Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ALLIANCE FOR RETIRED
AMERICANS, *et al.*,

             Plaintiffs,

      v.

SCOTT BESSENT, in his official capacity
as the Secretary of the Treasury, *et al.*,

             Defendants.

Civil Action No. 25-0313 (CKK)

I, Daniel Katz, declare under penalty of perjury:

1. I am the Chief of Staff of the Department of the Treasury (Treasury), and I have served in this role since January 20, 2025. I am a non-career appointee, reporting directly to the Secretary. In this role, I am the primary aide to the Secretary responsible for exercising supervision over the Deputy Chiefs of Staff, Executive Secretary, Director of Scheduling, and other officials and offices within the Office of the Chief of Staff. I am also currently performing the delegable duties of the Deputy Secretary, which were delegated to me on February 6, 2025, pending the confirmation of the nominee for Deputy Secretary.

2. I am familiar with the claims asserted against Treasury in the above-captioned action regarding the granting of access to systems maintained by the Bureau of the Fiscal Service to employees implementing Executive Order 14,158. Based on personal knowledge and information provided to me in the course of my official duties, I provide this declaration in support of the Defendants' Response to Plaintiffs' Objections to the Designation of the Administrative Record.

3. Supplemental AR Tab 1, Supp_25-cv-00313_DDC_UST_0001 contains a true and correct copy of a January 8, 2025, email from Jonathan Greenstein, who led the Trump Administration's Treasury Department Agency Review Team, to Treasury officials and other members of the Treasury Agency Review Team requesting that Thomas Krause (Krause) be included on the "day 1 team, to lead on Fiscal Services modernization efforts."

4. The Preliminary Work Plan produced in Treasury's administrative record at 25-cv-00313-DDC_UST_0060 was drafted by Krause, with input from me, and sent to senior Treasury officials.

5. Supplemental AR Tab 2, Supp_25-cv-00313_DDC_UST_0002 contains true and correct copies of Incident Detail tickets that set forth various IT steps taken to grant PAM, SPS, and CARS database access to Marko Elez (Elez).

6. Supplemental AR Tab 3, Supp_25-cv-00313_DDC_UST_0014 reproduces a copy of the document included in Treasury's administrative record at 25-cv-00313-DDC_UST_0063 with certain redactions lifted.

7. I reviewed the PST file of the 12:15 PM email bates stamped 25-cv-00313-DDC_UST_0066. I have confirmed that Elez sent this email from his "@treasury.gov" email address to his "@fiscal.treasury.gov" email address.

8. I reviewed the plaintiffs' March 11, 2025 Objections to the Designation of the Administrative Record (Plaintiffs' Objections), as well as the Court's March 13, 2025 order (March 13 Order) in this case.

9. A news article cited in Plaintiffs' Objections, at pages 4-5, references a "risk assessment" document created by a subcontractor. I confirm that that "risk assessment" document was not

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considered by Treasury as part of the decision to grant access to BFS systems and therefore is not properly part of the administrative record.

10. I have specifically reviewed Plaintiffs' Objections at pages 5-6 (paragraph 2) and the related portions of the March 13 Order, and I confirm that the administrative record is already complete and that Treasury did not consider or rely on any other non-privileged materials leading up to its decision to grant access systems maintained by the Bureau of the Fiscal Service to employees implementing Executive Order 14,158.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3/14/25

Signed:

Daniel Katz
Chief of Staff
U.S. Department of the Treasury

Supplemental AR Tab 1

From:	Jonathan Greenstein (Volunteer)
To:	TreasuryExecutiveResources; Michael Friedman
Cc:	███████████ ; Hampton, Ravin; ███████████
Subject:	RE: [EXTERNAL] White House Liaison - Meet and Greet
Date:	Thursday, January 9, 2025 1:21:43 PM
Attachments:	Tom_Krause.pdf

** **Caution:** External email from: [**JonathanG.Volunteer@47transition.com**] Pay attention to suspicious links and attachments. Send suspicious email to suspect@treasury.gov **

