Exhibit 9

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

INDIANA CIVIL LIBERTIES UNION, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:00-cv-0811
	)	
MIKE BRAUN,	)	
	)	
Defendant.	)	

SECOND DECLARATION OF MATTHEW BROADWELL

I, Matthew Broadwell, do hereby declare as follows:

1. I am over the age of eighteen, competent to testify, and provide this declaration based on my personal knowledge.

2. I am the Deputy Director of Investigations for the Indiana Office of Attorney General.

3. On September 30, 2026, I traveled to the Indiana Statehouse and took photographs of the exterior monuments and markers located on the Statehouse grounds. These include statues honoring individuals and groups, historical markers, commemorative plaques, and various other displays.

4. This photograph shows a wide shot of the west side of a statue honoring coal miners located on the lawn west of the Statehouse.



5. This photograph is a closer-in photograph of the west side of the plinth of the statute honoring coal miners.



6. This photograph is a closer-in photograph of the west side of the statute honoring coal miners.



7. This photograph shows the north side of the statute honoring coal miners.



8. This photograph shows the east side of the statue honoring coal miners.



9. This photograph is a closer-in photograph of the east side of the plinth of the statue honoring coal miners.



10. This photograph shows the south side of the statue honoring coal miners.



11. This photograph shows the west side of a bust honoring Christopher Columbus located on the lawn west of the Statehouse.



12. This photograph shows the south side of the bust of Christopher Columbus.



13. This photograph shows the east side of the bust of Christopher Columbus.



14. This photograph shows the north side of the statue honoring Christopher Columbus.



15. This photograph shows the north side of a monument commemorating the September 11, 2001 attacks located on the lawn southwest of the Statehouse.



16. This photograph shows the south side of the September 11, 2001 monument.



17. This photograph shows the south side of a monument commemorating the National Road, located on the lawn southwest of the Statehouse.



18. This photograph shows the south side of a monument commemorating Indiana's centennial anniversary, located south of the Statehouse.



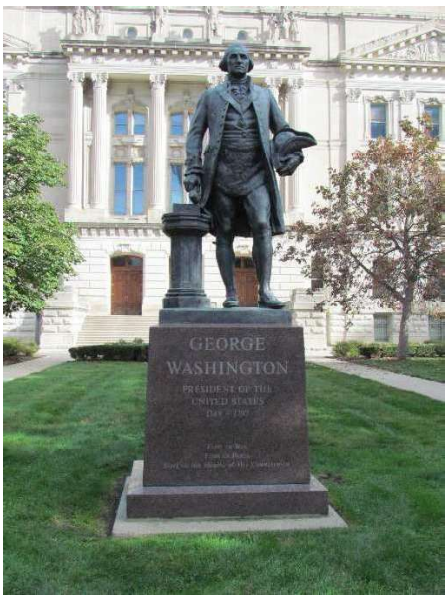
19. This photograph shows the north side of the monument commemorating Indiana's centennial anniversary.



20. This photograph shows the south side of a statue of George Washington located on the lawn south of the Statehouse.



21. This photograph shows a closer-in view of the south side of the statue of George Washington.



22. This photograph shows the west side of the statue of George Washington.



23. This photograph shows a closer-in view of the west side of the statue of George Washington.



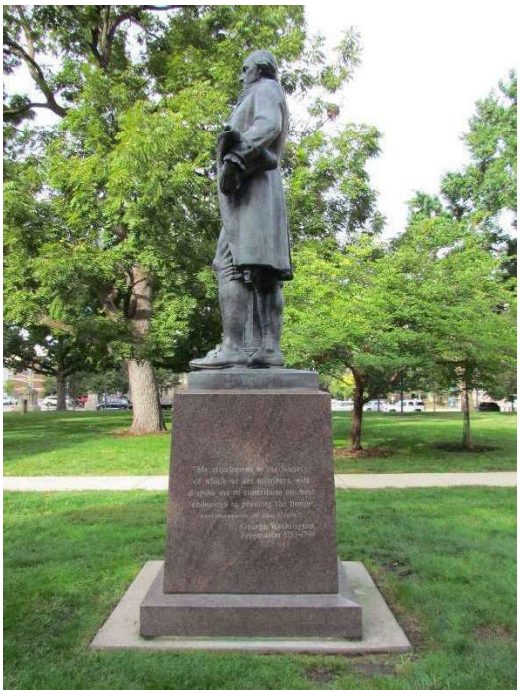
24. This photograph shows the north side of the statue of George Washington.



