

Nicholas Espiritu (SBN 237665)  
National Immigration Law Center  
3450 Wilshire Boulevard, #108-62  
Los Angeles, CA 90010  
Telephone: 213-639-3900  
Email: [espiritu@nilc.org](mailto:espiritu@nilc.org)

Attorneys for *Amici Curiae*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**STATE OF CALIFORNIA, by and through**  
**Attorney General Xavier Becerra,**

Plaintiff,

v.

**WILBUR L. ROSS, JR., in his official**  
**capacity as Secretary of the U.S. Department**  
**of Commerce; U.S. DEPARTMENT OF**  
**COMMERCE; RON JARMIN, in his official**  
**capacity as Acting Director of the U.S. Census**  
**Bureau; U.S. CENSUS BUREAU; DOES 1-**  
**100,**

Defendants.

3:18-cv-01865

**MOTION OF CENTRAL VALLEY**  
**IMMIGRANT INTEGRATION**  
**COLLABORATIVE, UNITED FARM**  
**WORKER FOUNDATION,**  
**NATIONAL IMMIGRATION LAW**  
**CENTER, ET AL. FOR LEAVE TO**  
**FILE BRIEF AS *AMICI CURIAE* IN**  
**SUPPORT OF PLAINTIFFS'**

Dept: 3

Judge: The Honorable Richard G. Seeborg

Trial Date: January 7, 2019

Action Filed: March 26, 2018

1 The Central Valley Immigrant Integration Collaborative, United Farm Work Foundation,  
 2 National Immigration Law Center and 15 other organizations respectfully seek leave to file a post-  
 3 trial brief as *amici curiae*. Amici Curiae submit this brief to present the Court with recently  
 4 published (January 2019) research<sup>1</sup> addressing whether the inclusion of the Citizenship Question  
 5 on the 2020 Census will lead to an undercount of immigrant and Latino populations in San Joaquin  
 6 Valley region and the State of California as a whole.

7 Amici are community organizations, philanthropic institutions, and service providers who  
 8 are focused on ensuring that the all Californians—including those in the San Joaquin Valley—are  
 9 able to live in fully represented, fully resourced, empowered, and healthy communities.  
 10 Differential undercount in the decennial census is a critical public policy concern. Any such  
 11 undercount will lead to a misallocation of census-driven federal and state funding and inequitable  
 12 political representation. Overcoming differential undercount of racial/ethnic minorities has been a  
 13 challenge throughout the history of the U.S. Census. There has been widespread and well-justified  
 14 alarm about the U.S. Department of Commerce’s plans to add a Citizenship Question to the  
 15 decennial census, which will undoubtedly exacerbate this problem. In the ten months since the  
 16 Secretary of Commerce announced his decision to add the proposed Citizenship Question, broad  
 17 public consensus has underscored the grave concern that his decision would decrease Census 2020  
 18 response rates among non-citizens more than among U.S.-born citizens. Given the San Joaquin  
 19 Valley region and California’s relatively high proportions of Latino and immigrant populations as  
 20 compared to the rest of the Country, the San Joaquin Valley region and California will ultimately  
 21 be disproportionately harmed by any resulting undercount of these populations.

22 Moreover, adding the proposed Citizenship Question will likely have more than simply  
 23 fiscal implications. The transformation of the decennial census from a civic ritual of affirmation—  
 24 securing an accurate picture of the U.S., a “mirror of America”—into an exercise in government-  
 25 sponsored efforts to diminish the importance of immigrants and blur our vision of a diverse  
 26 American nation, will take a severe toll on civic life. The damage wrought by efforts to add the  
 27

28 \_\_\_\_\_  
<sup>1</sup> This research is attached as Exhibits A and B to the *Amicus Curaie* Brief

1 proposed Citizenship Question to Census 2020 will negatively impact a wide range of immigrant  
 2 integration initiatives. The State of California itself, through legislative and regulatory action,  
 3 along with a multitude of public institutions in California and the San Joaquin Valley, have worked  
 4 for decades to effectively integrate immigrants into community life. A 2020 Census with the  
 5 proposed Citizenship Question—widely recognized as a proxy for an inquiry into immigration  
 6 status—will only serve to undermine the decades of work that public institutions throughout  
 7 California have invested in this mission, accelerating rapid growth in government distrust and  
 8 disengagement, and will only further foment community disappointment and anger regarding anti-  
 9 immigrant policies.

