

**UNITED STATES DISTRICT COURT
OF THE DISTRICT OF COLUMBIA**

CENTER FOR TAXPAYER RIGHTS et al.,

Plaintiffs,

V.

INTERNAL REVENUE SERVICE et al.,

Defendants.

No. 25-cv-457-CKK

Hon. Colleen Kollar-Kotelly

THE HONORABLE MEMBERS OF THE CONGRESSIONAL HISPANIC CAUCUS
LEADERSHIP UNOPPOSED MOTION FOR LEAVE TO FILE A BRIEF AS
AMICI CURIAE IN SUPPORT OF PLAINTIFFS

Pursuant to Local Rule 7(o), the Honorable Members of the Congressional Hispanic Caucus Leadership Representative Adriano Espaillat of New York, Representative Joaquin Castro of Texas, Representative Gil Cisneros of California, Representative Sylvia Garcia of Texas, Representative Rob Menendez of New Jersey, Representative Andrea Salinas of Oregon, and Representative Norma Torres of California (“Members”) respectfully move the Court for leave to file the brief as amici curiae in support of plaintiffs attached hereto as an exhibit. In support of this motion, the Members of Congress respectfully state:

1. The Members are well-acquainted with 26 U.S.C. § 6103 enacted by Congress to protect federal revenue and the privacy of taxpayers. The Members seek to ensure that the statute’s carefully designed framework and Congress’s intent is protected.

2. The Members submit this brief to defend the legislative powers reserved by the Constitution for Congress under threat by the Administration’s actions, through the Internal Revenue Service (“IRS”), to share return information with the Department of Homeland Security

and U.S. Immigration and Customs Enforcement for immigration enforcement purposes contrary to section 6103 and without explaining the basis for departing from past practice and policy protecting taxpayer return and return information in this context.

3. The Members' constituents, and taxpayers in general, will be harmed by the data sharing at issue in this case, which compromises taxpayer privacy and upsets reliance interests of taxpayers who filed returns based on assurances that their information would be kept confidential. Through various efforts, Congress and the IRS cultivated voluntary compliance particularly among immigrant communities who are now at risk of being misidentified by ICE and subject to deportation or worse. Undermining taxpayer reliance on the confidentiality of taxpayer return and return information will also negatively affect tax collection and public trust in the IRS.

5. The Members' brief as amici curiae is informed by their perspectives as members of Congress and as representatives of the people of their districts and speaks to the interest of both. The Members believe that these perspectives, different from those of the parties, will aid the Court in resolving the issues presented in this case.

6. The undersigned counsel reached out to counsel for plaintiffs and defendants, and counsel for both parties represented that they consent to this motion for leave to file a brief as amici curiae.

September 5, 2025

Respectfully submitted,

/s/ Andrew Weiner
Andrew Weiner (DC Bar No. 498633)
Kostelanetz LLP
601 New Jersey Avenue NW
Suite 260
Washington, DC 20001
Phone: 215-901-0873
Fax: 212-808-8108
Email: aweiner@kostelanetz.com

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[PROPOSED] ORDER

On consideration of the Honorable Members of the Congressional Hispanic Caucus Leadership Unopposed Motion for Leave to File a Brief as Amici Curiae in Support of Plaintiffs, it is hereby:

ORDERED that the motion is GRANTED. The Clerk of Court is directed to enter the Members' brief as amici curiae onto the electronic case docket in the above-captioned matter.

SO ORDERED this _____ day of _____, 2025.

BY THE COURT:

The Honorable Colleen Kollar-Kotelly
United States District Court Senior Judge

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2025, a copy of the foregoing motion for leave to file a brief as amici curiae was filed and served electronically.

/s/ Andrew Weiner
Andrew Weiner