

DECLARATION OF ELISHA DUNN-GEORGIU

I, Elisha Dunn-Georgiou, declare as follows:

1. I am the President and CEO at the Global Health Council (GHC). I submit this declaration in support of Plaintiffs' application for a temporary restraining order. The statements made in this declaration are based on my personal knowledge and my understanding of information made available to me pursuant to my duties at Global Health Council.

2. Plaintiff GLOBAL HEALTH COUNCIL ("GHC") is a private, not-for-profit, membership alliance incorporated in Delaware and enjoying tax-exempt status under Section 501(c)(3) of the Internal Revenue Code. GHC's business address is 2300 N Street NW, Suite 501A, Washington, DC 20037.

3. GHC was founded in 1972 under the name National Council of International Health as a U.S.-based, nonprofit membership organization with the purpose of identifying priority world health problems and reporting on them to the U.S. public, legislators, international and domestic government agencies, academic institutions, and the world health community.

4. GHC's 123 member organizations operate in at least 150 countries and include many prominent U.S. non-profit and academic organizations working to alleviate the burden of disease and disability in middle- and low-income countries. Approximately 25% of GHC member organizations are direct recipients of US foreign aid funding. Individually and collectively, these organizations work to strengthen the ability of developing nations to address critical public health challenges, including:

- a. Health Systems Strengthening
- b. Maternal and Child Health
- c. Infectious disease prevention and control
- d. HIV/AIDS prevention, treatment and care

5. GHC's members include Plaintiffs Chemonics International, Inc. and Management Sciences for Health (MSH).

6. As a membership organization, GHC provides a platform for members to collectively express concerns about U.S. policies affecting global health. Many GHC members rely on U.S. government funding but are reluctant to publicly criticize government agencies from which they receive support. Through their membership in GHC, organizations can voice objections to policies, propose recommendations, and advocate for changes without direct risk to their funding relationships.

7. Many of GHC's members administer global health programs and receive funding from USAID and other federal agencies and depend on sustained, uninterrupted funding to continue their work.

8. The Executive Order freezing U.S. foreign assistance (Executive Order 14169 of January 20, 2025 Reevaluating and Realigning United States Foreign Aid) has caused significant harm to GHC's members, directly impacting their ability to implement life-saving health programs. The funding freeze has disrupted critical health programs, including maternal and child health, infectious disease prevention, and health system strengthening efforts in vulnerable regions. Examples of these disruptions documented by GHC member organizations include:

- a. A GHC member organization reported that USAID had funded a USD \$20 million dollar project in Cambodia to support the development of hospital accreditation. As a result of the Executive Order and subsequent stop work order the project is suspended. The same GHC member organization reports that due to a stop work order, a USAID program to support transportation of children to an NGO hospital in Cambodia was suspended. The impact is also on those working on these projects and they are no longer being paid.
- b. A second GHC member organization has reported that because of the Executive Order and subsequent stop work orders related to the organizations active USAID programs they estimate up to 1,226 primary care clinics will close and more than 2.6 million patient-provider visits won't be allowed to occur for every month that a pause continues.
- c. A third GHC member organization has reported that the stop work order has impacted USD \$4 million worth of American Schools and Hospitals Abroad (ASHA) grants, \$2m for Nepal and \$2m for Vietnam. The stop work order is delaying the delivery of a microscope to Vietnam that would enable microsurgery to take place, which is critical to limb salvage and providing breast reconstruction to women in need. In Nepal, this organization runs the largest burn unit in the country and the equipment is essential to safely providing care.
- d. A fourth GHC member organization has reported that the stop work order has delayed indoor residual spraying (IRS) and insecticide-treated nets (ITN) campaigns which are critical to preventing malaria cases and saving lives and must be implemented before the rainy season starts and mosquito populations multiply. If the campaigns are delayed, the campaigns will not have the intended impact and may be logistically impossible to implement during the rainy season. Paused programs include:

- Indoor residual spraying campaigns in Kenya, Uganda and Ghana that would reach 1.7 million households and structures, protecting nearly 6 million people
- Scheduled delivery of 1.29 million nets in Ethiopia that will protect 2.6 million people.
- Distribution of Insecticide Treated Nets (ITNs) in Zimbabwe, ongoing procurement of entomology equipment, support for the therapeutic efficacy study and case management strengthening activities which are essential during this peak malaria season.

9. The uncertainty and financial distress caused by this funding freeze have compromised global health progress and put millions of lives at risk. Without immediate intervention, organizations that provide essential health services—including vaccination programs, HIV/AIDS treatment, malaria prevention, and emergency response efforts—will be forced to shut down operations.

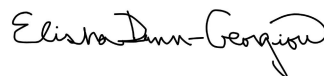
10. If the funding freeze continues, and if USAID is dismantled, many GHC members may be forced to permanently scale back or cease operations, resulting in:

- a. Long-term damage to global health infrastructure, including the loss of trained healthcare workers and supply chain disruptions.
- b. Failure to meet global health targets, such as reductions in maternal mortality and infectious disease control.
- c. Increased health inequities, as vulnerable populations lose access to critical health services.

11. The USAID funding freeze is an existential threat to GHC's members and their life-saving work.

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

Executed on February 10, 2025 in Washington, D.C.



Elisha Dunn-Georgiou
President and CEO
Global Health Council






Declaration of Harm - GHC - Dunn-Georgiou

Final Audit Report

2025-02-11

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