

Exhibit 3

**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 CATHERINE W. SAUNDERS

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I, Catherine W. Saunders, hereby declare as follows:

- 1) I have personal knowledge of the matters in this declaration, and this is what I would testify if called as a witness in Court.
- 2) I am 58 years old and am otherwise competent to testify.
- 3) I reside in Providence, Rhode Island with my husband and am registered to vote in Rhode Island,
- 4) I have been deeply involved in civic engagement issues in Rhode Island for more than two decades.
- 5) I am Director of the Lippitt House Museum. While I served as Curator of Education for the museum it won the Award of Excellence from the American Association of State and Local History for its Civics Program for Adult English Language Learners.
- 6) I am the President of the State Advisory Board of Common Cause Rhode Island. I have served on the Common Cause Rhode Island board since 2017.
- 7) In 2002, I was Director of Operations Vote for America-Rhode Island, a nonpartisan voter education and mobilization project.
- 8) Since 2020, I have served as a poll worker in Providence, Rhode Island. Prior to that I served as an Election Protection volunteer for Common Cause Rhode Island. I first volunteered for non-partisan get-out-the vote activity in my late teens, and my commitment to non-partisan access to the vote has never wavered. The right to vote is foundational to our democracy. Voting is the right upon which all others are based. Yet it can be challenging, as I have witnessed firsthand in my various roles.
- 9) I am concerned that the Department of Justice's request for the voter file, including highly-personal information, will be used to make voting harder for Rhode Islanders. I am worried about the manipulation of the lists to conduct amass challenges. I believe that voters already need to overcome a variety of obstacles to exercise their fundamental right.
- 10) I care both about the privacy of my personal data and about the security of the voting system. I believe that every eligible voter should be able to exercise their right to cast a ballot without worrying that their highly-personal information may be leaked or used for non-voting purposes.
- 11) I am concerned that this request for voter file information will make people afraid to register to vote and may deter eligible registered voters from voting in elections.
- 12) I supported Secretary of State Amore's decision to only share the publicly-available portions of Rhode Island's voter list. I believe that Rhode Island should be able to conduct its elections without interference from the federal government.

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 cursive script, appearing to read "Catherine W. Saunders". The signature is written in black ink and is positioned above the printed name.

Catherine W. Saunders