Exhibit 47

IN THE UNITED STATES DISTRICT COURT
FOR THE 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)

DECLARATION OF GUSTAVO TORRES

I, Gustavo Torres, pursuant to the provisions of 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

1. I am the Executive Director of CASA de Maryland, Inc. ("CASA"). In this capacity, in which I have served since 1994, my job is to lead an organization that builds power and fights for justice alongside the immigrant, Latino, and working class community in the United States. Over my 26 years at CASA, we have grown from a small welcome center for Central American refugees to the mid-Atlantic's largest immigrant advocacy organization, serving our community in Virginia, Maryland, and Pennsylvania. Through that work, we have grown our membership to over 110,000 lifetime members. We have done this through providing services our community needs and deserves, through organizing working class immigrants from over 140 countries around the world whom we are proud to count as members, and by standing with them in the streets, in the halls of power, and in courtrooms as they fight for justice, dignity, and the opportunity to thrive.

2. Based on my more than 25 years of professional experience working for Latino and immigrant serving organizations in both the public and private sectors, the current outreach to immigrant communities I oversee in my current capacity at CASA, and my conversations with individual CASA members, I believe the Presidential Memorandum to the Secretary of Commerce on the subject of "Excluding Illegal Aliens from the Apportionment Base Following the 2020 Census" ("Presidential Memorandum") will deter participation of many individuals in the Latino and immigrant communities, and result in a disproportionate undercount of Latinos. As a result of the decision to add this question, CASA has diverted and will continue to be required to divert resources from core organizational priorities to additional, remedial outreach to counteract the Presidential Memorandum's negative effect on Census response rates in our community.

3. The Presidential Memorandum will directly injure CASA members, many of whom live in areas of the United States in which immigrants of color and other communities of color exceed national and state averages. Specifically, they will be harmed because the exclusion on undocumented residents from the apportionment base will diminish their political power relative to other parts of their states. In addition, they will be harmed because the disproportionate undercount that will result from the Presidential Memorandum among immigrants of color will well as the amount of Census-guided funding those areas receive for key programs, services, and facilities that our members and their families rely on to succeed in the communities in which they live.

I. CASA's Mission and Activities

4. CASA is a non-profit 501(c)(3) membership organization headquartered in Langley Park, Maryland, with offices in Maryland, Virginia, and Pennsylvania. Founded in 1985, CASA is the largest membership-based immigrants' rights organization in the mid-Atlantic region, with more than 100,000 all-time members.

5. CASA's mission is to create a more just society by increasing the power of and improving the quality of life of low-income immigrant communities. To advance this mission, CASA offers social, health, education, job training, employment, and legal services to immigrant communities. CASA serves nearly 20,000 people a year through its offices and provides support to additional clients over the phone and through email.

6. As Executive Director, I work to increase the power of immigrant voices, including the political power of these communities, by promoting voting rights and participation by our communities in the democratic process. I oversee all aspects of CASA's work, including our community organizing, services, communications and other departments and programs. I am

deeply involved in all key decision making aspects of the organization, including our large scale Census outreach and education efforts across Maryland, Virginia and Pennsylvania.

7. CASA works with members in navigating and enrolling in public benefits for which they are eligible. This work includes connecting members with public benefits related to health, education, and legal services. CASA assists eligible members in enrolling in food assistance programs such as the Supplemental Nutritional Assistance Program (SNAP), which provides food assistance to low-income individuals, and the Special Supplemental Nutrition Program for Women Infants and Children (WIC), which provides supplemental foods, health care referrals, and nutrition education to eligible individuals. CASA also assists eligible members in enrolling for health care coverage through Medicaid, or enrolling their children in the Children's Health Insurance Program.

8. CASA's Education Department works with families residing in dense immigrant neighborhoods to navigate them through the school enrollment process in Title 1 funded public schools serving these neighborhoods. Staff also provide information about early childhood education programs available in the neighborhoods served by CASA and partner with local providers to enroll eligible children in those programs.

II. CASA's Census-Related Work

9. CASA has an ongoing commitment to promoting engagement in the Decennial Census among its members, constituents, and communities. Member participation in the Decennial Census advances CASA's mission by increasing the political power of low-income immigrant communities.

