



Voting Rights Project

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Re: *Coalition for Humane Immigrant Rights, et al. v. U.S. Department of Homeland Security, et al.*, Case No. 1:26-cv-03072 (D.D.C.) — Meet and Confer Regarding Plaintiffs' Anticipated Motion for Preliminary Injunction

Dear Counsel:

We write on behalf of Plaintiffs Coalition for Humane Immigrant Rights (“CHIRLA”) and Pedro Trujillo (herein “Plaintiffs”) in the above-referenced action. Although we have perfected service on Defendants, the time for them to appear has not yet occurred. We write to you because you represent Defendants on similar issues in a related case before this Court.

The Complaint, filed September 2, 2026, concerns Defendants’ use of federal databases (including the Systematic Alien Verification for Entitlements (“SAVE”) system) to generate a list of registered California voters whom Defendants believe to have identified as alleged noncitizens and are seeking to coerce the state of California to remove those voters from its voter rolls.¹ We are aware that earlier this week the Justice Department demanded California officials, including in Los Angeles County, within 48 hours, remove or segregate voters supposedly identified as noncitizens. As we explain in the Complaint, your clients’ actions in compiling the list violates established law; your efforts to employ this list to systematically purge voters, less than a month before the election, further violates the National Voter Registration Act, among other laws.²

Plaintiffs intend to file tomorrow an application for temporary restraining order and preliminary injunction that prohibits Defendants from utilizing such voter list(s), pending final judgment.

¹ *Coal. for Humane Immigrant Rights v. U.S. Dep’t of Homeland Sec.*, No. 1:26-cv-03072, ECF No. 1 (D.D.C. Sept. 2, 2026) at ¶¶ 3, 5, 49, 51, 54, 71 (“Comp”).

² See 52 U.S.C. § 20507(c)(2)(A).

Alternatively, Plaintiffs will seek such orders prohibiting Defendants from demanding removal of voters utilizing such voter list(s) without first:

- (a) establishing a process by which any person registered to vote in California may inquire and be informed, immediately, whether he or she is included on a list transmitted to California election officials that is accompanied by a request to investigate and/or alter the listed persons' voter registration; and
- (b) establishing a process by which any included individual may submit information to local election officials and be excused from any further inquiry as result of the list.

We are available to meet and confer on this motion at your convenience. Because of the 48-hour demand you have attempted to assert on California officials, we must file our motion tomorrow. If we have not heard from you, we will indicate your clients are opposed to this requested relief.

We look forward to your response.

Sincerely,



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