CONFIDENTIAL / SUBJECT TO PRESIDENTIAL MOU

███

From: Jonathan Greenstein (Volunteer)
Sent: Wednesday, January 8, 2025 10:42 PM
To: TreasuryExecutiveResources@treasury.gov; Michael Friedman <michaelf@47transition.com>; David Eisner (Volunteer) <DavidE.Volunteer@47transition.com>
Cc: ███████████@treasury.gov; Ravin.Hampton@treasury.gov; ███████████@treasury.gov
Subject: RE: [EXTERNAL] White House Liaison - Meet and Greet

CONFIDENTIAL / SUBJECT TO PRESIDENTIAL MOU

Sherri and Kim –

Please find attached and below the contact information of another member we would like to have on the day 1 team, to lead on Fiscal Services modernization efforts. Resume attached. Happy to discuss on the call tomorrow at 1pm ET.

- Tom Krause ███████████████████

Jonathan

Supplemental AR Tab 2

Incident Details

Report Title:	Incident Details
Run Date and Time:	2025-02-28 13:53:44 Eastern Standard Time
Run by:	▮▮▮▮▮
Table name:	incident

Incident

Number:	INC0130757	Channel:	Self-service
Caller:	▮▮▮▮▮	State:	Closed
Caller City:	Washington	On hold reason:	
Category:	Inquiry / Help	Impact:	3 - Low
Affected User:	▮▮▮▮▮	Urgency:	2 - Medium
Need help with:	Something else	Priority:	4 - Low
Service:	CAIA (Common Approach to Identity Assurance)	Assignment group:	Identity Management
		Assigned to:	▮▮▮▮▮
Configuration item:	SailPoint IdentityIQ	Parent Incident:	
Route reason:			

Short description:

Something else

Description:

Reroute CARS access request for Marko.Elez@treasury.gov for the following role: ▮▮▮▮▮ to ▮▮▮▮▮ as approver.

Notes

Watch list:		Work notes list:	

Additional comments:

Work notes:

2025-02-03 12:53:50 - ▮▮▮▮▮ (Work notes)
Transferring to IDM.

Related Records

Problem:		Change Request:	
Interaction:		Caused by Change:	

Resolution Information

Knowledge:	false	Service provided via:	
Resolution code:	Resolved - Permanent Fix Applied	Resolved by:	▮▮▮▮▮
		Resolved:	2025-02-03 12:56:56

Resolution notes:

Request forwarded.

Major Incident

Major incident state:

| Proposed by: | | Proposed: | |
| Promoted by: | | Promoted: | |

Business impact:

Probable cause:

Post Incident Report

Overview:

Findings:

Timeline:

Related List Title:	Task SLA List
Table name:	task_sla
Query Condition:	Task = INC0130757
Sort Order:	None

1 Task SLAs

Task	SLA definition	Type	Target	Stage	Business time left	Business elapsed time	Business elapsed percentage	Start time	Stop time
INC0130757	Priority 4 Resolution			Completed	4 Days 23 Hours 55 Minutes	4 Minutes	0.07	2025-02-03 12:52:09	2025-02-10 13:00:02

Related List Title:	Incident List
Table name:	incident
Query Condition:	Caller = ▮▮▮▮▮▮▮
Sort Order:	Number in descending order

24 Incidents

▼ Number	Action status	Active	Activity due	Additional assignee list	Agile story	Approval	Approval history
INC0131552		false	UNKNOWN			Not Yet Requested	
INC0131550		false	UNKNOWN			Not Yet Requested	
INC0130757		false	UNKNOWN			Not Yet Requested	
INC0130583		false	UNKNOWN			Not Yet Requested	

▼ Number	Action status	Active	Activity due	Additional assignee list	Agile story	Approval	Approval history
INC0130227		false	UNKNOWN			Not Yet Requested	
INC0130223		false	UNKNOWN			Not Yet Requested	
INC0129558		false	UNKNOWN			Not Yet Requested	
INC0115971		false	UNKNOWN			Not Yet Requested	
INC0107847		false	UNKNOWN			Not Yet Requested	
INC0079940		false	UNKNOWN			Not Yet Requested	
INC0079585		false	UNKNOWN			Not Yet Requested	
INC0079163		false	UNKNOWN			Not Yet Requested	
INC0077531		false	UNKNOWN			Not Yet Requested	
INC0077492		false	UNKNOWN			Not Yet Requested	
INC0075643		false	UNKNOWN			Not Yet Requested	
INC0073212		false	UNKNOWN			Not Yet Requested	
INC0070455		false	UNKNOWN			Not Yet Requested	
INC0069476		false	UNKNOWN			Not Yet Requested	
INC0069352		false	UNKNOWN			Not Yet Requested	
INC0062924		false	UNKNOWN			Not Yet Requested	
INC0048620		false	UNKNOWN			Not Yet Requested	
INC0047969		false	UNKNOWN			Not Yet Requested	
INC0024436		false	UNKNOWN			Not Yet Requested	
INC0023254		false	UNKNOWN			Not Yet Requested	

