

# Exhibit 4

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

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

I, Stuart Waldman, hereby declare as follows:

- 1) I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.
- 2) I am 84 years old and am otherwise competent to testify.
- 3) I reside in Providence, Rhode Island with my wife.
- 4) Until recently, I lived in New York City, where I was registered to vote. I moved to Rhode Island in May 2024 to be closer to my son and granddaughter. When I moved, I registered to vote as part of receiving a driver's license. I cast my first ballot here in the 2024 general election.
- 5) When I learned that the Department of Justice requested voter records from Rhode Island, including with sensitive data, I became concerned about how they might use these lists. I understand that people like me—who have moved from one state to another and were previously registered to vote in their former state—can be caught up in voter purges based

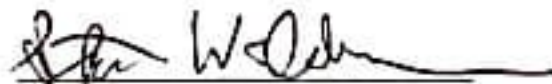
on cross-state database matching, especially if done improperly or incorrectly. I would be

outraged if I was removed from voter registration simply because I moved to a new state.

- 6) I care about the privacy of my personal data and am uncomfortable with the thought that my data may be distributed unnecessarily. I have been doxxed online in response to my political activity. My wife has also received a threatening phone call related to her political work. These experiences have made us very careful about our personal information.
- 7) 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. I also believe that eligible voters should not be removed from registration lists.
- 8) I believe strongly that voting is the foundation of democracy and helps shape the direction of the country. It is critically important to me that I vote in every election. I think of my granddaughter when I vote, and feel like I am voting for the country that she will live in.

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

Executed December 8th, 2025, in Providence, Rhode Island.

A handwritten signature in black ink, appearing to read "Stuart Waldman", written over a horizontal line.

Stuart Waldman