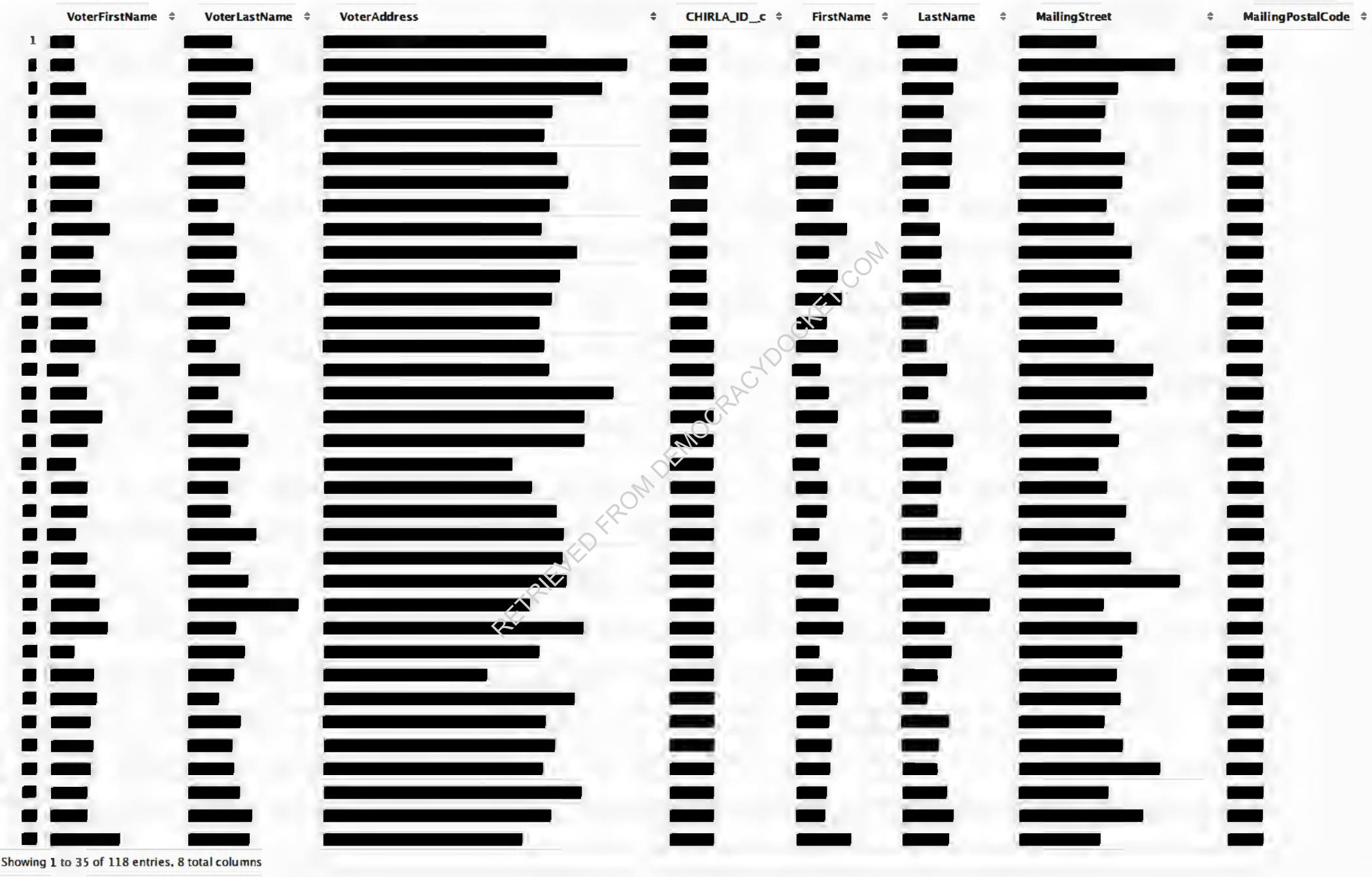
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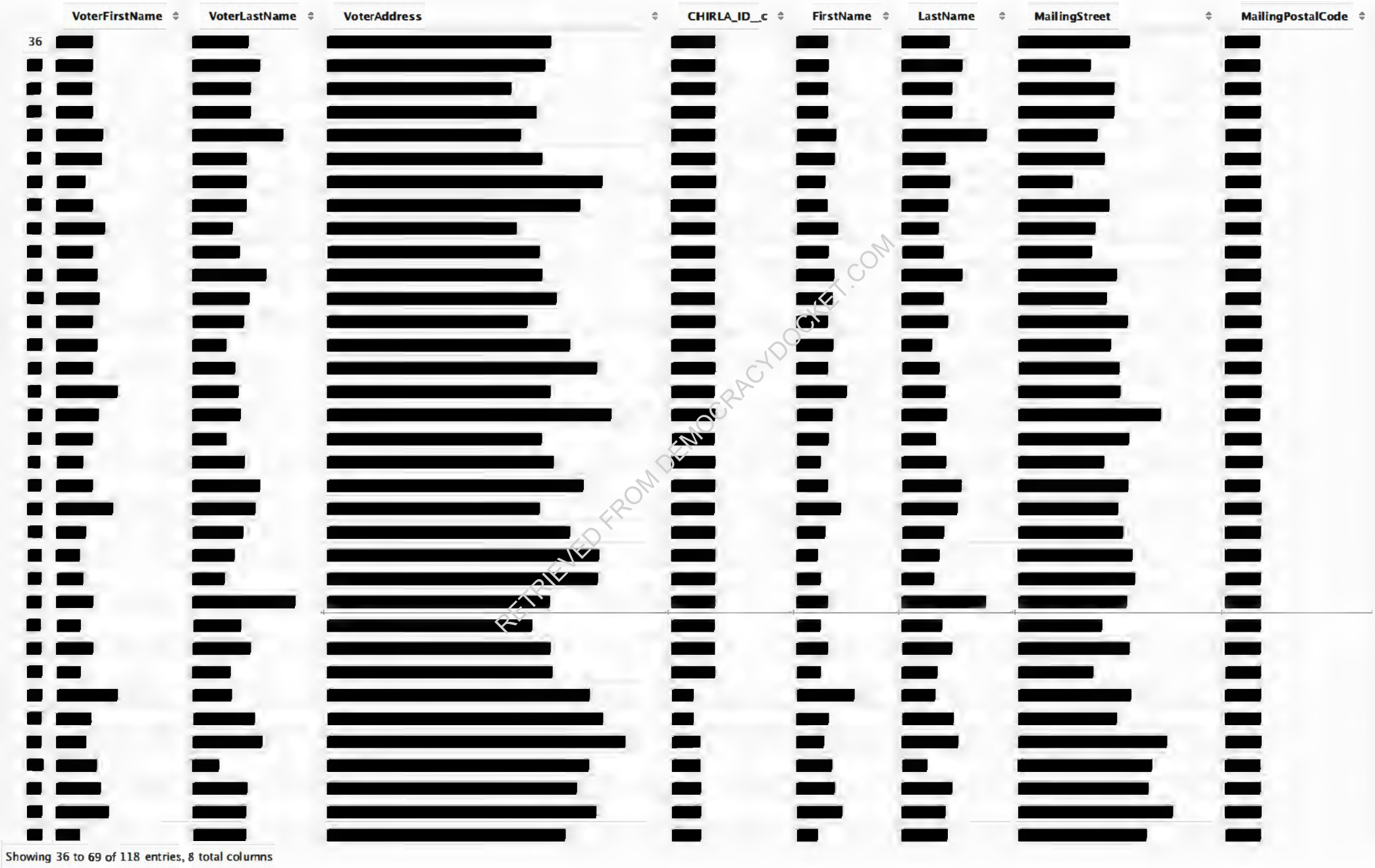
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	VoterFirstName	VoterLastName	VoterAddress	CHIRLA_ID__c	FirstName	LastName	MailingStreet	MailingPostalCode
1	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