Related List Title:	CIs Affected List
Table name:	task_ci
Query Condition:	Task = INC0130757
Sort Order:	None

1 CIs Affected

Configuration Item	Asset action	Swapped CI
SailPoint IdentityIQ		

Related List Title:	Impacted CIs List
Table name:	task_cmdb_ci_service
Query Condition:	Task = INC0130757
Sort Order:	None

1 Impacted CIs

Configuration Item	Managed by	Owned by	Approval group	Location	Operational status	Manually added
CAIA (Common Approach to Identity Assurance)		███████			Operational	true

Related List Title:	Knowledge List
Table name:	kb_knowledge
Query Condition:	Sys ID in
Sort Order:	Number in descending order

None

Related List Title:	Security Incident List
Table name:	sn_si_incident
Query Condition:	Parent = INC0130757 AND Enforce restriction = false .or. Enforce restriction is empty OR Enforce restriction = true AND Allowed members CONTAINS (███████) .or. Allowed groups CONTAINS (Fiscal Supervisor, BFS Employees, CAM System Owner) AND Parent = INC0130757
Sort Order:	Number in ascending order

None

Related List Title:	Security Incident List
Table name:	sn_si_incident
Query Condition:	Incident = INC0130757 AND Enforce restriction = false .or. Enforce restriction is empty OR Enforce restriction = true AND Allowed members CONTAINS (██████████) .or. Allowed groups CONTAINS (Fiscal Supervisor, BFS Employees, CAM System Owner) AND Incident = INC0130757
Sort Order:	Number in ascending order

None

Report Title:	Requested Item Details		
Run Date and Time:	2025-02-28 08:48:16 Eastern Standard Time		
Run by:	████████		
Table name:	sc_req_item		

Requested Item

Number:	RITM0180112	Opened:	2025-01-29 15:34:25
Item:	Top Secret (TSS) Mainframe Access Request	Opened by:	████████
		Stage:	Completed
Request:	REQ0177917	State:	Closed Complete
Request Requested for:	████████	Quantity:	1
Due date:	2025-02-12 15:34:25	Estimated delivery:	
Configuration item:		Delayed:	false
Watch list:		Order Guide:	

Additional comments:

2025-01-31 18:07:24 - ████████ (Additional comments)
sorry read/write is needed

2025-01-31 18:07:10 - ████████ (Additional comments)
again disregard, read/write

2025-01-30 09:12:59 - ████████ (Additional comments)
Please disregard - go with read only at this time

2025-01-30 07:37:40 - ████████ (Additional comments)
#AUDITRD , GLOBALPF, TSOALLPF are the new groups needed.

2025-01-29 18:02:58 - ████████ (Additional comments)
Change #PAMDADM to a read/write access

2025-01-29 16:30:01 - ████████ (Additional comments)
add readonly access to FROPK.*.SPR.*

Related List Title:	Catalog Task List
Table name:	sc_task
Query Condition:	Request item = RITM0180112
Sort Order:	Number in ascending order

1 Catalog Tasks

▲ Number	State	Assignment group	Assigned to	Short description	Due date	Actual start	Actual end
SCTASK0185700	Closed Complete	MACB	███████	TSS Access Request Created Account for Marko Elez, CA86		2025-01-31 18:08:05	2025-01-31 20:40:56

Related List Title:	Approval List
Table name:	sysapproval_approver
Query Condition:	Approval for = RITM0180112
Sort Order:	Created in descending order

1 Approvals

State	Approver	Comments	Approving	▼ Created
Approved	████████		Requested Item: RITM0180112	2025-01-29 15:34:27

