

**IN THE 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-1270-ACR

**DEFENDANTS' NOTICE**

Defendants file this notice in response to the Court's May 20 Minute Order directing the Parties to "notify the Court within 24 hours of any personnel changes within the CIS Ombudsman Office." As explained in the supplemental Declaration of Ronald Sartini (attached), the Deputy Ombudsman is currently beginning work at USCIS. Mr. Sartini was only made aware of this reassignment after he was alerted of the possibility yesterday and began investigating the issue immediately. Mr. Sartini is diligently working on finding a replacement Deputy.

Dated: May 21, 2025

Respectfully submitted,

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**Eric Hamilton**

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/s/Tiberius Davis

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**CERTIFICATE OF SERVICE**

I certify that on May 21, 2025, a true and correct copy of the foregoing document was electronically filed via the Court's CM/ECF system which sends notice of electronic filing to all counsel of record.

s/Tiberius Davis

**Tiberius Davis**

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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 § 452 of the Homeland Security Act of 2002, the CIS Ombudsman is an independent, impartial, and confidential office. It is part of DHS headquarters and 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. The Deputy Ombudsman served in his position for approximately four years. In that role he has performed various tasks, such as assisting individuals and employers in resolving problems experienced when seeking immigration benefits from USCIS, identifying trends and areas in which individuals and employers have problems dealing with USCIS, and recommending changes in USCIS' administrative practices to mitigate problems and enhance processes. He continued to assist me when I became the CIS Ombudsman just over two weeks ago.

3. I am aware of discussions for over a month that the Deputy Ombudsman might be interested in taking another senior job at USCIS. I was not aware, however, that such a reassignment was imminent.

4. A notice of reassignment to the Deputy Chief of the Office of Policy and Strategy at USCIS—a job responsible for setting USCIS-wide policy—was apparently issued on Sunday. I was not made aware that any reassignment had occurred. I had thought that he was still working with me and conveyed that to Mr. Davis when he called me during the court hearing on Tuesday, May 20. I had even sent the Deputy Ombudsman work emails as late as the evening of Tuesday, May 20, believing him to still be employed as the Deputy Ombudsman. I did not send him any emails on Monday, May 19, because I was out of pocket due to my court appearance and otherwise driving to and from my home, which is a significant distance from Washington, DC.

5. I immediately began investigating further by contacting the Deputy Ombudsman and the Office of the Chief Human Capital Officer (CHCO). Later in the afternoon of May 20, I learned for the first time he was reassigned on Sunday. Even then, it was not clear that the formal notice had been accepted, which is necessary for a formal reassignment. Unfortunately, CHCO's


personnel system was not working so we could not confirm this. Just in case, shortly after learning about the possible reassignment, I began drafting a job announcement for CHCO to post, and I sent a reclassified position description to expedite the process. Because the Deputy CIS Ombudsman is a Senior Executive Service (SES) position that must now be reclassified as GS-15, there was no one to immediately transfer in. My hope is to detail someone in to assist while the job announcement is posted, but there are not many GS-15s available.

6. The evening of May 20, I was able to get into contact with the Deputy Ombudsman. Apparently on Monday he was still unsure of his official status, but he had reported to USCIS' office. On Wednesday, May 21, he told me he only received informal messages telling him to start at USCIS. He has not formally accepted the transfer. Absent a formal acceptance of the notice, the current Deputy Ombudsman is technically still the Deputy Ombudsman and is being detailed to USCIS. I expect that a formal notice will be accepted at some point, however. Consequently, I continue to push for a replacement as soon as possible.

7. I continue to work diligently on the congressional report for CISOMB, on reviewing complaints, and on my plans for refocusing the Offices on their statutory functions.

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 21st day of May, 2025.



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