Exhibit 17

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, et al., Plaintiffs, v. TRUMP, et al., Defendants.	20-CV-5770 (JMF)

Pursuant to 28 U.S.C. § 1746(2), I, Sara Cullinane, 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 the co-founder and Director of Make the Road New Jersey ("Make the Road NJ"), a community-based immigrants' rights organization with centers in Elizabeth, Passaic, and Perth Amboy New Jersey – three cities with significant foreign-born populations. I have worked on immigrants' rights issues for the past fifteen years as a community organizer and an attorney. As Director of Make the Road NJ, I oversee the organization's community organizing and education programs, as well as our legal services department, which represents individuals in immigration proceedings. Prior to founding Make the Road NJ in late 2014, I represented immigrants in labor and employment proceedings. I am also a member of the Complete Count Committee of Union County, Passaic, and Elizabeth, NJ. I served as a commissioner for the New Jersey Complete Count Commission.

3. Make the Road NJ's mission is to build the power of immigrant and working-class communities through community organizing, legal services, policy advocacy, and transformative

education. Annually, we serve more than 10,000 immigrant families by providing Know Your Rights trainings, legal services, worker safety trainings, ESL classes, and youth development programs. The majority of immigrants we serve are non-citizens from Latin America. We also convene a statewide network of Deferred Action for Childhood Arrivals ("DACA") recipients.

4. The Trump Administration's immigration policies have made the immigrant communities that Make the Road NJ serves reluctant to engage with federal or state government representatives and have had a profound impact on immigrants and their U.S. citizen families in New Jersey.

5. Over the past year, our organization has held more than 30 events to educate immigrant communities about the census and to inform them of their responsibility to respond to the census. These activities include town halls, community forums, a census march where community members handed out thousands of flyers to inform Passaic's immigrant communities about the census, and online forums. Make the Road NJ has also trained immigrant volunteers to become census outreach ambassadors to inform other community members about the importance of responding to the census. I am a member of three local Complete Count Committees, and our staff serve on another two committees (Middlesex and Passaic County). Our organization also chairs a subgroup of immigrant community organizations that strategizes about how to conduct outreach and share resources across the state. Through these efforts, we have reached more than 10,000 individuals, the majority of whom are immigrants, many of whom may be undocumented.

6. Since President Trump issued the "Memorandum on Excluding Illegal Aliens From the Apportionment Base Following the 2020 Census" (the Presidential Memorandum) on July 21, Make the Road New Jersey has received numerous comments from community members, including immigrants and U.S. citizen family members of immigrants about the Presidential

Memorandum. Our organizers have had conversations with more than 50 community members about the Presidential Memorandum and have shared information on social media that has engaged more than 1,000 individuals.

7. The Presidential Memorandum states that it is U.S. policy to "exclude from the apportionment base aliens who are not in lawful immigration status under the Immigration and Nationality Act." Community members have expressed fear and resignation, observing that the Presidential Memorandum makes clear that they will not be counted in the census. For example, during a call with a number of members, a community member told one of our organizers that she was not going to respond to the census because she would not be counted.

8. In addition to fomenting fears about not being counted among community members, the Presidential Memorandum has reinforced fears about immigration enforcement. The memorandum states that "many" individuals who are being excluded from apportionment "entered the country illegally in the first place" and that counting them would "create perverse incentives encouraging violations of Federal law." Community members have expressed fear that because of the Presidential Memorandum, information regarding their immigration status will not be kept confidential and will be turned over to ICE. For example, a community member recently reiterated her fear that if she responded to the census her information would not be protected from ICE. I could tell she was frightened because her voice trembled, and she told me she was scared. I worry that other community members have similar fears.

9. Overall, based on my experience and observations, I anticipate that many immigrants and their U.S. citizen family members will choose not to respond to the Census as a whole because they believe that they will not be counted regardless of whether they answer the Census and they are frightened and anxious about what might happen if they complete the Census

(i.e., their information may be shared with immigration authorities). This will lead to vast undercounting in communities of color, immigrant communities, and low-income communities across New Jersey.

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

Executed on this 4th day of August 2020

Sara Cullinane
Make the Road New Jersey