Exhibit 39

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 Civ. 5770 (JMF) **DECLARATION OF JULIO RODRIGUEZ**

Pursuant to 28 U.S.C. § 1746(2), I, Julio Rodriguez, 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 Deputy Director for the Office of Employment and Training in the Department of Commerce and Economic Opportunity at the State of Illinois. I oversee the State's administration of the Workforce Innovation and Opportunity Act Program ("WIOA") and the Trade Adjustment Assistance Program (TAA). I have been employed by the State of Illinois since December 2001.

3. The Office of Employment and Training administers the federal Workforce Innovation and Opportunity Act Title IB (WIOA) program for the State of Illinois. WIOA supports creating a skilled workforce by helping individuals overcome barriers to employment and improving employer access to skilled workers. The program is mandated to target and prioritize services to individuals in designated target populations, such as: veterans, poverty / low income, individuals with disabilities, foreign primary language, and low educational attainment, among others. Our program depends on accurate census data to identify the levels of these targeted populations across the state. A key aspect of implementing the WIOA program in Illinois is for program leaders to make data-informed decisions to prioritize the types of services available, support continuous improvement, and develop more effective service strategies. Census data,

including American Community Survey data, is vital for our mandated statewide and regional strategic planning to understand the demographic and population migration profile of selected geographies. We also use Census occupational data to augment Bureau of Labor Statistics industry and occupational projections to better understand employment trends and characteristics of the workforce.

4. The Census information we use is not readily available from other sources, and where other sources do exist, the quality of the data is often suspect.

5. Reduced self-response rates have a negative impact the quality of information vital to the successful implementation of the WIOA program. Without data provided directly by citizens, we are forced to extrapolate, deduce and infer using other data sources and proxy data points to and understand workforce population characteristics at the statewide and regional levels.

6. Poorer quality census data translates directly to our program leaders making less-informed decisions on prioritization of service delivery.

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

Executed on this 3rd day of AUGUST, 2020

/Julio Rodriguez/

Julio Rodriguez
Deputy Director, Office of Employment and Training
IL Dept of Commerce and Economic Opportunity