

# EXHIBIT G

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL COUNCIL OF  
NONPROFITS, et al.,

*Plaintiffs,*

v.

Case No. 25-cv-239

OFFICE OF MANAGEMENT AND  
BUDGET, et al.,

*Defendants.*

**DECLARATION OF** [REDACTED]

I, [REDACTED], declare as follows:

1. I am a Co-Executive Director of [REDACTED].

2. [REDACTED] (hereinafter [REDACTED]) is a tribal organization with 34 active members consisting of federally recognized tribes in [REDACTED]

3. [REDACTED] is led by [REDACTED] elected tribal leaders on the Board of Directors as well as the member tribal nations.

4. [REDACTED] exists to serve as a unified voice of member tribes on issues related to our mission which is to promote and protect the health, safety, and welfare of tribal children and families which are inherent tribal governmental functions and are at the core of tribal sovereignty and tribal governance.

5. I began working with [REDACTED] as an independent contractor in December 2020 and joined the staff full-time in August 2021.

6. I have been a Co-Executive Director since November 2022.

7. I have worked for the past 11 years in government relations positions for tribal organizations and tribal communities, including my own, the [REDACTED], focusing on improving tribal member access to services in health care, public health, food and agriculture, and now child welfare.

8. I am an attorney licensed in the State of [REDACTED] and have a Juris Doctorate from the [REDACTED] College of Law at [REDACTED].

9. Based on my education and experience, I knew that when the OMB Memo 25-13 announcing a federal funding freeze was released on Tuesday, January 28, 2025, the impacts to tribes and their people could be devastating because many tribal nations rely on federal funding streams to run social services and day-to-day government operations.

10. The federal government has a trust responsibility to tribal nations to provide certain services as agreed to in treaties, authorized in legislation, and affirmed by courts over the past 250 years.

11. As such, my colleagues at [REDACTED] and I began communicating with member tribes shortly after we read the memo on the afternoon of 1/28/2025 to understand how tribes were or expected to be impacted by the funding freeze.

12. On the morning of Wednesday, 1/29/2025, between myself and our other [REDACTED] Co-Executive Director, [REDACTED] we contacted at least 11 member tribes.

13. A social service director from one [REDACTED] member tribe shared with me that they were unable to draw down their funds on Tuesday 1/28/2025. As a result, their tribal government had to lay off two employees on Tuesday afternoon because they would not have been able to meet payroll for the employees.

14. Even on the morning of Wednesday 1/29/2025 (after the stay on the funding freeze had been issued the day before), the tribe reports still being unable to log in to their grant portals through the Department of Justice (DOJ) and the Housing and Urban Development (HUD) Department.

15. The tribe is a recipient of a grant through the DOJ Office on Violence Against Women called the Tribal Governments Program.

16. The Tribal Governments Program grant was one of the grant portals they were still unable to log into as of Wednesday morning around 9:00am when we spoke on the phone.

17. The tribe reported to me that if they could not access their grant portal by the end of the week and there was still uncertainty around when or if that grant funding would continue, they would likely need to layoff two victim services employees.

18. The tribe also receives grants through HUD which were inaccessible as of Wednesday morning when we spoke.

19. The tribal representatives I spoke to also expressed great concerns about the likelihood of needing to layoff housing employees soon because there were three tribal families who urgently needed housing assistance and because their housing staff are primarily elderly tribal members with large families who rely on the elders' employment for income.

20. One additional member tribe that I received information about shared that even though they requested money from multiple federal grants before and after the stay was issued on Tuesday 1/28/2025, none of the funding was actually drawn down into their account as expected.

21. The tribe shared that if the funding is not received into their account, they will have to stop providing addiction services to their members.

22. One additional member tribe shared with me that they were unable to draw down funds from the payment management system until Thursday 1/30/2025.

23. The tribe reported they were able to pull down a 10-day advance on some grant funding, but a representative from their finance office indicated that if the rest of the funding did not come through by the ninth day, approximately by Friday 2/7/2025, then the tribe would need to declare a state of emergency and shutdown most of their governmental services.

24. One additional member tribe shared with me that although they have been able to draw down funding from the Administration for Children and Families for Tribal Temporary Assistance for Needy Families as of 1/31/2025, those funds have not been deposited into their accounts.

25. The tribe reported that if the funds are not received by 2/10/2025 they will begin furloughing employees.

26. Because I had conversations with tribal representatives just 1-2 days after the federal funding freeze was announced and then stayed, there was much uncertainty how the inability to access funds right away would directly impact tribal families, but it will undoubtedly disrupt services families rely on for essential day-to-day services like healthcare, sanitation, housing and food assistance, child safety, and more.

Executed on January 31, 2025



Executive Director