

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
AMERICAN FOREIGN SERVICE)	
ASSOCIATION, et al.,)	
)	
<i>Plaintiffs,</i>)	Civil Action No. 1:25-CV-352
)	
v.)	
)	
DONALD TRUMP, et al.,)	
)	
<i>Defendants.</i>)	
_____)	

DECLARATION OF XAVIER DOE

I, Xavier Doe, declare the following under penalties of perjury:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.
2. I am a member of the American Foreign Service Association.
3. Foreign Service Officer, currently serving overseas in a USAID mission.
4. There are multiple procedures and policies in place to ensure an orderly demobilization of USAID staff, close-out of programs, disposition of equipment and severing of local staff employment contracts. However, none of these have been followed in recent weeks, creating confusion and anxiety among not just the USAID staff; but also our implementing partners, most of whom are American organizations led by Americans.
5. The USAID shutdown has harmed me in the following ways – I am still awaiting payment of travel vouchers for reimbursement of travel expenses incurred

and I have not received my COLA payment for January. Payment for my government travel card is due on February 19, 2025 and I am personally liable for the payment, whether or not I am reimbursed. I do not have any information regarding where I am expected to return to (Washington, DC or home of record) should the repatriation plan continue nor what my employment status will be. As the sole financial provider for my family, the anxiety for my family is enormous as we just do not have any idea where we will be financially once repatriated back to the US, which is counter to existing procedures in the Foreign Assistance Manual and Automated Directive System, both of which govern USAID operations.

6. On February 9, 2025, USAID notified contracting and agreement officers to immediately terminate 146 contracts and cooperative agreements (grants). The notification, sent by Jami Roberts, Chief Acquisition and Procurement Executive, noted that the list of awards slated for termination were “reviewed and approved by Secretary Rubio.”

7. On February 10, 2025, another tranche of 92 media contracts and cooperative agreements were identified for termination. Shortly after that email was sent, a third tranche of 96 contracts were slated for termination. All emails noted that these lists had been reviewed and approved by Secretary Rubio.

8. The unclassified State Department cable (25STATE6828) noted that “Within thirty (30) days of the issuance of the review standards in paragraph 4, every Bureau, agency office and entity providing any type of foreign assistance shall produce to F for review a list of all active, pending, or proposed grants, subcontracts,

contracts, or subcontracts, and provide a clear and concise statement explaining if and how the current or proposed use of obligated funds advances President Trump’s policy.” However, to date, the review standards have not been issued, nor have USAID staff had an opportunity to provide the clear and concise statements regarding the status of our programs and whether or not they fit under the current administration’s policies.

9. Further, despite the notation that all agencies providing any type of foreign assistance were subject to the aforementioned cable guidance, only USAID is being targeted for limitations on reimbursement of travel expenditures, holds on payment of vouchers to implementing partners and closure of our programs. If this indeed was a comprehensive review, these standards should be applied equally to all agencies. Additionally, while reimbursement of travel expenditures were expressly waived in the 25STATE6828, these expenses remain unreimbursed.

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

Executed on February 11, 2025.

/s/ Xavier Doe
Xavier Doe