

EXHIBIT G

**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 ELLEN DOE

I, Ellen 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 been a dues-paying member of the American Federation of Government Employees since 2019.

3. I started my federal career in 2013 at the U.S. Department of State and then moved to USAID in 2014 as a federal contractor. In 2016, I transitioned into the civil service via the Presidential Management Fellowship Program (PMF). I have served under four presidential administrations, Republican and Democrat, with fulfillment, respect, and pride. I always considered the oath to the Constitution that I so proudly took as a civil servant to stand stronger than my allegiance to any one political party.

4. I have served at the USAID Mission in [REDACTED] and traveled on diplomatic assignments to various locations throughout Europe and Asia. These postings have, at times, caused me personal danger, and I've been severely ill in hospital beds in multiple countries, sometimes having to lie on an ironing board used as a stretcher. But I continued to take these assignments because of the good work we were able to do throughout the world.

5. In my official role, I supported the government and people of [REDACTED] following the tragic 2015 earthquakes by working in the disaster risk reduction office to help the country rebuild critical infrastructure; I supported the vulnerable population of [REDACTED] during the fatal COVID-19 pandemic wave in 2021, by facilitating oxygen cylinders, ventilators, and other medical supplies that ultimately saved lives; and I helped vulnerable [REDACTED] communities in South Asia and in the [REDACTED] under threat from their authoritarian regime, sustain their culture and heritage and push back against repression and aggression. During the [REDACTED], I helped USAID local staff from [REDACTED] who were receiving threats from the [REDACTED] resettle in other countries, including here in Washington, D.C. I'll never forget the gratitude that one woman expressed to me and USAID upon returning safely to Washington, telling me with tears in her eyes about the daily threats her family, who remained in [REDACTED], still continued to receive due to her affiliation with the United States and the guilt she felt having left them behind.

6. I've been a dues-paying member of the AFGE union since 2019. On February 4, 2025, I received a broad, generic e-mail from USAID's Internal

Communications address informing me that all USAID direct-hire staff would be placed on administrative leave as of Friday, February 7, 2025. The letter was unsigned, and did not specify what this new employment status would mean for pay or benefits, such as health insurance. While our future employment status remains uncertain, we have been told to expect that only 200-300 (out of 10,000 +) staff from USAID would retain their jobs under a new structure folded into the Department of State. With so many talented colleagues around me, any one of us would be naive to think that he or she would be one of those selected to stay.

7. The uncertainty about my situation and prospect of losing my job is causing me significant distress due to my personal circumstances. Family planning choices that I have made were predicated on the assumption that I would continue to have a stable income and benefits such as health insurance. I am now left to wonder how to navigate a job field that is foreign to me, as I have not looked for jobs outside the public sector in over a decade, and my sole work experience rests in international development, a field which the administration seeks to render defunct far beyond USAID itself.

8. Further, I took out a significant amount of student loans in order to receive a Master's Degree from an elite university. . Under the Public Service Loan Forgiveness plan, I was expected to have my loans forgiven in 2026, after ten years of service. With an impending move to the private sector (as almost no public sector jobs are hiring), I will now be forced to continue paying my loans off for decades to come instead of mere months.

9. The financial uncertainty of my situation has been compounded by the callous and cruel way that my colleagues and I have been treated. Throughout this uncertainty, the highest levels of our government have been ridiculing, mocking, and even threatening USAID employees, with many calling us “criminals” or “radical lunatics,” others calling for our arrest, and still others saying we are merely “tofu-eating wokerati” or telling us if we are upset to “call someone who cares.” My patriotism and loyalty to this country have been questioned, and I feel betrayed by a country I love and have been honored to serve.

10. Aside from the frustration and anger that I feel for myself, my emotions are intensified when I think of the American patriots I worked alongside being stranded in war zones without an ability to return home; or the thousands of Foreign Service National local staff who worked for the United States globally, often in harm's way in hostile or unfriendly countries to advance American values without the same protections American staff are afforded on diplomatic assignments. They now risk unemployment in countries where their job prospects, or even likelihood of safety and security, are bleak due to their association with the United States Government. I'm horrified at the way our government is treating friends and allies, and I believe the dismantling of USAID will harm our national security and standing in the world.

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

Executed on February 7, 2025.

/s/ Ellen Doe
Ellen Doe