

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ROBERT F. KENNEDY HUMAN RIGHTS;  
SOUTHERN BORDER COMMUNITIES  
COALITION; URBAN JUSTICE CENTER,

*Plaintiffs,*

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY; KRISTI NOEM, in her official  
capacity as Secretary of Homeland Security,

*Defendants.*

CASE NO. 1:25-cv-01270-ACR

**DECLARATION OF RONALD J.  
SARTINI**

**DECLARATION OF RONALD J. SARTINI**

I, Ronald J. Sartini, based upon my personal knowledge and information made known to me in the course of my official employment hereby declare, to the best of my knowledge, information, and belief, as follows relating to the above-captioned matter:

1. I am the Citizenship and Immigration Services (CIS) Ombudsman at the U.S. Department of Homeland Security (DHS). Established by section 452 of the Homeland Security Act of 2002, the Office of the CIS Ombudsman is an independent, impartial, and confidential office. It is part of DHS headquarters, not a part of U.S. Citizenship and Immigration Services (USCIS). Prior to becoming the CIS Ombudsman, I was the Acting Chief of Staff for the Office of the General Counsel (OGC). Before joining DHS OGC, I was employed at USCIS as the Acting Chief of Staff of the Identity and Information Management Division, Immigration Records and Identity Services Directorate. I have personal knowledge regarding the reductions in force at the

Office of the CIS Ombudsman (CISOMB), the DHS Office for Civil Rights and Civil Liberties (CRCL), and the DHS Office of the Immigration Detention Ombudsman (OIDO, and together, the Offices).

2. Each Office is continuing to staff up and perform statutory duties.
3. The following has occurred for CRCL:
  - Troup Hemenway has been appointed Acting CRCL Officer and designated full authority to hire and carry out the statutory duties.
  - As the Acting Deputy CRCL Officer, I am implementing plans to carry out the statutory functions of CRCL.
  - I have hired two (2) full time employees to work as CRCL investigators to add to the complement of 5 contract investigators as I continue to ensure compliance with CRCL's statutory compliance requirements.
  - CRCL maintains a number of active contracts, including assistance on reviewing EEO complaints and other complaints. These contracts have been scaled up along with significant additional funds applied to exercise surge contract line items. The DHS Office of Health Services has been engaged to assist with medical issues as needed.
  - Approximately fifteen (15) EEO contractors are actively intaking and logging cases, conducting counseling and investigations, and drafting Final Agency Decisions.
  - CRCL federal staff have resumed issuing decisions, including on a complaint concerning compliance with Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, brought by Plaintiff (CR-015046).

- Lawyers in the Office of the General Counsel continue to assist with review and triage of complaints and refer the most urgent ones to federal staff or contractors to be worked.
4. The following has occurred for OIDO:
- Joseph Guy has been appointed Acting OIDO Ombudsman and designated full authority to hire and carry out the statutory duties.
  - As the Acting Deputy OIDO Ombudsman, I am implementing plans to carry out the statutory functions of OIDO.
  - Two (2) detailees have onboarded at OIDO.
  - Three (3) full time hires have been selected for OIDO and are currently in the process of onboarding.
  - OIDO is operating, receiving complaints, and reviewing them. The proper procedure for submitting complaints is through OIDO's online portal, *see* <https://myoido.dhs.gov/en-US/>, which is operational and currently receiving complaints. This portal has been operational since March 2023 and is easy to find. Beginning in March 2025, multiple changes were made to OIDO's web pages. Among those was that OIDO identified on its website that the proper manner for filing a complaint was through OIDO's online portal. This change was made between March and May 2025 and well before the plaintiffs sent their July 25, 2025 email to the OIDO Outreach mailbox. Detainees have the ability to access tablets or computers, which they can use to access OIDO's online portal. The portal can also be accessed by individuals on behalf of detainees, such that an acquaintance,

family member, or attorney/accredited representative, can submit a case intake form.

- The OIDO Outreach mailbox that RFK copied is affiliated with the prior External Relations Division at OIDO, which no longer exists, and thus that mailbox is not an appropriate place to submit complaints. OIDO public materials do not reference this mailbox. Defendants have removed the auto-response message because it is not an accurate representation of the complaint submission process as clearly stated on OIDO's website, <https://myoido.dhs.gov/en-US/>.

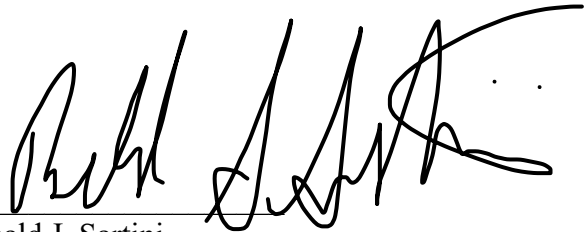
5. The following has occurred for CISOMB:

- I am the CIS Ombudsman with full authority to hire and carry out the statutory duties of the office and I am implementing plans to carry out those statutory functions.
- One individual is currently detailed to CISOMB.
- Rodolfo Gomes has been hired as the Deputy CIS Ombudsman.
- I have already held five discussions with USCIS leadership on trends, problem areas, outstanding RFIs, and how to handle Ombudsman case processing going forward.
- The Office has reviewed nearly 1,000 complaints since the March notice was issued and responded to trend-related inquiries from law firms and advocacy groups. Approximately 200 cases have been referred to USCIS. Given trends, I expect the overall number of complaints and general workload of CISOMB to decrease by half this year as compared to the unusually high volumes seen over the last four years.

- The CISOMB annual congressional report is nearly complete and will be transmitted to Congress by next week.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 15th day of August, 2025.

/s/ 

Ronald J. Sartini  
Office of Citizenship and Immigration  
Services (CIS) Ombudsman  
U.S. Department of Homeland Security