

EXHIBIT D

Declaration of Zitsi Mirakhur

Pursuant to 28 U.S.C. § 1746, I, Zitsi Mirakhur, hereby declare as follows:

1. I have personal knowledge of the matters set forth in this declaration, and if called as a witness in court, I would testify truthfully and competently to the facts stated herein.
2. I am 39 years old and am otherwise competent to testify.
3. I reside in Lexington, Kentucky.
4. I was born in India. I came to the United States in 1998, when I was eleven years old.
5. I am married to a U.S. citizen, who was born in the United States.
6. On March 28, 2008, I became a naturalized citizen at a ceremony in Cleveland, Ohio. I valued deeply what an American passport stood for—security, democracy, and a sense of belonging as an American citizen. I felt a responsibility to being American and wanted to be part of that.
7. Shortly after my naturalization, I registered to vote in Ohio, which was my permanent residence at the time.
8. I voted for the first time in the 2008 presidential election. I had not been able to vote in the 2004 general election, so it was especially meaningful to be able to participate in the democratic process for the first time.
9. I have remained registered to vote in every state that I have lived in since (Louisiana, New Jersey, and Kentucky).
10. I moved to Kentucky in 2020 and immediately registered to vote. I first voted in Kentucky in the 2020 general election and have voted in every general election in Kentucky since. I am a registered independent voter.
11. I am a member of the League of Women Voters of Kentucky and the League of Women Voters of Lexington. I first encountered the League at my naturalization ceremony in Cleveland, where they were present, and that experience left a lasting impression on me.
12. I care deeply about issues of voter suppression and efforts to cast doubt on the integrity of our elections. As someone who chose to become an American citizen and has voted faithfully in every general election since my naturalization, I believe strongly in the sanctity of the electoral process and the right of every eligible citizen to vote free from intimidation or interference.

13. When I learned that the Department of Justice requested voter records from Kentucky, including sensitive voter data, I became concerned about how they might use these lists. I believe that recently naturalized citizens like me may be more vulnerable than other groups of voters to false allegations about illegal voting.
14. I care about the privacy of my personal data and about the integrity of the electoral system. 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.

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

Dated: March 5, 2026

Zitsi Mirakhur

Zitsi Mirakhur