25. This photograph shows a closer-in view of the north side of the statue of George Washington.



26. This photograph shows the east side of the statue of George Washington.



27. This photograph shows a closer-in view of the east side of the statue of George Washington.



28. This photograph shows the north side of a marker commemorating Robert Dale Owen on the lawn south of the Statehouse.



29. This photograph shows the west side and south side (left to right) of the marker commemorating Robert Dale Owen.



30. This photograph shows the east side and north side (left to right) of the marker commemorating Robert Dale Owen.



31. This photograph shows the southeast side of the statue of former vice president and Indiana governor Thomas Hendricks located southeast of the Statehouse.

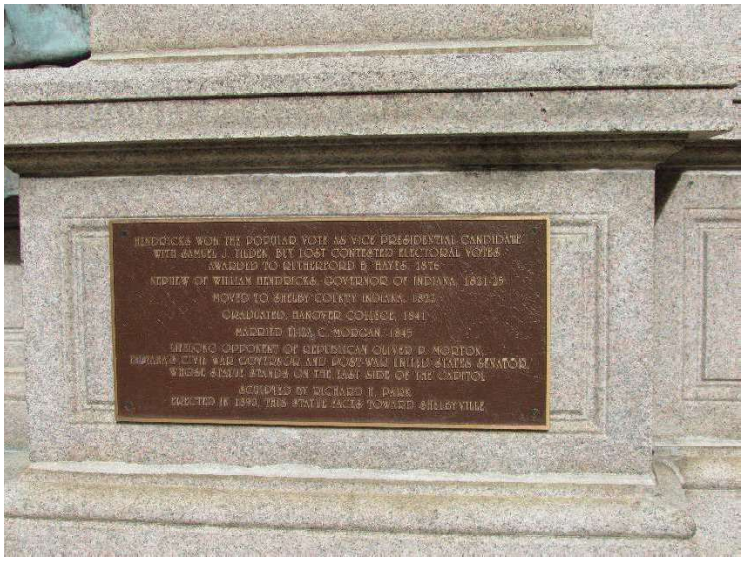


32. This photograph shows a closer-in view of the southeast side of the statue of Thomas Hendricks.



33. These four photographs show a closer-in view of the southeast side of the plinth of the statue of Thomas Hendricks.




HENDRICKS WON THE POPULAR VOTE AS VICE PRESIDENTIAL CANDIDATE
WITH SAMUEL J. TILDEN, BUT LOST CONTESTED ELECTORAL VOTES
AWARDED TO RUTHERFORD B. HAYES. 1876
NEPHEW OF WILLIAM HENDRICKS, GOVERNOR OF INDIANA, 1822-25
MOVED TO SHELBY COUNTY INDIANA, 1822
GRADUATED, HANOVER COLLEGE, 1841
MARRIED EMILY C. MORGAN, 1845
HENDRICKS OPPONENT OF REPUBLICAN OLIVER P. MORTON,
INDIANA'S CIVIL WAR GOVERNOR AND POST-WAR UNITED STATES SENATOR,
WHOSE STATUE STANDS ON THE EAST SIDE OF THE CAPITOL
ACCEPTED BY RICHARD E. PARK
ERECTED IN 1890, THIS STATUE FACES TOWARD SHELBYVILLE


THOMAS ANDREWS HENDRICKS


THIS PLAQUE WAS MOUNTED IN OCTOBER, 1995,
BY GOVERNOR EVAN BAYH,
LT. GOVERNOR FRANK O'BANNON
AND THE INDIANA DEPARTMENT OF ADMINISTRATION
TEXT COMPILED BY THE STATE ARCHIVES
INDIANA COMMISSION ON PUBLIC RECORDS
J. CHRAD HANDFIELD, JR., AND JUSTIN E. WALSH

34. This photograph shows the southwest side of the statue of Thomas Hendricks.



35. This photograph shows the northeast side of the statue of Thomas Hendricks.



36. This photograph shows the northwest side of the statue of Thomas Hendricks.



37. This photograph shows a sign discussing the history of the statue of Thomas Hendricks located in the lawn near that statue.



