

EXHIBIT B

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 OTTIS JOHNSON, JR.

I, Ottis Johnson, Jr., 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 the 14th District National Vice President of the American Federation of Government Employees, AFL-CIO (AFGE), a labor organization and unincorporated association that represents approximately 800,000 federal civilian employees through its affiliated councils and locals in every state in the United States.

3. AFGE advocates on behalf of its members and seeks to promote dignity, safety, and fairness for government employees.

4. AFGE, through its affiliate AFGE Local 1534, represents over 900 employees, including 500 members, at USAID.

5. AFGE Local 1534 is located within AFGE's 14th District.

6. AFGE has devoted considerable resources in recent days responding to requests and providing guidance about the Trump administrations actions at USAID.

7. If the vast majority of USAID direct-hire employees are placed on administrative leave or terminated at 11:59 PM on February 7, 2025, demand for AFGE's assistance will rise substantially, diverting resources from other AFGE members' needs and other AFGE priorities.

8. If USAID is dissolved, AFGE will be unable to represent its members who are USAID employees, and AFGE will also lose hundreds of members.

9. I have heard from and am aware of many AFGE members that have been frightened and confused by the administration's actions at USAID. Members have been required to make significant choices that may involve financial and familial consequences.

10. The injuries suffered by AFGE and its members are ongoing or imminent and will persist unless this Court intervenes.

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

Executed on February 7, 2025.

/s/ Ottis Johnson, Jr.
Ottis Johnson, Jr.
National Vice President
District 14, AFGE
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6th Floor
Washington, DC 20001