

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO-OAKLAND DIVISION

SIERRA CLUB and SOUTHERN
BORDER COMMUNITIES COALITION,

Plaintiffs,

v.

DONALD J. TRUMP, President of the
United States, in his official capacity; PATRICK
M. SHANAHAN, Acting Secretary of Defense, in
his official capacity; KIRSTJEN M. NIELSEN,
Secretary of Homeland Security, in her official
capacity; and STEVEN MNUCHIN, Secretary of
the Treasury, in his official capacity,

Defendants.

Case No.: 4:19-cv-00892-HSG

**SUPPLEMENTAL
DECLARATION OF CHRISTINA
PATIÑO HOULE, NETWORK
WEAVER, EQUAL VOICE
NETWORK**

I, Christina Patiño Houle, declare as follows:

1. I am over the age of eighteen, and I am competent to make this declaration. This declaration is based upon my personal knowledge and I would testify under oath to the facts herein if called upon to do so.

2. I am the Network Weaver for the Rio Grande Valley Equal Voice Network ("EVN"), a coalition of nonprofit organizations in the Rio Grande Valley and the Texas regional network for the Southern Border Communities Coalition ("SBCC"). In addition, I am a member of SBCC's Steering Committee, in which capacity I help determine SBCC's strategic priorities and actions.

3. I write this declaration to supplement my prior declaration in *Sierra Club v. Trump*, to clarify the nature of EVN's work in the Rio Grande Valley. Though advocacy in furtherance of policy goals is an important part of what we do, it comprises only about 20% of our work. We

deploy several tools to achieve the priorities determined by the communities we serve, including organizing, training, and education.

4. Each of our working groups deploys these tools in unique ways. Our Civic Engagement working group, for example, has prioritized voting and the Census. To help make the right to vote meaningful, EVN and our member organizations travel community-to-community and door-to-door to register voters, get-out-the-vote, transport voters to the polls, and offer direct support to voters. To ensure that our communities are counted and accounted for, EVN organizes and participates in workshops and trainings regarding the process, challenges, and timeline of the Census. As we do across working groups and initiatives, EVN works to build capacity and enable sustainable, lasting change by training community organizers to do this work as well. And EVN is collaborating with member organizations and allies to establish one or more resource centers where people can go for information, documents, and assistance in completing the Census.

5. As mentioned, our Immigrant's Rights Working Group hosts Town Halls for immigrants and their communities. We focus our efforts on rural and unincorporated areas that otherwise are underserved. In addition to hosting citizenship classes, we have trained communities to document abuses by law enforcement using free and easily accessible technologies; about developments in the law, including Deferred Action for Childhood Arrivals and State Bill 4; and about individuals' rights vis-à-vis law enforcement. Our partners from the Immigrant's Rights Working Group regularly host "house meetings" where we conduct trainings and answer questions in people's homes.

6. Each of our working groups works across disciplines to make concrete changes for our communities. Our Health Working Group conducts focus groups with community members to determine their needs. It recently led a study on secondary healthcare access and food insecurity, convened a summit to present the resulting white papers, and formed subcommittees to carry forward the recommendations in the white papers. It is planning another summit around lack of access to secondary healthcare in the Rio Grande Valley.

7. This interdisciplinary work informs and is benefited by our advocacy work. The working group learned, for example, that inefficiencies in the interaction between certain clinics and the county were preventing eligible members of the community from registering for an indigent care program. To remedy this problem, EVN successfully fought to bring county officials to the clinics themselves, enabling on-site registration and increasing the number of people who are successfully able to enroll in the program.

8. And our advocacy work depends on community engagement and training. I previously noted, for example, that our organizational partners, in collaboration with our Housing Working Group, have helped train and educate residents of *colonias* to win basic necessities like street lighting, paved roads, and garbage collection. Such training and education is part of a multi-year effort by EVN to support the creation of infrastructure in underserved communities: on the ground, it has required EVN and our member organizations travel to communities and organize individuals who are hopeful for change, identify or create opportunities for individuals to be heard, and encourage and prepare individuals to take advantage of these opportunities.

9. As I stated in my prior declaration, the declaration of a “national emergency” in our communities, the ongoing construction of a border wall, and the ever-present threat to build a wall without constitutional or congressional constraint has forced us to devote significant time and resources to the constant and credible demand to wall off our communities. We have devoted our time to remain prepared to respond to, protect, and educate the communities we serve, a feat that is complicated by a lack of transparency about the plans for construction. We continue to receive requests for information from our communities, coalition partners, and the media, to respond to stakeholders’ concerns, to identify and resist new, unlawful construction, and to counter the message about our communities being propagated by the President and the “national emergency” declaration.

10. Across our six working groups, there are significant demands on our organization. The attacks on our communities by President Trump and the federal agencies have spread thin our

already-limited capacity, frustrating our efforts to implement concrete and sustainable changes in the Rio Grande Valley.

I hereby declare under the penalty of perjury pursuant to the laws of the United States that the above is true and correct to the best of my knowledge.

EXECUTED this 2nd day of May, 2019.

A handwritten signature in black ink, appearing to read "Christina Patiño Houle", written over a horizontal line.