

**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.

Civil Action No. 25-354

SUPPLEMENTAL DECLARATION OF JANE DOE

I, Jane 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.
2. I am currently enrolled as a student in the University of California system, where I am a member of the University of California Student Association (UCSA). I submit this declaration to supplement the declaration that I executed on February 9, 2025, to support Plaintiff's motion for a temporary restraining order.
3. I am submitting this declaration anonymously because I come from a mixed-status family and fear that my and my family's information could be used for improper purposes, including immigration enforcement.
4. This morning, I learned that the Defendants stated in their opposition to Plaintiff's motion that the emotional distress I described in my declaration was

“conclusory.”

5. Although I strongly disagree with Defendants’ characterization, I am using this supplemental declaration to more fully explain the distress, anguish, and fear that DOGE’s access to my personal information has caused, and continues to cause, me.

6. Over the last two weeks, the news about DOGE’s access has caused me significant emotional stress to the point that it is impacting my learning, my sleep, and my emotional well-being.

7. I am a full-time student and work two jobs to help pay my living expenses. On top of everything I am balancing in my life, I am now constantly fearful about what the federal government is doing with my (and my family’s) information. Because of this, I am struggling to focus in class and on my out-of-school work.

8. Since the news broke about DOGE’s access to my private records, I have not slept well. This is unusual for me. During this time, I had a nightmare about being permanently separated from my parents, which has never happened before.

9. I also feel guilty for having applied for federal student aid, which now is putting my family at increased risk. Friends and classmates from mixed-status families have also spoken with me about similar feelings of guilt. I feel helpless and ashamed.

10. Prior to learning about DOGE’s access to my data, I was in the process

of applying to graduate school. I am currently reconsidering that plan, because I do not want to fill out the FAFSA again.

11. This experience is causing me to lose faith in the higher education system and in the federal government.

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

Executed on February 13, 2025.

/s/ Jane Doe

Jane Doe