

**EXHIBIT I**

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 JANE DOE**

I, Jane 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 U.S. Personal Services Contractor at USAID.

**My position at USAID and the nature of my work**

3. I am a USAID Personal Services Contractor (PSC) who has worked with the organization for five years. Currently, I serve as a Senior Humanitarian Assistance Officer, but I have previously held multiple leadership positions, including Planning Coordinator and Deputy Leader for Planning on the [REDACTED] Disaster Assistance Response Team (DART). My work has spanned high-risk humanitarian responses, including [REDACTED] and [REDACTED], where I have managed complex operations, coordinated with interagency and international partners, and led strategic planning

efforts. My role requires me to take on significant leadership and oversight responsibilities that directly impact USAID's ability to deliver life-saving assistance in conflict zones and disaster-affected areas.

**My general experience of the USAID shutdown**

4. Despite having dedicated my career to USAID, I now find myself completely uncertain about my employment status. My experience of the shutdown has been characterized by chaos, uncertainty, and fear.

5. Late Sunday night, I was abruptly cut off from my USAID email and all related platforms. I received no warning, no stop-work order, no termination notice, and no administrative leave notification—nothing. I simply lost access.

6. While colleagues who still had access to their accounts received an email at 12:42 AM informing them that the office was closed, I never received that message. I woke up on Monday morning with no guidance—unsure whether I should report to work or whether I even still had a job.

7. Reaching out to colleagues and supervisors proved difficult, as our primary means of communication—email and Google Chat—were now inaccessible to me. To this day, I have received no official clarification on my employment status. This has left me in an impossible situation where I cannot apply for unemployment benefits, cannot seek independent legal recourse, and have no way of knowing whether I am on administrative leave like some of my colleagues.

8. On the evening of February 4, colleagues with active USAID accounts informed me that they had received an official email confirming their placement on

paid administrative leave. Since I do not have access to my account, I do not know if I received this email and, therefore, whether I am also on administrative leave or if my contract has simply been terminated without notification.

9. I do not know if I will be paid for last week's work as I do not have access to the time and attendance site to input my timesheet. My supervisor also does not have access to approve the timesheet. Direct hire colleagues were recommended to reach out to USAID HR for completion of their timesheet. As a PSC, I do not have a centralized resource to provide this service.

10. I have attempted multiple avenues to clarify my status. I called the IT help desk, which was unable to provide any information. I contacted the HR help desk, which told me they could not assist. I wrote to my Contracting Officer, who has, to date, not responded.

11. I have dedicated my career to humanitarian assistance and believe deeply in USAID's mission. I have witnessed firsthand how USAID's work impacts lives around the world and strengthens America's global standing. However, the manner in which this shutdown has been carried out is shocking. It was executed by individuals who were neither vetted nor confirmed by Congress, individuals who do not understand the laws, rules, and regulations governing the U.S. Government. Their actions were not only reckless but also illegal, and they endanger the integrity of our institutions.

**The USAID shutdown has already harmed—and will continue to harm— me and other PSCs in the following ways**

12. The USAID shutdown has caused significant harm to me and my

colleagues, both professionally and personally. The abrupt loss of access to work systems, financial uncertainty, and the spread of misinformation have created an environment of fear and instability. If the shutdown continues, these harms will only deepen, leaving many of us without income, legal protections, or the ability to return to our careers.

13. **Personal Safety Risks:** The shutdown could have life-threatening consequences for PSC colleagues serving in high-risk locations. The abrupt shutdown of government devices and access was highly reckless to colleagues in active conflict zones, such as Ukraine and Somalia. Friends and colleagues lost access to the Embassy safety communication channels, and many could no longer use a safety app called “Scry Panic 2.0,” which is installed on government-furnished equipment. In addition, many PSCs serving USAID abroad were unsure if they remained under U.S. chief-of-mission authority, which guarantees access to U.S. Government resources to ensure staff safety and accountability, including for emergency evacuations. U.S. Department of State officials, who were tasked with developing a plan to get USAID officials home, had no instructions or information on the next steps.

14. Many USAID PSCs work in high-risk environments where access to security resources is critical. I have heard from overseas colleagues who have now lost access to Diplomatic Security systems, meaning they can no longer coordinate security protocols, evacuations, or emergency procedures. Without official communication from USAID leadership, these PSCs remain in dangerous locations without clarity on whether they still have institutional protection. Others fear that,

in the event of a medical emergency or security threat, they will be forced to rely on personal funds or external assistance, as USAID has not provided guidance on whether existing security protocols still apply to them.

