

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNIVERSITY OF CALIFORNIA
STUDENT ASSOCIATION,

Plaintiff,

v.

DENISE CARTER, in her official capacity as
Acting Secretary of Education, *et al.*,

Defendants.

Case No. 1:25-cv-00354-RDM

DECLARATION OF ADAM RAMADA

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

University of California Student Association

Plaintiffs,

v.

Denise Carter, in her official capacity as
Acting Secretary of Education, et al.,

Defendants.

Case No 1:25-cv-00354-RDM

Judge Randolph D. Moss

DECLARATION OF ADAM RAMADA

1. My name is Adam Ramada. I am currently employed at the United States DOGE Service (“USDS”), formerly known as the United States Digital Service. I started serving in this role on January 23, 2025. The following is based on my personal knowledge or information provided to me in the course of performing my duties.
2. Founded by President Obama in 2014, the United States Digital Service worked with various federal agencies to, among other things, repair and improve the federal government’s information technology and data organization systems.
3. On January 20, 2025, President Trump issued Executive Order 14,158, redesignating the United States Digital Service as the United States DOGE Service. The E.O. directs the USDS to modernize government technology and software to increase efficiency and productivity and to follow rigorous data protection standards and comply with all relevant laws when accessing unclassified agency records, software systems, and IT systems. It likewise directs agencies to ensure USDS has full access to all unclassified agency records and software and IT systems.
4. I have been detailed to the Department of Education since 28 January 2025 to, among other things, assist the Department of Education with auditing contract, grant, and related programs for waste, fraud, and abuse, including an audit of the Department of Education’s federal student loan portfolio to ensure it is free from, among other things, fraud, duplication, and ineligible loan recipients. In addition, I help senior Department leadership obtain access to accurate data and data analytics to inform their policy

decisions at the Department. One other USDS employee is also currently detailed to the Department of Education to assist me.

5. Two additional federal government employees from other agencies are detailed to the Department of Education to assist me with the above-described tasks.
6. At least two Department of Education employees are likewise helping me with these tasks.
7. All six employees listed above, including myself, are employees of the federal government, attended an ethics briefing, received information security training, and signed an information technology rules of behavior and user agreement for privileged users.
8. The relevant employees are aware of and familiar with the rules governing access to Department of Education data systems and are complying with these rules to the best of their knowledge.
9. The relevant employees require access to Department of Education information technology and data systems related to student loan programs in order to audit those programs for waste, fraud, and abuse.
10. The Department of Education receives certain tax records from the Department of the Treasury for purposes of effectuating certain student loan programs. It is my understanding that these records are protected from unauthorized access and disclosure by federal law.
11. The relevant employees have thus far not accessed any tax-related information. They will do so in the future only with appropriate authorization and for purposes consistent with applicable law, such as conducting analyses to estimate costs related to student loan repayment plans, awards, or debt discharges.
12. The relevant employees will not access any database requiring a security clearance without first obtaining the appropriate clearance
13. The relevant employees report to the Office of the Secretary of Education and her designees and—like other Department of Education employees—are required to act in accordance with the directions and guidance of the Department’s senior leaders.
14. The relevant employees perform Department of Education work using Department computers and other information technology assets.

15. To my knowledge, the “home” agencies of all detailed employees mentioned above have agreements in place with the Department of Education governing the detail of the listed employees to the Department of Education.
16. The employees listed above understand that—like all Department of Education employees—they must comply with all applicable laws and regulations should they wish to share any information garnered during their work with federal employees outside the Department of Education.
17. Finally, like any other government employees, Education employees are required to abide by all applicable federal rules and regulations regarding data privacy and other topics.

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

Executed in Washington, DC this 13th day of February.

A handwritten signature in black ink, appearing to read 'Adam Ramada', is written over a horizontal line.

Adam Ramada