10. Given CASA's 35 year history working with immigrant communities throughout the Mid-Atlantic region and the trust it has developed with these communities as a result of this

history, CASA has consistently been a "go-to" organizational partner in conducting outreach and education around the Decennial Census and other related activities.

11. In 2019-2020, CASA partnered with various state and local government education and outreach campaigns throughout Maryland, Pennsylvania, and Virginia. In addition, CASA received dedicated funding from other sources to conduct door-to-door outreach, facilitate group educational sessions as well as conducting follow up outreach via phone and text message, and social media, and ongoing work with local, ethnic media to inform, engage, and encourage participation in the Census among Limited English Proficient, immigrant communities in the region.

12. CASA's messaging has focused on the importance of the Decennial Census in ensuring that the political power of the districts where our members live reflect the total population of these areas. CASA has emphasized that every person, regardless of citizenship status and whether they are documented or not, is counted in the Census for purposes of political apportionment and Census-guided funding. As part of these efforts, CASA developed Census outreach materials in English and Spanish, reaching the community through social media and direct outreach, as well as by phone. We utilized physical and digital "Census pledge" cards, gathering commitments from community members to participate in the Census. These efforts were targeted particularly at the immigrant and Latino community, and were specifically designed to reach individuals in families with mixed immigration status. CASA has an ongoing commitment to promoting our members' engagement with the Decennial Census, because a complete and accurate Census count is critical to ensuring that our members receive the full political representation and funding to which they are entitled.

III. Harm to CASA as a Result of the Exclusion of Undocumented Residents from Apportionment

13. As described below, the Presidential Memorandum harms CASA members, as well as the organization more broadly. The Presidential Memorandum is increasing already heightened levels of fear among immigrants. The Trump Administration's anti-immigrant policies and rhetoric have led to decreased engagement with the government generally, and specific fear of participating in the Decennial Census. This latest step by the Trump Administration to exclude undocumented residents from the apportionment base is only serving to increase this fear, and discourage participation in the Decennial Census. This fear and decreased participation harms CASA as an organization, because it undermines our core messaging regarding the importance of the Decennial Census, and is requiring us to divert our resources to encourage participation in the Decennial Census. In addition, this latest move requires us to change our messaging after nearly 11 months of programming aimed at increasing participation in the Decennial Census.

A. Fear in the Latino Immigrant Community under the Current Administration

14. Based on our conversations and work in the community, immigrant members of CASA have felt targeted, bullied and attacked by the rhetoric and actions of the Trump administration. Starting with the presidential campaign, through to its current policies, CASA members have expressed fear, frustration and despair over how they feel this administration has scapegoated them. In particular, they have expressed fear over the emphasis this administration has placed on increased deportations and immigration enforcement.

15. Policies such as family separation at the border, the "zero-tolerance policy" for immigrants entering the United States without documentation, and the attempted elimination of the Deferred Action for Childhood Arrivals (DACA) and the Temporary Protected Status (TPS)

programs have all increased the fear among immigrant communities of being targeted by agencies such as ICE. This fear has led to a chilling effect on the willingness of immigrant communities of all types, regardless of immigration status, to interact with the federal government in any way.

16. CASA and its partner providers have begun to track a decrease in the number of individuals applying for certain public benefits. Most troubling has been a decrease in the number of enrollments into benefits completely unrelated to as of yet announced policies, such as a decrease in the number of immigrants applying for health insurance made available through the Affordable Care Act or a decrease in the number of Legal Permanent Residents applying for citizenship. We have also noted a marked decrease in individuals accessing food stamps, which has not only made families less food secure but also contributed to local schools systems losing funding, because aid is tied in part to the number of children in the schools who are receiving food stamps. To those of us at CASA, this decreased participation indicates that the Trump Administration's policies are not only affecting those directly targeted by these policies, but are increasing fear among the immigrant community more broadly. Similarly, CASA has noticed a general distrust of government resulting in increased hesitancy among naturalized US Citizens and their family members to register to vote for the first time.

