

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, CITY OF NEW YORK,  
STATE OF CONNECTICUT, and STATE OF  
VERMONT,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND  
SECURITY; KEVIN K. McALEENAN, *in his official  
capacity as Acting Secretary of the United States  
Department of Homeland Security*; UNITED STATES  
CITIZENSHIP AND IMMIGRATION SERVICES;  
KENNETH T. CUCCINELLI II, *in his official capacity  
as Acting Director of United States Citizenship and  
Immigration Services*; and UNITED STATES OF  
AMERICA,

Defendants.

**CIVIL ACTION NO.  
19 Civ. 07777 (GBD)**

MAKE THE ROAD NEW YORK, AFRICAN  
SERVICES COMMITTEE, ASIAN AMERICAN  
FEDERATION, CATHOLIC CHARITIES  
COMMUNITY SERVICES, and CATHOLIC LEGAL  
IMMIGRATION NETWORK, INC.,

Plaintiffs,

v.

KEN CUCCINELLI, in his official capacity as Acting  
Director of United States Citizenship and Immigration  
Services; UNITED STATES CITIZENSHIP &  
IMMIGRATION SERVICES; KEVIN K.  
McALEENAN, in his official capacity as Acting  
Secretary of Homeland Security; and UNITED STATES  
DEPARTMENT OF HOMELAND SECURITY,  
Defendants.

**CIVIL ACTION NO.  
19 Civ. 07993 (GBD)**

**DECLARATION OF ELENA GOLDSTEIN**

Elena Goldstein, 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 the Governmental Plaintiffs in this action. I submit this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction or in the Alternative for a Temporary Restraining Order.

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

1. Order in *Dep't of Homeland Sec., et al. v. New York, et al.*, 589 U.S. \_\_\_\_ (2020), dated January 27, 2020.
2. Order in *Dep't of Homeland Sec., et al. v. New York, et al.*, No. 19A785, dated April 24, 2020.
3. Order in *Wolf, et al. v. Cook County, et al.*, No. 19A905, dated April 24, 2020.
4. Printout of USCIS Public Charge Alert, dated Mar. 13, 2020.
5. Letter from State Attorneys General to Chad Wolf, Acting Secretary, U.S. Department of Homeland Security et al., dated Mar. 6, 2020.
6. Letter from Oxiris Barbot, MD, Commissioner, Commissioner, New York City Department of Health and Mental Hygiene et al., to Chad Wolf, Acting Secretary, U.S. Department of Homeland Security et al., dated Mar. 18, 2020.
7. Letter from State Attorneys General to Chad Wolf Letter from State Attorneys General to Chad Wolf, Acting Secretary, U.S. Department of Homeland Security et al., dated Mar. 19, 2020.
8. Declaration of Eden Almasude, Psychiatrist, Yale School of Medicine.
9. Declaration of Oxiris Barbot, MD, Commissioner, New York City Department of Health and Mental Hygiene.
10. Declaration of Lawrence L. Benito, Executive Director, Illinois Coalition for Immigrant and Refugee Rights, Chicago, IL.

11. Declaration of Maria Lucia Chavez, Deputy Director of Northwest Immigrant Rights Project, Seattle, WA.

12. Declaration of Sabrina Fong, Deputy Director of Research and Policy Advisor, New York City Mayor's Office of Immigrant Affairs, NY.

13. Declaration of Janel Heinrich, Director of Public Health, Madison and Dane County, Madison, WI.

14. Declaration of Dana Kennedy, Director of Community Partnerships, Center for Health Progress, Denver, CO.

15. Declaration of Camille Kritzman, Case Manager, Integrated Refugee & Immigrant Services, New Haven, CT.

16. Declaration of Leighton Ku, Professor of Health Policy and Management and Director of the Center for Health Policy Research at the Milken Institute School of Public Health, George Washington University in Washington, DC.

17. Declaration of Pedro Moreno, Assistant Professor of Family Medicine, University of California San Francisco, CA.

18. Declaration of Bitta Mostofi, Commissioner, New York City Mayor's Office of Immigrant Affairs, NY.

19. Declaration of Lisa M. Newstrom, Managing Attorney, Santa Clara County Regional Office of Bay Area Legal Aid, San Jose, CA.

20. Declaration of John Paul Newton, Director of the Public Benefits Unit, Bronx Legal Services, New York, NY.

21. Declaration of Rachel Pryor, Deputy Director for Administration, Virginia Department of Medical Assistance Services, Richmond, VA.

22. Declaration of Aaron Coskey Voit, Managing Attorney, Monterey County Medical-Legal Partnership at California Rural Legal Assistance, Inc., Salinas, CA.

23. Declaration of Sarah Nolan, Supervising Attorney, Legal Health Division, New York Legal Assistance Group, New York, NY.

24. Declaration of Theo Oshiro, Deputy Director for Make the Road New York, NY.

25. Declaration of C. Mario Russell, Director, Division of Immigrant and Refugee Services, Catholic Charities Community Services, Archdiocese of New York.

26. Declaration of Jo-Ann Yoo, Executive Director, Asian American Federation, New York, NY.

27. Declaration of Alejandra Aguilar, Lead Health Educator, HIV Navigation Services Unit, East Los Angeles Women's Center, Los Angeles, CA.

Dated: April 28, 2020

By: /s/ Elena Goldstein

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