Exhibit 15

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 MICHAEL E. CLINE**

Pursuant to 28 U.S.C. § 1746(2), I, Michael E. Cline, 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 the State Demographer of North Carolina and work in the North Carolina Office of State Budget and Management. Annually, I estimate the total population of 100 counties and 551 municipalities, the projection of state and county populations, and analyze the implication of demographic trends for state agency planning and budgets. I have been employed by the State of North Carolina since 2017 and have worked, in varying capacities, with decennial census data since after the 1990 Census.

3. Housing, household, and demographic characteristics obtained every ten years are critical to the functioning of my office and the population estimates, population projections, and demographic analyses that I produce. In turn, my population estimates are used in formulas that are used to distribute state revenues to local communities to support schools, transportation infrastructure, art programs, libraries, emergency services, parks programs, and other things. In addition, annually, we produce county population estimates and population projections of up to twenty years into the future. These population estimates and projections provide detailed data by sex, race, age, and ethnicity for the state and for our 100 counties and are used within state government in order to plan for and fund schools, roads and public transportation programs, aging

services, public health services, economic development, etc. In addition, local governments, nonprofit groups and private industry use our demographic projections for their own programmatic and business planning.

4. There is no other source for comprehensive population, household, and housing counts than the decennial census. While our annual estimates are prepared by using data from other sources (including vital statistics and administrative data) the census provides an important benchmark for which to validate and adjust our models every ten years. Of our municipalities, 60% (330) have populations of less than 5,000. The decennial census is the most accurate source of information to obtain average household size and housing occupancy – critical values needed for the estimation of municipal populations (sample estimates produced by the American Community Survey for small areas such as these do not provide precise estimates). Without this information, it will be more difficult to produce accurate population estimates for these smaller municipalities in future years.

5. In order to produce population projections, our office needs detailed historical census counts – including population by age, sex, race, and ethnicity. These data are essential for understanding trends in the different components of population change – natural increase (births minus deaths) and net migration (in-migration minus out-migration). These comprehensive historical benchmarks every ten years combined with vital statistics data help us understand how our state and counties in our state are changing in order to develop assumptions about future change (including assumptions regarding future birth, mortality, and migration rates). Census population counts are used in denominators to calculate rates and thus an undercount (or overcount) of any particular population grouping (by race/ethnicity/sex/age), can contribute to over- or under-estimating certain populations and the total population overall. This may lead to a greater risk of the state and local governments to either be unprepared for future population needs (such as not building schools when school aged populations are under-estimated) or building infrastructure that is not needed (when populations are over-estimated).

6. According to the US Census Bureau's own analysis of the 2010 Census, at 7.6%, North Carolina had the seventh largest omission rate among the 50 states and District of Columbia[1]. These omission rates were highly correlated with mail-in response rates (as response

[1] Mule, Thomas, "Census Coverage Measurement Estimation Report: Summary of Estimates of Coverage for Persons in the United States," U.S. Census Bureau, Decennial Statistical Studies Division, May 22, 2012.

rates decreased – omission rates increased)[2]. While imputation methods and differentials in undercounts may overcome these omissions, there remains a risk that certain groups will be excluded from the final 2020 results. Those at risk of being excluded include persons of color, young children, and rural populations[3]. Thirty-eight percent of North Carolina's population are people of color – including rapidly growing Hispanic and Asian populations and the second largest American Indian population east of the Mississippi River[4].

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

Executed on this 5th day of August, 2020

Michael Cline

Michael E. Cline
State Demographer of North Carolina
Office of State Budget and Management

[2] https://www.gc.cuny.edu/Page-Elements/Academics-Research-Centers-Initiatives/Centers-and-Institutes/Center-for-Urban-Research/CUR-research-initiatives/Census-Self-Response-Rates-Mapped-and-Analyzed-2000,-2010,-and-(soon)-2020 (Accessed August 5, 2020).

[3] Mule, Thomas, "Census Coverage Measurement Estimation Report: Summary of Estimates of Coverage for Persons in the United States," U.S. Census Bureau, Decennial Statistical Studies Division, May 22, 2012.

[4] https://files.nc.gov/ncosbm/documents/files/Population-Dyanmic-2020Report.pdf