10 *Amici* have a significant interest to the case. The following briefly describes each  
 11 organization:

12 **Blue Shield of California Foundation** (the “Foundation”) is a private foundation whose  
 13 mission is to build lasting and equitable solutions to make California the healthiest state in the  
 14 country and end domestic violence. To achieve this mission, the Foundation builds strong, safe,  
 15 and vibrant communities in California where all people are heard, respected, and have  
 16 opportunities to contribute. The Foundation’s interest in this case arises from a deep concern that,  
 17 if included in the Census, a question about citizenship will significantly undermine efforts to  
 18 achieve a fair and comprehensive Census in 2020. As shown by the Foundation-funded research  
 19 described in this Brief, inclusion of a citizenship question would decrease the willingness of many  
 20 first-and second-generation immigrants to respond to the Census. The Foundation, our grantees,  
 21 and our governmental partners in California all rely on accurate Census data as a necessary  
 22 foundation for a well-functioning government and robust civil society. Accurate Census data helps  
 23 identify community needs, informs grantmaking priorities, and drives funding for many  
 24 government programs that are necessary supports for the well-being of our communities. Inclusion  
 25 of a citizenship question in the Census would strike at the heart of our ability to accurately assess,  
 26 and take into account, the assets and needs of vulnerable communities – a step that is essential for  
 27 us to achieve our goal of making California the healthiest state.

1           **The California Endowment** (“The Endowment”) is a private statewide health foundation,  
2 established in 1996, with the stated mission to expand access to affordable quality health care for  
3 underserved individuals and communities, and to promote fundamental improvements in the health  
4 status of all Californians. This commitment to improving health beyond access to health care is  
5 globally recognized by the term “social determinants of health.” Pursuant to our mission, therefore,  
6 The Endowment works to improve the social determinants of health of Californians by investing  
7 in the social, economic, and civic power of residents and communities who have been the targets  
8 of exclusion, stigma, and discrimination and by collaborating with public and private sector  
9 partners at the state and local levels to improve health outcomes for all Californians.

10           The Endowment’s interest in the outcome of this case arises out of grave concerns that the  
11 inclusion of a citizenship question in the 2020 Census will adversely impact the health and  
12 wellbeing of California residents as a whole, the effectiveness of our nonprofit and public partners,  
13 and the lives and livelihoods of our most vulnerable Californians, namely, our immigrant and  
14 language-minority families, many of whom struggle to secure basic needs for their families and  
15 maintain healthy and vibrant communities.

16           As the most populous and diverse state in the nation, the impact of any proposed changes  
17 to the 2020 Census are most profoundly felt in California. Under the United States Constitution,  
18 the census serves as a fundamental building block for our democracy, affecting not only the  
19 apportionment of each state’s representation in the U.S. House of Representatives, but also the  
20 allocation of more than \$800 billion in federal government resources annually to states and  
21 localities. Because 2020 Census data is used to determine the allocation of federal funding levels  
22 and democratic representation for a decade, any changes to the census that would dissuade  
23 participation or exclude entire populations from being counted must be assessed very carefully, as  
24 such changes could initiate a ripple of long lasting negative and potentially irreversible effects.

25           The Endowment relies on data collected through an accurate census to inform not only our  
26 work and strategies, but that of our philanthropic, governmental and business partners throughout  
27 the state. Census data informs a range of local services and decisions including the location of  
28 schools, hospitals and housing. An accurate census helps the private sector make investment

1 decisions about facilities, hiring, and marketing. Census data serves as an essential tool that allows  
2 health care service providers, public health officials, practitioners, and advocates to effectively  
3 anticipate and address public health issues, assess health risks and trends over time and deploy  
4 limited resources where they may be most needed. Our partners in state and local government  
5 likewise have a major stake in assuring that the census is fair and accurate. A census undercount  
6 will lead to serious distortions in our collective ability to understand and direct appropriate  
7 resources to those who make up California's diverse population. In short, an accurate census is  
8 essential to our ability to achieve our mission.

