

EXHIBIT H

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 FRANCES DOE

I, Frances 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. My position at USAID is the Supervisory Program Officer at the USAID Mission in [REDACTED]. I supervise a staff of 20 Americans and local staff. We are responsible for strategic planning, budgeting and reporting on foreign assistance funding for international development programs

4. The USAID shutdown has been one the worst and most stressful experiences of my professional career. I've served for 15 years overseas, including in [REDACTED], and during this shutdown we've been insulted and treated like criminals. However, we're the ones that have been asked to carryout policies and executive orders that may not be entirely legal. We have no one to ask for guidance

because they put all Washington leadership on administrative leave, without just cause. People without security clearances took control of our personal and financial information. I've been afraid to speak out or push back because I fear for my job and my pension. We're not given any information on what steps are being taken or their plans for an upcoming Reduction In Force (RIF) – we only learn about it by reading about it in the news.

5. The shutdown has caused extreme stress for myself and my family members including my two elementary age children. I went to work every day for the last week not knowing if that was the day I was going to lose my job. Then, uncertainty and conflicting guidance about the FSO recall and evacuation to the U.S. – at one point we heard on a military flight with three days' notice – caused me to have a panic attack. My children know that something is wrong and are worried about where we're going to live and if we're going to be ok.

6. If evacuated to Washington, I'd also face a period of family separation because my spouse is employed in [REDACTED]. I love working for USAID – it's not just a job for me, the Foreign Service has been my life. Having to accept that the Agency will be shutdown so abruptly and with such cruel treatment of FSOs has been absolutely devastating emotionally.

7. My family will need to move out of the house where we live at short notice. My spouse is a UN employee assigned in the same city and his contract does not finish until December 2025. Our family will need to stay abroad in-country and find alternate housing at short notice. It's unclear whether our moving and relocation

expenses will be covered by the USG. If I'm recalled to Washington, I'll need to incur expenses to stay there if not covered by USG per diem.

8. USAID being shutdown and our staff being removed from the Embassy community greatly increases our security risks. If I move out of my USG-leased housing, I have no security support from the Embassy. I live in a country with high rates of violent crime. We will be locked out of our USAID email on Friday night, a source for security information from the Embassy's security office and warnings on local issues such as protests or security advisories.

9. I have subscribed to professional liability insurance due to the shutdown of all USAID's activities in [REDACTED]. As the Supervisory Program Officer and a member of the Mission's leadership team, I regularly interacted with implementing partners whose contracts are paused or have been cancelled. These partners could easily add my name to a potential lawsuit against the Agency

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

Executed on February 7, 2025.

/s/ Frances Doe
Frances Doe