# Exhibit 10

**UNITED STATES DISTRICT COURT**
**SOUTHERN DISTRICT OF NEW YORK**

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

**DECLARATION OF JASON BROUGHTON**

Pursuant to 28 U.S.C. § 1746(2), I, Jason Broughton 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 Vermont State Librarian, responsible for the Vermont Department of Libraries. In that capacity I also serve as Chair of the Vermont 2020 Complete Count Committee. I have been employed by the State of Vermont since 2017.

3. Created by Executive Order 09-19 in November 2019, the Vermont 2020 Complete Count Committee is responsible for (a) identifying barriers that may impede the full participation of Vermonters in the 2020 Census and (b) assisting in the development and implementation of outreach efforts to overcome those barriers to ensure as complete a count as possible of Vermont's population in the 2020 Census.

4. Such efforts include (a) coordinating with 2020 Census officials to identify, plan and implement public outreach campaigns; (b) coordinating and supporting Vermont's Area Census Office in meeting its goal of hiring 1,500 Vermont enumerators; (c) coordinating plans with the Vermont State Data Center for ensuring specific populations that normally are associated with hard-to-count groups are properly counted (*e.g.*, homeless, migratory, or college students); (d) collaborating with community leaders, non-profit organizations, local government, legislative leaders and the Governor of the State of Vermont to raise public awareness of the importance of

the 2020 Census; and (e) supporting radio, print, television, and social media awareness campaigns to increase census participation.

5. While serving as Chair of the Vermont 2020 Complete Count Committee, I have become aware of the significant challenges in obtaining a full and accurate count of Vermont's immigrant communities.

6. I have also heard from some of our community partners that the July 21, 2020 Presidential Memorandum and related public statements by the Trump administration have increased that level of fear and mistrust about participating in the census. For example, I received such input from an organization working to provide census information to over 400 migrant workers across Vermont. The memorandum has cast doubt amongst migrants on the importance of participating in the census. In addition, the memorandum has created some confusion among Vermont's refugee resettlement population about census participation, as well as concerns about whether census reporting will remain confidential.

7. The Vermont 2020 Complete Count Committee is deeply concerned that the Presidential Memorandum may deter immigrants from completing the census, and that this could lead to undercounting. In an attempt to mitigate the impact of the President's memorandum on census response rates, the Committee will engage in additional outreach efforts, including (a) providing mini-grants to increase outreach to hard-to-count communities, (b) conducting additional open educational meetings, (c) providing additional provide multilingual public service announcements, (d) further promoting Census participation across Vermont state government and business community, and (e) increasing collaboration with immigrant support and social justice organizations to promote full census participation. Actions that confuse Vermont's state and local

messaging to hard-to-count populations threaten to weaken recently-built community connections and undermine past and current efforts to ensure accuracy of the count.

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

Jason Broughton