15. I have heard of PSC colleagues stationed at overseas posts who were blindsided by a general directive on the internet instructing USAID workers to return to the U.S. within 30 days. However, these colleagues have received no official communication, leaving them in limbo regarding whether this directive applies to them. One colleague stationed overseas with their spouse—who is 36 weeks pregnant—has been left without answers on whether they are required to evacuate. Returning to the U.S. at this stage in the pregnancy is medically unsafe, yet they have been given no guidance on their options or support.

16. PSCs are also at increased risk of physical harm due to the threats, harassment, and misinformation that have accompanied the shutdown. The reckless rhetoric spread on social media and in political discourse has put USAID personnel at risk. I have heard from colleagues who have been labeled as criminals, supporters of terrorists, or Marxists—simply for doing their jobs.

17. High-profile figures, including Elon Musk and his supporters, have fueled this misinformation, creating a hostile environment where USAID staff fear for their personal safety. With individuals involved in the January 6th insurrection now released, there is a heightened sense of danger that USAID employees could be targeted next. I have colleagues who no longer feel safe in their own homes, with some refusing to leave family members alone out of fear that someone radicalized by online

misinformation may try to harm them.

18. Many of us are also deeply concerned that our personal information—home addresses, banking details, social security numbers, and phone numbers—has been compromised, significantly increasing the risk of harassment or identity theft. I learned that all of my personally identifiable information has likely been exposed to an unvetted and insecure source who may not hold a security clearance. This unauthorized access to sensitive data creates serious privacy and security concerns, and I have no clear recourse to address the potential risks. Without guidance from USAID or the federal government, I am left vulnerable to potential misuse of my information, including financial fraud, doxxing, or other forms of targeted harassment.

19. **Loss of Employment Status & Work Access:** I lost access to my USAID email and all related platforms on Sunday night without warning. I received no official communication about whether I had been furloughed, terminated, or placed on administrative leave. Many PSC colleagues experienced the same sudden cutoff, leaving us unable to communicate with supervisors, access critical documents, or even confirm our employment status.

20. **Financial Harm:** As PSCs, we are personally liable for many upfront costs, including health and life insurance payments, travel expenses for temporary duty (TDY) assignments, and work-related language training. Under normal circumstances, these expenses are reimbursable under the terms of my contract.

21. However, since the freeze on foreign assistance and the shutdown of

USAID operations, I and many of my colleagues have been unable to process thousands of dollars in reimbursement claims. I have heard of PSC colleagues who have incurred substantial out-of-pocket costs from diplomatic travel—covering hotels, meals, and transportation—who now have no way of knowing if they will ever be reimbursed. USAID still owes some of my colleagues thousands of dollars in reimbursements for travel or health care expenses, but they cannot claim these funds or even confirm when they might be paid due to payment systems being shut down under the Foreign Aid freeze.

22. With contracting and payroll teams unable or unwilling to process pending claims, thousands of dollars in reimbursements remain unpaid. This is particularly damaging to PSCs stationed overseas, where diplomatic travel costs and emergency preparedness expenses are high. Colleagues who relied on USAID for financial stability are now forced to absorb these costs personally, further exacerbating their financial distress.

23. Many PSCs are also currently not receiving income. I have heard from colleagues who have not been paid for multiple pay periods in 2024 and have received no response from payroll regarding their missing salaries. Many of these colleagues are overseas and gave up stable jobs with health insurance and retirement benefits to take on PSC roles, only to now find themselves in a war zone with uncertain income, housing, or medical coverage.

24. One colleague, a senior humanitarian PSC based in East Africa, has gone unpaid for consecutive pay periods, leaving them struggling to meet financial



obligations. This also puts them at risk of filing incorrect taxes, as they have no way of accurately reporting their income. Meanwhile, another colleague has household effects in storage valued at \$3,000 that they are entitled to retrieve, but due to the shutdown, the individuals responsible for processing these requests have been furloughed, leaving their property in limbo.

25. Many PSCs had contracts set to be renewed in 2025 or 2026, providing expected job security. However, with the administration's actions, these renewals are unlikely to move forward, leaving us and our families without future income. I have heard from colleagues who had planned their careers, housing, and family decisions around their anticipated contract renewals, only to now face complete financial uncertainty.

26. Moreover, with no clear timeline for resolution, PSCs risk long-term unemployment. Additionally, these large-scale staffing and funding cuts will likely drive thousands of PSC staff into a job market that is greatly constricted due to the agency's dismantling, rendering future job prospects uncertain. Some of my colleagues are pregnant or have children about to enter college, but without income, they are now unsure if they can afford essential items or tuition. Others do not own homes or have significant savings and risk losing their housing.