Showing 1 to 35 of 118 entries, 8 total columns

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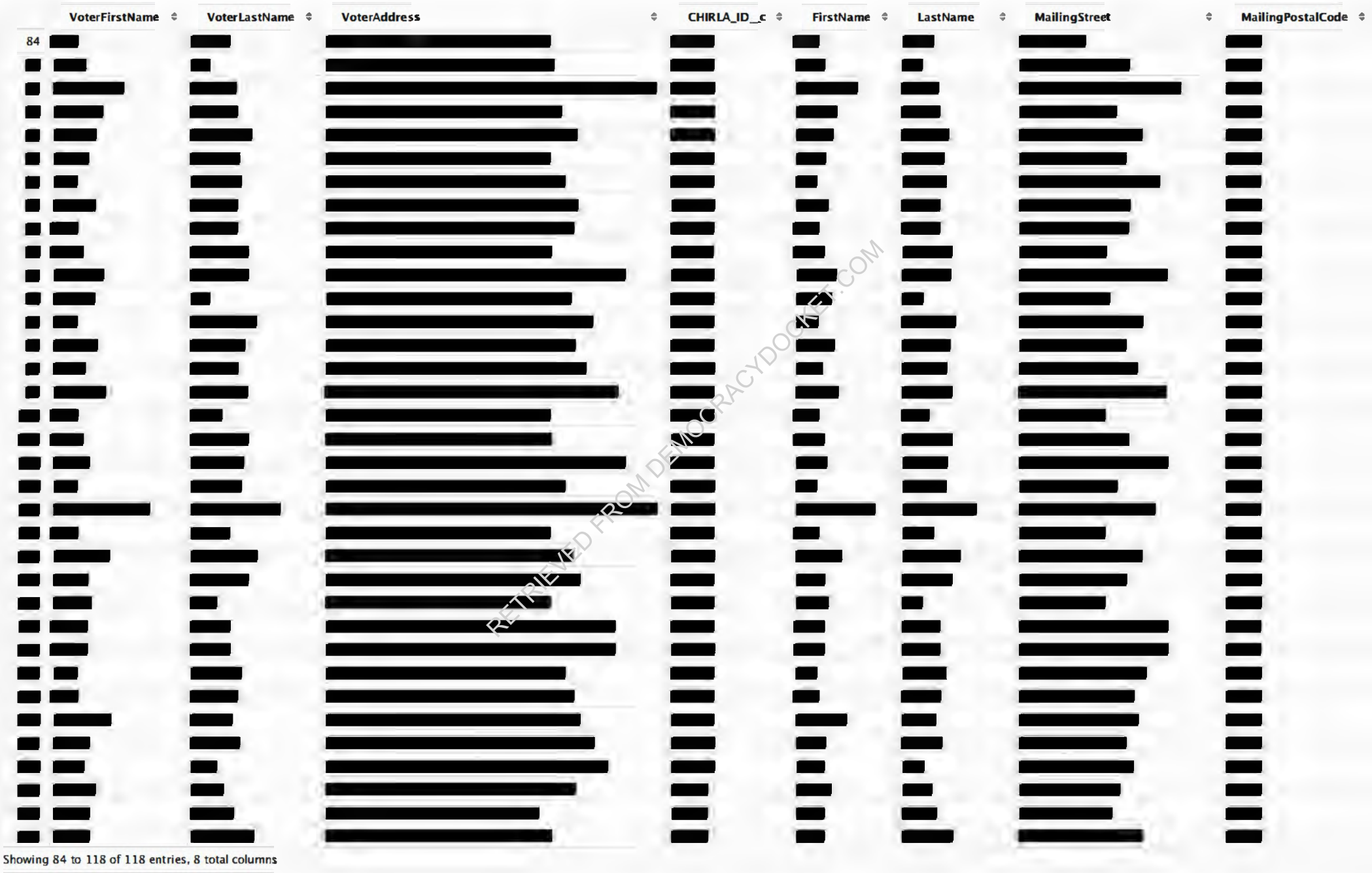
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	VoterFirstName	VoterLastName	VoterAddress	CHIRLA_ID__c	FirstName	LastName	MailingStreet	MailingPostalCode
71	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