9 For the census to serve its intended purpose, meet its constitutional mandate and remain an  
10 essential data utility for both the public and the private sectors, it must be inclusive of all persons  
11 living in California, not just citizens. The Endowment believes that inclusion of a citizenship  
12 question in the 2020 Census will lead to a serious undercount across the state, especially in those  
13 communities with significant numbers of immigrant families. Not only will a citizenship question  
14 discourage noncitizens from responding to the census, but it will likely discourage other family  
15 and household members as well. The impact of excluding so many California residents from  
16 participating in the census, especially in communities with concentrations of immigrants, will  
17 dramatically change the purpose and value of the census. Communities would be disempowered  
18 by the loss of representation in the political process and disadvantaged by reductions in necessary  
19 health and social services – especially the most vulnerable populations prioritized by The  
20 California Endowment. Philanthropic organizations will not be able to fill the gaps created by this  
21 anticipated undercount in Census 2020. A failed and unreliable Census helps no one and harms  
22 everyone. A fair and accurate census that includes effective measures to count “hard-to-count”  
23 people is imperative for The California Endowment and for all Californians.

24 The **California Pan-Ethnic Health Network (CPEHN)** is a statewide multicultural health  
25 advocacy organization. Founded over 25 years ago, CPEHN unites communities of color to  
26 achieve health and wellness, and to eliminate persistent health inequities. CPEHN derives its  
27 strength from its mobilizing arm, the Having Our Say (HOS) coalition which consists of over 30  
28 community-based organizations across California working together to improve access to care and

1 health outcomes as well as through its Behavioral Health Equity Collaborative (BHEC) and  
2 California Oral Health Network (COHN) partners. California has made huge strides in reducing  
3 health disparities and improving health outcomes for all Californians. CPEHN's interest in the  
4 outcome of this case arises out of a concern that, if adopted, the inclusion of the Citizenship  
5 Question would have an adverse impact on the health of California's low-income communities of  
6 color, including immigrants and their families, and mixed status families, who would be  
7 disempowered by the loss of representation in the political process.

8       The **California Rural Legal Assistance Foundation** (CRLA Foundation) advocates for  
9 low-income, predominantly immigrant, rural communities in the agricultural regions of California.  
10 CRLA Foundation's advocacy includes health, education, housing, immigration, employment  
11 rights, community environment, and infrastructure issues affecting rural areas. CRLA Foundation  
12 addresses practices by both private and public entities that disproportionately and negatively affect  
13 communities of color and relies on demographic mapping and other analyses that derive from  
14 census reports to support this work. Undercounting of immigrants will directly affect the reliability  
15 of this data. CRLA Foundation represents populations that historically have been subject to a  
16 differential undercount in the Decennial Census, including, migrant and seasonal farmworkers,  
17 immigrants, limited English proficient speakers, racial and ethnic groups, children, renters, large  
18 families, complex households, people who reside in hidden housing and hard to reach  
19 communities, and other difficult to reach, lower income, especially rural geographies. CRLA  
20 Foundation's work will be harmed if responses to census questionnaires in rural communities  
21 decline for fear of responding to questions regarding citizenship. A question about citizenship  
22 status, in the current anti-immigrant atmosphere, will only contribute to reluctance to participate  
23 in the Census and feed uncertainties about privacy and confidentiality. Fewer census responses  
24 and a resulting increase in the differential undercount in these rural communities and the resulting  
25 lack of accurate data would have an adverse effect on the very funding CRLA Foundation has  
26 advocated needs to be fairly apportioned in the areas of health, education, housing, land use and  
27 planning and basic community infrastructure and on civil rights enforcement.

