

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

<p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>v.</p> <p>GREGG M. AMORE, in his official capacity as Secretary of State for the State of Rhode Island,</p> <p>Defendant.</p>	<p>Case No. 1:25-cv-00639 (Hon. Mary McElroy)</p>
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DECLARATION OF JOHN MARION

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I, John Marion, hereby declare as follows:

- 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 live in Rhode Island, and I am an eligible registered voter. Voting is the most fundamental form of democratic participation, and I am proud to be a Rhode Island voter. I am the Rhode Island State Director of Common Cause. I am also a member of Common Cause. I serve as the primary spokesperson and lobbyist for Common Cause in Rhode Island, working to protect voting rights, promote ethical government, and to hold power accountable. In my role as State Director I also lead the Rhode Island Voting Access Coalition—a group of more than twenty organizations that serves as the state’s only permanent voting rights coalition. I work with the coalition to advance pro-voter reforms and increase civic engagement including through events such as National Voter Registration Day.
- 3) Common Cause is a nonprofit, nonpartisan membership organization incorporated under the laws of the District of Columbia and registered to do business in Rhode Island. Pursuant to its bylaws, Common Cause is organized and operated as a membership organization and brings this action in a representative capacity on behalf of its members.
- 4) Pursuant to its bylaws, Common Cause has defined who qualifies as a member. Under its definition, a “member” of Common Cause is any individual who, within the past two years, (a) made a financial contribution to the organization; or (b) has taken meaningful action in support of Common Cause’s advocacy work. Such meaningful action includes, but is not limited to, signing petitions directed to government officials; participating in letter-writing or phone-banking campaigns; attending town halls, workshops, or rallies organized by Common Cause; or otherwise engaging in activities designed to advance the organization’s mission. There are 4503 Common Cause Rhode Island members.
- 5) Common Cause’s mission is to uphold the core values of American democracy by creating an open, honest, and accountable government that serves the public interest, promotes equal rights, opportunity, and representation for all, and empowers people to make their voices heard in the political process.
- 6) In Rhode Island, Common Cause ensures that Rhode Islander’s voices are heard in the political process. Common Cause’s Rhode Island members live throughout the state and include registered voters whose personal information is maintained in the statewide voter registration database held by the Rhode Island Secretary of State. If the Secretary discloses the unredacted voter registration file to DOJ, these members’ sensitive personal information—including driver’s license numbers, and portions of social security

numbers—would be unlawfully released, causing an invasion of privacy, chilling participation in the electoral process, and undermining confidence in the integrity of Rhode Island elections.

- 7) Common Cause believes the right to vote is the cornerstone of a functioning democracy. We are committed to ensuring that every eligible Rhode Islander can register and cast their ballot. Through our advocacy, in the last two decades Rhode Island has adopted a number of pro-voter reforms, including pre-registration for 16- and 17-year-olds, online voter registration and automatic voter registration. Our advocacy has also resulted in a number of reforms, including post-election audits, that seek to ensure the security and accuracy of our elections. These efforts are not just about increasing participation—they are about ensuring that every voice is heard, and every vote is protected.
- 8) Common Cause has a history of fighting to protect voter privacy in Rhode Island. In 2017 Common Cause supported then-Secretary of State Nellie Gorbea's decision to begin withholding the month and day of birth when releasing electronic copies of the full voter file.
- 9) As a nonpartisan democracy reform organization, Common Cause, our volunteers, and coalition allies, regularly assist eligible Rhode Islanders in registering to vote through community education and outreach. The voters we help are now part of the state's official voter file, and we consider it our duty to safeguard the trust they place in us and in the democratic process.
- 10) At public engagement events, we invite Rhode Islanders not only to register but also to verify and update their voter information. As a result, many voters we assist become part of the official statewide voter file. We have a vested interest in protecting the integrity and privacy of that data. Any threat to the security of the voter file, especially one that could result in the misuse of personal information, directly undermines our work, damages public trust, and risks chilling voter participation. We also run targeted communications campaigns, including through social media, to keep Rhode Islanders informed about key election deadlines and updates. These efforts amplify official messages from the Office of the Secretary of State and other election officials, helping ensure voters have accurate, timely information to participate confidently in our democracy.
- 11) Disclosure of the entire, unredacted Rhode Island voter file would undermine Common Cause's work and risk harm to our members. We rely on public confidence in the security and integrity of voter data to encourage participation. If voters fear their personal information, like a partial Social Security number or driver's license number, could be misused or exposed, they may avoid registering to vote, decline to update their current voter registration record, or withdraw from civic engagement activities altogether. Such results undermine Common Cause's mission to expand access and participation, especially among historically marginalized communities. Knowing that their personal data could be weaponized to question their eligibility to vote would chill engagement

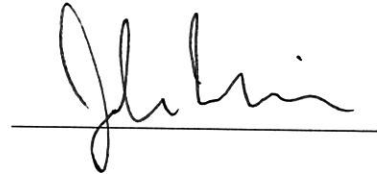
with the democratic process. This is especially true for voters in marginalized communities who already face systemic barriers and distrust government surveillance. Common Cause expends significant resources conducting on-the-ground voter engagement and assistance efforts seeking to register voters and engage voters in the democratic process.

- 12) Disclosure of the full Rhode Island voter file would facilitate unsubstantiated voter challenges, a concern especially for vulnerable communities. Improper and flawed mass challenge programs disproportionately target voters without stable housing or traditional addresses. Common Cause actively works to register and protect these very same disenfranchised Rhode Islanders. Mass challenges, often filed in bulk by activists, can overwhelm local election officials, divert resources from voter outreach and education, delay or obstruct legitimate registrations and ballot processing. This undermines the infrastructure that Common Cause and our partners rely upon to ensure smooth, inclusive elections. Diverting resources to address these improper activities weakens our capacity to run voter registration drives, educate voters, and mobilize communities. These sorts of challenges also work to revive historical tactics of voter suppression. Private voter challenges have roots in post-Reconstruction laws used to disenfranchise Black voters. Today, they are increasingly used to target voters of color, Indigenous Peoples, young voters, and those who are unhoused or in transient living situations; all of whom Common Cause prioritizes in our voter registration work and lobbying/advocacy supporting the inclusion of their voting rights. If voters' sensitive data is turned over to the federal government and used to promote mass disenfranchisement, Common Cause will be forced to redirect resources to mitigating the disenfranchisement of existing voters and away from its core activities of registering voters and engaging new voters in the democratic process.
- 13) Common Cause also runs a nonpartisan Election Protection program in Rhode Island, which provides critical information and assistance to voters around primary and general elections. These include helping voters navigate the vote-by-mail process, encouraging voters to participate, and assisting voters when they experience problems in trying to vote. It is the largest nonpartisan voter protection effort in the state. The success of this program and our ability to effectively identify and respond to issues that hinder voters depend on voters' trust in the election system. When voters fear their personal information could be misused for partisan or punitive reasons, especially under a federal administration known for voter suppression rhetoric and tactics, they may hesitate to accept help from volunteers, avoid reporting issues at the polls, and disengage from the voting process altogether.
- 14) If Rhode Island discloses the unredacted voter file, this will work to normalize federal overreach into state-run elections, weakening local control and opening the door to future demands for even more intrusive data. It poses a grave threat to voter privacy and public

confidence. This threatens the decentralized structure of U.S. elections, which Common Cause defends as a safeguard against authoritarianism.

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

Signed on the 8th day of December, 2025, in Providence, Rhode Island.

A handwritten signature in black ink, appearing to read "John Marion", is written over a horizontal line.

John Marion