Related List Title:	Task SLA List
Table name:	task_sla
Query Condition:	Task = RITM0180112
Sort Order:	None

1 Task SLAs

Task	SLA definition	Type	Target	Stage	Business time left	Business elapsed time	Business elapsed percentage	Start time	Stop time
RITM0180112	Catalog Item SLA - 2 weeks	SLA	Resolution	Completed	13 Days 21 Hours 27 Minutes	2 Hours 32 Minutes	0.76	2025-01-29 15:34:25	2025-01-31 20:40:57

Related List Title:	Attachment List
Table name:	sys_attachment
Query Condition:	Table name in sc_request, sc_req_item, sc_task, ZZ_YYsc_req_item AND Table sys ID in 7089fc9b1b179e5011230f67624bcb8b, 7889fc9b1b179e5011230f67624bcb8b, 87df6f738753561003dd85550cbb35c9
Sort Order:	Created in descending order

Requested Item Details

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2 Attachments

File name	Content type	Table name	Table sys ID	▼ Created	Size bytes
CA86.PNG	image/png	sc_task	87df6f738753561003dd 85550cbb35c9	2025-02-02 13:50:06	42337
CA86 PAM Profile Removed.png	image/png	sc_task	87df6f738753561003dd 85550cbb35c9	2025-02-01 17:26:53	4836

Catalog Task Details

Report Title:	Catalog Task Details
Run Date and Time:	2025-02-28 08:49:32 Eastern Standard Time
Run by:	███████████
Table name:	sc_task

Catalog Task

Number:	SCTASK0185700	Priority:	4 - Low
Assignment group:	MACB	State:	Closed Complete
Assigned to:	██████	Service provided via:	
Configuration item:		Request item:	RITM0180112
Contract:		Request item Requested for:	████████████
		On Hold:	false

Short description:

TSS Access Request Created Account for Marko Elez, CA86

Description:

TSS CREATE(CA86)TYPE(USER)DEPT(CONTACID)NAME('ELEZ, MARKO') –
PASSWORD(,,EXP)
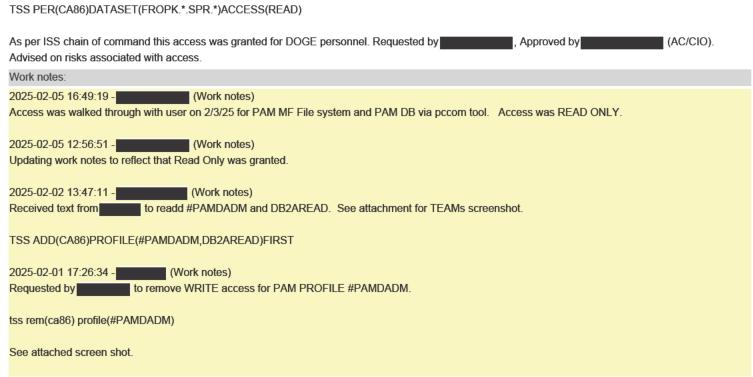TSS ADD(CA86)PROFILE(#AUDITRD,#PAMDADM,TSOALLPF,GLOBALPF)
TSS ADD(CA86)TSOLPROC($TSOUSER)
TSS ADD(CA86)TSOLSIZE(8192)
TSS ADD(CA86)TSOLSIZE(8192)
TSS ADD(CA86) MFACTOR(AZFCERT1) MFADATA(REGSTATE:OPEN) MFACTIVE(YES)
TSS ADD(CA86) MFPOLICY(POLICY1)
TSS PER(CA86)DATASET(FROPK.*.SPR.*)ACCESS(READ)

As per ISS chain of command this access was granted for DOGE personnel. Requested by ██████████, Approved by ███████████ (AC/CIO).
Advised on risks associated with access.

Work notes:

2025-02-05 16:49:19 - ███████████ (Work notes)
Access was walked through with user on 2/3/25 for PAM MF File system and PAM DB via pccom tool.   Access was READ ONLY.

2025-02-05 12:56:51 - ███████████ (Work notes)
Updating work notes to reflect that Read Only was granted.

