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

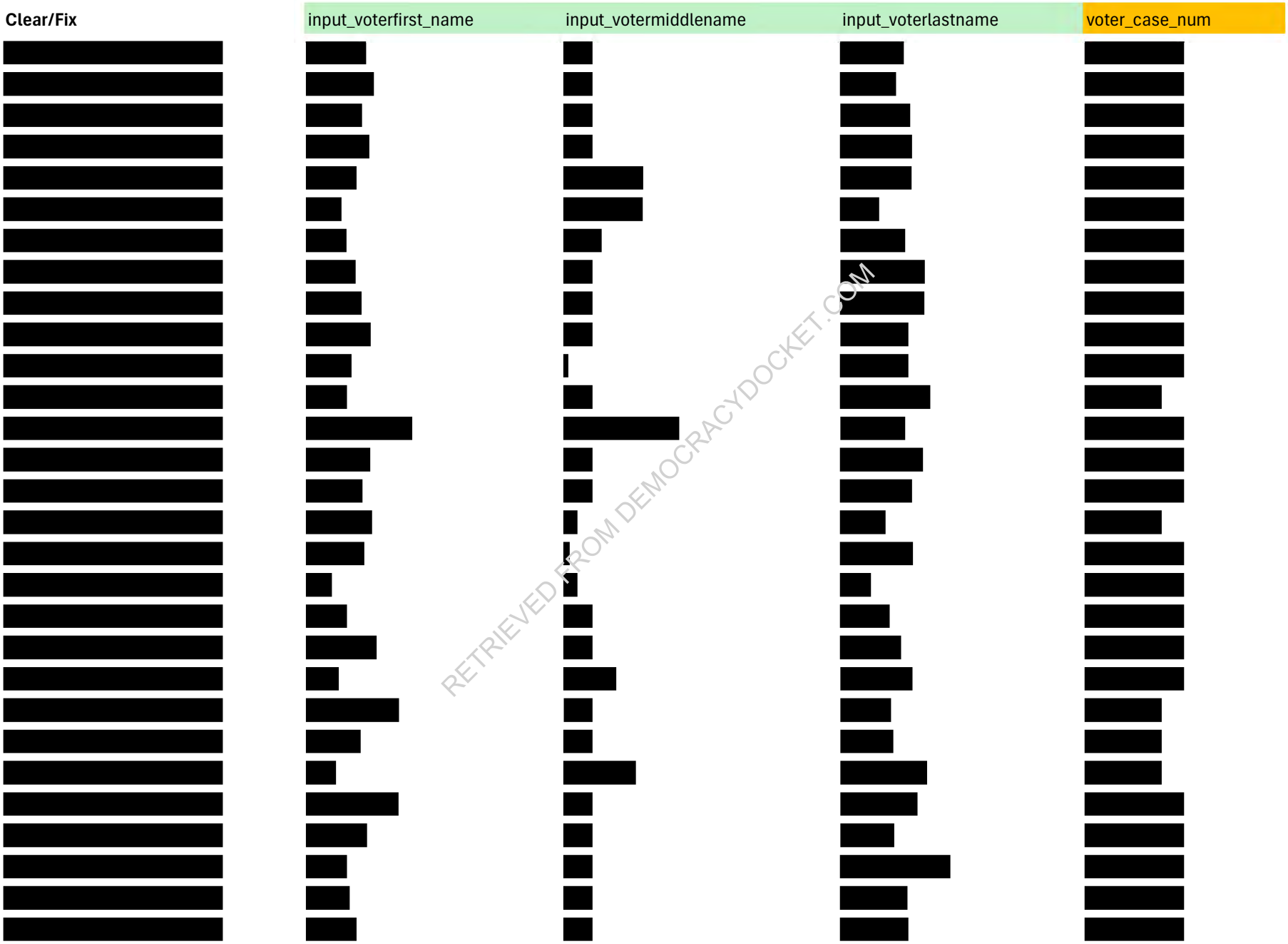
Lodged with the Court for *in camera* review due to sensitive private information

