

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

**CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON,**

Plaintiff,

v.

U.S. DOGE SERVICE, et al.,

Defendants.

No. 25-cv-511 (CRC)

DECLARATION OF AMY GLEASON

1. My name is Amy Gleason. The following is based on my personal knowledge or information provided to me in the course of performing my duties at the United States DOGE Service (USDS).
2. I currently serve as the Acting Administrator of USDS. I joined USDS on December 30, 2024.
3. I am a full-time, government employee at USDS.
4. In my role at USDS, I oversee all of USDS's employees and detailees to USDS from other agencies.
5. I report to the White House Chief of Staff, Susie Wiles.
6. Elon Musk does not work at USDS. I do not report to him, and he does not report to me. To my knowledge, he is a Senior Advisor to the White House.

USDS's Structure and Operation

7. On January 20, 2025, President Trump issued Executive Order 14,158, reforming and renaming the United States Digital Service as the United States DOGE Service (USDS). *See Establishing and Implementing the President's "Department of Government Efficiency,"* Executive Order 14,158 (Jan. 20, 2025) (hereinafter, "USDS Order").

8. USDS derives its structure and authority from the USDS Order. USDS has no independent statutory basis. Pursuant to the USDS Order, USDS was transferred out of the Office of Management and Budget (“OMB”) as of January 20, 2025, and established as a standalone component in the Executive Office of the President.
9. In addition to creating USDS, the USDS Order created the U.S. DOGE Service Temporary Organization, which sits within USDS and thus within the Executive Office of the President.
10. USDS is a permanent entity, whereas the U.S. DOGE Service Temporary Organization is, as its name suggests, a temporary entity with an expiration date of July 4, 2026.
11. As described in the USDS Order, the USDS Administrator heads both USDS and the U.S. DOGE Service Temporary Organization.

Agency DOGE Teams

12. In addition to establishing USDS and the U.S. DOGE Service Temporary Organization, the USDS Order directs the heads of federal agencies to form teams within their respective agencies (called, “DOGE Teams”) in consultation with the USDS Administrator. The agency heads have ultimate decisionmaking authority with respect to the members of their agency DOGE Team.
13. Every member of an agency’s DOGE Team is an employee of the agency or a detailee to the agency. The DOGE Team members – whether employees of the agency or detailed to the agency – thus report to the agency heads or their designees, not to me or anyone else at USDS.
14. In some instances, members of agency DOGE Teams are detailees from USDS to the agency. Where USDS detailees are assigned to an agency DOGE Team and acting in their capacity as a detailee to the DOGE Team, they are supervised by personnel of the agency to which they are detailed.
15. As explained in the USDS Order, agency DOGE Teams are headed by a DOGE Team Lead. That individual is also an agency employee and – whether an appointed employee of the agency or a detailee – reports to agency personnel.
16. The agency DOGE Teams and agency DOGE Team Leads coordinate their work with USDS, as contemplated by the USDS Order and subsequent Executive Orders (*see* ¶¶ 7, 22), but they are distinct from both USDS and the U.S. DOGE Service Temporary Organization, and, again, do not report to me for work conducted within and for the agency.