2025-02-02 13:47:11 - ███████████ (Work notes)
Received text from ████████ to readd #PAMDADM and DB2AREAD. See attachment for TEAMs screenshot.

TSS ADD(CA86)PROFILE(#PAMDADM,DB2AREAD)FIRST

2025-02-01 17:26:34 - ████████ (Work notes)
Requested by ████████ to remove WRITE access for PAM PROFILE #PAMDADM.

tss rem(ca86) profile(#PAMDADM)

See attached screen shot.

Related List Title:	Task SLA List
Table name:	task_sla
Query Condition:	Task = SCTASK0185700
Sort Order:	None

1 Task SLAs

Task	SLA definition	Type	Target	Stage	Business time left	Business elapsed time	Business elapsed percentage	Start time	Stop time
SCTASK0185700	Cask- Two weeks- with Approval	SLA	Resolution	Completed	13 Days 21 Hours 27 Minutes	2 Hours 32 Minutes	0.76	2025-01-31 18:08:05	2025-01-31 20:40:56

Related List Title:	Attachment List
Table name:	sys_attachment
Query Condition:	Table name in sc_request, sc_req_item, sc_task, ZZ_YYsc_req_item AND Table sys ID in 7089fc9b1b179e5011230f67624bcb8b, 7889fc9b1b179e5011230f67624bcb8b, 87df6f738753561003dd85550cbb35c9
Sort Order:	Created in descending order

2 Attachments

File name	Content type	Table name	Table sys ID	▼ Created	Size bytes
CA86.PNG	image/png	sc_task	87df6f738753561003dd85550cbb35c9	2025-02-02 13:50:06	42337
CA86 PAM Profile Removed.png	image/png	sc_task	87df6f738753561003dd85550cbb35c9	2025-02-01 17:26:53	4836

Related List Title:	Requested Item List
Table name:	sc_req_item
Query Condition:	Request = (empty)
Sort Order:	Number in ascending order

None

Catalog Task Details   Page 1

Report Title:	Catalog Task Details
Run Date and Time:	2025-02-28 08:51:51 Eastern Standard Time
Run by:	███████████
Table name:	sc_task

Catalog Task

Number:	**SCTASK0185701**	Priority:	4 - Low
Assignment group:	UNIX Operating Systems	State:	Closed Complete
Assigned to:	███████████	Service provided via:	
Configuration item:		Request item:	RITM0180120
Contract:		Request item Requested for:	███████████
		On Hold:	false

Short description:

Fulfillment Task: On-Prem Linux Account

Description:

Work notes:

2025-02-06 09:30:41 - ███████████ (Work notes)
Modified the melez001 account to have /bin/false for a login shell. This will prevent CLI access to the RHEL platform which is not needed for this account.
This account was setup to allow direct DB2 access for tools like DBArtisan or other GUI database tools.

Modify the marko.elez SELinux context to user_u.

2025-02-05 16:50:08 - ███████████ (Work notes)
Access was walked through with user on 2/5/25 for SPS DB - Access is READ ONLY

2025-02-05 14:49:19 - ███████████ (Work notes)
Modified the group from dbrdwr to dbrdonly.

Created local account melez001 and added them to the dbrdonly group. This is for direct DB2 logins.
Added the account, marko.elez, to the dbrdonly groups and enabled that group to SSH into the server. This is for CLI access for DB2.

2025-02-05 12:57:47 - ███████████ (Work notes)
Updating work notes to reflect that Read Only was granted.

2025-02-01 05:04:46 - ███████████ (Work notes)
Created local account melez001 and added them to the dbrdwr group. This is for direct DB2 logins.
Added the account, marko.elez, to the dbrdwr groups and enabled that group to SSH into the server. This is for CLI access for DB2.

