Exhibit 25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, *et al.*, Plaintiffs, v. DONALD J. TRUMP, *in his official capacity as President of the United States*, *et al.*, Defendants.	20 Civ. 5770 (JMF) **DECLARATION OF JILL KANEFF**

Pursuant to 28 U.S.C. § 1746(2), I, Jill Kaneff, hereby declare as follows:

1. I am over the age of eighteen and have personal knowledge of all the facts stated herein.

2. I am Jill Kaneff for the Northern Virginia Regional Commission (NVRC). I oversee the demographics program for NVRC. NVRC is a regional government agency and council in the Northern Virginia suburbs of Washington DC. NVRC is one of 21 regional councils and planning districts in the Commonwealth of Virginia. Specifically, Northern Virginia is designated as Region 8 of Virginia. The NVRC regional council has thirteen member local governments. The thirteen member jurisdictions are the counties of Arlington, Fairfax, Loudoun, and Prince William, the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park, and the incorporated towns of Dumfries, Herndon, Leesburg, and Vienna. I have been employed by NVRC since August 2019. Prior to NVRC I was the senior demographer for twelve years at Loudoun County and two years as a demographer at Prince William County. Both Loudoun and Prince William counties are NVRC member jurisdictions.

3. NVRC uses census data to assess regional demographic trends and current conditions for regional environmental, land use, economic, and government human services and infrastructure planning and decision making. NVRC partners with our local governments to assist

them on their demographic analyses that they utilize for their jurisdiction's land use, economic, fiscal, transportation, and government services planning and decision making. Examples of government services that need decennial census data for planning include childcare services, police and fire resources, water and utilities services, and much more. Brief descriptions of common uses and needs for census data follow.

- The ability to perform demographic trend analysis is important for government agencies, including providing a foundation for forecasting future growth and future service needs and assessing the progress towards achieving policy goals. Low quality Decennial Census data will create unrealistic data trends across time. This would lead to a loss of the ability to use Census data for data-driven decision making and policy making. Decennial Census population, housing units, household, household size, and vacancy rate trends over time are widely used by government agencies to forecast population, housing units, households, household size, and vacancy rates at traffic analysis zones and planning areas. There are many other uses of trend analysis, including that performed by NVRC, which can be found by going to the NOVA Region Dashboard:
    - https://www.novaregiondashboard.com/.

- NVRC and its local government partners are committed to providing services and achieving equity in the community. We rely on race, ethnicity, and age data at the block level for the following.
    - Assessing environmental justice, social equity, and fair housing.
    - School facilities planning and assessing equity in schools. Assessing how the school age population changed in the last 10-years is essential to determining future school enrollment growth. A difference of a couple of hundred students could have direct implications on needed additional facilities.
    - Redrawing local election districts boundaries, also known as redistricting. It is a federal law to draw districts in a manner that does not discriminate on the basis of race or ethnicity.

  Arlington County recently adopted new equity policies that rely on this data for assessing the progress of the policy goals. Fairfax County relied on this data for developing their

One Fairfax equity policy. NVRC recently assessed the impacts of sea level rise on the Potomac River's minority and senior citizen communities and plans to continue assessing it over time. Refer to the "Sea Level Rise: Impact on Northern Virginia" web page for more information:

- https://nvrc.maps.arcgis.com/apps/MapJournal/index.html?appid=d36a7c30fbe3436e8ce5ceb91b38c3af

Not having quality demographic characteristic data would impact program administration and monitoring of these and other programs.