1           The **California Wellness Foundation** (Cal Wellness) is a statewide organization with a  
 2 mission to protect and improve the health and wellness of the people of California. California is  
 3 home to the largest population of immigrants, making our state one of the most diverse in the  
 4 country. Cal Wellness relies on census data to help identify and serve the needs of our diverse  
 5 communities, particularly communities that are often underrepresented and underserved. Cal  
 6 Wellness believes every person in California should be able to enjoy good health and experience  
 7 wellness. To achieve our mission, Cal Wellness makes grants to support organizations that increase  
 8 access to health care, quality education, good jobs, healthy environments, and safe neighborhoods.  
 9 Cal Wellness funds direct services that address the urgent needs of low-income individuals, people  
 10 of color, immigrants and refugees, youth and residents of rural areas. As a statewide funder, Cal  
 11 Wellness' interest in the outcome of this case comes from concern that if adopted, the addition of  
 12 a citizenship question would compromise a fair and accurate count and would hinder participation  
 13 of many California residents in the 2020 Census. As a result, allocation of federal dollars to support  
 14 essential safety net services that keep our communities healthy and well would be compromised.

15           **Californians for Pesticide Reform** (CPR) is a diverse, statewide coalition of over 190  
 16 member organizations working with communities on the frontlines of pesticide exposure to  
 17 strengthen pesticide policies in California and protect public health and the environment. Member  
 18 groups include public and children's health advocates, clean air and water groups,  
 19 health practitioners, environmental justice groups, labor, education, farmers and sustainable  
 20 agriculture advocates from across the state. CPR works primarily with Latinx farmworker  
 21 communities throughout California, but particularly in the San Joaquin Valley, who are  
 22 disproportionately burdened with multiple health hazards, usually without insurance, and have the  
 23 least political power to confront the problem. CPR is strongly opposed to adding a citizenship  
 24 question to the census as research shows it will dramatically reduce (in some cases by half) the  
 25 number of people within certain, primarily Latinx, populations in the San Joaquin Valley who  
 26 respond to the census. This decline in response is expected among undocumented immigrants who  
 27 grow the nation's produce, legal residents, naturalized citizens, and U.S.-born citizen children of  
 28 foreign-born parents who are concerned about the racist and anti-immigrant enforcement actions



that could arise from responding to such a census question. This decline in response rate will not be made up for by proxy interviews as neighbors are rightly reluctant to provide information about their neighbors without permission. In the San Joaquin Valley, the expected region-wide undercount of nearly 200,000 people is likely to have a fiscal impact of billions of dollars over the next decade, a serious problem for the low-income, Latinx communities we work with who are already underrepresented and underserved, with some of the highest levels of poverty, pollution and food insecurity in the United States.

The **Central Valley Immigrant Integration Collaborative** (CVIIC) serves immigrant families in California's San Joaquin Valley. The region's residents include some 900,000 immigrants and over half a million children with at least one immigrant parent. Immigrants in the region are for the most part long-term residents, with deep roots in the region's economy and society. As part of CVIIC's work in preparation for the 2020 Census, CVIIC has helped establish local census coalitions and complete count committees in Fresno, Tulare, Kern, Merced, Stanislaus and San Joaquin counties. The local groups include a wide range of organizations with a presence in the region, ranging from nonprofit organizations to public sector agencies, health advocates, faith-based communities, chambers of commerce, and others. Invariably, a major concern of all the committees is that the inclusion of a citizenship question in the 2020 Census will have a significant impact on the participation of the families they serve and undermine their efforts to promote an accurate and complete count of immigrant families and their social networks. The opposition to the inclusion of the proposed citizenship question is widespread among these agencies, which work on a daily basis with immigrants and other hard to count populations. The costs of a significant undercount would be devastating to a region of the state and the country that is already suffering from some of the highest levels of poverty in the nation. Moreover, it would exacerbate the problem of political underrepresentation and heighten alienation from our democratic process. For these and numerous other reasons, CVIIC opposes the inclusion of the proposed citizenship question in the 2020 Census.