Showing 71 to 105 of 118 entries, 8 total columns

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF CALIFORNIA, *et al.*,

Defendants.

Case No. 2:26-cv-12025-DOC-ADS

DECLARATION OF NICOLAS BARTELL REGARDING DEAN LOGAN'S SAMPLE LIST

Date: October 27, 2026
Time: 1:00 PM PST
Courtroom: 1
Action Filed: October 15, 2026

Hon. David O. Carter
United States District Judge

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In accordance with the provisions of 28 U.S.C. § 1746, I, Nicolas Bartell, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

1. I currently hold the position of Associate Director of the Fraud Detection and National Security Directorate (FDNS) at U.S. Citizenship and Immigration Services (USCIS) in the Department of Homeland Security (DHS)—a role I assumed in July 2026.

2. I previously served as senior counselor and strategic policy advisor to the Office of the Director from September 2025 to July 2026, and concurrently, Acting Associate Director for FDNS from April 2026 to July 2026.

3. I began my career with USCIS in 2008 as a district adjudications officer in the Chicago Field Office and worked my way up through various roles prior to assuming my current role.

4. Some of those positions included supervisory immigration services officer in Detroit, Michigan; a field office director in Montgomery, Alabama; and as the leader of the Fraud Integrity and National Security Branch within the USCIS Field Operations Directorate.

5. I received my juris doctor with a concentration in international law from Thomas M. Cooley Law School and my bachelor's in history from Michigan State University.

6. I previously submitted a declaration in support of the federal government's motion for temporary restraining order in *United States v. California*, 2:26-cv-12025 (C.D. Cal.). *See* Dkt. 22-4. That Declaration explained USCIS's role in federal election integrity, how USCIS processes alien or noncitizen voter records, and the process by which USCIS analyzed California's voter roll to create a list of individuals who FDNS believes are highly likely to be noncitizen aliens registered to vote in the 2026 federal election in California. FDNS subsequently provided the list to Homeland Security Investigations (HSI) for further refinement (*see* Declaration of Eric McLoughlin

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describing such refinement), ultimately resulting in a list of approximately 20,930 individuals ("the DHS List"). I understand that the DHS List was made available to the California Secretary of State and Los Angeles County Registrar-Recorder/County Clerk on October 13, 2026.

7. On October 26, 2026, USCIS received an updated list of 200 subjects from Norton Rose Fulbright US LLP on behalf of their client, the Los Angeles County Registrar – Recorder/County Clerk (RR/CC). The list included three columns: "VoterFirstName", "VoterMiddleName", "VoterLastName", "DOB", and "VoterAddress", and is the list referenced by Aman Bhullar in his declaration in support of Dean Logan's opposition to the United States application for temporary restraining order ("County's Sample List"). See Dkt. 32-3 para. 24. A copy of the County's Sample List is attached as Exhibit A.

8. USCIS used the information in the County's Sample List to identify matches to subjects previously provided to the County in the DHS List. A true and correct copy of the excel sheet created by USCIS showing the County's Sample List compared to the DHS List, marked as Exhibit B, contains sensitive private information, will be lodged with the Court *in camera*.

9. A redacted version of the first page of Exhibit B is attached hereto as Exhibit C, showing columns for voter first, last and middle names, voter case number, date of birth, address, phone number, email address, voter registration date, earliest voting date, earliest federal election date, latest federal election date, potential primary A number, social security number, whether the subject is a match, and whether the subject is a US citizen, Alien number, current status, USCIS country of birth, and California voter roll country of birth.

