

# EXHIBIT D

## DECLARATION OF JOSE MATTHEWS

Pursuant to 28 U.S.C. § 1746, I, Jose Matthews, declare the following:

1. 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.
2. I currently reside in Wilmington, Delaware, and I am an eligible, registered voter in Delaware.
3. I am currently a family caretaker and serve on the school board Red Clay School District.
4. In my role as a school board member and from my interactions with voters, I understand that voters would be less likely to participate in elections if they thought their data could be shared with the federal government.
5. When I learned that the federal government had made an unprecedented request for Delaware's complete statewide voter registration file, including sensitive personal information, I became deeply concerned about how this data, including my personal data, might be used. I believe many other registered voters in Delaware would also be concerned about how their data might be used if disclosed to the federal government, and other eligible voters might be reluctant to register to vote if they are concerned about their privacy. Delaware voters' sensitive personal information should not be disclosed without a lawful basis and purpose.
6. I care deeply about the privacy of my personal data, as well as the integrity of the electoral system as a whole. I believe that we should make the electoral process more welcoming to every eligible voter and make sure that voters are not intimidated from exercising their rights.

7. My personal experiences have also shown me the profound importance of privacy and confidentiality protections, particularly for those who have heightened concerns about their safety. My mom is a survivor of domestic violence, and our family has seen firsthand the harm that can occur when our personal information is not kept private. While there are legal protections for survivors of domestic violence in Delaware, including ways to keep their personal information from being disclosed in the public voter rolls, I am very worried that this request by the federal government for the full, unredacted voter file could put these survivors and their information at risk.

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

Dated: February 2, 2026



Jose Matthews