

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

CATO INSTITUTE

Plaintiff,

v.

U.S. DEPARTMENT OF EDUCATION.

MIGUEL CARDONA, Secretary, U.S.
Department of Education, in his official
capacity;

RICHARD CORDRAY, Chief Operating
Officer of Federal Student Aid, Department of
Education, in his official capacity;

JOSEPH R. BIDEN, President of the United
States, in his official capacity;

Defendants.

CIVIL CASE NO. _____

**DECLARATION OF PETER
GOETTLER**

DECLARATION OF PETER GOETTLER

1. I, Peter N. Goettler, President and CEO of the Plaintiff Cato Institute (“Cato”) am over the age of 18 years old.
2. I graduated from the Massachusetts Institute of Technology and hold a Bachelor of Science and Master of Science in Management.
3. I have been the CEO of Cato for seven-and-a-half years and make this declaration on my own knowledge and the records of the organization.
4. Cato is organized as a § 501(c)(3) organization under the Internal Revenue Service Code and is incorporated in the State of Kansas.
5. Cato’s mission is to originate, disseminate, and advance solutions based on the principles of individual liberty, limited government, free markets, and peace.

6. To do this, among other things, it issues many publications and multimedia and digital content, holds events and symposiums on numerous policy issues, and supports scholars and research related to a host of issues important to a free society.

7. Excluding periodic intern classes, Cato currently has approximately 170 employees working to fulfill its mission.

8. At the time of this declaration, Cato has 15 employment opportunities open and available for which it seeks new employees to help fulfill its mission.

9. Cato employs, has employed, and seeks to recruit for employment individuals who have federal student loans.

10. Current and previous Cato employees have participated in the Public Service Loan Forgiveness program.

11. As a matter of basic economics, the Biden Administration's loan forgiveness program will disadvantage Cato in the market for such employees.

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

Executed On: 10/17/2022


Peter N. Goettler, President and CEO, Cato
Institute