



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

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Re: Comment of Citizens for Responsibility and Ethics in Washington in response to Notice of Proposed Rulemaking, titled “Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions” (Docket No. 260903-0005)

Citizens for Responsibility and Ethics in Washington (CREW) is a nonpartisan nonprofit organization committed to promoting ethics, transparency and accountability in government and to preserving democratic institutions. We submit this comment on the Notice of Proposed Rulemaking (NPRM or proposed rule) titled “Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions” (Docket No. 260903-0005), issued by the Department of Commerce, Census Bureau, on September 10, 2026.¹ We strongly urge the Bureau to withdraw its proposal to redefine “usual residence” to exclude certain persons in the United States from the apportionment count and its proposal to collect information about legal status by adding a question to the decennial census or by relying on interagency data-sharing agreements.² The Bureau’s proposed definition would unlawfully exclude “persons” required to be included under the Fourteenth Amendment’s apportionment provisions, and the methods by which the Bureau proposes to confirm an individual’s legal status likely would result in incomplete and inaccurate data. The Bureau proposes these changes amid the administration’s ongoing efforts to target immigrant and minority communities and fails to explain what steps it will take to prevent undercounts of these populations. We urge the Bureau to withdraw these proposed additions to the Code of Federal Regulations governing the decennial census.

¹ Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions, 91 Fed. Reg. 57524.

² *Id.* at 57526.

Among other efforts to threaten the safety and well-being of immigrant communities, in President Trump's second term his administration has deported immigrants to third countries without notice,³ arrested U.S. citizens⁴ and thousands of immigrants with no criminal record,⁵ detained people in inhumane conditions,⁶ attempted to revoke immigrants' citizenship,⁷ threatened to withhold funding from so-called "sanctuary jurisdictions"⁸ and attempted to limit who qualifies for birthright citizenship under the Fourteenth Amendment.⁹ Had the Supreme Court not struck down this final effort—which the president recently called "unfortunate" because, in his view, the Fourteenth Amendment "wasn't for Chinese people . . . pouring into our country"—approximately 255,000 people per year would be born without this constitutionally conferred legal status.¹⁰

In addition to this record of hostility toward immigrant communities, the first Trump administration's attempt to add a citizenship question to the decennial census raises doubt about any alleged justification by this administration to redefine who must be included in the apportionment count. Within two weeks of assuming office during President Trump's first term, then-Department of Commerce Secretary Wilbur Ross started to take steps to add

³ Laura Romero, *Supreme Court rules Trump administration can continue rapidly deporting migrants to 3rd countries*, ABC News (Sep. 29, 2026), <https://abcnews.com/US/supreme-court-rules-trump-administration-continue-deporting-migrants/story?id=136867487>.

⁴ Naureen Shah, *We Documented 1,200+ Actions by ICE. Here's What We Found.*, ACLU (July 16, 2026), <https://www.aclu.org/news/immigrants-rights/we-documented-1200-actions-by-ice-heres-what-we-found>.

⁵ David Nakamura & Emmanuel Martinez, *How ICE is arresting soaring numbers of immigrants with no criminal record*, Wash. Post (Aug. 8, 2026), <https://www.washingtonpost.com/immigration/2026/08/28/how-ice-arrests-immigrants-with-no-criminal-record-are-soaring-under-trump/>.

⁶ Joe Walsh, *Alligator Alcatraz held detainees in "cramped conditions," sometimes "small metal enclosures," DHS watchdog finds*, CBS News (Sep. 14, 2026), <https://www.cbsnews.com/news/florida-alligator-alcatraz-small-metal-enclosures-dhs-ice-watchdog/>.

⁷ Hamed Aleaziz & Madeleine Ngo, *Trump Administration Wants to Strip 12 Immigrants of U.S. Citizenship*, N.Y. Times (May 8, 2026), <https://www.nytimes.com/2026/05/08/us/politics/trump-immigrants-citizenship.html>.

⁸ Nick Penzenstadler, *Cities that block ICE could lose police, rape kit funding, DOJ says*, USA Today (July 16, 2026), <https://www.usatoday.com/story/news/nation/2026/07/16/us-cities-police-ambulance-funding-rape-kits-ice-doj/90903355007/>.

⁹ *Trump v. Barbara*, 146 S. Ct. 2438, 2444 (2026).

