Exhibit 22

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) **DECLARATION OF ELIZABETH M. HEWLETT**

Pursuant to 28 U.S.C. § 1746(2), I, Elizabeth M. Hewlett, hereby declare as follows:

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

2. Since 2011, I have served as the Chair of the Prince George's County Planning Board of the Maryland-National Capital Park and Planning Commission (M-NCPPC). The Board is responsible for urban, suburban, rural and regional planning, zoning and land use, parks and recreation in Prince George's County.

3. I also currently serve as Chair of the County's Complete Count Committee for the 2020 Decennial Census (Committee). In my role as Chair, I am responsible for overseeing the Committee's efforts to improve the completeness of the count including, specifically, the correct and complete accounting for undercounted populations in the County.

4. According to U.S. Census Bureau data, the immigrant population in Prince George's County exceeds 20%. Therefore, prior to the commencement of the Census, the Committee and the M-NCPPC Planning Department identified those "hard to count" areas in the County with a high rate of foreign-born populations and other socioeconomic variables to better track responsiveness.

5. As of August 5, 2020, Committee mapping data clearly demonstrates a direct correlation between hard to count areas and those areas reporting the lowest rate of census responses.

6. Since 2018, when the proposal to add a citizenship question was first announced by Commerce Secretary Wilbur Ross, concerns were raised about the impact a citizenship question would have on the ability of the U.S. Census Bureau to accurately account for certain segments of the County's population. Despite the question not appearing on the census form, the Committee and the Councilmember representing a majority of the hard to count areas regularly hear from constituents and residents that fears of deportation and other consequences of revealing citizenship information are preventing persons from returning census mailers.

7. In response, the Committee has undertaken extraordinary time and effort to inform residents that their citizenship status will not be requested on census forms nor is citizenship a requirement for completing the census. In coordination with the Prince George's County Office of Community Relations, more than 100 events have been undertaken to heighten awareness and distribute information to the community, including the use of foreign-speaking liaisons to penetrate hard-to-reach populations. As I emphasized in my July 2019 briefing to the County Council, it is imperative that we inform people it is illegal for personal information given through the census to be used to justify deportation and that disclosing the information to anyone outside of those who are authorized to handle the census is punishable by a fine and prison time. We find we must continue to emphasize this again and again because the question is continually being raised.

8. The President's July 21, 2020 memorandum to the Secretary of Commerce threatens to undermine the efforts that the Committee has undertaken to assure County residents that citizenship status is irrelevant when it comes to completing the census. The new message that

undocumented immigrants will now be excluded from apportionment, in effect, *that only citizens count*, will further exacerbate existing confusion, skepticism, and distrust among members of the County's hard to reach areas. As a result, our Committee will be required to devote more time and effort to make sure every individual is fully aware of their Constitutional right to be counted in the 2020 Census.

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

Executed on this 5th day of August, 2020

Elizabeth M. Hewlett, Esq.
Chair, Prince George's County Complete Count Committee