

EXHIBIT D

**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 ERIC DOE

I, Eric 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 have loyally served as Foreign Service Officer for 15 years in a variety of countries including dangerous, unstable place. I currently oversee a portfolio of energy and environmental protection programs that received bipartisan support up until January 20th.

4. I have served as a diplomat in five countries over a fifteen stretch. I have served both Republican and Democratic administrations in a professional and apolitical manner. I have always faithfully implemented the foreign policy set by the White House and the foreign assistance programs approved in advance by the U.S Congress. My family has made untold sacrifices for a country that we thought valued

public service. Yet here we are being treated with cruelty and contempt. Now my family is facing the prospect of being evicted from our home, and my kids are facing the prospect of being uprooted from their school. In the very near future, we will be back in the United States homeless, without a car, without a school district, without employment, without a pension, and without health insurance. This experience has been degrading, dehumanizing, and traumatizing for my family.

5. This directive will have profound impacts on the wellbeing of my kids' personal, educational and psychological development. I have two children at Post: a seven-year-old in first grade and a two-year-old in preschool. Both have received "Class 2" medical clearances from State MED and thus they receive a Special Needs Education Allowance (SNEA) for occupational therapy (OT). My older child has documented gross and fine motor skill delays due to prenatal intrauterine growth restriction (IUGR). My younger child also has documented gross and fine motor skill delays due to torticollis. Both children receive OT services in conjunction with their schooling in a purposefully integrated manner, a best practice promoted by specialists at the State Department 's Office of Child and Family Program (CFP) who oversee their care. Additionally, my older child who is in first grade was recently diagnosed by a licensed medical professional with ADHD and anxiety. They are now receiving Cognitive Behavioral Therapy (CBT) at Post from a licensed therapist and the Embassy Medical Unit is tracking their care.

6. Uprooting my children from their school, OT service providers, and child therapist in the middle of the school year will undoubtedly set back their development

with possible lifelong implications. In the United States, we currently have no home or ties to a specific school district. My kids have lived overseas nearly their entire life in service of our country. There will be an inevitable gap - possibly a long one - before they are back in a stable routine of integrated schooling, OT services, and psychological services, a routine that medical professionals have determined they need to overcome developmental delays, and in the case of my seven-year-old, ADHD.

7. Regarding the two-year-old, the head of the school stated in a letter, “Developing a sense of structure and routine are vital for ■■■ and interruptions to these would negatively impact [their] progress and development. Consistent sessions which target [their] Individualized Support Plan allow [them] to reach [their] full potential and this would be greatly impacted without consistency.” Regarding my seven-year-old, the letter stated, “Continuity in [their] therapeutic support allows ■■■ to complete the goals of [their] Individualized Support Plan and the curriculum targets designed for [them] without interruption. An early departure could result in significant gaps in [their] learning, leading to setbacks that could affect [their] confidence and academic performance.”

8. In the very near future, we will be back in the United States homeless, without a car, without a school district, without employment, without a pension, and without health insurance. The financial harms cannot be calculated at this time but they will be crippling and will wipe away the financial safety net I have built for my family over fifteen years of patriotic, professional, and apolitical service.

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

Executed on February 7, 2025.

/s/ Eric Doe
Eric Doe