B. CASA Members are Less Willing to Engage with the Decennial Census Due to Increased Fear

17. Under the current environment, CASA members have expressed fear of even a knock on their door by a stranger given the high number of arbitrary immigration enforcement actions that have resulted in the deportation of immigrants with little or no criminal background in the communities CASA serves. During CASA's census outreach efforts, one of the most effective messages for ensuring that residents completed their census forms was that by self-

reporting, they would avoid a surprise visit from a census bureau employee. In addition, Many CASA members have expressed doubts and fears about how information within the government is shared, and whether an answer to a question on a particular document or application may lead to their family being harmed or separated.

18. Following the announcement by the Trump Administration that they were seeking to exclude millions of immigrants from the Census count, CASA was approached by a number of media outlets, including CNN, to represent the reaction of our community. We conveyed how harmful the action is and our commitment to ensuring that our members are fully counted.

19. The threat that undocumented residents will not be counted for apportionment purposes even if they do participate in the Decennial Census has further discouraged individuals from participating in the Census. This action by the Trump Administration is the latest iteration of its attempts to dehumanize undocumented residents, by stating that they are not "persons" under the 14th Amendment of the U.S. Constitution. In addition, this latest action has heightened concerns regarding the privacy and confidentiality of Census questionnaire responses. The announcement that the Administration will exclude undocumented residents from the apportionment base has led to concerns that the Administration is gaining detailed information regarding where undocumented residents reside, and could use this information to target our members' communities with immigration enforcement actions or other adverse consequences.

20. The Presidential Memorandum decreases the likelihood that CASA members will participate in the Decennial Census, where the perceived costs of potential adverse immigration enforcement actions appears to outweigh the potential benefits, particularly when the Decennial Census will not contribute to promoting the political power of these communities.

C. CASA is Diverting Resources to Encourage Participation in the Decennial Census

21. CASA recognizes the importance of the Decennial Census for its members and the broader Latino immigrant community. Participation in the Census is necessary to preserve the political power of these communities, and to ensure that these communities receive the vital federal resources that so many of our members rely upon. In order to combat the increased fear in the Latino immigrant community, and the unwillingness of many CASA members to participate in the Decennial Census, CASA has planned and is currently implementing a massive response to try and overcome the many barriers to participation.

22. This latest action by the Trump Administration to exclude undocumented residents from the apportionment base has diluted the efficacy of our Census outreach materials and programming, as it directly contradicts a key component of CASA's messaging and outreach materials. As a result, CASA must now devote additional resources to addressing the confusion and fear that have resulted from this latest action after 15 months of preparation and action in our Decennial Census programming.

23. To address the fear and confusion raised by the Presidential Memorandum in the immigrant communities, CASA will have to reorganize its communication team, reassign staff to Census outreach and education, and revise and redistribute messaging materials that CASA has prepared regarding the Decennial Census. Given that the significant additional funding for this work was not anticipated, some of the resources required to do this work will have to be diverted from other programs that are key to CASA's mission, including community and issue organizing and other civic engagement efforts, as well as funded through other sources, perhaps including CASA reserves, precious unrestricted funds including membership dues, and leveraged with volunteers. CASA's outreach program was scheduled to end at the end of July, but we have

been forced to continue to dedicate staff time to respond to calls and questions, and to place additional funding into communications and digital work to reassure community members and encourage them to complete their census form. The increased focus on Census outreach and education and need to revise all of CASA's Census education and messaging materials will necessarily divert CASA's limited resources, resulting in less resources being allocated to other vital CASA programs.

24. Unfortunately, CASA will have less time than anticipated to address the fear and confusion caused by the Presidential Memorandum among the immigrant communities that CASA serves. The actual counting period of the Census is only a few months, but the consequences of the Census in terms of political power and funding allocation last for a decade. At the time the Presidential Memorandum was published on July 21, there were 102 days remaining in the enumeration period, which was then scheduled to end on October 31. However, on July 31, the Census Bureau abruptly accelerated the end of the enumeration period to September 30. With only 56 days left in the headcount, every single day remaining is a critical opportunity for CASA and its members to conduct further Census outreach and increase response rates in the immigrant communities we serve. CASA will have to accelerate its remaining Census education and outreach efforts to address the Presidential Memorandum's negative effect on Census responses.

25. I declare under penalty of perjury that the foregoing is true and correct.

Executed: AUG. 5, 2020

Prince Georges County, MD

Gustavo Torres