¹⁰ TIME Staff, *Read the Full Transcript of Donald Trump's 2026 Interview With TIME*, TIME (Oct. 1, 2026), <https://time.com/article/2026/10/01/donald-trump-2026-interview-transcript/>; Steven Lubet, *Trump's top two voting initiatives could disenfranchise many Americans*, The Hill (Apr. 27, 2026), <https://thehill.com/opinion/campaign/5847790-birthright-voting-rights-conflict/>; *Ending Automatic Birthright Citizenship Would Significantly Increase the Size of the U.S. Unauthorized Population*, New Projections Show, Penn. St. Soc. Sci. Rsch. Inst., Population Rsch. Inst. (May 13, 2025), <https://pop.psu.edu/news/ending-automatic-birthright-citizenship-would-significantly-increase-size-us-unauthorized/>; *Trump v. Barbara*, 146 S. Ct. at 2458.

a citizenship question to the 2020 decennial census,¹¹ including by asking various agencies to request that the Bureau collect citizenship data.¹² After speaking directly to the Attorney General, Ross successfully elicited a request from the DOJ, purportedly to “enhance” Voting Rights Act enforcement.¹³ DOJ’s request letter—which “drew heavily on contributions from Commerce staff and advisors”—specifically asked for Commerce to include a citizenship question on the census.¹⁴

When the Supreme Court considered the lawfulness of these actions, it affirmed the district court’s holding that the addition of the citizenship question was unlawfully based on a pretextual rationale and thus violated the Administrative Procedure Act.¹⁵ As the Court explained:

Altogether, the evidence tells a story that does not match the explanation the Secretary gave for his decision. In the Secretary’s telling, Commerce was simply acting on a routine data request from another agency. Yet the materials before us indicate that Commerce went to great lengths to elicit the request from DOJ (or any other willing agency). And unlike a typical case in which an agency may have both stated and unstated reasons for a decision, here the VRA enforcement rationale—the sole stated reason—seems to have been contrived.¹⁶

Before these facts came to light, in congressional hearings Ross repeated the narrative that the DOJ—rather than Commerce—had initiated the request.¹⁷ And after these facts came to light, Congress held Ross and then-Attorney General William Barr in criminal contempt for

¹¹ *Dep’t of Com. v. New York*, 588 U.S. 752, 782–83 (2019). Cf. Chun Hin Jeffrey Tsoi, et al., *The Supreme Court’s big green light for a lawless second Trump administration*, CREW (July 18, 2024), <https://www.citizensforethics.org/news/analysis/the-supreme-courts-big-green-light-for-a-lawless-second-trump-administration/> (describing communications between Ross and his Deputy Chief of Staff).

¹² *Dep’t of Com.*, 588 U.S. at 762, 783–84; see also Letter from Wilbur Ross, Secretary, Department of Commerce, to Karen Dunn Kelley, Under Secretary for Economic Affairs, Department of Commerce, at 8 (Mar. 26, 2018), <https://epic.org/wp-content/uploads/privacy/litigation/pia/epic-v-commerce/Ross-citizenship-questions-letter-032618.pdf>. A study published shortly thereafter explained that, despite Ross’s claims to the contrary, “the census ha[d] never asked for the citizenship status of everyone in the country.” Thomas P. Wolf & Brianna Cea, *A Critical History of the United States Census and Citizenship Questions*, 108 Geo. L.J. Online 1, 5 (2019).

¹³ *Dep’t of Com.*, 588 U.S. at 784.

¹⁴ *Id.*

¹⁵ *Id.* at 766, 780, 785.

¹⁶ *Id.* at 784.

¹⁷ Tsoi, *supra* note 11.

stonewalling requests for documents related to this effort.¹⁸ Ross's conduct also was the subject of a Commerce Office of Inspector General investigation, which the Commerce OIG presented to the DOJ for criminal prosecution.¹⁹ The legal and practical shortcomings of the NPRM outlined below, and any stated rationale for the present proposal, must be considered against this backdrop: Both the first Trump administration's pretextual efforts to get citizenship information and to obstruct congressional oversight of those efforts, and the second Trump administration's persistent focus on targeting immigrant populations.

