

EXHIBIT A

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

Ward Brehm,

Plaintiff,

v.

Pete Marocco, et al.,

Defendants.

Civil Case No. 25-cv-660

DECLARATION OF WARD BREHM

I, Edward Walter (Ward) Brehm, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the President and CEO of the United States African Development Foundation (USADF).

2. USADF was established by Congress to invest directly in African grassroots enterprises and social entrepreneurs. United States African Development Foundation: About, www.usadf.gov (last accessed Mar. 5, 2025). USADF provides grant funds, among other resources, “to develop, grow and scale African enterprises and entrepreneurs who improve lives and livelihoods.” *Id.* “USADF’s investments increase incomes, revenues, and jobs by promoting self-reliance and market-based solutions to poverty.” *Id.* USADF works with partners in 22 African countries, focusing on “populations least served by existing markets or assistance programs” with the goal of helping them “transition out of poverty.” *Id.*

3. I was formerly a Board Member of USADF.

4. I was first appointed to the Board of USADF in 2008 by President George W. Bush. He subsequently appointed me chairman of the board via executive order.

5. I was subsequently re-appointed to the board by President Obama.

6. During President Trump's first term, he did not make any new nominations, and so by statute, I remained on the board.

7. During President Biden's term, he nominated new board members but none of them appointed, so, by law, I was to remain on the board until replaced.

8. As a member of the Board, I was made aware that, following President Trump's February 19 Executive Order, DOGE was including USADF among its targets for elimination.

9. On February 24, I received an email without (letterhead or signature) from Trent Morse stating that, at the direction of President Trump, effective immediately, I had been terminated from the USADF Board.

10. Specifically, the February 24 email read:

Ward,

At the direction of President Donald J. Trump, I am writing to inform you that your position as a board member of the United States African Development Foundation is terminated, effective immediately.

Trent Morse

Deputy Director

Office of Presidential Personnel

11. On Monday, March 3, I was elected and sworn in as President and CEO of USADF.

12. On March 4, USADF's CFO received an email from Nate Cavanaugh that Pete Marocco would be coming to the USADF office on March 5 in his capacity as purported Chairman of the Board.

13. I responded to Mr. Cavanaugh with a signed letter on USADF letterhead stating that any Presidential nominees to USADF's Board had to be vetted by the Senate Foreign Relations Committee and subsequently confirmed by the Senate before being able to speak or act on behalf of USADF.

14. On March 5, just before noon, I received an email—once again unsigned and without letterhead—from DOGE employee Nate Cavanaugh, asking on what authority I claimed to be President and CEO of USADF.

15. Just after noon, Cavanaugh, Pete Marocco, and others arrived at the building that houses USADF headquarters. They made false statements to the security guard, who refused to allow them access, including that they would bring a lawsuit against him if he did not let them up onto the 10th floor, where USADF is located.

16. Cavanaugh, Marocco, and the others called the building's property manager. I understand that they told him that if he did not let them upstairs and into the USADF offices, they would call the Federal Marshals and the United States Secret Service.

17. The property manager brought them to the 10th floor. But at my instruction, the USADF staff did not allow the group into the USADF offices.

18. From what I understand, a number of the staff were scared, as the DOGE group were threatening to call Federal Marshals. The staff did not feel that they could leave the office—even to use the restroom—because it would allow the DOGE group to walk into the USADF office.

19. I believe that it was the intention of Marocco and his group of DOGE employees to gain access to the USADF computer system and cancel all contracts, cancel all grants, lay off all employees, shut down the IT system, and shut down the USADF website.

Minneapolis, Minnesota
March 6, 2025

/s/ Edward Walter Brehm
Edward Walter Brehm