Exhibit 13

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 J. CASSIDY**

Pursuant to 28 U.S.C. § 1746(2), I, Michael J. Cassidy, 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 President and CEO for The Commonwealth Institute for Fiscal Analysis ("TCI"). In this capacity, I provide the strategic management of the organization's team of professional staff to conduct research, analysis, and technical assistance on key fiscal and economic policies in Virginia. Prior to this position, I served in the Virginia Department of Planning and Budget (the Governor's budget office) and the Office of Management and Budget (the White House budget office), working on a wide array of social policy programs. I have been employed by TCI since 2006. TCI is a non-partisan 501(c)(3) non-profit organization.

3. TCI provides technical assistance from time-to-time to local governments and school divisions in their use of Census data. For example, in 2013 TCI provided technical assistance to the City of Richmond in preparing a report of its Anti-Poverty Commission, which used Census data to inform its geographic focus areas.[1] As researchers engaged in public policy

[1] http://www.richmondgov.com/CommissionAntiPoverty/documents/Antipovertycommissionfinal1_17_2013c--printready.pdf This report primarily used U.S. Census Bureau American Community Survey (ACS) data. The Census Bureau uses the decennial census results to determine the statistical sampling frames for the American Community Survey (ACS), which replaced the long form in the decennial census and is part of the Decennial Program, and the dozens of current surveys conducted by the Census Bureau. https://www2.census.gov/programs-surveys/decennial/2020/program-management/planning-docs/2020-oper-plan.pdf

issues in Virginia, we are also aware of many other ways that local governments in Virginia use Census data. For example, Census age data has been used in recent years by multiple localities within Virginia to project and prepare for school enrollment growth[2] and to understand and plan for the aging of their population[3]. The official population estimates for Virginia localities, which are produced by the University of Virginia Demographics Research Group and used in state funding, planning, and budgeting decisions, rely on Census population estimates as their base.[4] And Decennial Census data on neighborhood (Census Block Group and Census Tract) composition by race, as well as household size and occupancy, is used by multiple localities in the preparation of Analysis of Impediments to Fair Housing Choice reports and other housing planning.[5]

4. Because the Decennial Census is the largest, most reliable information source on population by age, race, and ethnicity for small geographic areas[6], it allows local governments to plan for providing core services in a geographically-appropriate manner. This is particularly critical for geographically-sensitive planning purposes, such as elementary school locations and zoning decisions. Similarly, when conducting analysis of residential segregation by race as part of preparing an Analysis of Impediments to Fair Housing Choice, having reliable data at the neighborhood level is critical.[7]

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[2] Richmond City: https://www.croppermap.com/documents/RPSBackgroundReportFull111023.pdf
Henrico County: http://croppermap.com/Henrico/Documents/HCPS_VA_Background_Report_190906r2.pdf

[3] Chesterfield County: https://www.chesterfield.gov/DocumentCenter/View/7754/Chesterfield-County-Demographic-Report-PDF and https://www.chesterfield.gov/189/Chesterfield-Age-Wave
Fairfax County: https://www.fairfaxcounty.gov/health-humanservices/sites/health-humanservices/files/assets/documents/pdf/report%20cards/positive_living_web.pdf

[4] https://demographics.coopercenter.org/sites/demographics/files/VA_PopEstimates_LocalityMethodology_Jan2015.pdf

[5] See, for example, the City of Richmond (https://homeofva.org/wp-content/uploads/2019/01/RIC_FINAL_6282013.pdf) and the City of Harrisonburg (https://www.harrisonburgva.gov/sites/default/files/EconomicDevelopment/Files/Draft%20for%20Public%20Review%205.4.12%20A.I..pdf). And housing planning from Arlington (https://housing.arlingtonva.us/wp-content/uploads/sites/15/2013/10/092613-Prelim-Data-Report.pdf) and James City County (https://jamescitycountyva.gov/DocumentCenter/View/13602/James-City-County-Housing-Needs-Assessment-PDF?bidId=)

[6] The Decennial Census provides information at the Census Block level, providing nationally comparable information for small geographic areas: https://www.census.gov/newsroom/releases/archives/2010_census/cb11-cn151.html . The smallest geographic area covered by the American Community Survey is the Block Group, and even with five-year pooled data, there is often a large margin of error in American Community Survey estimates at the census tract and census block group level: https://www.census.gov/content/dam/Census/library/publications/2019/acs/acs_state_local_handbook_2019_ch02.pdf

[7] See, for example, this report collaboratively commissioned by the seven independent cities that make up the Hampton Roads region. https://www.vbgov.com/government/departments/housing-neighborhood-preservation/fair-housing/Documents/Combined%20Final%20Draft%2011.30.11.pdf

5. Based on our experience and knowledge of local government planning processes, poorer quality Census data about age, race, and ethnicity will reduce the ability of local governments in Virginia to understand and appropriately plan for a range of services, including school locations, school zoning, and housing policy. This will harm the residents of Virginia, as well as the local governments themselves, as they are less able to anticipate and plan for future needs in a cost-effective manner.

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

Executed on this 4th day of August, 2020