1. The Fourteenth Amendment requires the counting of the "whole number of persons" for apportionment.

The decennial census has been conducted every 10 years since 1790.²⁰ At its inception, the census systematically excluded significant portions of the population. Under Article I of the Constitution each enslaved human counted as only three-fifths of a person, while non-taxed Native Americans did not count at all.²¹ This intentional marginalization not only caused undercounts of these populations, but it gave disproportionate power to slave-holding states that remained accountable only to the needs of White, voting residents and not to the needs of Black Americans who lived within their borders.²²

Following the Civil War, the ratification of the Fourteenth Amendment unequivocally required "counting the whole number of persons in each State."²³ In debating whether to retain the language requiring a count of the entire population, members explained that this figure—which included non-voting classes such as women and children—constitutes "the

¹⁸ Nicholas Fandos, *House Holds Barr and Ross in Contempt Over Census Dispute*, N.Y. Times (July 17, 2019), <https://www.nytimes.com/2019/07/17/us/politics/barr-ross-contempt-vote.html>.

¹⁹ Dep't of Commerce, *Investigation into Misrepresentations of the Origins of the Proposed Citizenship Question on the Decennial Census*, Investigative Report No. 19-0728, at 19 (July 6, 2021), <https://www.citizensforethics.org/wp-content/uploads/2021/07/2021-001869-Response-Package-SIG-NED.pdf>. CREW also requested and sued for records on DOJ's decision not to prosecute Ross. CREW requests records on Wilbur Ross's misrepresentation about citizenship question, CREW (July 23, 2021), <https://www.citizensforethics.org/reports-investigations/foia-requests/crew-requests-records-on-wilbur-rosss-misrepresentation-about-citizenship-question/>; CREW sues DOJ for records on Wilbur Ross's misrepresentation about citizenship question, CREW (Feb. 1, 2022), <https://www.citizensforethics.org/legal-action/lawsuits/crew-sues-doj-for-records-on-wilbur-rosss-misrepresentation-about-citizenship-question/>.

²⁰ U.S. Census Bureau, *Decennial Census History* (Oct. 31, 2023), <https://www.census.gov/about/history/historical-censuses-and-surveys/census-programs-surveys/ddecennial-census.html>.

²¹ U.S. Const. art. I, § 2, cl. 3; Janai Nelson, *Counting Change: Ensuring an Inclusive Census for Communities of Color*, 119 Colum. L. Rev. 1399, 1409 (2019).

²² Nelson, *supra* note 21, at 1410.

²³ U.S. Const. amend. XIV, § 2; see also 8 U.S.C. § 1401 (birthright citizenship). In practice, this change did not immediately rectify the severe undercounts of these populations. Nelson *supra* note 21, at 1409-10 (explaining that the Fourteenth Amendment continued to exclude non-taxed Native Americans and that the post-Civil-War census "severely undercounted newly emancipated black people").

true basis of representation.”²⁴ Although the Supreme Court held in *Department of Commerce v. New York* that “the Enumeration Clause . . . permits Congress, and by extension the Secretary, to inquire about citizenship on the census questionnaire,”²⁵ it did not hold that the secretary could use that information to determine the apportionment of representatives required by the Fourteenth Amendment—that is, the purpose for which Commerce now proposes to use this information.²⁶ Indeed, in prior litigation Commerce took the opposite position, contending that “it is constitutionally required to include all persons, including illegal aliens, in the apportionment base, insofar as an accurate count is reasonably possible.”²⁷

Because the Bureau’s proposal to limit who is included in the apportionment count is inconsistent with the Fourteenth Amendment, it must withdraw this portion of the rule.

2. Adding a question on legal status would result in incomplete and inaccurate data and disproportionately impact minority communities.

Governments, academics and others rely on the population count established by the census for many purposes, including apportioning representatives, allocating funds for housing and other public assistance programs, drawing electoral districts and “such varied purposes as computing federal grant-in-aid benefits, drafting of legislation, urban and regional planning, business planning, and academic and social studies.”²⁸ When the census does not accurately reflect the population of the states, undercounted areas face not only underrepresentation in Congress, but also the risk of losing significant resources that support basic services such as roads, schools, hospitals and public health programs.²⁹

²⁴ *Evenwel v. Abbott*, 578 U.S. 54, 66-67 (2016); *id.* at 68 (“It cannot be that the Fourteenth Amendment calls for the apportionment of congressional districts based on total population, but simultaneously prohibits States from apportioning their own legislative districts on the same basis.”); *Fed’n for Am. Immigr. Reform v. Klutznick*, 486 F. Supp. 564, 567 (D.D.C. 1980) (explaining that a “straightforward head count . . . ha[d] been the practice since the first census in 1790; everyone is counted except foreign diplomatic personnel living on embassy grounds (which is considered ‘foreign soil,’ and thus not within any state) and foreign tourists, who do not ‘reside’ here”).

