

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 #2 OF ERIC
MCLOUGHLIN IN SUPPORT OF
UNITED STATES' *EX PARTE*
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND THE
ORDER TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION
SHOULD NOT ISSUE**

Date: October 27, 2026

Time: 1:00 PM PST

Courtroom: 1

Action Filed: October 15, 2026

Hon. David O. Carter

United States District Judge

DECLARATION OF ERIC MCLOUGHLIN

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

1. My name is Eric McLoughlin. I am the Assistant Director for the Cyber and Operational Technology section at Homeland Security Investigations (HSI). HSI is a component of the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE). I have held this position since about April 2026.

2. In my current role, I lead operational technology and systems-development functions that support investigative, analytic, and operational activities. My responsibilities include directing and managing approximately 300 personnel and managing a budget exceeding \$250 million. These resources support the development, deployment, governance, and sustainment of approved data and analytic capabilities used in support of HSI's mission.

3. The statements in this declaration are based on my personal knowledge, reasonable inquiry, and information made available to me in the course of my official duties from information obtained from records, systems, databases, other DHS employees, and/or information portals maintained and relied upon by DHS.

4. I previously submitted a declaration regarding election integrity efforts in California. I am submitting a supplemental declaration to provide additional details.

5. On or about March 19, 2026, HSI received what appeared to be the California voter list from a DHS senior counselor. The list appeared to be credible, in part, because it was accompanied by a document showing the list was obtained from the California Secretary of State's Office.

6. Exhibit A is the document that appears to show the voter list came from the California Secretary of State's Office.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct to the best of my knowledge.

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4 Executed on October 26, 2026, at Los Angeles, California.

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8 Eric McLoughlin
9 Assistant Director
10 Homeland Security Investigations
11 Immigration and Customs Enforcement
12 Department of Homeland Security
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Exhibit A

RETRIEVED FROM DEMOCRACYDOCKET.COM

California Voter Registration File Request -

To:

Hello

The attached downloadable link contains the voter registration requested from the state of California.

The file has been encrypted using 7-Zip software and will require a password. You will find the decrypted data is in a standard tab-delimited text format. The first record contains the names of each field. To decrypt the file:

1. Download the .zip file with the attached link -

<https://>

2. Open the .zip file with 7-Zip or another zip utility that supports .zip files.
3. Unzip the files to chosen location by entering the password provided by our office. You can call our office for the password.

You are approved to use this data only for the purpose stated in your application - not for any type of commercial purpose. Authorization must be obtained from the California Secretary of State before this data can be used for any other purpose or before it can be transferred to another party. This data is required to be maintained in a secure and confidential manner.

Please contact our office at (888) if you have any questions or concerns.

Sincerely,

Elections Analyst

Elections Division

California Secretary of State

Phone: Direct: (916) Helpdesk: (916)

Email: @sos.ca.gov

Email: VoteCalhelp@sos.ca.gov



Shirley N. Weber, Ph.D.

California Secretary of State

www.sos.ca.gov



**PVRDR File
Layout.pdf**