38. This photograph shows the east side of a statue of Indiana Governor Oliver Perry Morton located at the Statehouse's east entrance.



39. This photograph shows the south side of the statue of Indiana Governor Oliver Perry Morton.



40. This photograph shows the west side of the statue of Indiana Governor Oliver Perry Morton.



41. These two photographs show closer-in views of the plaques located on the west side of the plinth of the statue of Indiana Governor Oliver Perry Morton.





42. This photograph shows the north side of the statue of Indiana Governor Oliver Perry Morton.



43. These two photographs show engraved scenes including union soldiers located at the eastern entrance of the Statehouse.





44. This photograph shows a plaque commemorating the remodeling of the eastern entrance of the Statehouse during the administration of Governor Ralph Gates.



45. This photograph shows a plaque commemorating one million trees planted in Indiana between 2020–2024 by Governor Holcomb located on the lawn southwest of the Statehouse.



46. These ten photographs show plaques located on the south side of the Statehouse commemorating the planting of various trees.






RED OAK (QUERCUS RUBRA L.)
PLANTED APRIL 14, 1981
BY THE HONORABLE
MATTHEW E. WELSH, GOVERNOR


THIS TULIP TREE IS A TRIBUTE
TO
INDIANA'S
NUMBER ONE ADVOCATE
FOR THE ELDERLY
MARTIN H. MILLER
WHO WAS BORN MARCH 29, 1892
PRESENTED APRIL 30, 1962


THIS TULIP TREE IS A TRIBUTE
TO
INDIANA'S
NUMBER ONE ADVOCATE
FOR THE ELDERLY
MARTIN H. MILLER
WHO WAS BORN MARCH 29, 1892
PRESENTED APRIL 30, 1962
THIS SILVER MAPLE TREE
HAROLD W. HANDLEY
GOVERNOR OF
THE STATE OF INDIANA


TREE IS A TRIBUTE
TO
DIANA'S
NE ADVOCATE
MARCH 29, 1892
THIS SILVER MAPLE TREE
HAROLD W. HANDLEY
GOVERNOR OF
THE STATE OF INDIANA
GOV. HENRY F. SCHRICKER
DELVE INEZ DOWNING
REDEDICATED
NOVEMBER 6, 1991

