

DOGE LAWSUIT DECLARATIONS

My goal for this page is to catalog the useful declarations that appear in DOGE and similar lawsuits.

USAID

Pete Marocco declaration 3

AFGE v. Trump

Two employee unions challenge freeze on USAID employees.

Judge Carl Nichols

[docket]

DE 9 declarations

Randall Chester: VP of American Foreign Service Association describes membership.

Ottis Johnson: VP of AFGE describes efforts to respond to shutdown.

Beth Doe: Describes challenges of dealing with pregnancy, other children in school, and breaking \$4,000 lease.

Eric Doe: Describes challenges to two special needs children.

Carol Doe: Describes how the lack of guidance creates a personal financial liability for procurement officers.

Diane Doe: Describes shutdown of office managing PEPFAR and the person risk posed by threats Elon has issued.

Ellen Doe: Describes financial exposure and emotional toll of shutdown.

Frances Doe: Describes risk of family separation because husband is contracted with UN through

December 2025.

Jane Doe: Describes withdrawal of security communications.

Janice Doe: Describes financial risk and challenges for children, notes medical information on unsecure cloud page.

Jeanne Doe: Describes safety risk even in DC and failure to get compensation for travel.

Laura Doe: Describes live-saving programs not receiving waivers, and communication standards not being upheld.

DE 24 declarations

Marcus Doe: Describes evacuation from Kinshasa, concerns about cost of evacuation, and lack of support upon arriving in DC.

Nancy Doe: Also describes evacuation from Kinshasa. Describes inability to monitor efforts in Congo. Describes lack of spending support.

Nathan Doe: Also describes evacuation. Sent family to Michigan to save costs. Describes financial exposure of thousands of dollars.

Olivia Doe: Describes risk to program intended to access Congo's cobalt and other minerals.

Ruth Doe: Describes lack of support for prenatal care, including during the evacuation.

Sarah Doe: Describes challenges posed by shutdown in third trimester of pregnancy.

Thomasina Doe: Provides details of shutdown orders from perspective of Contracting Officer.

Ulysses Doe: A USAID contractor incurring \$50,000 in monthly expenses because of the shutdown.

Virginia Doe: Describes the arbitrary nature of shutdown as contracting officer. [Includes detail about single PEPFAR folder.]

Walter Doe: A USAID controller [comptroller?], who describes how even approved payments could

not be put through on the Phoenix system.

Wanda Doe: Describes risks for a third trimester USAID employee.

Xavier Doe: Describes not getting reimbursed for overseas travel.

Yolanda Doe: Describes how program review is supposed to work with a change of administration.

Zeb Doe: Debunks Pete Marocco's claim that there's no way to review programs without shutting everything down.

Jane Doe 1: Presents the perspective of Personal Services Contractor.

Jane Doe 2: Explains why Personal Services Contractor Association members should be included in injured parties.

Randall Chester: Debunks claims Pete Marocco made.

Terry Doe: Describes refusal to medevac pregnant wife and medical complications that have resulted.

Emelia Doe: Describes funding shutdown, massive interests payments, and imminent loss of electricity.

Randall Chester: Debunks Pete Marocco claims.

Global Health Council v. Trump

USAID contractors challenge breach of contract.

Judge Amir Ali

[docket]

DE7 declarations

Elisha Dunn-Gergioui (CEO of Global Health Council): Describes scope of Global Health Council projects funded, including health clinics and anti-malarial work.

Robert Nichols, Small Business Association for International Companies: Describes the risk of bankruptcy to small businesses involved in this work.

Mark Hetfield, Hebrew Immigrants Aid Society (exhibits): Describes inability to get guidance about approved projects, especially in Chad and Venezuela.

Marian Wentworth, Management Sciences for Health: Describes layoffs and disruption of supply chains of necessary medicines.

James Butcher, Chemonics International: Describes programs at risk of shutdown, including one each in El Salvador and Colombia attempting to stop migration at its source.

Zan Northrip, DAI Global: Describes the increasing risk their partners face overseas as bills come due.

Eric Bjornlund, Democracy International: Describes shuttering many of its programs, including those protecting Christian minorities, fostering democracy, and countering Russian authoritarianism.

Scott Carlson, American Bar Association: Describes program support freedom of religion being shuttered.

Zahra Doe: Contracting Officer placed on leave on February 23 who debunked Morocco's latest declaration (including that Marco Rubio could have individually signed off on terminations).

Della Doe: Financial Manager describing that the only thing that has gotten paid was US' own expenses, not partners.

Ellie Doe: Personal Services Contractor describing her efforts to pay for services already delivered.

Clara Doe: Another Contracting Officer, claiming that State is not giving guidance as a way to avoid complying with the TR0.

Sandra Doe: A Personal Services Contractor

covering emergency food aid with waivers
describes how with her termination, the programs
won't happen.

State backup

DE 46 declarations

Can Varol: Describing how Chemonics gets paid

James Butcher: Describing risks because of
shutdown (including Scott Perry disinformation)

Jane Doe: Describing conversation with USAID
contact telling her ABA's contracts were being
cut, in spite of approval to continue

Jessica Doe: Describing how Gavin Kilger has
final say over USAID payments

Jocelyn Doe: A USAID Contracting Officer's
Representative, debunking claims Marocco made
about existing payments waiting to be paid

AIDS Vaccine Advocacy v. State

Two USAID contractors challenge breach of
contract.

Judge Amir Ali

[docket]

Jessica Doe: Contracting officer describes how
PEPFAR is not going out, anti-fraud programs
shut down.

Does 1-26 v Musk

26 USAID Does making an Appointments Clause
against Musk.

Judge Theodore Chuang

[docket]

Declaration of J Doe 1: Describing security
risks associated with past deployment to combat
zones.