10. The columns highlighted in light green in Exhibits B and C represent what was provided to USCIS from Norton Rose Fulbright representing the County's Sample List. The columns in orange are source data from the voter file. USCIS also added the last two columns to capture the USCIS Country of Birth (COB) and the voter roll Place

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of Birth.

11. Los Angeles County claimed that upon their review of the DHS List, they identified 38.9% (77.8 people) individuals who claimed they were born in the United States. Los Angeles County did not identify who on the County's Sample List claimed to be born in the United States.

12. USCIS examined the DHS List and identified 51 individuals on the DHS List where California's voter roll indicates the person claimed to be born in the United States. After a thorough review of the immigration records of all the individuals on the County's Sample List, it was determined that none of the individuals USCIS matched to the County's Sample List were born in the United States according to USCIS records.

13. USCIS re-reviewed each match to re-confirm that 1) the voter subject is a match to the USCIS identity/holding, and 2) the USCIS identity/holding is likely a current alien. The re-review resulted in a determination that four subjects might have a claim to U.S. citizenship, three of which potentially derived citizenship through a parent but were not born in the United States.[1] One person was determined to be deceased.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Nicolas Bartell

Executed this 26th day of October 2026, Los Angeles, California.

[1] None of the four individuals have conclusive proof of citizenship. The determination of derivative citizenship requires a detailed and complex analysis to determine the applicable law at the time of birth or naturalization of the parent, or upon entry into the United States as lawful permanent resident, among other factors. Although a thorough review was conducted for each person included in the DHS List, there is always a risk for human error.

EXHIBIT A

County of Los Angeles Sample List of 200 names

Lodged with the Court for *in camera* review due to sensitive private information

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EXHIBIT B

Excel sheet created by USCIS showing County's Sample List compared to DHS List

Lodged with the Court for *in camera* review due to sensitive private information

