

**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)

DECLARATION OF MATTHEW COLANGELO

Matthew Colangelo, pursuant to penalty of perjury under 28 U.S.C. § 1746, does hereby state the following:

I am an attorney in the Office of the New York State Attorney General and counsel to Plaintiffs in 20-CV-5770 (JMF). I submit this Declaration in support of Plaintiffs’ Motion for Partial Summary Judgment or Preliminary Injunction.

Attached to this Declaration are true and correct copies of the following numbered exhibits:

1. Declaration of Oswaldo Alvarez, Illinois Statewide Census Co-Director for the Illinois Department of Human Services and the State of Illinois (August 4, 2020).
2. Declaration of Thomas Aragon, Director of Planning and Zoning for Rio Arriba County (August 3, 2020).
3. Declaration of Allison Arwady, M.D., Commissioner of the Chicago Department of Public Health (August 4, 2020).
4. Declaration of Marc Baldwin, Assistant Director for Washington State's Office of Financial Management (August 5, 2020).
5. Declaration of Anita Banerji, Director of the Democracy Initiative, Forefront (August 4, 2020).
6. Declaration of Stephen G. Bayer, Planner V for the State of Delaware (August 3, 2020).
7. Declaration of Wendy Bell, Deputy Director for the Office of Community Development at the Illinois Department of Commerce and Economic Opportunity (August 3, 2020).
8. Declaration of Gia Biagi, Commissioner of the Chicago Department of Transportation (August 3, 2020).
9. Declaration of Melissa Bird, Executive Director of DC Census 2020 (August 3, 2020).
10. Declaration of Jason Broughton, Vermont State Librarian (August 4, 2020).
11. Declaration of Susan Brower, State Demographer for the State of Minnesota (August 6, 2020).
12. Declaration of Susan Bysiewicz, Lieutenant Governor for the State of Connecticut (August 3, 2020).
13. Declaration of Michael J. Cassidy, President and CEO for The Commonwealth Institute for Fiscal Analysis (August 4, 2020).
14. Declaration of Steven K. Choi, Executive Director of New York Immigration Coalition (August 6, 2020).
15. Declaration of Michael E. Cline, State Demographer of North Carolina (August 5, 2020).
16. Declaration of Norman Bristol Colón, Executive Director for Pennsylvania's Census 2020 Complete Count Commission (August 4, 2020).
17. Declaration of Sara Cullinane, Director of Make the Road New Jersey (August 4, 2020).
18. Declaration of Cesar Espinosa, Executive Director of FIEL Houston, Inc. (August 6, 2020).

19. Declaration of Emily Freedman, Director of Community Development for the City of Providence (August 6, 2020).
20. Declaration of Jessie Hammond, Public Health Statistics Manager for the Vermont Department of Health (August 3, 2020).
21. Declaration of Jeff Hardcastle, State Demographer for the State of Nevada Department of Taxation (August 5, 2020).
22. Declaration of Elizabeth M. Hewlett, Chair of the Prince George's County Planning Board of the Maryland-National Capital Park and Planning Commission (August 5, 2020).
23. Declaration of Bing A. Howell, Chief Portfolio Officer for the Chicago Public Schools (August 4, 2020).
24. Declaration of Elsa Jimenez, Director of the Monterey County Health Department (August 3, 2020).
25. Declaration of Jill Kaneff, Northern Virginia Regional Commission (August 4, 2020).
26. Declaration of Samer E. Khalaf, National President of the American-Arab Anti-Discrimination Committee and ADC Research Institute (August 6, 2020).
27. Declaration of James Lane, Virginia Superintendent of Public Instruction (August 3, 2020).
28. Declaration of Chris Lopez, Board Member of the Board of Supervisors of Monterey County (August 3, 2020).
29. Declaration of Mark Lundine, Administrator for Economic Development Division in the Department of Development for the City of Columbus (August 5, 2020).
30. Declaration of Maria Matos, President and CEO of The Latin American Community Center (July 31, 2020).
31. Declaration of Melissa McCaw, Secretary of the Connecticut Office of Policy and Management (August 5, 2020).
32. Declaration of Lori Medina, Director of Monterey County Department of Social Services (August 3, 2020).
33. Declaration of Alaa Mohamed, Policy Coordinator for the Office of Mayor William Peduto, City of Pittsburgh (August 5, 2020).
34. Declaration of Bitta Mostofi, Commissioner of the City of New York's Mayor's Office of Immigrant Affairs (August 5, 2020).

35. Declaration of Doug Murray, former Director of Community Affairs for Mayor Andrew Ginther of the City of Columbus (August 5, 2020).
36. Declaration of Theo Oshiro, Deputy Director of Make the Road New York (August 6, 2020).
37. Declaration of Robert Rapoza, Executive Director for the Rhode Island Board of Elections (August 6, 2020).
38. Declaration of Susan Roche, Executive Director for the Immigrant Legal Advocacy Project (August 5, 2020).
39. Declaration of Julio Rodriguez, Deputy Director for the Office of Employment and Training in the Department of Commerce and Economic Opportunity at the State of Illinois (August 3, 2020).
40. Declaration of Charles Rynerson, research faculty member and Oregon State Data Center Coordinator at Oregon's Population Research Center (August 5, 2020).
41. Declaration of Joseph J. Salvo, Chief Demographer for New York City (August 4, 2020).
42. Declaration of Monica Sarmiento, Executive Director for the Virginia Coalition for Immigrant Rights (August 3, 2020).
43. Declaration of Jenny Seon, Legal Service Director of Ahri for Justice (August 5, 2020).
44. Declaration of Vatsady Sivongxay, Director of Organizing and Census Manager for the Massachusetts Immigrant and Refugee Advocacy Coalition (August 5, 2020).
45. Declaration of Rosemary Soto, Management Analyst III for the County Administrative Office for the County of Monterey (August 3, 2020).
46. Declaration of Jonathan Sternesky, Manager of Policy and Legislative Affairs for the New Jersey Housing and Mortgage Finance Agency (August 4, 2020).
47. Declaration of Gustavo Torres, Executive Director of CASA de Maryland, Inc. (August 5, 2020)
48. Declaration of Christopher A. Wheeler, Chief Data Officer for the New Jersey Department of Community Affairs (August 4, 2020).
49. Declaration of Anastacia Wyatt, Monterey County Housing Program Manager (August 3, 2020).
50. Declaration of David Wortman, Deputy Director for the Office of Community Assistance in the Department of Commerce and Economic Opportunity at the State of Illinois (July 31, 2020).

51. Declaration of Edgar Aranda-Yanoc, Executive Director of the Virginia Coalition of Latino Organizations (August 5, 2020).
52. B. Kendrick, Journal of the Joint Committee of Fifteen on Reconstruction (1914), pp. 1-206.
53. Census and Reapportionment, Report to Accompany S. 312, S. Rep. No. 71-2 (1929).
54. Apportionment of Representatives, Report to Accompany H.R. 11725, H.R. Rep. 70-2010 (1929).
55. Apportioning Representatives in Congress, Report to Accompany S. 2505, H.R. Rep. 76-1787 (1940).
56. Expert Declaration of Dr. Matthew A. Barreto, Ph.D. (August 7, 2020).
57. Expert Declaration of John Thompson (August 6, 2020).
58. Expert Declaration of Dr. Christopher Warshaw (August 7, 2020).
59. B. Kendrick, Journal of the Joint Committee of Fifteen on Reconstruction (1914), pp. 207-429.

Dated: August 7, 2020

/s/ Matthew Colangelo
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