Exhibit 64

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 JENNY SEON

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

1. I am the Legal Service Director for Plaintiff Ahri for Justice ("Ahri"). I am a founding member of Ahri and have been on staff since December 2019. 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 5, 2020 in this case.

3. Ahri provides legal services, has a hotline to address community concerns, and conducts civic engagement work, including census-related outreach. As part of our census outreach, we have a goal to contact at least 10,000 individual households to encourage them to fill out the census. We also provide information about the census to our legal services clients and to individuals who call our hotline. After news of the July 21, 2020, Presidential Memorandum to the Secretary of Commerce ("Presidential Memorandum"), we began to hear concerns from the community concerning the impact of the Presidential Memorandum on the census. Households that already responded to the census are concerned that they improperly responded, while households that have not yet responded to the census are hesitant to respond because they either believe they are not permitted to respond, or because they fear identifying their household to the federal government.

4. Although our team has continued to encourage households to respond to the census by highlighting its importance to funding and redistricting, the Presidential Memorandum makes messaging difficult. We have informed our clients and constituents that we are now involved in a lawsuit to challenge the Presidential Memorandum, but the fact remains that the Memorandum is still in effect. For this reason, we are spending a longer amount of time trying to convince households to respond to the census, time that could be spent contacting additional households and on our other program areas. With the September 30 deadline quickly approaching, a court order invalidating the Presidential Memorandum would make our census outreach efforts more efficient and effective. Our messaging to our community would change from "we are trying to stop the Presidential Memorandum but are not there yet," to "a federal court has halted the Presidential Memorandum." Every single day that we can tell our constituents that they will count for apportionment purposes and that the federal government is not permitted to identify the

immigration status of individuals or households to exclude them from apportionment is valuable and will help with outreach.

5. We know this kind of messaging works. We often get questions like, "Do I have to reveal my status on the census?" We immediately quell this concern by pointing to the citizenship question injunctions. We believe that similar messaging that the Court has enjoined the Presidential Memorandum will help to immediately quell community concerns about the Memorandum, making conversations shorter to allow Ahri to reach a larger number of households.

6. Getting relief from the Presidential Memorandum as soon as possible is also key to ensuring that census door knockers have success. With relief from the Memorandum, we can publicize the Court's order to encourage our community to open their doors to census outreach workers, rather than hiding out of confusion or fear and avoiding the census completely.

7. Ahri is already preparing to shift our messaging as soon as the Court grants relief. Since our communications team first learned that Plaintiffs had filed a motion for a preliminary injunction, they have continued to follow-up for updates so that so we can start doing outreach. If the Court issues an order granting Plaintiffs relief, we plan to immediately contact Korean news media, issue press releases, and do social media to let our community know about the order and encourage the community to respond to the census.

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

Dated: August 24, 2020 in Los Angeles, California

Jenny Seon