

EXHIBIT 55

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-128

DECLARATION OF ALEX DOE

Pursuant to 28 U.S.C. § 1746, I, Alex Doe, hereby declare as follows:

1. I am currently employed by the Minority Business Development Agency (MBDA).

I am over the age of 18 and have personal knowledge of all the facts stated herein, except those matters stated upon information and belief; as to those matters, I believe them to be true.

2. I am submitting this declaration pseudonymously because I fear retaliation. But if the Court would like to know my name or job position, I would be willing to provide it ex parte and under seal.

3. This declaration supplements the declarations I submitted on April 3, 2025, and April 11, 2025, with information that I have learned since that date.

4. Earlier today, an individual named Nate Cavanaugh, purporting to act “[u]nder the authority of Keith Sonderling, Acting Undersecretary of MBDA,” sent notices to recipients of MBDA grants informing them that their grants were being terminated effective April 17, 2025. It is my understanding that all preexisting MBDA grants were terminated pursuant to such notices.

5. It is my understanding that Mr. Cavanaugh is an official at the Department of Government Efficiency (DOGE).

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on April 17, 2025.

/s/ Alex Doe
Alex Doe