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EXHIBIT C

Redacted first page of Exhibit B

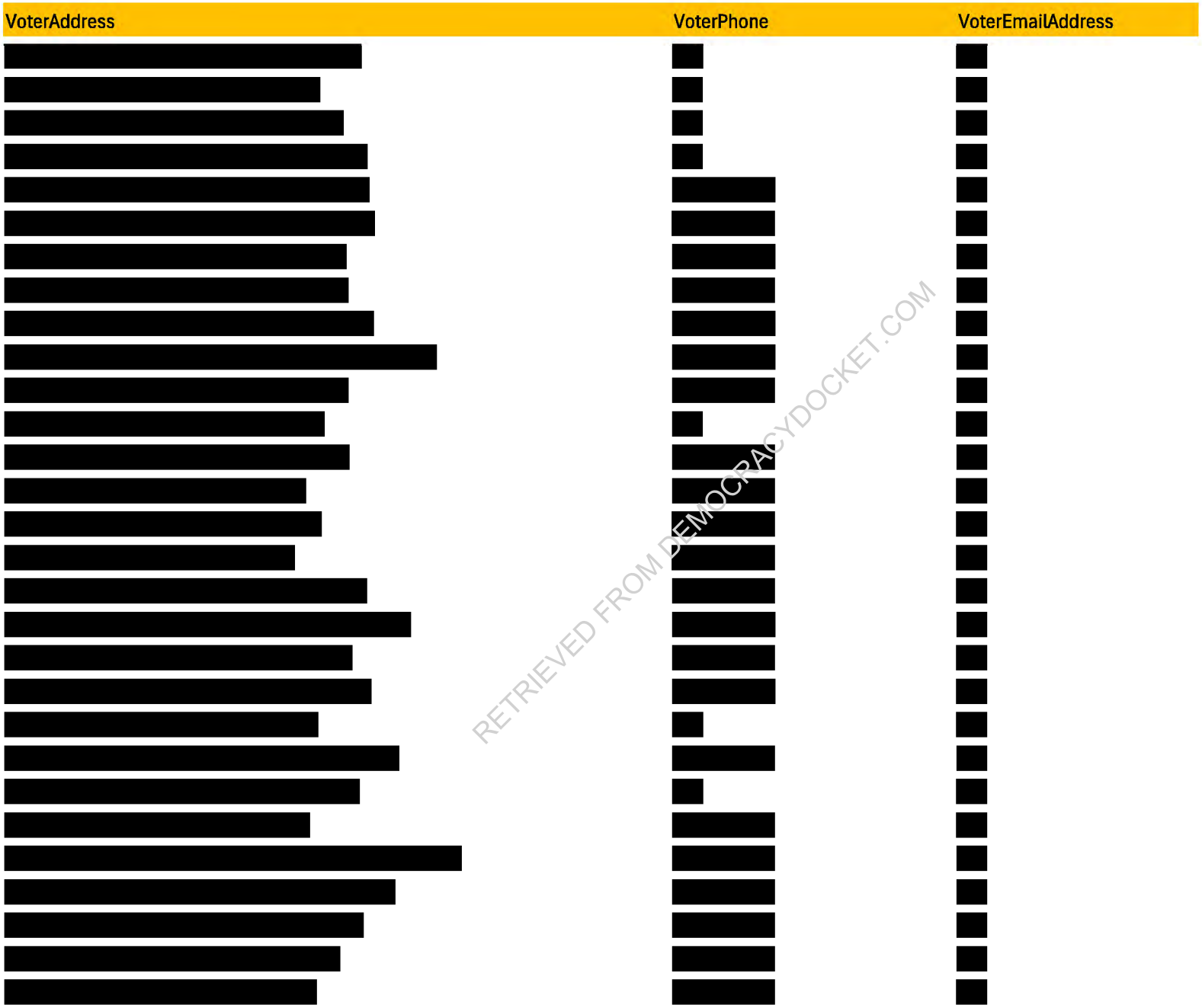
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Clear/Fix	input_voterfirst_name	input_votermiddlename	input_voterlastname	voter_case_num
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

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voter_case_	VoterFirstName	VoterMiddleName	VoterLastName	VoterProvidedDOB	VoterProvided	VoterProvided
[redacted]						

