

No. 19A785

**In the
Supreme Court of the United States**

DEPARTMENT OF HOMELAND SECURITY, et al.,

Applicants,

v.

NEW YORK, et al.,

Respondents.

I, Camille Kritzman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a case manager at Integrated Refugee & Immigrant Services (“IRIS”). IRIS, which primarily serves as a refugee resettlement program based in Connecticut, provides refugees with a variety of services designed to help them on the road to self-sufficiency by providing lifesaving support during their transition to life in the United States. IRIS also works with asylees, individuals seeking asylum in the United States, undocumented immigrants, as well as other non-refugee immigration status. I work as a case manager for immigrants seeking asylum. As a case manager, I help my clients enroll their children in school, assist them in obtaining immigration assistance, and connect my clients with a variety of social services, including services provided by IRIS or the State of Connecticut. I have worked for IRIS for the last year and graduated from the University of Connecticut in 2013. I have personal knowledge of all of the facts set forth in this declaration.

2. Since the Public Charge Rule went into effect at the end of February, I have observed that many of my clients who are eligible for social services have refused to apply for those necessary social services.

3. For example, at the end of February 2020, one of the families that I work with disenrolled from HUSKY, the State of Connecticut's public health coverage program for eligible children, parents, relative caregivers, elders, individuals with disabilities, adults without dependent children, and pregnant women, because they feared that there could be immigration consequences to their continued enrollment. The parents worried that if they enrolled in health insurance, they would risk negative immigration consequences and feared being separated from their child for immigration reasons.

4. The COVID-19 crisis has caused many of my clients to lose their employment, and many face serious food insecurity. However, some of my clients have refused to sign up for food benefits because they fear the immigration consequences of accessing those services. For example, in March of 2020, one family that I work with told me that it was better for them to be without food than to apply for SNAP because they feared adverse immigration consequences. Another client recently refused to sign up to use IRIS's own food pantry because of the Public Charge Rule. I could not convince this client—who is currently unemployed because of the COVID-19 epidemic—to access this necessary food resource, even though use of the food pantry is totally outside of the scope of the Rule.

4/10/2020

DATED this _____ day of April, 2020 at New Haven, CT

DocuSigned by:


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CAMILLE KRITZMAN