²⁵ *Dep’t of Com.*, 588 U.S. at 770.

²⁶ Decennial Census of the Population of Americans, 91 Fed. Reg. at 57524.

²⁷ *Klutznick*, 486 F. Supp. at 568; see *Evenwel*, 578 U.S. at 74 (explaining that the Framers of the Fourteenth Amendment intended for representatives to “serve all residents, not just those eligible or registered to vote”); see also *Yick Wo v. Hopkins*, 118 U.S. 356, 369 (1886) (holding that “the Fourteenth Amendment to the Constitution is not confined to the protection of citizens” and applies to all persons within the territorial jurisdiction of the state); see also *Plyler v. Doe*, 457 U.S. 202, 210 (1982) (explaining that, regardless of their legal status, “[a]liens . . . have long been recognized as ‘persons’” under the Constitution).

²⁸ U.S. Const. art. I, § 2, cl. 3; *id.* amend. XIV, § 2; *Dep’t of Com.*, 588 U.S. at 760; U.S. Census Bureau, *Decennial Census History* (Oct. 31, 2023), <https://www.census.gov/about/history/historical-censuses-and-surveys/census-programs-surveys/d ecennial-census.html>.

²⁹ Hansi Lo Wang, *Trump officials propose sweeping changes to the census that would reshape voting maps*, Nat’l Pub. Radio (Sep. 10, 2026),

Adding a question on legal status to the census likely would result in the loss of congressional representation and services for undercounted communities. Bureau officials have long warned that inquiring about legal status damages both the response rate and the accuracy of collected data.³⁰ For the 2020 census, for example, the Bureau estimated that adding a citizenship question would result in an approximately 5% decrease in response rate.³¹ Studies have also shown that, for households containing at least one likely undocumented member, including a citizenship question on the census lowers the response rate by a statistically significant amount,³² with the resulting disparities disproportionately impacting (already undercounted) minority communities.³³ In the context of its proposal to remove demographic questions, the Bureau asserts that “in general, the more questions that are included on the decennial census questionnaire, the lower the overall response rate.”³⁴ But nowhere in the NPRM does it address the decrease in response rate that likely would result from adding a question on legal status or the corresponding impact on the resulting data.

Relatedly, if a household does not respond to the census, the Bureau conducts additional outreach that includes sending census takers to the addresses that have not responded.³⁵ For the 2020 census, for example, the Bureau estimated that 500,000 census takers would need to go door to door to visit approximately 56 million addresses and manually collect in-person responses.³⁶ Although this process is largely executed on a local level, Bureau employees must train hundreds of regional staff, and the Government Accountability Office (GAO) has identified longstanding shortcomings in the Bureau’s support for these local

<https://www.npr.org/2026/09/09/nx-s1-5845147/trump-us-census-citizenship-question-race-categories>; Piper Hudspeth Blackburn, *Trump admin pushes sweeping overhaul of census that could exclude millions, reshape Congress and slash federal funding*, CNN (Sep. 10, 2026), <https://www.cnn.com/2026/09/10/politics/census-overhaul-trump-administration>.

³⁰ *Dep’t of Com.*, 588 U.S. at 761–62; *Klutznick*, 486 F. Supp. at 568 (“[A]ccording to the Bureau[,] any effort to ascertain citizenship will inevitably jeopardize the overall accuracy of the population count”); Brief for Former Directors of the U. S. Census Bureau as Amici Curiae in *Dep’t of Com. v. New York*, No. 18-966, at 3 (Apr. 2019).

³¹ *Dep’t of Com.*, 588 U.S. at 775.

³² J. David Brown and Misty L. Heggeness, *Citizenship question effects on household survey response*, J. Policy Analysis & Management, at 2 (2026), <https://onlinelibrarywiley.com/doi/10.1002/pam.70004>; Brief for Former Directors of the U. S. Census Bureau as Amici Curiae in *Dep’t of Com. v. New York*, No. 18-966, at 10–13 (Apr. 2019).