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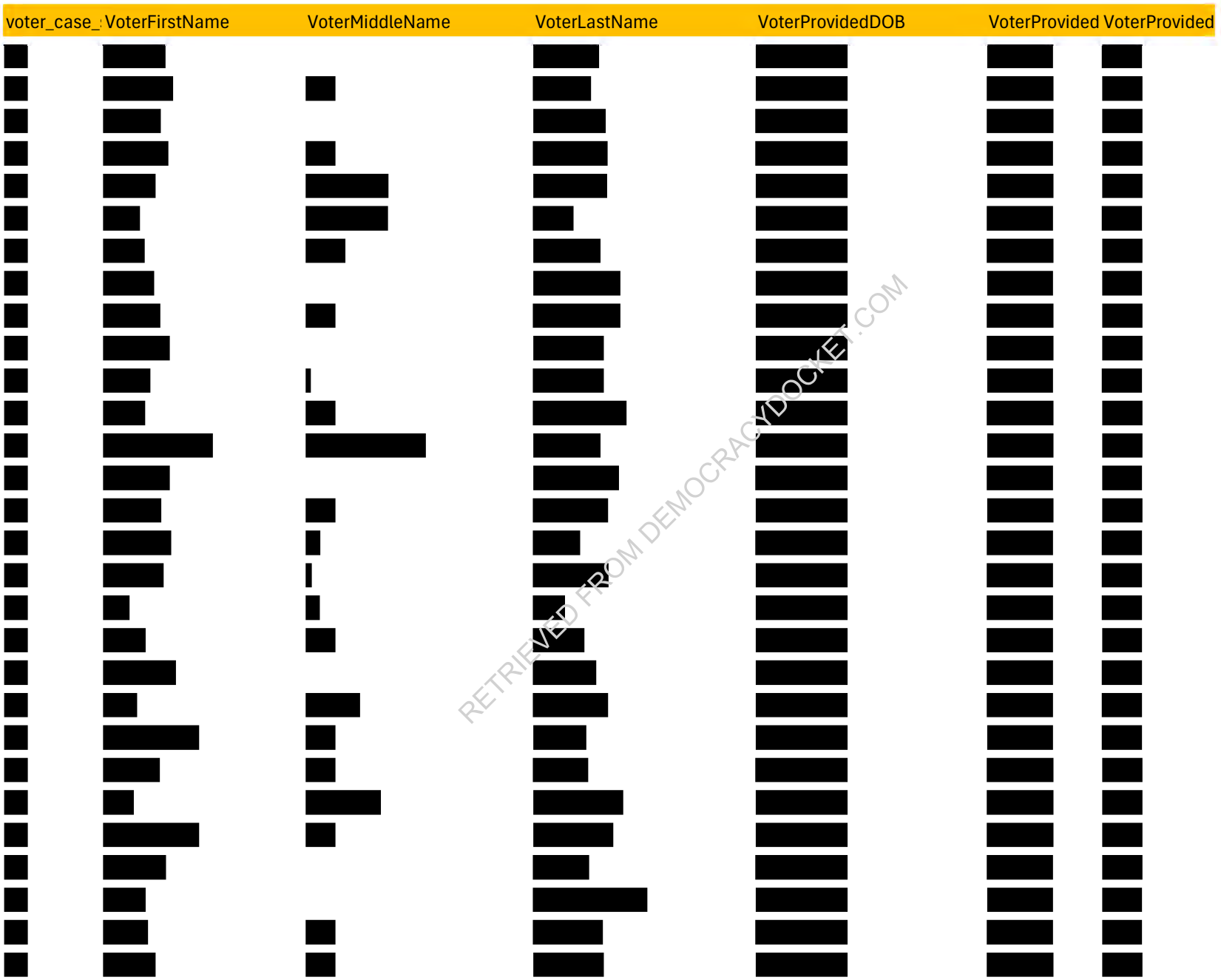
EXHIBIT C

Redacted first page of Exhibit B

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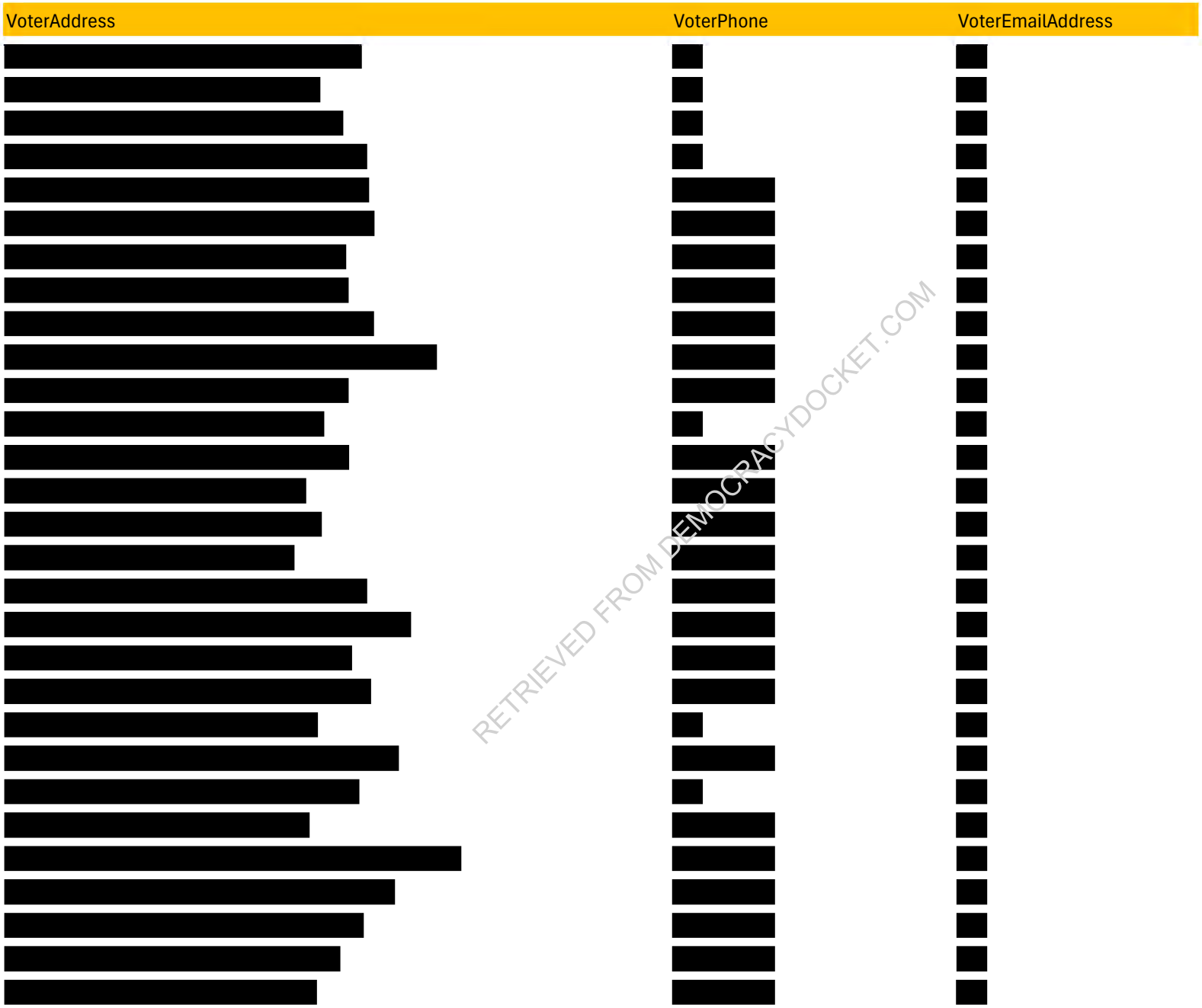


