

# EXHIBIT C

**DECLARATION OF SUE RYAN**

Pursuant to 28 U.S.C. § 1746, I, Sue Ryan, declare the following:

1. My name is Sue Ryan. I am the Executive Director of the Delaware Coalition Against Domestic Violence (hereinafter “DCADV”). I submit this declaration in support of DCADV’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 2015, I joined DCADV as the Executive Director. In my capacity as Executive Director, my responsibilities include oversight and management of the organization, as well as supervision of staff. I oversee DCADV’s annual budget, as well as DCADV’s operations and programs. As the Executive Director, I am staff to the Board of Directors and work with the Board on programmatic and fiscal oversight of the agency.
4. DCADV is a statewide, nonprofit, non-partisan membership organization and coalition of organizations, groups and individuals that strive to promote conditions that prevent and eliminate domestic violence by educating its members and community partners; providing informational resources to the community; advocating as a strong, unified voice for victims/survivors of domestic violence and children who are affected; and providing domestic violence programs and victim services.
5. DCADV’s current Member Organizations include four board-approved member agencies that are private nonprofit organizations providing direct services to victims of domestic violence, including 24-hour hotlines, shelter, supportive services, advocacy, legal assistance, and connection to resources. Supporting Members include allied organizations

and caring individuals, businesses, and groups who support DCADV's mission to end domestic violence in Delaware. In addition to three current organizations that are Supporting Members, DCADV also currently has approximately 48 individual dues-paying members in Delaware, which includes registered voters in Delaware, and in total, approximately 145 current members, donors, and supporters.

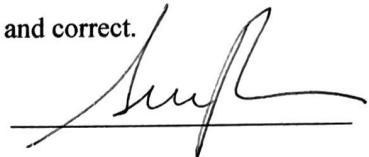
6. Delaware's Address Confidentiality Program ("ACP") allows eligible individuals to receive a substitute address in place of their actual address to ensure their safety. 11 *Del. C.* § 9612. Persons eligible for the substitute address include "[a] victim of domestic violence, sexual assault, human trafficking, kidnapping, or stalking who has filed for a protection from abuse order," and persons who were "named as a victim in any criminal or delinquency proceeding brought for the purpose of determining liability for the commission of any crime or offense as those terms are defined in [11 *Del. C.* § 233], and who further states that the victim fears future violent acts by the perpetrator of the abuse." 11 *Del. C.* § 9613(1). Additionally, "[a] person who has obtained or is seeking relief from a domestic violence program or service, as certified by the director of that program or the director's designee" is eligible for the program. 11 *Del. C.* § 9613(4).
7. In the voting context, a participant in the ACP or a person who petitions the Superior Court with a similar legitimate need and lawful purpose can receive an order to have that person's address kept confidential, though it is required to be included on a voter registration application. 15 *Del. C.* § 1303(a). The person's address is then "removed from all voter records available for public inspection, as long as the submission is not 21 days prior to an election, in which case the person's address shall be removed from the voter records within 7 days after the election." *Id.*

8. Recognizing the profound importance of such confidentiality protections for the safety and well-being of victims/survivors of domestic violence, DCADV has provided information about the ACP and other confidential voter registration options, including through DCADV's website. As another example of a confidentiality protection, two of DCADV's Member Organizations operate confidential shelters throughout the state that serve survivors of domestic violence. Confidentiality is a foundational requirement when providing domestic violence services because it enhances safety and helps to protect victims of domestic violence from further abuse.
9. DCADV and its Member Organizations also recognize the importance of encouraging Delawareans, including victims/survivors of domestic violence, to take part in civic engagement opportunities to have their voices heard. As an example of this type of work, DCADV put together a non-partisan voter guide for survivors of domestic violence in 2024, explaining how survivors could use the ACP to protect their address information.
10. Disclosure of the entire, unredacted Delaware voter file would greatly undermine DCADV's commitment to survivor privacy. If domestic violence victims/survivors in the ACP or thinking of applying for the ACP fear that their personal information such as their residential address, partial Social Security number, or driver's license number could be exposed or misused, they may be deterred from voting, registering to vote, or updating their voter registration information. If their confidential personal information were to be disclosed, we are also concerned that this could be used in an unfounded effort to question voter eligibility, including with survivors in marginalized communities, and those who have had to change or keep their addresses confidential for safety reasons; they may be more likely to face the most severe scrutiny and consequences.

11. If Delaware discloses the unredacted voter file, this will undermine DCADV's and its Member Organizations' work to bolster the safety of survivors of domestic violence, since such a breach of privacy would lead to an immediate loss of confidence in the system. We are also concerned that such disclosure may open the door to future demands for even more intrusive data. Disclosure would be disastrous for domestic violence survivor safety, privacy, and confidence.

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

Dated: February 2, 2026



Sue Ryan