

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

THE CITY OF ROCHESTER;  
MALIK D. EVANS, Mayor of Rochester, in his  
Official Capacity; ROCHESTER CITY  
COUNCIL; MIGUEL A. MELENDEZ, JR.,  
President of the Rochester City Council, in his  
Official Capacity,

Defendants.

Case No. 6:25-cv-06226 (FPG)

**DECLARATION OF AMY BELSHER  
IN SUPPORT OF MOTION TO INTERVENE**

I, Amy Belsher, hereby declare the following to be true under penalty of perjury:

1. I am an attorney at the New York Civil Liberties Union Foundation (“NYCLU”) and serve as counsel to the Proposed Intervenor-Defendants Third Presbyterian Church, Ibero-American Action League, Inc., New Hope Free Methodist Church, and the Western New York Coalition of Farmworker Serving Agencies in this action. I submit this declaration in support of Proposed Intervenor-Defendants’ Motion to Intervene. I have personal knowledge of the matters set forth herein, and, if called upon to do so, I would testify competently to them.

2. On June 3, 2025, I contacted counsel for the parties to seek their consent to the motion to intervene. The defendants consent to intervention. The plaintiff opposes this intervention request.

3. Attached as **Exhibit 1** is a true and correct copy of the declaration of Angelica Perez-Delgado, the President and Chief Executive Officer of the Ibero-American Action League, Inc., in support of the motion to intervene.

4. Attached as **Exhibit 2** is a true and correct copy of the declaration of Irene Sanchez, the Executive Director and Co-Founder of the Western New York Coalition of Farmworker Serving Agencies, Inc., in support of the motion to intervene.

5. Attached as **Exhibit 3** is a true and correct copy of the declaration of Reverend Rebecca Segers, the Pastor and Head of Staff of Third Presbyterian Church, in support of the motion to intervene.

6. Attached as **Exhibit 4** is a true and correct copy of the declaration of Reverend Marissa Mattox Heffernan, co-lead pastor of New Hope Free Methodist Church, in support of the motion to intervene.

7. Attached as **Exhibit 5** is a true and correct copy of Proposed Intervenor-Defendants' [Proposed] Notice of Motion to Dismiss.

8. Attached as **Exhibit 6** is a true and correct copy of Proposed Intervenor-Defendants' [Proposed] Memorandum of Law in Support of Motion to Dismiss.

9. On June 4, 2025, I served the following upon all counsel of record for all parties via CM/ECF: Proposed Intervenor-Defendants' Notice of Motion to Intervene; Memorandum of Law in Support of Motion to Intervene; and the declaration of Amy Belsher and the exhibits appended to it, including the declarations of Angelica Perez-Delgado, Irene Sanchez, Reverend Rebecca Segers, and Reverend Marissa Mattox Heffernan; the [Proposed] Notice of Motion to Dismiss; and the [Proposed] Memorandum of Law in Support of Motion to Dismiss.

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

Dated: June 4, 2025  
New York, New York

/s/ Amy Belsher  
Amy Belsher