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voter_case_	VoterFirstName	VoterMiddleName	VoterLastName	VoterProvidedDOB	VoterProvided	VoterProvided

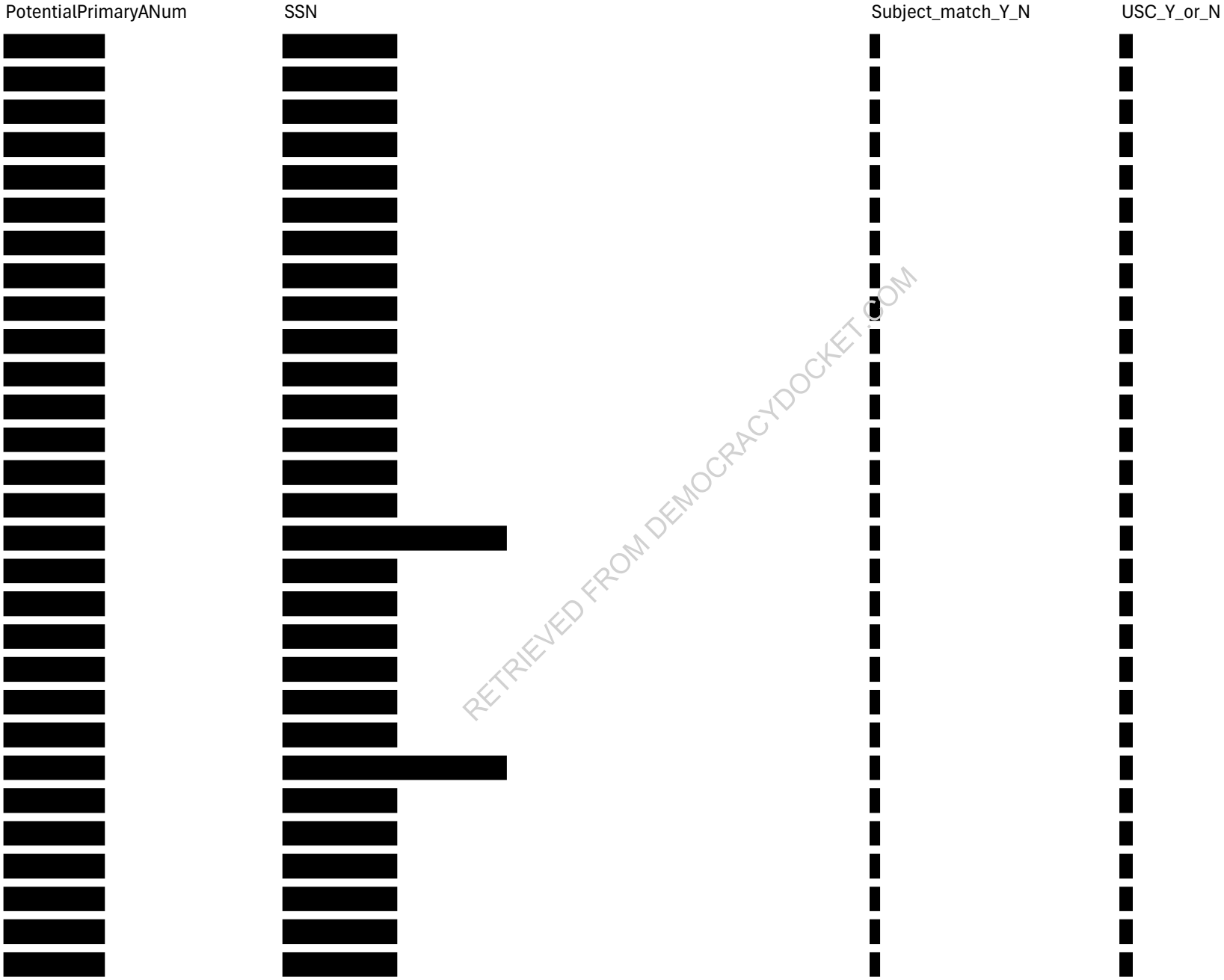
