

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
NO. 1:15-CV-00399-TDS-JEP**

SANDRA LITTLE COVINGTON, *et al.*,  
Plaintiffs,  
v.  
THE STATE OF NORTH CAROLINA, *et al.*,  
Defendants.

**DECLARATION  
OF  
SCOTT FALMLEN**

COMES NOW, Scott Falmlen:

1. My name is Scott Falmlen. I am an adult and under no disability. I have personal knowledge of the matters set forth herein, unless otherwise specifically indicated.
2. I am a resident of Raleigh, North Carolina.
3. In 2011 I formed The Democracy Project II, a 501(c)(4) non-profit corporation. Since then, I have solicited and raised funds on behalf of The Democracy Project II from private individuals and entities, a portion of which has been used to pay legal fees associated with redistricting litigation in North Carolina. Other individuals and entities not associated with The Democracy Project II, have also solicited and raised funds for this purpose.
4. In connection with my fundraising efforts, I have consistently assured donors and potential donors that their identities would be confidential. I am confident that certain of the donors would not have contributed without that assurance. I am also confident that disclosure of the identities of certain of those donors would chill their willingness to participate in future advocacy activities.

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

Executed on April 13 2016.



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Scott Falmlen

**CERTIFICATE OF SERVICE**

I, Jim W. Phillips, Jr., hereby certify that I have this day electronically filed the foregoing DECLARATION OF SCOTT FALMLEN with the Clerk of Court using the CM/ECF system which will provide electronic notification of the same to the following:

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This the 14th day of April, 2016.

/s/ Jim W. Phillips, Jr.  
Jim W. Phillips, Jr.