# Exhibit 30

**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>DONALD J. TRUMP, *in his official capacity as President of the United States, et al.*,<br><br>Defendants. | 20 Civ. 5770 (JMF)<br><br>**DECLARATION OF MARIA MATOS** |

Pursuant to 28 U.S.C. § 1746(2), I, Maria Matos, 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 President and CEO for The Latin American Community Center, ("LACC"), also known as "El Centro Latino." I oversee all LACC operations, which includes management of approximately 125 staff persons in 50 different program areas. I have been employed by LACC since 1994.

3. The LACC is a multi-service, non-profit 501(c)(3) organization founded in 1969. It is a member of the UnidosUS Affiliate Network, collaborating on programs and advocacy to address the social, economic, and political barriers faced by the Latino community. In a given year, we provide direct services to over 7,000 people, touching the lives of approximately 20,000-25,000 members of the community. Services provided by the LACC include family support services, healthcare prevention and advocacy programs, financial empowerment programs, and a broad

spectrum of educational services, including early childhood education, before and after school programs, summer camps, adult education, and English language classes.

4. The LACC has an advocacy program that encourages the Latino community to participate in the 2020 Census. The LACC participates in Census Count Committees for the City of Wilmington, New Castle County, and the State of Delaware. These committees are aimed at increasing participation in the 2020 Census and working to control the spread of misinformation regarding the Census in Delaware. The LACC also works with the Delaware Hispanic Commission, through its Social Justice Committee, to increase census participation. Additionally, the LACC hosted a Census-related job fair in Fall 2019 to promote hiring of census workers that reflected the Latino community.

5. Due to the COVID-19 pandemic, the LACC has had to pivot our Census-related advocacy to virtual efforts. On April 1, 2020, our Director of Prevention and Advocacy went Live on LACC's Facebook page to urge our community to fill out the Census. There is a Spanish-language video on our Facebook page that demonstrates the step-by-step process of filling out the Census. The LACC has also been sharing materials provided to us by New Castle County's Census Online Campaign on all of our social media platforms.

6. The LACC provides language assistance and technological assistance in connection with its census-related advocacy. This assistance includes providing interpreter services to non-English-speaking or limited English-speaking individuals to help them complete their census responses. The LACC also helps provide access to smartphones and computers so that individuals who normally do not have this access can complete their census responses online. The lack of access to technology is a severe concern in the Latino community in Delaware. This lack of technological access contributes to non-response in the Latino community.

7. Due to lack of technological access, decreased ability to perform in-person outreach efforts, the spread of misinformation about the Census, and citizenship-related fears, people in the Latino community are less likely to respond to the 2020 Census.

8. The COVID-19 crisis has greatly impeded the LACC's ability to conduct in-person Census-related outreach. The LACC was due to host a community dinner at the LACC on March 18, 2020 to inform the community about the importance of filling out the Census, but this was cancelled due to the COVID-19 pandemic. In past census years, including the 2000 and 2010 Census, the LACC engaged in a significant amount of in-person outreach, by sending ambassadors into the Latino community to go to homes door to door, which is crucial for hard-to-reach communities that do not have access to the internet. The LACC is not able to do this in 2020 because of the COVID-19 crisis. This increases non-participation and the spread of misinformation in the Latino community regarding the Census.

9. The LACC previously advocated against the inclusion of a citizenship question on the 2020 Census. Fears in the Latino community were somewhat assuaged when this Court determined that the federal government could not include the citizenship question on the 2020 Census. Now, we are hearing increased fears, confusion, and concern on the part of the Latino Community as a result of the Presidential Memorandum issued on July 21, 2020, which purports to exclude undocumented immigrants from the Census Count. *See* "Memorandum on Excluding Illegal Aliens From the Apportionment Base Following the 2020 Census." 85 Fed. Reg. 44,679 (July 23, 2020).

10. These fears and concerns have been relayed to me by staff members at LACC meetings, as well as through my work with the Delaware Hispanic Commission, which includes

participation in several coronavirus task forces. Additionally, we have heard these concerns from the community via social media platforms.

11. The Presidential Memorandum undermines our message to the Latino community that everyone counts in the Census. The Presidential Memorandum signals to the Latino community that the federal government is determined to leave them out of participation in the democratic process.

12. The Presidential Memorandum increases fear in the undocumented immigrant community that responding to the Census will result in deportation or bar them from obtaining citizenship.

13. The Presidential Memorandum also increases fears and apathy in the non-immigrant community as well. Non-immigrants in mixed-immigration families are more afraid to complete the Census, fearing that their family members will be penalized or deported in connection to their responses.

14. The LACC is committed to encouraging participation in the Census to the best of our capabilities, given the COVID-19 crises that is hindering our in-person outreach efforts. We will continue to work within the Latino community to increase participation in the Census and stop the spread of misinformation and fear regarding the Census through remote outreach efforts, language assistance, and technological assistance to ensure that everyone in our community is counted.

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

Executed on this 31 day of July, 2020

Maria Matos

Maria Matos
President and CEO, LACC