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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CITY OF SAN JOSE, CALIFORNIA, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States, et al.,

Defendants.

CASE NO. 5:20-cv-05167-LHK-RRC-EMC

DECLARATION OF MICHELLE RAMSEY IN SUPPORT OF PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT AND IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR PARTIAL SUMMARY JUDGMENT

Date: October 8, 2020
Time: 1:30 p.m.
Place: Courtroom 8, 4th Floor
Judge: Honorable Richard R. Clifton
Honorable Lucy H. Koh
Honorable Edward M. Chen

DECLARATION OF MICHELLE RAMSEY

I, Michelle Ramsey, hereby declare:

1. I am over the age of 18, have never been convicted of a crime of moral turpitude and am of sound mind and qualified to make this affidavit. I am personally familiar with the facts contained in this declaration.

2. I am the Director of Grants and Accounts Receivables for the Harris County Auditor's Office. My primary job duties include overseeing all accounting and reporting requirements for all of Harris County's grants. I have been the Harris County Auditor's Office and in my current position for approximately 7.5 years.

3. As part of my official duties, I oversee all accounting related to Harris County's grants. Harris County creates a yearly Comprehensive Annual Financial Report ("CAFR"). Contained within that report is an exhaustive list of Harris County's schedule of expenditures of federal and state grant awards ("SEFA").

4. Based on my review of Harris County's 2019 end of the year SEFA, Harris County expended a total of $155,038,339 federal and state grant awards for the year ended February 2019. The SEFA reflects that Harris County expended federal grants from the U.S. Department of Agriculture, U.S. Department of Housing and Urban Development, U.S. Department of Justice, U.S. Department of Transportation, U.S. Department of Treasury, U.S. General Services Administration, National Aeronautics & Space Administration, National Endowment for the Humanities, Institute of Museum and Library Services, U.S. Department of Health and Human Services, Office of National Drug Control Policy, and the U.S. Department of Homeland Security in an amount equal to at least $90,529,359.

5. I have reviewed the working paper entitled *"Uses of Census Bureau Data in Federal Funds Distribution: A New Design for the 21st Century"* issued in September of 2017 and prepared by Marissa Hotchkiss and Jessica Phelan. The paper outlined all federal grant awards that rely on accurate census data. Based on my review of that material, I estimate that approximately $90,529,359 of the grants expended by Harris County in FY2019 depended on accurate census data.

6. Following the recommendations of the working paper listed above, an inaccurate census count could negatively impact the overall budget of Harris County.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 21, 2020 in Houston, Texas.

Michelle Ramsey