

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

AFL-CIO et al.,

*Plaintiffs,*

vs.

U.S. Department of Labor et al.,

*Defendants.*


Case No. 1:25-cv-339-JDB

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**DECLARATION OF MARK B. SAMBURG**

I, Mark B. Samburg, counsel for Plaintiffs in the above-captioned matter declare as follows:

1. The information set forth in this declaration is based upon my personal knowledge.
2. The Department of Health & Human Services maintains a public Employee Directory website that can be accessed at <https://directory.psc.gov/employee.htm>.
3. On March 13, 2025, I searched the HHS directory for employees with the job title “Executive Engineer.” A true screenshot of the results I received at 7:19 PM EDT is pasted here:

← → ↻  directory.psc.gov/hhsdir/eeQ.asp



Last name	First name	MI	Organization	Job title
<a href="#">Coristine</a>	Edward		IOS	Executive Engineer
<a href="#">Elez</a>	Marko		IOS	Executive Engineer
<a href="#">Farritor</a>	Luke		IOS	Executive Engineer
<a href="#">Moghaddassi</a>	Aram		IOS	Executive Engineer

4.

5. Public reporting has identified all four of the individuals listed above to be DOGE staffers. *See, e.g., The People Carrying Out Musk’s Plans at DOGE*, N.Y. Times (updated Mar. 11, 2025), <https://www.nytimes.com/interactive/2025/02/27/us/politics/doge-staff-list.html> (NYT Tracker); *Treasury Sought to Freeze Foreign Aid Payments, Emails Show*, N.Y. Times (Feb. 6, 2025)

6. On March 13, 2025, I searched the HHS employee directory for employees with the name Rachel Riley. A true screenshot of the results I received at 7:24 PM EDT is pasted here:

← → ↻ ☰ directory.psc.gov/hhsdir/eeQ.asp



Last name	First name	MI	Organization	Job title
<a href="#">Riley</a>	Rachel	W	/DHHS/NIH/OD/OM/NBS/AMS	
<a href="#">Riley</a>	Rachel		OS/ASA	0301 - GS15 - Senior Advisor

7.

8. Public reporting has identified Rachel Riley as a DOGE staffer. *See* NYT Tracker.

Separate reporting has specifically described her as a “top DOGE lieutenant . . . who is listed internally as a senior adviser at HHS and the State Department [and] works closely with Brad Smith, a healthcare entrepreneur and senior DOGE member who for years has been a leading voice pushing for privatizing parts of Medicare and Medicaid.” Will Steakin and Anne Flaherty, *Key Musk DOGE adviser meets with leaders of Medicare agency*, ABC News (Feb. 14, 2025), <https://abcnews.go.com/Politics/key-musk-doge-adviser-meets-leaders-medicare-agency/story?id=118843035>.

9. I am over eighteen years old, of sound mind, and submit this declaration of my own account, not subject to any duress, fraud, or undue influence. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing declaration is true and correct to the best of my knowledge, information, and belief.

Executed in Takoma Park, Maryland on March 13, 2025

/s/ Mark B. Samburg  
Mark B. Samburg