The **Community Water Center** ("CWC") is a not-for-profit organization based in California working to ensure all Californians have access to safe, clean, and affordable



1 drinking water. We work with communities and strive to achieve our goal through the use of  
2 education, outreach, and advocacy. CWC has worked with low-income communities throughout  
3 the South San Joaquin Valley, and now Salinas Valley, for over 12 years. Many of the residents  
4 within these communities are undocumented and often filling important roles within the heart of  
5 agriculture industry in California. CWC's interest in the outcome of this case arises out of a concern  
6 that the inclusion of a "citizenship" question on the 2020 census will result in the significant under-  
7 counting of a portion of our country, and thus result in under representation for many Americans.  
8 Undocumented populations will be deterred out of fear for themselves and their families from  
9 either answering honestly as to their immigration status or from filling out the census at all,  
10 effectively and unfairly erasing them from our understanding of the makeup of our country's  
11 population. An inaccurate accounting will also result in many communities appearing less  
12 populated, causing an under representation at all levels of government and even less essential state  
13 and federal funding flowing to keep communities alive and grow their resiliency.

14       Incorporated in 1986, the **Grove Foundation** is dedicated to grant making in the areas of  
15 reproductive rights, safety net, immigration, environmental justice and civic  
16 engagement. The Grove Foundation has a particular interest in ensuring the rights of low income,  
17 unrepresented and marginalized people. The Grove Foundation's interest in the 2020 census  
18 centers around its concerns over a full and accurate count. The Grove Foundation believes that  
19 including the question will undermine the census count impacting representation as well as  
20 resource allocation for the communities we support.

21       The **Immigrant Legal Resource Center (ILRC)** is a national non-profit resource center  
22 on immigration law and policy. The ILRC is committed to the fair and humane administration of  
23 United States immigration laws and respect for the civil and constitutional rights of all persons.  
24 The ILRC's interest in this case stems from its work to promote civic engagement by immigrant  
25 communities. The ILRC also has full-time staff based in California's San Joaquin Valley that work  
26 with local immigrant communities and legal service providers. Inclusion of the citizenship  
27 question in Census 2020 will deter participation by immigrant community members and ultimately  
28 lead to diluted political representation and inadequate levels of federal funding. For a region like

1 the San Joaquin Valley, which has a large immigrant population and some of the highest levels of  
2 poverty in the state, this would have dire consequences.

3       **The Jakara Movement** is a primary organization in the United States exclusively  
4 dedicated to defending and advancing the rights and opportunities of Sikh-Americans, many of  
5 which are mixed-status. A “mixed-status family” is a family whose members include people with  
6 different citizen- ship or immigration statuses. One example of a mixed-status family is one in  
7 which the parents are undocumented and the children are U.S.-born citizens. The Jakara  
8 Movement's interest in the outcome of this case arises out of a concern that the inclusion of a  
9 Citizenship Question would have an adverse impact on Sikh-American immigrants and their  
10 families, including mixed status families, who would be disempowered by the loss of  
11 representation in the political process.

12       The **Latino Community Foundation (LCF)** is the premier statewide foundation focused  
13 on unleashing the power of Latinos in California. LCF fulfills its mission by building a movement  
14 of civically engaged philanthropic leaders, investing in Latino-led organizations, and increasing  
15 political participation of Latinos. LCF believes that the U.S. Census is a cornerstone of our  
16 democracy. It is responsible for distributing \$76 billion in federal funds to California annually and  
17 ensures our fair political representation. An accurate count is necessary for California’s Latino  
18 community to assert their rightful claim to tax dollars to build necessary infrastructure, schools,  
19 and access to healthcare—among other things. The census also secures political voice and  
20 representation at the federal level. The citizenship question on the next census will disincentivize  
21 Latinos from participating in the 2020 Census. Latinos across California, especially the  
22 undocumented community, are fearful and anxious over how their response to this question be will  
23 be used. Research has already validated these assertions. A January 2018 poll commissioned by  
24 LCF showed that over 50% of California’s Latinos believe that their responses to the census might  
25 be shared with immigration authorities. Moreover, a recent survey from the San Joaquin Valley  
26 Health Fund showed that only 25% of undocumented immigrants in the San Joaquin Valley would  
27 respond to a census that includes a citizenship question. For LCF, it is imperative that a citizenship  
28

question is left off the census because politicizing the census by adding a citizenship question would do great harm to the future of our state and nation.