³³ Brief for Former Directors of the U. S. Census Bureau as Amici Curiae in *Dep’t of Com. v. New York*, No. 18-966, at 15–16 (Apr. 2019); *Dep’t of Com.*, 588 U.S. at 800 (J., Breyer, concurring).

³⁴ Decennial Census of the Population of Americans, 91 Fed. Reg. at 57527.

³⁵ Pat Cantwell, *How We Complete the Census When Households or Group Quarters Don’t Respond*, U.S. Census Bureau (Apr. 16, 2021), <https://www.census.gov/newsroom/blogs/random-samplings/2021/04/imputation-when-households-or-group-quarters-dont-respond.html>.

³⁶ *Door-to-Door Visits Begin Nationwide for 2020 Census*, U.S. Census Bureau (Aug. 11, 2020), <https://www.census.gov/newsroom/press-releases/2020/door-to-door-visits-begin-nationwide.html>.

efforts.³⁷ Moreover, such efforts are expensive and less likely to produce accurate results.³⁸ For households that self-respond to the survey, this fieldwork is unlikely to correct for any of that household's omissions.³⁹

At the same time that adding a question on legal status would lower the response rate and, thus, enhance the need for additional outreach, the Bureau has lost nearly one-fifth of its staff. Office of Personnel Management data reveals that the Bureau has experienced a 19.3% reduction in its workforce since fiscal year 2024.⁴⁰ Not only are these follow-up efforts less likely to generate accurate data,⁴¹ but in the NPRM the Bureau does not provide an estimate of the additional costs of local outreach—which likely would require even more resources than the 2020 decennial census given the lower response rate for forms with a question about legal status—explain how it would implement and support those efforts in light of the decrease in Bureau staff levels or outline what steps it would take to prevent further undercounts of these populations.

Because the Bureau's proposal to add a question on legal status would reduce response rates and result in less accurate data that disparately impacts minority communities, we urge the Bureau to withdraw this portion of the rule.

3. The Bureau's proposal to rely on information collected pursuant to data-sharing agreements lacks adequate transparency and risks the use of unreliable data.

Finally, the Bureau is “considering utilizing its enormously broad access to administrative records to determine an individual's legal status.”⁴² The Bureau states that it has access to records from “a vast and expanding universe” of entities, including records from the Department of Treasury, Department of Health and Human Services, Department of Homeland Security, Department of State, Department of Defense, U.S. Postal Service, certain states, localities, and tribes and third-party commercial data.⁴³ The Bureau says that it is “routinely entering into and/or updating agreements with other Federal agencies, state and local governments, and other entities to expand its access to information.”⁴⁴

³⁷ U.S. Gov't Accountability Off., *2020 Census: Office Managers' Perspectives on Recent Operations Would Strengthen Planning for 2030*, GAO-21-104071, at 14, 18-19 (July 2021), <https://www.gao.gov/assets/gao-21-104071.pdf>.

³⁸ Brief for Former Directors of the U. S. Census Bureau as Amici Curiae in *Dep't of Com. v. New York*, No. 18-966, at 2 (Apr. 2019).

³⁹ Brown & Heggeness, *supra* note 32, at 2.

⁴⁰ Steve Pierson, et al., *2026 Midyear Update: Resources and Leadership Supporting Federal Statistics*, American Stat. Ass'n (amended Sep. 10, 2026), https://www.amstat.org/docs/default-source/amstat-documents/FedStatHealth_MidYearUpdate.pdf.

⁴¹ Brief for Former Directors of the U. S. Census Bureau as Amici Curiae in *Dep't of Com. v. New York*, No. 18-966, at 15 (Apr. 2019).

⁴² Decennial Census of the Population of Americans, 91 Fed. Reg. at 57526.

⁴³ *Id.*

⁴⁴ *Id.*

We strongly urge the Bureau to immediately publish these data-sharing agreements and to not rely on data received pursuant to these agreements to determine legal status.

