

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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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 ZEB DOE**

I, Zeb 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 have familiarity with the formulation and execution of USAID’s budget process.
3. Mr. Marocco’s Declaration stated it was impossible to review existing programs without shutting everything down.
4. Having over a decade of experience with USAID’s programs, budget processes, and program reviews, I would say this assertion is incorrect.
5. Comprehensive reviews are possible and have previously been conducted: It is possible to conduct a comprehensive review of foreign

assistance without shutting down all programs and activities. There is precedent in the Quadrennial Diplomacy and Development Review (QDDR) exercises that took place in 2010 and 2014. These comprehensive reviews were in-depth studies of Department of State and USAID operations and programs taken to better align them with policy and strategic priorities, including in foreign assistance. Neither QDDR effort involved shutting down all (or any) programs so that the review could be conducted.

6. Data and information systems are sufficient to form the foundation of a strategic review: Since the time of the QDDRs, the systems and information available to conduct comprehensive reviews have only improved. The FACTS Info NextGen system contains detailed information on all USAID and State foreign assistance. It allows for reporting and data export across a range of foreign assistance program information. This includes Operational Plans (OPs) – an annual budget planning document that describes how State and USAID operating units will use the foreign assistance funds allocated to them. They include detailed information on individual implementing mechanisms and activities (including narrative program descriptions, implementing partner names, and funding), budget allocations by accounts and program areas, funding attributions and narratives related to key issues, and more. It includes similar programmatic information on the PEPFAR Country and Regional Operational Plans (COP/ROP). It also includes Performance Plans and

Reports (PPRs), which are the annual data call and record for performance information across all State and USAID operating units that implement foreign assistance programs – these consist of indicator data, associated descriptive data, and key issue narrative reporting. The [foreignassistance.gov](https://foreignassistance.gov) website also provides comprehensive information on foreign assistance activities and financial flows – including obligations and disbursements associated with various program areas and mechanisms. USAID’s reporting on this website is consistently the most complete and up-to-date of any reporting department or agency. All of this information is readily available and accessible to State and USAID staff and leadership for compilation and analysis to contribute to a review without the need to shut down any program or activity.

7. Staff and subject matter experts are necessary for a comprehensive review: While data such as that in FACTS Info NextGen would form the foundations for such a review, interpreting and reviewing these data, and responding to the specific, tailored questions of a comprehensive assistance review would require significant staff time dedicated by subject matter experts across disciplines. Additionally, the data captured in these systems is not necessarily tailored to or comprehensive of the type of questions and topics that may be covered in a review of alignment to new Administration priorities – the data are from a point in time. They should be complemented by staff analysis and

contributions to provide the most accurate information to inform a review. If a large number of staff are on administrative leave or otherwise not available to participate due to being locked-out of Agency systems, then the relevant subject matter experts would not be available to answer detailed questions on specific activities nor provide needed information to make a determination on the alignment of the activities with the Administration's priorities. Particularly when Administration priorities are being newly-articulated or are emergent, both foundational program data and staff subject matter expertise and analysis (including from technical experts, activity managers, program and budget analysts, evaluators, etc.) are necessary to effectively carry out a comprehensive review.

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

Executed on February 11, 2025.

/s/ Zeb Doe  
Zeb Doe