

Exhibit 10

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

UNITED STATES INSTITUTE OF PEACE, *et al.*,

Plaintiffs,

v.

KENNETH JACKSON, *et al.*,

Defendants.

Case No. 1:25-cv-00804-BAH

DECLARATION OF DR. GAVIN HELF

I, Gavin Helf, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I served as a Senior Expert on Central Asia for the United States Institute of Peace (USIP) from 2019 until March 2025. My work with USIP focused on matters in Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, and Uzbekistan.

2. Prior to joining USIP, I worked as a Senior Democracy and Governance Advisor in the USAID Asia and Middle East Bureaus. I also worked at USAID/Iraq where I designed programs promoting community peacebuilding. Additionally, I have taught courses at Notre Dame, Cornell, Moscow's International University, George Washington University Georgetown, among others.

3. I received my BA, MA, and Ph.D. in political science from UC Berkeley.

4. Since 2018 USIP has convened Central Asian government advisors, policy experts, media, and representatives of civil society as a “Regional Consultative Working Group” (RCWG) on security issues. The RCWG has sponsored small research projects and meets roughly three times a year. The projects focus on ways to reduce the appeal of violent extremism, including sharing experience across the region of the rehabilitation and reintegration of returning Central Asian citizens from conflict zones of Iraq and Syria.

5. Another example is our work on the border dispute between Kyrgyzstan and Tajikistan. USIP sponsored a Track 2 dialogue between an influential group of former advisors and policy experts to discuss initiatives to reconcile the divided and hostile communities. A Track 2 dialogue, also known as Track II diplomacy, refers to informal and unofficial interactions between non-state actors, such as academics, NGOs, religious leaders, retired officials, and civil society representatives. These dialogues aim to address conflicts and foster understanding by focusing on relationship-building, changing perceptions, and exploring innovative solutions outside the constraints of formal governmental negotiations. Throughout the border dispute between Kyrgyzstan and Tajikistan, the governments’ representatives focused on difficult border demarcation and access issues. On the other hand, the USIP-related dialogue worked on initiatives that more broadly address how to reestablish normal interaction between communities on both sides of the border. The USIP dialogue thawed relations between the foreign parties and paved the way for a historic official border demarcation deal.

6. Our non-USG status made it possible for us to quietly host these participants who would otherwise not be able to meet in an official setting.

I declare under penalty of perjury under the laws of the District of Columbia that the foregoing declaration is true and correct.

Dated this 4th of April 2025, and executed in Washington, D.C.

Signed: /s/ Gavin Helf

Print Name: Gavin Helf