

3. Sometimes, this guidance takes the form of responses to inquiries from individual county auditors. For instance, attached to this declaration as **EXHIBIT 1** is a true and correct copy of an email exchange in which I, on behalf of the Secretary's office, provided advice to a county auditor's office about how to treat mailed-in registration packets that, to the auditor's understanding, did not comply with South Dakota's new proof-of-citizenship law.

4. Other times, this guidance takes the form of correspondence sent, via email listserv, to all county auditors' offices at once. For example, attached to this declaration as **EXHIBIT 2** is a true and correct copy of an email I sent to the listserv outlining the Secretary's responses to some common questions concerning the new proof-of-citizenship law.

5. While the Secretary does not register voters, once a county auditor registers an individual voter and enters that voter's information into the registration database, the Secretary's office has access to a profile created for the individual voter. Attached as **EXHIBIT 3** to this declaration are true and correct screenshots of the voter profile for Jaysen Hill, the individual plaintiff in this lawsuit. I added the text explaining each screenshot.

6. According to the voter profile, Hill registered to vote in Minnehaha County on May 4, 2026; the Minnehaha County Auditor flagged that "[c]itizenship documentation [was] needed"; and Hill was registered as a federal-only voter pursuant to SDCL § 12-4-1.3.

7. The voter profile also permits the Secretary's office to view correspondence sent by the county auditor to the voter. In this case, Hill's voter profile includes a document (labeled "[m]iscellaneous") sent to him by the Minnehaha County Auditor's office on May 4, 2026. A true and correct copy of this document—which, to my understanding, was created and issued by the Minnehaha County Auditor's office—is attached to this declaration as **EXHIBIT 4**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 4th day of September, 2026.


Christine Lehrkamp