

# **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

DECLARATION OF ALEXA T. MILTON

I, Alexa T. Milton, 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 29, 2025, I searched the HHS employee directory for employees with the name Conor Fennessy. A true screenshot of the results I received at 1:01 PM EDT is pasted here:



Last name	First name	MI	Organization	Job title
<a href="#">Fennessy</a>	Conor		/DHHS/HRSA/OA	OA
<a href="#">Fennessy</a>	Conor	M	OS/ASA	Senior Advisor

4.

5. Public reporting has identified Conor Fennessy as a DOGE staffer. *See, e.g., The People Carrying Out Musk’s Plans at DOGE*, N.Y. Times (updated Mar. 26, 2025), <https://www.nytimes.com/interactive/2025/02/27/us/politics/doge-staff-list.html> (NYT Tracker); *Elon Musk’s Demolition Crew*, ProPublica (updated March 14, 2025), <https://projects.propublica.org/elon-musk-doge-tracker/> (ProPublica Tracker).

6. On March 29, 2025, I searched the HHS employee directory for employees with the name Jeremy Lewin. A true screenshot of the results I received at 1:03 PM EDT is pasted here:



Last name	First name	MI	Organization	Job title
<a href="#">Lewin</a>	Jeremy		/DHHS/HRSA/OA	OA
<a href="#">Lewin</a>	Jeremy		IOS	Senior Advisor

7.

8. Public reporting has identified Jeremy Lewin as a DOGE staffer. *See, e.g., NYT Tracker; ProPublica Tracker; Kate Knibbs, Some DOGE Staffers Are Drawing Six-Figure Government Salaries*, Wired (March 4, 2025), <https://www.wired.com/story/doge-government-salaries-elon-musk/>.

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 Washington, D.C. on March 29, 2025

/s/ Alexa T. Milton  
Alexa T. Milton