

# EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF THE DISTRICT OF COLUMBIA**

CITIZENS FOR CONSTITUTIONAL  
INTEGRITY,

Plaintiff,

v.

THE CENSUS BUREAU, *et al.*,

Defendants.

No. 1:21-cv-3045

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**ANDRONIKI LAGOS DECLARATION**

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1. My name is Androniki Lagos, and I reside in the Brooklyn borough of New York City. I am a member of Citizens for Constitutional Integrity. The Census Bureau's 2021 Census injured me by resulting in the State of New York receiving one fewer seat in the U.S. House of Representatives (from 27 to 26 seats). Consequently, each representative will have more constituents. That injures me by diluting my vote and by making my vote less effective. It also injures me by making my congressperson harder to reach because I will be competing with more constituents for my congressperson's time and attention.

2. I am a native-born United States citizen, and I have lived in New York State for 6 years. I moved here to study urban planning at Columbia University in the City of New York, earning a Master's Degree in 2017. I have always wanted to impact public policy in pursuit of more equitable access to the American dream, and to foster resiliency—from individual resiliency to national resiliency.

3. As the child of immigrants, I was raised with the notion that our representative democracy is first among reasons why the United States is a place of possibility. I have lived in states ranging from Alaska to Florida, and I have personally witnessed both the effects of disparate

representation, and what is possible when laws and policies sufficiently account for local character and needs.

4. Currently, I work at Urbane Development Group LTD, a company that builds bridges to community wealth in traditionally underinvested neighborhoods. As an economic development consultant there, I design strategies to grow capacity and opportunity within low- and moderate-income (LMI) communities. I conduct primary community research, analyze market conditions, and design responsive economic interventions that bolster neighborhood anchors and individual residents.

5. My work largely aims to advance and uplift New Yorkers by identifying and marshalling federal resources from agencies that include the U.S. Department of Housing and Urban Development, the Small Business Administration, and the U.S. Department of Agriculture. Congressional actions impact my work through the allocation of federal subsidies that are the lifeblood of services and programs which the private market fails to provide. Federal policies shape incentives that enable my employer to develop affordable spaces for people to live, create and operate small businesses. For example, Community Development Block Grants are indispensable for my nonprofit clients to train people for in-demand jobs and to support seniors with healthy aging programs. Having fewer members in the House advocating for New York will likely result in the United States spending fewer resources on critical community investments in affordable housing, public infrastructure, education and workforce training, food access programs and micro and small business development, among many others. That potential loss of federal funding fundamentally jeopardizes the health and stability of New York and New Yorkers through a mismatch in size and type of investment in proportion to the population. Those funding allocations affect not only my work, but also the community where I live.

Lagos Decl.

6. Currently, Nydia M. Velázquez represents me. I voted for her. When I moved to New York after living for years in Washington, D.C., where I could not vote for U.S. Representatives or U.S. Senators, I felt grateful to have that opportunity in New York. I voted in the general election in 2020, and I intend to vote in New York in the general election in 2022 and beyond. I want to have a representative represent my interests more directly and more effectively.

7. I understand that the Secretary of Commerce Gina Raimondo, the Department of Commerce, Acting Census Bureau Director Ron S. Jarmin, and the Census Bureau have failed to comply with the Fourteenth Amendment and the United States Code by failing to account for voting abridgments in several states, and by failing to discount those states' populations when distributing seats in the U.S. House of Representatives. I understand that the Census Bureau's report and the Secretary of Commerce's statement will result in New York losing a representative seat in the U.S. House of Representatives, while other states abridge their citizens' rights to vote. With one fewer representative for the State of New York, the Census report and Commerce statement dilute my vote.

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

Executed on 11.20.2021.

  
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ANDRONIKI LAGOS