**Leadership Counsel for Justice and Accountability** (Leadership Counsel) is a not-for-profit 501(c)(3) organization based in the San Joaquin Valley and Eastern Coachella Valley. Leadership Counsel works with lower income, majority Latino communities and neighborhoods in the San Joaquin and Eastern Coachella Valleys on issues related to neighborhood health and community sustainability including access to housing, safe drinking water, and transit. Leaders from the under-resourced neighborhoods struggle each day to draw state and federal resources to their communities to address decades of underinvestment in their neighborhoods, to improve public health, and increase access to economic opportunity. They also work hard to ensure fair representation in decision-making bodies from city hall to Congress. A census undercount would undermine the work that communities throughout the San Joaquin Valley and the state are engaged in to secure resources for basic services and infrastructure and fair representation by government, thereby threatening community health, well-being, and economic opportunity.

The **National Immigration Law Center** (“NILC”) is the primary national organization in the United States exclusively dedicated to defending and advancing the rights and opportunities of low-income immigrants and their families. Over the past 35 years, NILC has won landmark legal decisions protecting fundamental rights, and advanced policies that reinforce our nation’s values of equality, opportunity, and justice. NILC’s interest in the outcome of this case arises out of a concern that the inclusion of a citizenship question in the 2020 Census will have an adverse impact on low-income immigrants and their families because it will lead to a undercount of these communities, which would then be disempowered by loss of representation in the political process and disadvantaged by a reduction in necessary services.

Founded in 1976, **Radio Bilingüe** (RB), is California nonprofit based in Fresno, California. RB is a trusted, ethnic, community media platform broadcasting particularly to indigenous migrant communities, farm workers, mono-lingual Spanish-speakers and other hard to reach populations, and across multiple generations. Radio Bilingüe has 3 full power FM radio stations that serve the entire San Joaquin Valley 24/7 and an additional 3 radio stations

1 in California, and an additional 8 full power FM radio stations in Arizona, New Mexico, Colorado  
2 and south Texas; RB also has 9 translators. RB's programming for the San Joaquin Valley is on-  
3 air 24/7, and includes coverage of local and national news, public affairs and cultural issues, as  
4 well as rapid-response broadcasting to relay urgent updates or to clarify misinformation circulating  
5 in communities.

6 The vast majority of Radio Bilingüe's public radio listeners are Latinos in mixed-  
7 immigration-status families including native-born citizens, naturalized citizens, legal and  
8 undocumented residents and new immigrants. RB listeners are primarily Spanish-speaking, but  
9 also from Mixteco- and Triqui-speaking indigenous communities, who are among the poorest in  
10 California. Considering this profile, and from audience surveys, RB knows that very few listen to  
11 traditional English language public radio and deeply trust the news and information broadcast by  
12 RB.

13 In recent months RB has heard from many in its audience through its live  
14 interactive radio talk shows that they are not likely to participate in the Census count if there is a  
15 citizenship question on the questionnaire. Radio Bilingüe has hosted academic researchers on our  
16 information radio platforms that have done research on the prospects of Latino participation if  
17 there is a citizenship question on the Census form; the results are not encouraging. Many Latinos  
18 will not participate. The prospects of Latinos, the largest racial group in the San Joaquin Valley,  
19 not participating would be devastating. The Latino population is relatively young with the Latino  
20 community having about two thirds of the children or more; the majority population of all residents  
21 in the San Joaquin Valley depend on MediCal for their healthcare; there is deep poverty in the  
22 Valley. Fresno, which is Radio Bilingüe's headquarters, has among the poorest zip codes in the  
23 nation and the highest concentration of children living in poverty. Since the Census data will be  
24 used in the allocation of significant programs serving the poor in health care and programs for  
25 children, the nonparticipation by Latinos will be seriously detrimental.