- NVRC and the local governments rely on the aggregation of Decennial Census block level data to produce demographic characteristics for small, non-census geographies such as traffic analysis zones, planning areas, watersheds, and voter precincts. For an example, refer to Arlington County's Demographics by Neighborhood website:
  - https://projects.arlingtonva.us/data-research/demographics/neighborhood/

  The planning areas of Loudoun County are another example of a non-census geography that utilizes the aggregation of Decennial Census block data for local planning. The planning areas of Loudoun County are used for fiscal and capital planning. This and other regional planning processes depend on high quality Decennial Census block data on population, households, vacancy rates, and household size for estimating intercensal populations and forecasting growth. For more information on the Loudoun County capital planning process, refer to the following websites:
  - https://lfportal.loudoun.gov/LFPortalinternet/0/edoc/270168/2017%20Fiscal%20Impact%20Committee%20Guidelines.pdf
  - https://www.loudoun.gov/2070/Capital-Planning

- The Decennial Census block data is the benchmark for the U.S. Census Bureau's population estimates program and the American Community Survey (ACS) county, block group, and other small geographies. These data products are heavily used by government agencies. This is another critical reason for the Decennial Census data to be accurate. NVRC and the local governments depend on the ACS for detailed demographic

characteristics that are not included the Decennial Census such as income, language spoken, and education level characteristics. This ACS data is used for economic development, local planning, policy making, and decision making. An incomplete Decennial Census will cause the American Community Survey data to have an even larger margin of error than it already has. Some data pieces in the American Community Survey already have large margins of error, deeming some data already unreliable to be used for decision making. Demographers and decision makers cannot afford to have the American Community Survey become less reliable, given the already large margin of error.

4. NVRC and our local government partners depend on Decennial Census data for detailed data down to the census block (neighborhood) geographic level. No other government data source provides demographic data at this level of detail. No federal government agency other than the Census Bureau's provides age, race, population, housing units, and households. No data source other than the Census Bureau's Decennial Census does a complete count for all these demographic characteristics. Intercensal estimates for demographic characteristics such as the U.S. Census Bureau's American Community Survey and Population Estimates Program and our local government demographic estimates and forecasts of population, households, vacancy rate, household size, and age depend on an accurate foundational base for producing estimates for the intercensal years and forecasts for future years. We depend on the Census Bureau's Decennial Census for this accurate, complete count that is used as a basis for deriving intercensal estimates that are used for government planning. The Northern Virginia region has an estimated 2.5 million people according to the Census Bureau intercensal population estimates program. Carrying out our own complete count survey for a region of this size would entail hiring a significant amount of staff with expertise in designing, managing, and implement a survey and processing survey results. The funds are not available to hire a significant amount of staff that would focus on this, given that the existing funds are stretched thin and already being allocated for critical government services and operations. NVRC and its local government partners depend on the Census Bureau's expertise and the federal funds that are distributed to the Census Bureau for this purpose.

5. Past Decennial Censuses have shown that neighborhoods with young children, low-income, and areas a high percentage of minorities are the hardest to count. These areas tend to

have the lowest self-response rate and require much effort by Census staff to obtain a complete count through field work. Reduced census response rates will cause the quality of the demographic characteristics data to suffer immensely, particularly for these hard to count areas. Undermining the race, age, and population data, particularly for these low income and minority areas will impact the funding that local governments rely upon to support subsidized housing, child services, food stamps, Medicaid, Title 1 grants, equity programs, and many other programs.

The lower the response rate, the larger the margin of error in the demographic characteristics. In other words, the smaller the percentage of the population that is sampled, the greater the margin of error. Having large margins of error in demographic data greatly impacts the reliability of data, which in turn greatly restricts the usage of the data for government planning.

6. Accurate and reliable data enable government agencies to assess their communities to make informed decisions and devise policies. Having poor quality information could threaten the safety and quality of life of residents of our local area. For instance, fire stations that need built to handle housing and commercial growth may be unable to be funded and built in a timely manner if unreliable data is used that leads to wrong planning decisions. Police stations in high growth areas may also encounter the same issue as fire stations. If the household size and vacancy rate data is of low quality that could lead to an under-estimation of the forecasted population, which would in turn lead to poorly planned transportation infrastructure needs and traffic jams and over-crowded schools.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on this _04_ day of August, 2020