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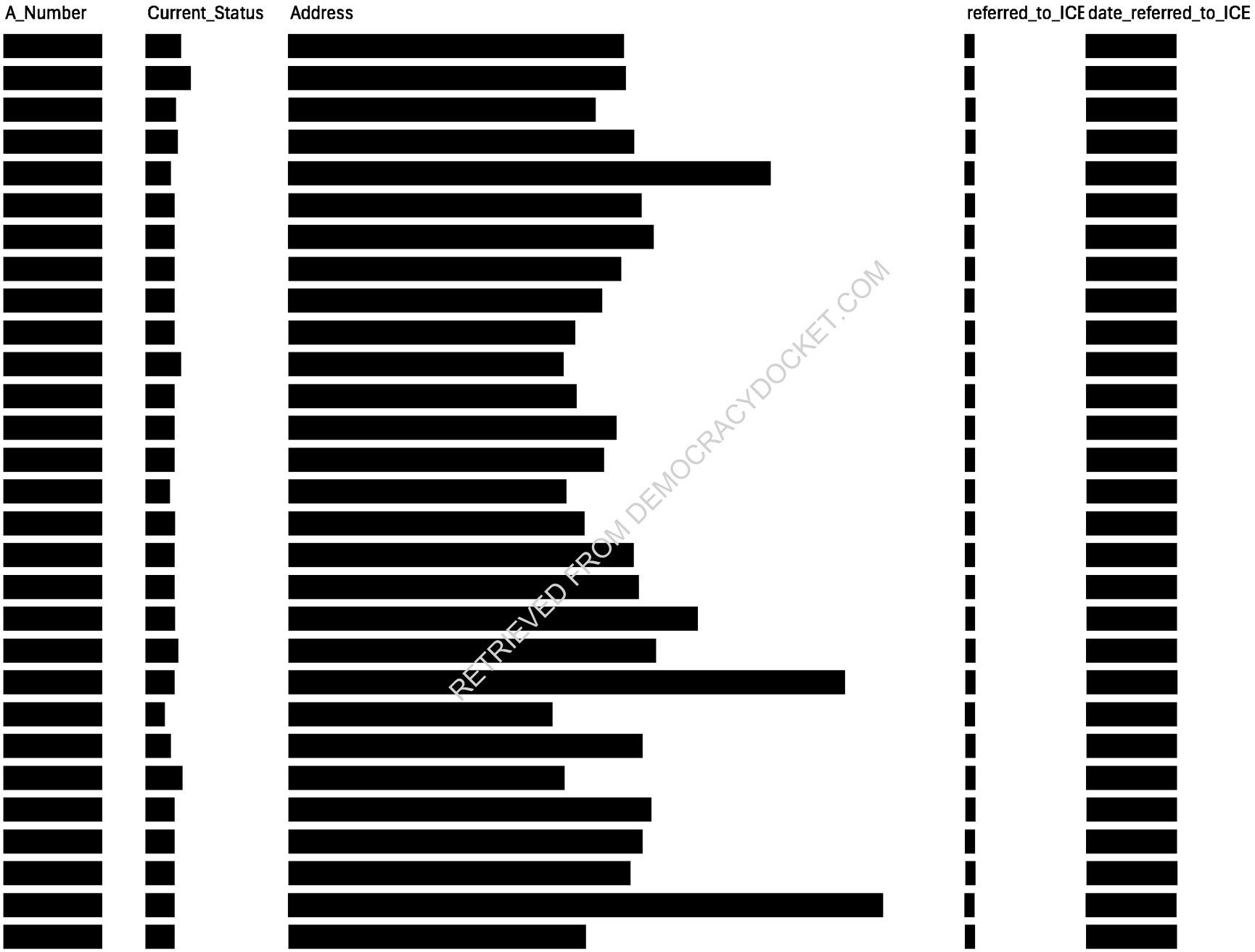
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VoterRegistrationDate	EarliestVotingDate	EarliestFederalElectionDate	LatestFederalElectionDate
[redacted]	[redacted]	[redacted]	[redacted]

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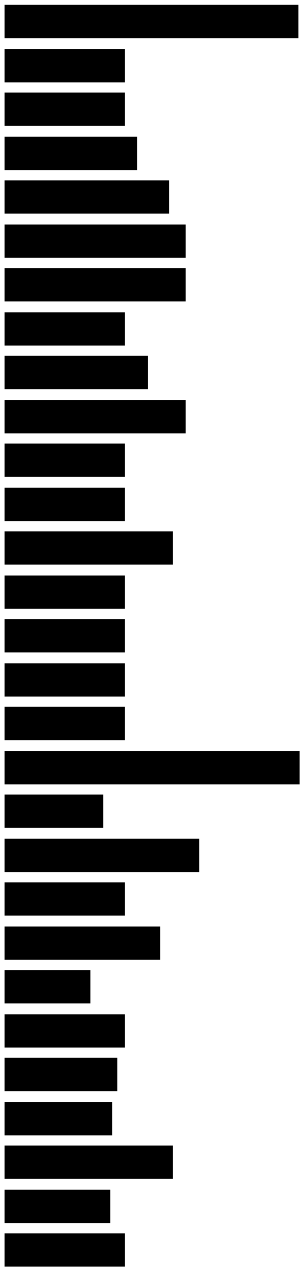
PotentialPrimaryANum	SSN	Subject_match_Y_N	USC_Y_or_N
[redacted]	[redacted]	[redacted]	[redacted]

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uscis_cob_set



ca_voter_roll_cob



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