Supp_25-cv-00313_DDC_UST_0012

Related List Title:	Task SLA List
Table name:	task_sla
Query Condition:	Task = SCTASK0185701
Sort Order:	None

1 Task SLAs

Task	SLA definition	Type	Target	Stage	Business time left	Business elapsed time	Business elapsed percentage	Start time	Stop time
SCTASK0185701	Cask- Two weeks- with Approval	SLA	Resolution	Completed	13 Days 13 Hours 5 Minutes	10 Hours 54 Minutes	3.24	2025-01-31 18:10:51	2025-02-01 05:04:52

Related List Title:	Attachment List
Table name:	sys_attachment
Query Condition:	Table name in sc_request, sc_req_item, sc_task, ZZ_YYsc_req_item AND Table sys ID in 918005d31b979e5011230f67624bcb87, d98005d31b979e5011230f67624bcb87, 6370fbf38753561003dd85550cbb3573
Sort Order:	Created in descending order

None

Related List Title:	Requested Item List
Table name:	sc_req_item
Query Condition:	Request = (empty)
Sort Order:	Number in ascending order

None

Supplemental AR Tab 3

From:	Matthew.Garber2@treasury.gov
To:	Timothy E. Gribben
Cc:	Matthew J. Miller; Susan Robinson; Lillian Cheng; Joseph Gioeli III; Nathaniel Reboja
Subject:	Confirmation to Proceed
Date:	Sunday, January 26, 2025 5:42:08 PM

<div style="background:#1a5a96;color:white;text-align:center;padding:4px">This message was sent securely using Zix®</div>

Tim,

Please consider this note your approval/direction to move forward with the process outlined below.

Thanks to the DDM and ISS teams for actioning against the request over the weekend.

Matt

From: Katz, Daniel <Daniel.Katz@treasury.gov>
Sent: Sunday, January 26, 2025 6:34 PM
To: Garber, Matthew <Matthew.Garber2@treasury.gov>

Thanks Matt for actioning this so quickly. The below process looks good and appropriate to me. Let me know if you need any help getting State working with this protocol - I'm happy to reach out to them again.

Appreciate the work over the weekend as well.

Dan Katz

██████████

From: Garber, Matthew <Matthew.Garber2@treasury.gov>
Sent: Sunday, January 26, 2025 4:31:02 PM
To: Katz, Daniel <Daniel.Katz@treasury.gov>

Dan,

We've successfully set up the technical and process adjustments at Fiscal to support this request within the appropriate bounds. A reminder of the process we discussed and will execute against beginning Monday:

- **Fiscal will intercept USAID payments files prior to ingestion into our PAM/SPS systems** *(this is in place now and can begin immediately)*
    - We developed a process to intercept the file, and additional flags to ensure we catch all USAID payment requests through our systems
    - Fiscal will manually pull an unredacted and unmodified copy to share with State officials
    - Individual ITS payment requests will be flagged and shared for review as needed

- NOTE: Fiscal will not provide any preliminary review or determination on the payments, and will not edit or modify the file at any point in this process
- **Fiscal will deliver the USAID payment file to the designated State officials for review**
  - Fiscal has set up a secure portal where the designated officials will be able to access the files *(this will have encryption and MFA, and has completed third party pen testing)*
  - We developed a user guide and instructions to support State officials in using the portal
    - We can provide additional technical support as needed
  - We will deliver the file once-a-day according to the normal USAID payment schedule
- **State officials will review and provide a determination to Fiscal on whether or not to release the file into our normal payment processes**
  - We will provide a template for State officials to provide the determination back to Fiscal
  - Files that are determined by State as able to move forward will be released by Fiscal into PAM/SPS or ITS systems
  - Files that are determined by State as unable to move forward will be returned to USAID for correction
    - *State will work directly with USAID to provide any necessary corrections prior to resubmission.*
- **Payment files that are cleared by State and released into our normal payment processes will continue to be certified by USAID certifying officers prior to payment**

While we will begin intercepting the USAID files prior to ingestion immediately on Monday, we will not transmit files to State until **we receive confirmation from the appropriate security officers (likely in the CIO office) that:**

  - the individuals at State accessing and reviewing the information have the appropriate clearances, etc
  - the necessary data security methods are in place at State and those standards have been communicated and agreed to by the individuals accessing the files
  - NOTE: We are still working to connect with the appropriate IT/Security/Technical individuals at State, which we believe will happen as soon as Monday morning.

Additional note:
  - As mentioned, these files are mixed and contain a variety of payments. We recommend State ensures they can review these files and provide a determination same-day to avoid any unintended downstream issues.

Please confirm we are still good to execute this plan beginning Monday. Happy to hop on a call if needed.

Thanks,

Matt