

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

AMERICAN FOREIGN SERVICE)
ASSOCIATION, et al.,)

Plaintiffs,)

v.)

DONALD TRUMP, et al.,)

Defendants.)

Civil Action No. 1:25-CV-352

DECLARATION OF RUTH DOE

I, Ruth 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. I am a USAID Foreign Service Health Officer and oversee the responsible management of about \$60 million annually.

4. My husband and I were evacuated from Kinshasa, Democratic Republic of Congo (DRC) to Brazzaville, Republic of Congo on January 29, 2025. We were notified of the ordered departure evacuation at 3pm on January 28 and picked up from our apartment by Embassy vehicles at 3:30am on January 29. We were consolidated at another embassy residence and waited at the consolidation point for 12 hours without access to food and limited water. We were offered Meals-Ready-to-Eat (MREs) after a few hours. I am pregnant and I was unable to eat the MREs. By

the time we crossed by boat to Brazzaville around 1pm, I was sick from lack of food and water and exhaustion and had to be expedited to the hotel to be able to get food and water.

We were allowed to bring one carry-on bag per person small enough to sit on our lap which we mostly filled with essential documents (passports, birth certificates, marriage certificate, etc.) and a couple pieces of clothing, including winter jackets since we would be returning to Washington, D.C in the middle of winter. We left behind the rest of our belongings, including two vehicles and other valuables.

We boarded a charter flight to depart Brazzaville, Republic of Congo on January 31st at 1.30am. After almost 20 hours of travel, we arrived in Washington Dulles Airport on January 31st around 3.30pm.

Since arriving in Washington, DC, I have struggled to find a health care provider to access prenatal services. Up to this point, all of my prenatal care has been managed by the State Department Bureau of Medical Services through the Medical Unit at the US Embassy in Kinshasa. I called five different practices in the DC area upon arrival and the earliest appointment I could obtain is March 10 which is too late for a second trimester scan according to the timeline for care I received from the medical provider with the Medical Unit in the US Embassy in Kinshasa. I was assured before evacuation that the State Department would help facilitate access to timely prenatal care so that I would be able to obtain my second trimester scan on time. Up to this point, the State Department Bureau of Medical Services has been unable to assist with arranging an appointment earlier than March 10. The imminent

shut down of USAID has further exacerbated my stress and concern in accessing timely prenatal services since I would be cut off from my email and communication with the State Department Bureau of Medical Services. Even while on Administrative Leave, it is not clear what support I would be able to access.

To obtain timely prenatal care, I have paid out of pocket to fly to my home of record where I have been able to arrange for a prenatal appointment through family contacts with a provider.

5. The USAID shutdown has limited the ability of the Agency to disburse funding and make payments. This is extremely concerning for USAID Officers recently evacuated to Washington, DC who are forced to cover costs of accommodation, food, clothes and other necessities since we were unable to pack anything substantial before departing Kinshasa. In one week, I have spent almost \$5,000 on these necessities. We have received conflicting and unclear guidance on how to submit for reimbursement for these costs. Given the chaotic nature of the USAID shutdown, I am concerned that we will not receive timely reimbursement for these costs. As previously stated, I am already paying out of pocket to travel outside of Washington DC to seek timely prenatal care. I have not been put on administrative leave yet or terminated; however, I am extremely concerned about losing access to health insurance while pregnant and without adequate notice.

My husband is an eligible family member (EFM) employed by the Department of State and works in the General Services Office in the US Embassy in Kinshasa. He is currently working in Washington, DC while we are on evacuation orders. He

has been told that his employment eligibility is linked to my continued employment as a USAID Foreign Service Officer, making both of our incomes uncertain.

6. USAID financially supports the procurement warehousing, and distribution of commodities for the diagnosis, prevention, and treatment of tuberculosis, including multi-drug-resistant tuberculosis, in the DRC. As of early January, due to the global shortage of rifampicin, almost 11,000 patients were on a wait list to receive tuberculosis treatment. At this moment, there are commodities sitting in the warehouse in the National TB program in Kinshasa waiting to be distributed to provinces and to last-mile health facilities. With the shutdown and stop work order put in place, these commodities which have already been paid for, will continue to sit in the warehouse. This will increase the number of patients with treatment interruption which will increase the risk of multi-drug resistance, increase the number of patients who will die of tuberculosis, and increase the spread of the disease within their communities. Infectious diseases do not recognize international borders. As we collectively learned during the COVID-19 pandemic, respiratory diseases are particularly difficult to contain and increased rates of tuberculosis globally will pose a threat to global health security and the health of Americans at home.

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

Executed on February 10, 2025.

/s/ Ruth Doe
Ruth Doe