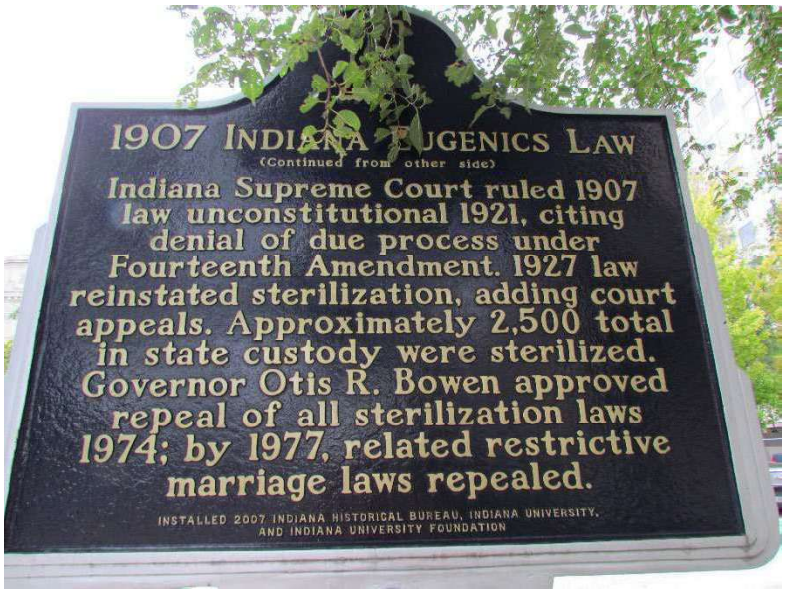

GOV. HENRY F. SCHRICKER
DELVE INEZ DOWNING
GOVERNOR TOWNSEND
TULIP TREE
REDEDICATED
NOVEMBER 6, 1991


GOV. HENRY F. SCHRICKER
PLANTED THIS SYCAMORE
DELVE INEZ DOWNING
GOVERNOR TOWNSEND
TULIP TREE

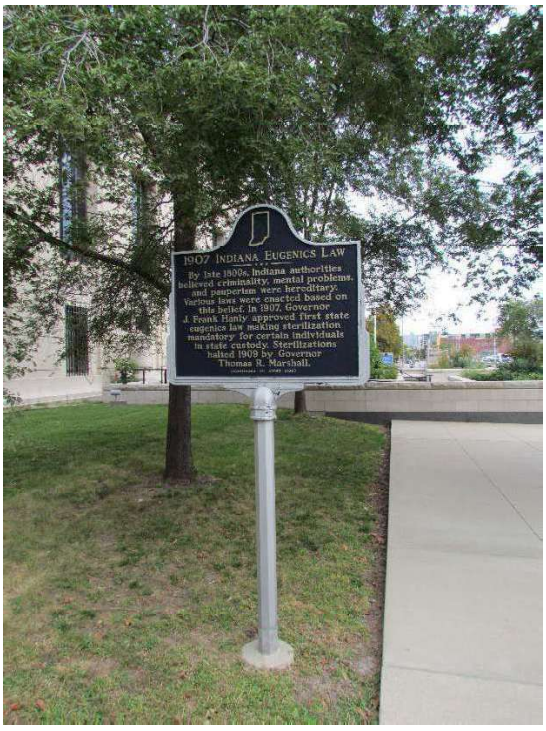

GOV HENRY F SCHRICKER
PLANTED THIS SYCAMORE
OLIVE INEZ DOWNING
NATIVE WHITE OAK TREE
GOVERNOR RALPH F GATES


NATIVE WHITE OAK TREE
GOVERNOR RALPH F GATES
BICENTENNIAL TREE PLANTING
1817

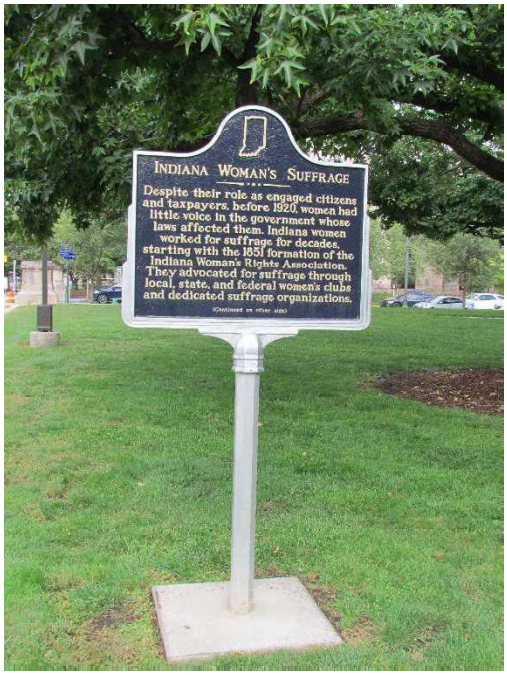
47. This photograph shows the north side of a marker discussing the history of Indiana's 1907 Eugenics Law and that law's eventual repeal, located on the lawn west of the Statehouse.



48. This photograph shows the south side of a marker discussing the history of Indiana's 1907 Eugenics Law and that law's eventual repeal.



49. This photograph shows the east side of a marker commemorating the history of women's suffrage in Indiana located on the lawn southwest of the Statehouse.



50. This photograph shows the west side of the marker commemorating the history of women's suffrage in Indiana.



51. This photograph shows the southeast side of a historical marker commemorating President Lincoln's funeral train located southeast of the Statehouse.



52. This photograph shows the northwest side of the marker commemorating President Lincoln's funeral train.



53. This photograph shows the south side of a historical marker commemorating the State capitol's construction and relocation located East of the Statehouse.



54. This photograph shows the north side of the historical marker commemorating the State capitol.



55. This photograph shows the north side of a historical marker commemorating the Indiana State Arsenal during the Civil War located East of the Statehouse.



56. This photograph shows the south side of the historical marker commemorating Indiana's Civil War Arsenal.



I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on October 16, 2026

Matthew Broadwell