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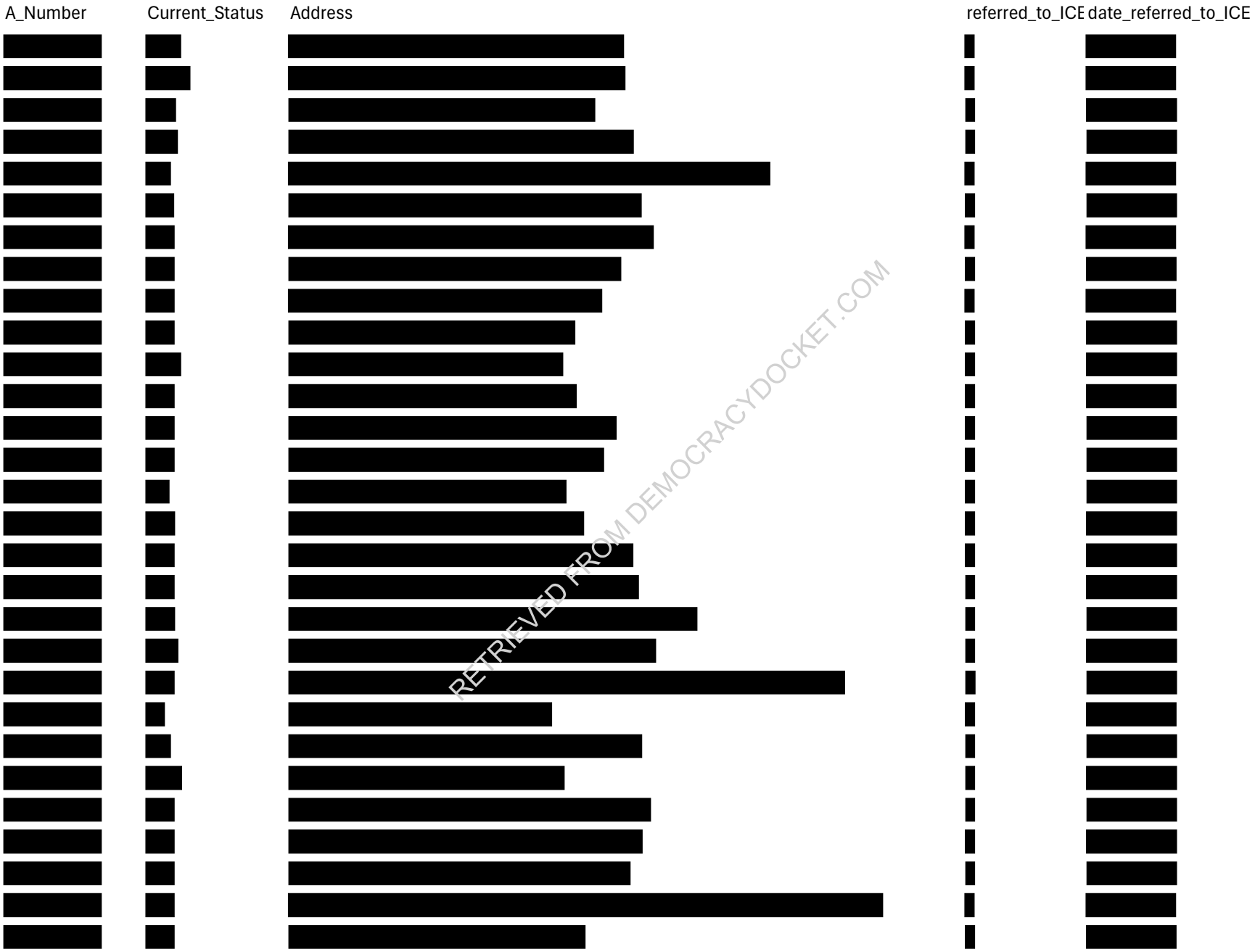
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VoterRegistrationDate	EarliestVotingDate	EarliestFederalElectionDate	LatestFederalElectionDate