USDS Functions and Agency DOGE Team Functions

17. As described in the USDS Order, USDS is charged with furthering President's Trump DOGE agenda, by "modernizing Federal technology and software to maximize governmental efficiency and productivity."
18. In furtherance of these efforts, the USDS Order directs the USDS Administrator to work with agency heads to "promote inter-operability between agency networks and systems, ensure data integrity, and facilitate responsible data collection and synchronization."
19. In addition, the USDS Order charges the DOGE Service Temporary Organization with advancing President Trump's 18 month "DOGE agenda," as set forth in various Executive Orders. See ¶¶ 7, 22.
20. Per the USDS Order, as the USDS Administrator, I oversee the work of USDS and the U.S. DOGE Service Temporary Organization and am responsible for initiating the President's "Software Modernization Initiative."
21. As described in the USDS Order, USDS also consults with agency heads and their designees on technology improvements and other matters related to the President's DOGE agenda.
22. The "DOGE agenda" includes the technology modernization efforts described in the USDS Order, as well as initiatives that are described in four separate Executive Orders and a presidential memorandum. These materials describe distinct—and limited—roles for USDS and agency heads and agency DOGE Teams. They include:
 - a. Executive Order 14,170, *Reforming the Federal Hiring Process and Restoring Merit to Government Service* (Jan. 20, 2025), which directs the USDS Administrator to consult with the Assistant to the President for Domestic Policy and the OMB Director on a federal hiring plan that focuses on hiring highly skilled Americans. The order charges the Assistant to the President for Domestic Policy with actually developing the plan and disseminating it to agency heads.
 - b. Presidential Memorandum, *Hiring Freeze* (Jan. 20, 2025), which instructs the USDS Administrator to consult with the OMB Director, who is responsible for submitting a "plan to reduce the size of the Federal Government's workforce through efficiency improvements and attrition." The USDS Administrator is also responsible for consulting with the OMB Director and the Treasury Secretary, who is responsible for determining when to lift the hiring freeze at the Internal Revenue Service.

- c. Executive Order 14,210, *Implementing the President's "Department of Government Efficiency" Workforce Optimization* (Feb. 11, 2025), which directs agency heads to reduce agency headcount and agency DOGE Team Leads to provide monthly reports to the USDS Administrator on agency hiring. The USDS Administrator is also directed to report to the President on agencies' compliance with the order.
 - d. Executive Order 14,218, *Ending Taxpayer Subsidization of Open Borders* (Feb. 19, 2025), which requires the USDS Administrator to consult with the Assistant to the President for Domestic Policy and the OMB Director to identify sources of federal funding for illegal immigrants and collectively recommend agency actions to align spending with the purposes of the order and, where relevant, enhance eligibility verification systems.
 - e. Executive Order 14,219, *Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative* (Feb. 19, 2025), which requires agency heads, in consultation with their DOGE Teams Leads, to undertake deregulatory efforts.
 - f. Executive Order, 14,222, *Implementing the President's "Department of Government Efficiency" Cost Efficiency Initiative*, (Feb. 26, 2025), which requires each agency head to make federal expenditures transparent and for DOGE Team Leads to report to the USDS Administrator on contracting and non-essential travel expenses.
23. Cumulatively, these orders and memorandum set forth the responsibilities assigned to USDS, the U.S. DOGE Service Temporary Organization, agency DOGE Teams, and agency DOGE Team Leads. As an entity created by Executive Order, USDS has no other independent sources of legal authority.

USDS's Data and Records Management

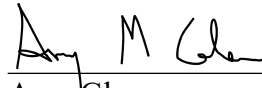
24. Per the USDS Order, USDS is required to adhere to rigorous data protection standards.
25. USDS and the U.S. DOGE Service Temporary Organization have obligations to maintain records and do so pursuant to the Presidential Records Act ("PRA"). In accordance with the PRA's requirements, USDS materials will be transmitted to the National Archives and Records Administration at the appropriate time.
26. USDS has informed its employees (including those in the U.S. DOGE Service Temporary Organization) that they must adhere to records-preservation requirements.
27. USDS has also provided employees with a document hold for this litigation in accordance with the Court's instructions.

Harm to USDS and the President if USDS is Required to Comply with the Court's Order

28. If USDS is required to comply with the court's order, it will have to set up a new FOIA operation from scratch within USDS. Because USDS is an Executive Office of the President component that reports to the White House Chief of Staff and advises the President, it has adopted no FOIA regulations, hired no document processors or reviewers, and has no dedicated budget for these activities. To complete all of these tasks will divert significant time and resources from an organization that is charged with advising the President and others on high-priority projects of this Administration.
29. Because USDS is an Executive Office of the President component that reports to the White House Chief of Staff and advises the President, it works closely with other senior White House advisors on a regular basis. A requirement that USDS produce records not only threatens to divert time and resources, but also risks chilling and inhibiting the exchange of information and advice among the President's advisors on Administration priorities.

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

Executed in Washington, DC this 14th day of March.



Amy Gleason