26 **Sierra Health Foundation** is a private foundation whose mission is to improve the health  
27 and quality of life for all who live in a 26-county Northern California region. The foundation relies  
28 heavily on census and American Community Survey data for our own planning, grant-making, and

1 engagement with grantees and philanthropic and community partners. The foundation is one of 18  
 2 funder partners of the San Joaquin Valley Health Fund, a project of The Center for Health Project  
 3 Management, Sierra Health Foundation's 501(c)(3) public charity. Given the important role  
 4 census data has in federal (and state) program funding and political representation, and the data  
 5 implications for advancing the foundation's mission and service to communities in need, the  
 6 foundation is a significant stakeholder in this litigation. Sierra Health Foundation believes strongly  
 7 that the inclusion of a citizenship question on Census 2020 would deter non-citizens, relatives and  
 8 other community members throughout the United States from responding to the census, thereby  
 9 detrimentally impacting the health and wellbeing of millions of children and families.

10       The **United Farm Workers Foundation** (UFW Foundation) is a dynamic nonprofit  
 11 organization established in 2006 with the core purpose of empowering communities to ensure  
 12 human dignity. UFW Foundation serves over 90,000 immigrants annually through a holistic  
 13 approach; UFW Foundation provides critical services and engage our constituents in systemic  
 14 change to break the cycle of poverty. UFW Foundation's regional offices—located in the San  
 15 Joaquin Valley region and other regions in the state of California—are safe havens that provide  
 16 resources and services such as credible immigration legal advice and act as hubs for educational  
 17 outreach and organizing. The UFW Foundation's interest in the outcome of this case is of great  
 18 concern as this will disproportionately negatively impact our members who are farm worker  
 19 families, low-income immigrants, immigrants with disabilities and persons of color. UFW  
 20 Foundation believes that adding this question to the census is a racist stunt that will have dangerous  
 21 consequences for all of our families, friends, and neighbors as it continues to exacerbate the  
 22 rhetoric of hate. Farm working and immigrant families in the Central Valley are not only vital to  
 23 our economy and food security; they are also vital to our communities. UFW Foundation believes  
 24 that it is crucial that a citizenship question is not included in the Census.

25       **Westside Family Prevention Services Network** (WFPSN) is a non-profit, grassroots  
 26 CBO headquartered, for the past twenty years, in the agricultural city of Huron,  
 27 California. WFPSN's mission is family strengthening and it works to prevent child abuse. It  
 28 operates two Neighborhood Resource Centers, one in Huron and another in a nearby community

1 with similar demographics, Coalinga, and provides home visiting services for vulnerable families  
 2 in sixteen, similar, rural communities on the West side of Fresno County. The Citizenship Question  
 3 will result in a severe undercount in the rural, agricultural communities of West Fresno County. If  
 4 these communities are undercounted they will lose representation in the political process, and they  
 5 will lose the social and human services upon which they depend for survival like access to quality  
 6 and affordable health care, parenting and life skills trainings, resume and employment assistance,  
 7 and crisis management services for victims of violent crime.

8 *Amici* have a significant stake in this case, and their brief highlights the new research on  
 9 the impact of the proposed Citizenship Question on the San Joaquin Valley and to California as a  
 10 whole. For the reasons stated above, *amici* respectfully request that the Court grant their motion to  
 11 file a brief as *amici curiae*.

12 Dated: February 1, 2019

Respectfully submitted,

13 /s/Nicholas Espiritu

14 Nicholas Espiritu

15 National Immigration Law Center

3450 Wilshire Boulevard, #108-62

16 Los Angeles, CA 90010

17 Telephone: 213-639-3900

Email: [espiritu@nilc.org](mailto:espiritu@nilc.org)

18 Attorney for *Amici Curiae*

**CERTIFICATE OF SERVICE**

The undersigned certifies under penalty of perjury under the laws of the United States and the laws of the State of California, that on the 1<sup>st</sup> day of February, 2019, the foregoing document will be served electronically upon registered participants identified on the Notice of Electronic Filing.

*Attorney for Amici*

By /s/Nicholas Espíritu  
Nicholas Espíritu