

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

NATALIA USECHE, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 20-cv-02225

Hon. Paula Xinis

**DECLARATION OF MARÍA  
RODRIGUEZ**

Pursuant to 28 U.S.C. § 1746, I, María Rodriguez, hereby declare and state as follows:

1. I am over the age of eighteen years. I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon personal information provided to me by others, and I am competent to testify thereto.

2. I am the Executive Director of the Florida Immigrant Coalition (“FLIC”), a bold and dynamic social movement organization that seeks the fair and equal treatment of all people, including immigrants. In this role, I build the staff team, implement programs based on mission and manage funds coming in and going out.

3. FLIC is a nonprofit member-based organization headquartered in Miami, Florida.

4. FLIC is a statewide coalition of more than 65 member organizations and over 100 allies. FLIC’s members include grassroots and community organizations, farmworkers, youth, advocates, lawyers, and union members. FLIC has staff in six Florida counties and has members located throughout Florida.

5. FLIC’s mission is to amplify the power of immigrant communities to impact the root causes of inequality and to defend and protect basic human rights, including the right to live without fear.

6. To achieve its mission, FLIC runs numerous campaigns and programs, including those relating to immigration issues, civil rights, labor rights issues, civic engagement, and access to college.

7. In connection with the 2020 Census, FLIC is engaging in an education and engagement campaign to encourage census participation among Spanish, English and Creole speaking diverse immigrant and refugee communities. For example, FLIC launched a large-scale phone and texting operation, as well as a social and earned media strategy reaching tens of thousands of people in Florida to encourage participation in the census. FLIC's census-related efforts have focused on targeted outreach to hard-to-count communities.

8. Based on my experience as Executive Director at FLIC, prior experience working with Spanish and Creole speaking immigrant communities, and FLIC's outreach and communications with Spanish, English and Creole speaking diverse immigrant and refugee communities in Florida, I believe President Trump's Memorandum to the Secretary of Commerce regarding "Excluding Illegal Aliens from the Apportionment Base Following the 2020 Census" ("Presidential Memorandum") will deter and suppress participation in the 2020 Census among Spanish, English and Creole speaking diverse immigrant and refugee communities, including undocumented, and mixed-status households in Florida.

9. The Presidential Memorandum has made it harder to convince members of the Hispanic, Latino, and immigrant communities to respond to the 2020 Census and has made FLIC's census-related outreach efforts much more difficult. The Presidential Memorandum has further increased fear of governmental scrutiny and thus fear of immigration enforcement within Spanish, English and Creole speaking diverse immigrant and refugee communities. The Presidential Memorandum has brought concerns regarding the census back to the forefront for these communities,

and has elevated their fear in responding to the census by linking status to the issue of the census. In my experience with FLIC's census-related engagement efforts, it has to be mentioned very explicitly every single time that census information is not shared with immigration enforcement agencies and is kept confidential. The Presidential Memorandum has increased these concerns by bringing the issue back to the forefront and highlighting the Trump administration's focus on immigration status related to the census.

10. The Presidential Memorandum has undermined FLIC's messaging to the community regarding the Census. FLIC works to show Spanish, English and Creole speaking diverse immigrant and refugee communities, undocumented, and mixed-status households the importance of responding to the census to ensure these communities in Florida obtain political representation and federal funding. For example, people phone banking and going door-to-door as part of FLIC's campaign highlight the impact the census count has on federal funding and specific programs within the community. The Presidential Memorandum has undermined this effort and made this messaging more difficult.

11. In addition, the Presidential Memorandum has undermined FLIC's broader mission and goals, including amplifying the power of immigrant communities in Florida.

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



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María Rodríguez

Dated August 14, 2020 in Miami, Florida.