27. Finally, many of us have worked for years to accumulate paid time off (PTO) for critical life events, such as family planning. Now, even receiving a payout for this accrued leave is uncertain. A colleague who spent years saving their PTO for family planning is now left in a situation where they do not even know if they will be

compensated for the leave they rightfully earned. Other PSC colleagues currently on parental leave could lose this benefit immediately upon termination of their contract, causing significant financial hardship. Furthermore, PSCs who have gradually accrued compensatory time—which can be used in lieu of PTO—will forfeit said time without any payout if their contracts are suddenly terminated, losing dozens of hours in leave earned from overseas travel and other duties.

28. **Disruption of Essential Benefits & Liabilities:** Many PSCs rely on USAID systems to access health insurance information, payroll and tax information, and security resources. Without access to these systems, some colleagues cannot verify whether their health insurance is still active or adjust their payroll settings, such as stopping automatic 401(k) contributions in anticipation of lost income.

29. The USAID shutdown also prevents PSCs from seeking unemployment benefits. PSCs do not receive the same employment protections as direct-hire staff, and because we cannot confirm our employment status, we are unable to apply for unemployment benefits. Many of us are also struggling to seek independent legal recourse, as there has been no formal documentation of termination or stop-work orders.

30. I know of a colleague whose contract was set to be renewed for another year. Despite being in good standing and meeting all performance requirements, their contract modification was delayed multiple times. They returned their signed contract renewal on January 27, but later that day, the contracting team was abruptly told to stop working. As a result, the renewal was never finalized, and the

colleague never received any official notice of termination or administrative leave.

31. They have been left entirely in limbo—without employment, without access to health insurance reimbursements, and without clarity on whether they are even entitled to administrative leave or unemployment benefits. They had been refinancing their home and planning to start a family, all based on their expected income and benefits. Now, they face financial and personal upheaval with no clear recourse.

32. **Exposure to Legal Liability:** I am an Agreement Officer Representative (AOR) managing a variety of multimillion dollar grants to USAID partners. Per instructions from USAID leadership, I have been explicitly prohibited from communicating with these implementing partners since January 23, 2025. Following this directive, my access to USAID systems was revoked without cause on February 6, 2025.

33. This has effectively rendered me unable to fulfill my oversight responsibilities as outlined in the legally binding AOR Letters I have signed. Significant, undocumented changes have occurred across these awards due to ongoing disruptions to grant implementation—including partial Stop Work Orders, DEIA activity cancellations, and lapses in payment reimbursements.

34. Without proper oversight and reporting to the designated Agreement Officers, USAID is in direct violation of its grant management obligations. I am also unable to report instances of fraud, waste, and abuse as required under my oversight responsibilities for these programs, further compounding the lack of accountability

and compliance with federal regulations.

35. These actions constitute an intentional and fraudulent obstruction of federal oversight processes. There is growing concern among program staff, most of which in my bureau are PSCs, that implementing partners could seek legal recourse directed at their AOR for failure to adhere to USAID contracts.

36. **Personal & Professional Harm:** The negative press surrounding USAID in the past week, along with misinformation and inflammatory rhetoric from political figures, has made PSCs feel targeted and harassed. I have felt the weight of this hostility, as it created a sense of professional uncertainty and reputational damage. USAID staff—especially PSCs—have been unfairly portrayed in political discourse, further isolating us and making it more challenging to seek external support or new employment opportunities.

37. **Legal & Contractual Uncertainty:** As PSCs, we have a more vulnerable employment status than direct hire colleagues, yet we regularly take on all of the same responsibilities. My colleagues and I all serve inherently governmental functions. As PSCs, we are potentially subject to contracts that require 15 days' written notice before termination (if performed by the government in good faith). However, given the lack of communication, whether this legal obligation will be honored remains unclear. If USAID chooses to disregard these contracts, it could set a precedent that PSCs can be fired at will. Many of us deeply fear long-drawn-out legal proceedings in the future to acquire what is owed to us under the terms of our contracts, whether it be health insurance reimbursement, travel reimbursement,

regular pay, or payout of accrued annual leave.

**The USAID Shutdown Is Damaging the Agency's Mission**

38. **Damaged Relationships with Implementing Partners:** Under USAID leadership's directive, we have been forced to ignore our implementing partners, who rely on us for critical updates and program continuity. This has severely harmed professional relationships that take years to build and maintain, undermining trust in USAID and jeopardizing future humanitarian and development efforts. Our inability to provide guidance or acknowledge partner inquiries risks long-term damage to USAID's credibility as a reliable donor and technical partner.

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

Executed on February 7, 2025.

/s/ Jane Doe  
Jane Doe