Declaration of J Doe 2: An IT worker describing how DOGE used root access to access classified files.

Declaration of J Doe 6: Worked on foreign malign influence.

Declaration of J Doe 7: A disaster relief specialist describing that World Food Program is out >\$800M.

Declaration of J Doe 9: Describing being located in high risk area in Middle East.

Declaration of J Doe 12: Describing PSCs being cut off from updates.

Declaration of J Doe 19: Describing running programs in Asia.

Declaration of J Doe 26: Describing, as a senior manager, being unable to work with classified information.

DL 36 documents

Declaration 2 J Doe 1: Received generic BCC email terminating them, doesn't believe that will work for unemployment.

Declaration 2 J Doe 2: Describes ticket showing Garret Kligler setting up HR email on February 23.

Declaration 2 J Doe 9: SCRY has been reactivated but concerned about bad press locally based on Musk's false claims.

Declaration J Doe 8: Terminated via anonymous mail February 21, worried they won't get paid.

Declaration J Doe 20: PSC contracted publicly posted, concerned about offboarding.

Declaration J Doe 21: Describes receiving Elon five bullets, then being fired, including backup.

Declaration of J Doe 22: In high-risk area in Central America, people using Google forms to get people home, and security and communications facilities going unpaid.

Ann Lewis Declaration: Describing that DOGE has root access.

Mary Comans Declaration: Describes clawing back \$80M to NYC.

Declaration of J Doe 11: A GS-15 supervisor, describes the various kinds of emails sent (including one from Garret Kligler. Includes statement comparing DOGE to serving overseas.

Three new proposed declarations (one showing DOGE staffer metadata on firing emails)

Brehm v. Marocco

On shutdown of US African Development Foundation.

Judge Richard Leon

[docket]

Declaration of Elizabeth Feleke: Describes initial attempts to shut USADF down.

Declaration 2 of Elizabeth Feleke: Describes updated events (and actual DOGE takeover).

Trans rights

Shilling v. Trump

Challenge to DOD trans ban.

Judge Benjamin Settle

[docket]

Emily Shilling: Lead plaintiff, Commander currently in large naval acquisitions, previously 1750 hours as test pilot. Describes \$20 million spent on her training.

Blake Dremann: Supply corps Commander stationed on submarine in Guam.

Geirid Morgan: Lieutenant Commander stationed in Office of Naval Research, previously a Navy Diver, has worked on studies of extreme undersea dive capabilities.

Jane Doe: Sergeant First Class working as Satellite Communications Operator.

Videl Leins: Sergeant First Class working on Electrical Systems at Fort Nellis.

Katie Schmid: SigInt analyst and Sergeant First Class stationed at Ft. Meade.

Matthew Medina: 23-year old paying for tattoo removal in preparation to join Marines.

Danielle Askini Aubain: Gender Justice League Executive Director.

Carlos del Toro: Secretary of Navy from 2021 to 2025.

Gil Cisneros: Undersecretary of Defense for Personnel and Readiness, 2021 to 2023.

Shawn Skelly: Performed duties of Undersecretary of Defense for Personnel and Readiness, 2023 to 2025.

Ashish Vazirani: Acting Undersecretary of Defense for Personnel and Readiness, 2023 to 2025.

Randi Ettner: On trans diagnoses.

Talbott v. Trump

Challenge to DOD trans ban.

Judge Ana Reyes

[docket]

Nicholas Talbot: Platoon Leader for MP unit. Describes efforts to enlist going back to 2016.

Erica Vandal: Major serving as Brigade Fire Support Officer and West Point Graduate. Started transitioning in 2021. Would lose educational

reimbursement, medical care, and GI Bill support.

Kate Cole: Sergeant First Class serving as Senior Military Science Instructor. Part of RAND study on effects of trans soldiers on readiness.

Gordon Herrero: Operations Research Systems Analyst designated to teach at West Point. Told his team about upcoming transition, which they applauded.

Dany Danridge: Ensign serving as Student Naval Flight Officer. Delayed chest reconstruction surgery a year to maintain readiness.

Jamie Hash: Defense Legislative Fellow, selected first among 45 candidates to be Senior Master Sergeant. Involved in early efforts to implement trans service members.

Koda Nature: 23-year old from family of 17 generations who served trying to join the Marines.

Cael Neary: 30-year old attempting to join the Army.

Firings

Storch v. Hegseth

Fired Inspectors General challenge their firing.

Judge Ana Reyes

[docket]

DE14 declarations

Phyllis Fong, fired USDA Inspector General:
Claims monetary impact of \$19 billion.

Robert Storch, fired DOD Inspector General:
Details role in overseeing Ukraine aid. Does not include claimed monetary impact, which is \$10.8 billion.

Michael Missal, fired VA Inspector General:

Describes solving murder perpetrated by nursing assistant, identifying problems with electronic health record system, and discovering \$10.8 million in improper bonuses for senior VA executives. Does not include claimed monetary impact, which is \$45 billion.

Christi Grimm, fired HHS Inspector General:
Describes a June 2024 operation that resulted in charges against 193 defendants, as well as efforts to ensure safety of nursing homes. Does not include claimed monetary impact, which is \$18.5 billion.

Larry Turner, fired DOL Inspector General:
Describes finding \$191 billion in improper COVID payments, many fraudulent, and suggests there may be \$135 billion remaining.

Mike Ware, fired SBA Inspector General:
Describes finding around \$200 billion in COVID fraud, returning \$40 billion to the US Treasury.

Cardell Richardson, fired State Inspector General: Describes monetary impact of \$16.7 million in less than 8 months.

Sandra Bruce, fired Education Inspector General:
Describes investigation into four people accused of defrauding the State of Indiana of \$44 million.