

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CAMPAIGN LEGAL CENTER,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE,

Defendant.

Civil Action No. 18-1187 (TSC)

DECLARATION OF NADAV ARIEL

I, Nadav Ariel, do hereby declare the following to be true and correct:

1. I am an attorney licensed in the District of Columbia and represent Plaintiff Campaign Legal Center (“CLC”) in the above captioned case. I make this Declaration in support of Plaintiff’s Cross-Motion for Summary Judgment and Opposition to Defendant’s Motion for Summary Judgment. The facts stated herein are based on my personal knowledge and my review of relevant documents.

2. Attached as **Exhibit 1** is a true and correct copy of a memorandum dated March 26, 2018 from Wilbur Ross to Karen Dunn Kelley as published by the United States Department of Commerce at https://www.commerce.gov/sites/commerce.gov/files/2018-03-26_2.pdf.

3. Attached as **Exhibit 2** is a true and correct copy of a letter dated December 12, 2017 from Arthur Gary to Dr. Ron Jarmin as filed on June 8, 2018 in the administrative record published by the United States Department of Commerce at

<http://osec.doc.gov/opog/FOIA/Documents/AR%20-%20FINAL%20FILED%20-%20ALL%20DOCS%20%5bCERTIFICATION-INDEX-DOCUMENTS%5d%206.8.18.pdf>.

4. Attached as **Exhibit 3** is a true and correct copy of a June 21, 2018 memorandum by Secretary of Commerce Wilbur Ross, supplementing the administrative record, and filed on June 21, 2018 by Bureau of the Census, United States Department of Commerce in case number 1:18-cv-02921-JMF before the Southern District of New York as Document 189-1.

5. Attached as **Exhibit 4** is a true and correct copy of emails dated May 2, 2017 between Wilbur Ross and Earl Comstock as filed in the administrative record published by the United States Department of Commerce at <http://osec.doc.gov/opog/FOIA/Documents/CensusProd001.zip>.

6. Attached as **Exhibit 5** is a true and correct copy of emails dated August 8, 2017 through August 10, 2017 between Wilbur Ross and Earl Comstock as filed in the administrative record published by the United States Department of Commerce at http://osec.doc.gov/opog/FOIA/Documents/Census_Prod002.zip.

7. Attached as **Exhibit 6** is a true and correct copy of a memo dated September 8, 2017 from Earl Comstock to Wilbur Ross filed on September 17, 2018 in case number 1:18-cv-02921-JMF before the Southern District of New York as Document 325-1.

8. Attached as **Exhibit 7** is a true and correct copy of emails dated September 13, 2017 through September 18, 2018 between Danielle Cutrona and Wendy Teramoto as filed in the administrative record published by the United States Department of Commerce at <http://osec.doc.gov/opog/FOIA/Documents/CensusProd001.zip>.

9. Attached as **Exhibit 8** is a true and correct copy of emails dated November 27, 2017 through November 28, 2017 between Wilbur Ross and Peter Davidson as filed in the

administrative record published by the United States Department of Commerce at
http://osec.doc.gov/opog/FOIA/Documents/Census_Prod002.zip.

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 24, 2018

/s/ Nadav Ariel
Nadav Ariel