

EXHIBIT A

DECLARATION OF MARIA MATOS

Pursuant to 28 U.S.C. § 1746, I, Maria Matos, declare the following:

1. My name is Maria Matos. I am an eligible, registered voter in Delaware. I am the President and CEO of the Latin American Community Center (hereinafter “LACC”). I submit this declaration in support of LACC’s motion to intervene in this matter.
2. I am over 18 years old and am otherwise competent to testify. I have personal knowledge of the matters in this declaration, and I would testify thereto if I were called as a witness in Court.
3. In 1994, I joined LACC as the Executive Director, and in 2013, I became President and CEO. In my capacity as President and CEO of LACC, my responsibilities include directing the administration of the center and fulfilling all administrative duties as prescribed by the Board of Directors; cooperating with all organizations with which the center has an affiliation, and with all related State and local agencies; serving as an ex-officio member of the Board and of each Board Committee; supervising the members of the staff in accordance with personnel policies established by the Board; and reporting to the Board of Directors on the programs, services and operations of the center.
4. LACC is a non-partisan, nonprofit organization whose mission is to empower the Latino Community in Delaware through education, advocacy, partnerships and exceptional services. LACC advances this mission through family support services, adult and youth education, advocacy, and other programming. LACC annually serves approximately 7,000 clients primarily in New Castle County, including many naturalized citizens.
5. As a core part of its services, LACC promotes non-partisan civic participation among the Latino community. LACC has trained its staff as registrars who can offer voter

registration services to eligible constituents, and LACC has also facilitated voter registration events and provided transportation assistance to registered voters, among other efforts.

6. LACC also offers a wide range of services to its constituents, including family support services for victims/survivors of domestic violence, a group within our community for which confidentiality and privacy protections are particularly important.
7. People throughout Delaware have been sensitive to disclosures of their personal information, including in the Latino community. If the federal government were to have access to the unredacted Delaware voter file, this would heighten anxieties about such disclosure and federal overreach. Delaware voters, particularly Latino voters, including naturalized citizens, would be very concerned if the federal government, or any actors the federal government chooses to share information with, had information about where they live, their partial social security numbers, or their driver's license numbers.
8. This sensitivity is heightened with immigrant voter communities. Many of these eligible voters—including Latino immigrants who have become naturalized citizens or native-born United States citizens with family and friends who are immigrants—would be very concerned if their personal information was shared with the federal government, especially if it was shared with agencies like the Department of Homeland Security or Immigration and Customs Enforcement. We have seen that these government bodies have recently wrongfully targeted citizens in their immigration enforcement operations, meaning immigrant citizens are at risk of wrongful targeting for immigration enforcement when the federal government has their data.

9. In light of these and other privacy concerns, if the unredacted statewide voter file were to be shared with the federal government, these voters may also be deterred from registering to vote or updating their current voter registration record. They may also be deterred from voting, suppressing their most fundamental right as citizens.
10. These communities are also particularly concerned about the risk that the federal government would use unredacted voter data to attempt to remove Delaware immigrant citizens from the voter rolls or might share this data with outside organizations with the same goal. These eligible voters could have their data cross-checked against inaccurate or out-of-date information about their voter eligibility (including their citizenship status), or their address or other personal information, which could lead to them being mistakenly removed from the voter rolls.
11. Within these communities, the constituents we serve who are also victims/survivors of domestic violence would be particularly concerned about how disclosure of their unredacted personal data could impact their safety and well-being. They could also be deterred from taking part in LACC's voter registration services due to fear that their confidential information in the voter roll could be disclosed.
12. The aforementioned risks and concerns would greatly impact LACC's mission and work, including LACC's core work promoting civic engagement in its community. Eligible voters will be less likely to take advantage of LACC's core services related to voting and civic engagement if they think their sensitive personal data would be shared with the federal government.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 3, 2026

Maria Matos

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