

**IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS,
THIRD JUDICIAL DISTRICT**

In the Matter of the Petition to Summon a Grand Jury Filed by
_____ Case No. _____

PETITION TO SUMMON A GRAND JURY

The undersigned qualified electors of the county of Shawnee and state of Kansas hereby request that the district court of Shawnee county, Kansas, within 60 days after the filing of this petition, cause a grand jury to be summoned in the county to investigate alleged violations of law and to perform such other duties as may be authorized by law.

Person filing this petition (K.S.A. 22-3001(c)(2))

Name: _____

Address: _____

Phone: _____

1. Subject matter of the prospective grand jury

The subject matter of the prospective grand jury is the conduct of the persons who, from January 2025 to the present, carried out duties at the Social Security Administration for the Department of Government Efficiency (the "SSA DOGE Team"), and any of their subordinates and other affiliated persons, in copying, sharing, transmitting, and disclosing records held in Social Security Administration computer systems through a third-party server not approved to hold that data and outside the agency's security protocols, or into a cloud environment lacking independent security controls, including whether those records contained personal identifying information of residents of Shawnee County, Kansas, and in any disclosure or attempted disclosure of such records to a political advocacy group.

2. Areas to be inquired into

2.1. The transmission of Social Security Administration data through the third-party service Cloudflare between March 7, 2025 and March 17, 2025, and whether records of Shawnee County residents were among the data transmitted.

2.2. The identity of each person who transmitted, requested, approved, or supervised that transmission, and of each person who has had access to that data.

2.3. The present location of that data and whether it still exists on any third-party system.

2.4. The "Voter Data Agreement" signed in March 2025 by a member of the SSA DOGE Team with a political advocacy group that had asked for help analyzing state voter rolls, including the identity of that group and whether any Social Security Administration data was matched against, or disclosed for matching against, any state voter roll.

2.5. The cloud environment that the whistleblower disclosure set out in paragraph 4.6 describes as the "DOGE specific, self-administered cloud environment lacking independent security controls and hosting a copy of NUMIDENT," and the identity of each person who requested, created, administered, or has had access to that environment.

2.6. Whether the records of Shawnee County residents held in that copy have been accessed, copied, shared, or used, and by whom.

3. Offenses under Kansas law

The grand jury is asked to inquire into whether the persons described in paragraph 1 committed the following offenses under the laws of Kansas.

Count 1. Unlawful acts concerning computers, K.S.A. 21-5839(a)(3): knowingly exceeding the limits of authorization and copying, disclosing, or taking possession of a computer, computer system, computer network, or any other property, namely the data held in Social Security Administration computer systems.

Count 2, in the alternative. Unlawful acts concerning computers, K.S.A. 21-5839(a)(1): knowingly and without authorization accessing and copying, disclosing, or taking possession of a computer, computer system, computer network, or any other property, namely the data held in Social Security Administration computer systems.

4. General allegations

Each allegation in paragraphs 4.1 through 4.7 cites its source. The principal source is the Notice of Corrections to the Record filed by the United States Department of Justice on January 16, 2026, in *American Federation of State, County and Municipal Employees, AFL-CIO v. Social Security Administration*, No. 1:25-cv-00596-ELH (D. Md.), ECF No. 197 (the "Notice of Corrections").

4.1. Between March 7, 2025 and March 17, 2025, members of the SSA DOGE Team shared Social Security Administration data through Cloudflare, a third-party server that was not approved for storing Social Security Administration data. Notice of Corrections § VI, at 6.

4.2. That sharing was outside the Social Security Administration's security protocols. Notice of Corrections § VI, at 6.

4.3. The Social Security Administration "has not been able to determine exactly what data were shared to Cloudflare or whether the data still exist on the server." Notice of Corrections § VI, at 6.

4.4. The same filing states that in March 2025 "a political advocacy group contacted two members of SSA's DOGE Team with a request to analyze state voter rolls that the advocacy group had acquired," that "[t]he advocacy group's stated aim was to find evidence of voter fraud and to overturn election results in certain States," and that "one of the DOGE team members signed a 'Voter Data Agreement,' in his capacity as an SSA employee, with the advocacy group," sending the executed agreement to the group on March 24, 2025. It further states: "Email communications reviewed by SSA suggest that DOGE Team members could have been asked to assist the advocacy group by accessing SSA data to match to the voter rolls, but SSA has not yet seen evidence that SSA data were shared with the advocacy group." That review was the agency's own. A grand jury can compel the communications and records the agency reviewed. Notice of Corrections § V and n.1.

4.5. On April 10, 2026, in the en banc appeal in that case, the opinion of Judge Heytens of the United States Court of Appeals for the Fourth Circuit, joined on this point by Chief Judge Diaz and Judge Harris, described that filing this way: "In that notice, the government admits: (1) that it provided inaccurate information to the district court and may not have fully complied with its temporary restraining order; (2) that DOGE used an unauthorized third-party server to share SSA data; and (3) that DOGE team members may have agreed to share SSA data with a political advocacy group that aims to 'find evidence of voter fraud and to overturn election results in certain States.'" No. 25-1411, slip op. at 15-16 n.8 (opinion of Heytens, J.). The federal district court quoted that description in its memorandum opinion of June 26, 2026. On April 14, 2026, the district court granted the plaintiffs' motion for discovery into the matters the Notice of Corrections disclosed (ECF No. 212). On June 26, 2026, it denied the government's motion to rescind that order and wrote that in the Notice of Corrections "defendants disclosed that several

sworn declarations previously submitted to the Court were inaccurate." Mem. Op., June 26, 2026.