[redacted]	[redacted]	[redacted]	[redacted]

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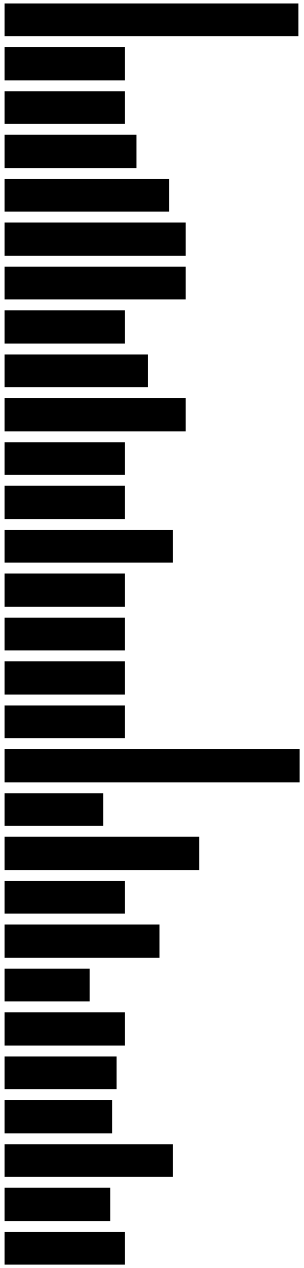


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