Exhibit 62

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-CV-5770 (JMF)
NEW YORK IMMIGRATION COALITION, et al., Plaintiffs, v. DONALD J. TRUMP, *in his official capacity as President of the United States*, et al., Defendants.	20-CV-5781 (JMF)

SUPPLEMENTAL DECLARATION OF CESAR ESPINOSA

Cesar Espinosa, pursuant to the provisions of 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am the Executive Director of FIEL Houston, Inc. ("FIEL"). I am over 18 years of age. I have personal knowledge of the facts stated in this declaration.

2. This declaration supplements my declaration dated August 6, 2020 in this case.

3. Obtaining court relief to clarify that every person, including undocumented immigrants, will count in the census to determine congressional apportionment will allow FIEL to do

meaningful outreach to our constituents. Every single day available for FIEL to spread this message to the community will help to our outreach efforts. Specifically, a court order that stops the exclusion of undocumented immigrants from the census would make FIEL's efforts to encourage census participation easier by allowing us to clarify the current confusion and help ease the fear caused by the Presidential Memorandum, and it would take FIEL less time and fewer resources to convince members of the communities we serve to participate in the census.

4. As stated in my prior declaration, the Presidential Memorandum is deterring Census participation in the communities FIEL serves and burdening our outreach efforts. This is evident when we provide services to our community at our physical office. Since approximately mid-June of this year, FIEL started opening our physical office to provide services by appointment three days a week, while taking extra health and safety precautions. We had previously closed our physical office temporarily and operated remotely due to the ongoing pandemic in Houston. While providing our normal range of immigration legal services during client appointments, we also inform our clients about other services and programs we offer to make our engagement with our clients more impactful, given the limited amount of time available. For example, in the limited time we have per appointment, we also inform our clients about our census outreach and Get Out The Vote (GOTV) efforts. Recently, we have begun organizing people around COVID relief efforts, because the COVID pandemic has hit the communities we serve severely and disproportionately. In addition to our advocacy for greater assistance from state and local authorities, we use the limited time in our client appointments to also promote COVID-related safety protocols and provide free masks if needed and share information on rent assistance programs during the pandemic.

5. Further, in the course of providing legal services, we inform our clients about other legal work we are involved in, including serving as plaintiffs in the present case. As noted above, during appointments we educate our clients about the census and encourage them to participate. As a result of the recent Memorandum, I have witnessed that about half of the individuals we serve express apathy or fear about engaging in the census, understanding that the President wants to exclude undocumented immigrants. Some individuals simply ask, "what's the point?" Others say they would rather not participate because they come from mixed-status families and fear that one or more family members could be subjected to negative consequences if the government determines their status. This complicates and extends the time we engage in census education.

6. The fear and apathy we witness about participating in the census is not limited to clients to whom we provide direct services. On August 8, 2020, FIEL participated in a car parade in the Greenspoint community of northern Houston organized by local agents of the Census Bureau. Greenspoint is comprised of a large and growing Latino population, with a significant African American population. More affordable rent in Greenspoint compared to other Houston communities has allowed for growing numbers of immigrants to move into the area, including many mixed-status families. The Census Bureau had reached out to FIEL last year to ask if we could be part of their community outreach efforts. We also had meetings about doing joint outreach efforts with the Census Bureau this year prior to the pandemic and they posted official Census Bureau signs at our offices. As part of that relationship, the Census Bureau invited FIEL and various grassroots organizations, in partnership with local pastors and community leaders, to participate in the car parade to encourage census participation in the midst of a pandemic. FIEL was the only Spanish-speaking organization participating in the parade. FIEL members, including myself, took part in the parade and drove through Greenspoint neighborhoods raising

awareness about the census through vocal outreach to residents in Spanish and English. We talked to a gathering of community members and various individuals from our vehicles. During the course of the hour and a half long parade, I estimated based on my experience in organizing that FIEL members spoke to about 200 individuals, encouraging them to participate in the census and reach out to us for questions about the process. While some individuals were receptive to our messages, about half of the people we engaged with were apathetic. Unfortunately, of all the individuals we personally engaged with, only one person said to us they already filled out census. By my estimation, about 85% of the individuals who expressed apathy about the census were Latino. Based on my knowledge of and experience working with the Greenspoint community, many Latinos in Greenspoint come from mixed-status families who are afraid to engage in the census due to their perception that undocumented individuals could be targeted by the government through the census.

7. If FIEL did not have to expend extra efforts to encourage, reiterate or persuade people about the importance of census participation, especially individuals who genuinely fear or have apathy about it due to their perception that undocumented individuals will not be counted and could be targeted for immigration purposes by the census, it would free up a significant amount of time and resources for FIEL. As noted previously, many of the individuals we serve, as well as many of our members, come from mixed-status families where one or more family members may be undocumented. Although it normally takes a few minutes to educate and inform each individual about census participation, the amount of time and personnel resources collectively used by our organization to overcome the confusion and fear caused by the Presidential Memorandum is significant for a nonprofit organization like FIEL. We could otherwise use that time to promote our other services, like our COVID relief and GOTV efforts. For example, we

would be able to provide other services and information to our clients during our time-limited appointments at our physical office, or we would be able to serve more people during our office hours. We would be more productive in our mission.

8. Even with only a limited amount of time left before the end of the count, having a legal mandate to reassure people they will be counted for the purpose of determining Texas' congressional seats and electoral votes would help us encourage census responses among the community we serve through our public communications. Every additional day to engage in census outreach without having to fight the misinformation of the Presidential Memorandum would allow FIEL to engage in more efficient and effective outreach, if not in person, through our communication streams. FIEL would be able to employ conventional media, such as press releases, press conferences, and press statements, given our relationships with TV and radio media within both Spanish language and English language networks. We would also be able to employ our large social media network through platforms such as Facebook, Twitter, and Instagram. All of these avenues of communication would be available to us, even for last minute pushes to amplify our census outreach and encourage our community and constituents to fill out the census.

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

Dated: Houston, Texas

August 23, 2020

Cesar Espinosa