4.6. On August 26, 2025, Charles Borges, then the Chief Data Officer of the Social Security Administration, submitted a whistleblower disclosure to the United States Office of Special Counsel and to four committees of Congress. The disclosure states that on June 10, 2025 a request was made to create "a cloud environment to which SSA's Numerical Identification System or 'NUMIDENT' data could be transferred," and it describes the "DOGE specific, self-administered cloud environment lacking independent security controls and hosting a copy of NUMIDENT." The Numident contains one record for each Social Security number ever assigned, so a copy of it contains the records of every resident of Shawnee County who has been issued a Social Security number. Disclosure of Charles Borges, Aug. 26, 2025; Social Security Administration Office of the Inspector General, Audit Report A-06-16-50069.

4.7. On March 10, 2026, the plaintiffs in the federal case described in paragraph 4 filed a Notice of Factual Development informing the court of reported allegations that a former DOGE-affiliated individual may have removed sensitive Social Security data, including records affecting hundreds of millions of people, intending to use it in later work at a private-sector employer. The notice identifies the data as two agency databases, "NUMIDENT and SSA's 'Death Master File.'" ECF No. 208.

4.8. On information and belief, based on the facts set out above, the records of Shawnee County residents were among the Social Security Administration data shared through a third-party server the agency had not approved, or copied into a cloud environment lacking independent security controls. The agency holds a record for every resident who has been issued a Social Security number, and it has told a federal court that it "has not been able to determine exactly what data were shared to Cloudflare." Whether residents' records were copied, shared, matched or retained, and by whom, is what this petition asks a grand jury of Shawnee County to determine.

5. Jurisdiction and venue

5.1. Under K.S.A. 21-5106(a)(1), a person is subject to prosecution and punishment under the laws of Kansas for a crime committed wholly or partly within this state.

5.2. Under K.S.A. 21-5106(b)(3), a crime is partly committed within this state if the proximate result of an act that is a material element of the offense occurs within this state. Under

K.S.A. 21-5106(h), "proximate result" means any logical effect or consequence of such act regardless of whether the statute governing the charged offense considers the specific effect or consequence of such act.

5.3. On information and belief, the copying or disclosure of the Social Security records of residents of Shawnee County, Kansas, as alleged in paragraph 4.8, is a logical effect and consequence, occurring in Shawnee County, of the acts alleged in paragraph 4. See *State v. Rozell*, No. 121,094 (Kan. Apr. 22, 2022) (reinstating the prosecution of a defendant who, while in Missouri, submitted an allegedly false claim on a Kansas resident's insurance policy, and holding that the State presented sufficient evidence to establish probable cause that his actions "caused a consequence or effect in Kansas close enough in time or cause to the alleged criminal acts ... to qualify as a proximate result that allows Kansas to exercise jurisdiction"); *Strassheim v. Daily*, 221 U.S. 280, 285 (1911).

5.4. Under K.S.A. 22-2619, a prosecution for a crime committed with an electronic device, which the statute defines to include unlawful acts concerning computers under K.S.A. 21-5839, may be brought in the county in which the victim resides. On information and belief, the victims of the acts alleged in paragraph 4 include residents of Shawnee County whose records were copied or disclosed.

6. Further inquiry

The grand jury may further inquire into other alleged violations of law, by these or other individuals, which arise as part of the same investigation.

What this petition does not do

This petition names no person as a defendant. It alleges conduct that the United States government has itself described in a filing made to a federal court, together with facts stated in a whistleblower disclosure, and it asks a grand jury of Shawnee County to inquire whether Kansas law was broken. It cites no federal criminal statute. This is a request that a grand jury investigate.

7. Request

The person filing this petition requests that the court, upon the county election officer's certification that this petition bears the signatures of qualified electors of Shawnee County equal in number to 100 plus 2 percent of the total votes cast for governor in the county at the last preceding election, find this petition in proper form and order a grand jury summoned within 60 days after the filing of this petition, as provided by K.S.A. 22-3001(c).

Signature of person filing: _____ Date: _____

The signature pages that follow are part of this petition. Print as many copies of the signature page as needed.

The undersigned qualified electors of the county of Shawnee and state of Kansas hereby request that the district court of Shawnee county, Kansas, within 60 days after the filing of this petition, cause a grand jury to be summoned in the county to investigate alleged violations of law and to perform such other duties as may be authorized by law.

Petition to Summon a Grand Jury, Shawnee County, Kansas. Signature page _____ of _____. Do not separate this page from the petition.

Person filing this petition (K.S.A. 22-3001(c)(2)): Name _____

Address _____ Phone _____

Notice to signers: This page is filed with the District Court of Shawnee County and becomes a public record. Sign only if you are a registered voter of Shawnee County. Print your name as it appears on your voter registration, and print legibly. Write your residence address with the street and number, or rural route number. Once this page has been sworn before a notary, no further signature may be added to this page.

No.	Printed name	Signature	Residence address (street and number, or rural route)	City	Date
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Verification (K.S.A. 22-3001(c)(3)(B)(i))

I, _____, one of the signers of this paper, verify upon oath that each signature appearing on this paper is the genuine signature of the person whose name it purports to be, and that I believe the statements in the petition are true.

Signature: _____ Date: _____

State of Kansas, County of _____, ss.

Subscribed and sworn to before me this _____ day of _____, 20____.

_____ Notary Public My commission expires: _____