Exhibit 33

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, *et al.*, Plaintiffs, v. DONALD J. TRUMP, *in his official capacity as President of the United States*, *et al.*, Defendants.	20 Civ. 5770 (JMF) **DECLARATION OF THE CITY OF PITTSBURGH**

Pursuant to 28 U.S.C. § 1746(2), I, Alaa Mohamed, hereby declare as follows:

1. I am over the age of eighteen and have personal knowledge of all the facts stated herein.

2. I am Policy Coordinator for the Office of Mayor William Peduto, City of Pittsburgh.

3. In May 2014, Mayor Peduto launched the Welcoming Pittsburgh initiative with input from over three thousand community members and direction from a diverse forty-person Advisory Council. This input provided the basis for the Welcoming Pittsburgh Plan, which, today, is a living document used by the Office of Equity and the wider welcoming community to improve the lives of all immigrants, create more informed, diverse, and welcoming experiences throughout the City of Pittsburgh. Details of our

City's provision of services to immigrants can be found online at https://pittsburghpa.gov/wp/roadmap-report

4. An accurate census helps ensure fair representation at all levels of government, including the City of Pittsburgh.

5. The census directly impacts the funding the City of Pittsburgh will receive over the next decade. While many financial assistance programs and block grants, like the Community Development Block Grant (CDBG), are distributed to cities based on American Community Survey (ACS) statistics, the benchmark for all ACS data is the decennial census.

6. The census provides the most reliable and complete data for research, decision making and planning in City government, including

i. *Demographic composition of a community and constituency*. ACS data are used to enforce federal anti-discrimination laws related to education. For example, ACS data on race and ethnicity, English language ability, and educational attainment are used by the Department of Justice to enforce Section 203 of the Voting Rights Act, which ensures that those with Limited English Proficiency have language assistance provided to them in their first language throughout the election process. In addition, the Department of Justice also uses ACS data on gender, ancestry, and English language ability to make sure that schools are compliant with anti-discrimination laws

ii. *Education planning*. The decennial census, the ACS, and other decennial census-derived sources provide education-related data that inform education

surveys and research, which education providers and scholars use to measure and predict trends and needs across the country. The ACS contains particularly rich education data, such as statistics on school enrollment broken down by different demographics. Education-related data from the census and the ACS inform a variety of research and programming decisions in the education sector.

iii. *Procurement and provision of services*.

iv. *Infrastructure and transportation planning*. The ACS provides data on a housing unit's building-type, cost, utilities, and occupants. The census provides data that are used to determine Fair Market Rents (FMR), which are used for a number of housing programs. Surveys that show current housing trends and help predict future trends depend on the census and ACS. Decennial census and ACS data also help determine more than $30 billion58 in annual federal funding for major housing programs

v. *Allocation of resources and a way to provide financial assistance where needed.*

1. Section 8 Housing Choice Vouchers/Section 8 Housing Assistance Payments: Both programs depend on the census and ACS data to determine local housing needs and funding levels for public housing agencies that help low-income renters afford housing.

2. Community Service Block Grant (CSBG): CSBG funds are granted to local agencies to address poverty in their communities; census derived HHS poverty guidelines determine eligibility.

3. Community Development Block Grants (CDBG): CDBG funds are given to communities based on their income level, which is determined using the ACS.

vi. *Emergency preparedness, disaster relief, and resiliency planning.*

vii. *Characterization of built structures for zoning and permitting processes.*

viii. *Measurement of the success and outcomes of local programs and initiatives.*

7. President Trump's July 21, 2020 "Memorandum on Excluding Illegal Aliens From the Apportionment Base Following the 2020 Census" causes the City of Pittsburgh great concern. The City's Welcoming Pittsburgh plan is a recognition and a celebration that Pittsburgh, like the United States, is a community built on immigrants. Immigration and migration have historically driven Pittsburgh's economy, and the City's continued success is directly related to the innovation brought about by its diverse population.

8. Pittsburgh and the Commonwealth of Pennsylvania, like the United States as a whole, have experienced lower census response rates in light of COVID-19. Immigrant communities in particular have borne the brunt of the Census Bureau's late start for non-response follow-up. The City of Pittsburgh believes that these circumstances are working to frustrate the purpose of the census, to the detriment of not only our immigrant population, but to the City as a whole. Exclusion of undocumented immigrants will necessarily result in inaccurate and unfair allocation of resources for numerous City programs. The impact of this will be felt for at least a decade.

9. The census should count every single person in the City of Pittsburgh. The City's ability to ensure the safety and success of its residents depends on that.

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

Executed on this 5 day of August, 2020

/s/ *Alaa Mohamed*

Alaa Mohamed
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