First, the lack of public access to these agreements raises significant concerns in light of the government's persistent and evolving efforts to collect sensitive information on legal status⁴⁵ to create a national voter database in seeming violation of the law.⁴⁶ The Bureau has not specified in the NPRM from which entities it would collect this information nor how the Bureau would ensure compliance with the Privacy Act of 1974 or other confidentiality requirements.⁴⁷ The NPRM does refer, however, to an agreement with the Department of Homeland Security that apparently "has been substantially updated" since 2019 and has "equipped the Census Bureau with significantly more information pertaining specifically to foreign citizens present in the United States than was previously available in the lead up to 2020."⁴⁸ In April 2025, CREW requested information about the Bureau's and DHS's data sharing agreements and policies under the Freedom of Information Act. Specifically, we requested:

- "[A]ll formal or informal data sharing agreements between DHS and the Census Bureau through which DHS and the Census Bureau share personally identifiable information or immigration status information";
- "Privacy or data security safeguards in place for protecting personally identifiable information or immigration status information shared by DHS or the Census Bureau";
- "[A]ll formal or informal policies, determinations or conclusions (including underlying memoranda) concerning the Census Bureau's access to or use of personally identifiable information or immigration status information from DHS, or vice-versa."⁴⁹

Yet to date, DHS has not provided copies of any agreements currently in place, stating that they were unable to locate or identify any such agreements in response to CREW's FOIA request. This lack of transparency is all the more concerning given the unreliability of these government records. States relying on DHS's SAVE database, for example, have wrongfully revoked or threatened to revoke the voter registrations of U.S. citizens.⁵⁰ And relying on

⁴⁵ Andrew Duehren, *Trump Administration Prepares to Ask Tax Filers if They Are U.S. Citizens*, N.Y. Times (Sep. 29, 2026), <https://www.nytimes.com/2026/09/29/business/irs-tax-returns-citizenship.html>.

⁴⁶ See, e.g., Meghan Faulkner, *Why Trump's voter roll consolidation attempts are illegal and other frequently asked questions*, CREW (Sep. 17, 2026), <https://www.citizensforethics.org/news/analysis/why-trumps-voter-roll-consolidation-attempts-are-illegal-and-other-frequently-asked-questions/>.

⁴⁷ See also 13 U.S.C. § 9.

⁴⁸ Decennial Census of the Population of Americans, 91 Fed. Reg. at 57528.

⁴⁹ Letter from Kayvan Farchadi, Senior Counsel, CREW, to Roman Jankowski, Chief FOIA Officer, DHS, *Freedom of Information Act Request*, at 2 (Apr. 9, 2025), <https://www.citizensforethics.org/wp-content/uploads/2025/04/DHS-SAVE-Program-FOIA-.pdf>.

⁵⁰ *League of Women Voters v. U.S. Dep't of Homeland Sec.*, 835 F. Supp. 3d 79, 113 (D.D.C. 2026).

other government records also may lead to inaccurate information: In *Department of Commerce v. New York*, for example, the Court noted the then-Secretary's conclusion that relying on administrative records for citizenship data would be "inadequate because they were missing for more than 10% of the population."⁵¹ Additionally, the Bureau's recent effort to identify noncitizen voter records has led to questions from experts about the Bureau's methodology, sourcing, accuracy and coordination with non-governmental organizations.⁵²

Given the potential unreliability of administrative records, we urge the Bureau not to rely on them to determine legal status. At the very least, the Bureau must specify on which entities' records it proposes to rely and immediately publish any data-sharing agreements with these entities.

Thank you for your consideration.



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⁵¹ 588 U.S. 752, 762–63 (2019); see also Tara Bahrapour, *DHS Plan To Share Noncitizens' Data With Census Bureau Could Further Frighten Immigrants, Experts Say*, Wash. Post (Mar. 8, 2019), https://www.washingtonpost.com/local/social-issues/dhs-plan-to-share-non-citizens-data-with-census-bureau-could-further-spook-immigrants-experts-say/2019/03/08/2feafc5c-4129-11e9-9361-301b5bd5e6_story.html (finding that the DHS's plan to share noncitizens' information with the Census Bureau could make immigrants feel less safe responding to the 2020 census, thus undermining the integrity of the Census count).

⁵² Hansi Lo Wang & Jude Joffe-Block, *Experts raise alarms over Census Bureau report Trump is touting on noncitizen voting*, NPR (Aug. 19, 2026), <https://www.npr.org/2026/08/19/nx-s1-5938799/trump-census-bureau-noncitizen-voting>; see also Letter from John Hill, Senior Litigation Counsel, CREW, to Department of Commerce and Census Bureau FOIA Officers, *Re: Expedited Freedom of Information Act Request* (Aug. 21, 2026) (requesting records related to the Bureau's report), https://www.citizensforethics.org/wp-content/uploads/2026/08/CREW-Census-Report-FOIA-Request-8_21_26_Redacted.pdf.