

# EXHIBIT C

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

State of New York, *et al.*

*Plaintiffs,*

v.

Case No. 1:25-cv-1144-JAV

U.S. Department of the Treasury, *et. al.*

*Defendants.*

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I, Daniel Katz, hereby declare upon penalty of perjury:

1. I am the Chief of Staff of the Department of the Treasury (Treasury), and I have served in this role since January 20, 2025. I am a non-career appointee, reporting directly to the Secretary. In this role, I am the primary aide to the Secretary responsible for exercising supervision over the Deputy Chiefs of Staff, Executive Secretary, Director of Scheduling, and other officials and offices within the Office of the Chief of Staff. I am also currently performing the delegable duties of the Deputy Secretary, which were delegated to me on February 6, 2025, pending the confirmation of the nominee for Deputy Secretary. I provide this declaration in support of the Defendants' Motion to Partially Dissolve the Preliminary Injunction.
2. On January 20, 2025, the President issued an Executive Order entitled "Establishing and Implementing the President's 'Department of Government Efficiency.'" That Executive Order established the U.S. DOGE Service (USDS) within the Executive Office of the President and directed each agency to establish a DOGE team to carry out the President's

DOGE mission of modernizing Federal technology and software to maximize governmental efficiency and productivity, promoting inter-operability between agency networks and systems, ensuring data integrity, and facilitating responsible data collection and synchronization. Treasury established such a team (Treasury DOGE Team).

3. In my role as Treasury Chief of Staff, I am the primary official responsible for assisting the Secretary in overseeing the work of the Treasury DOGE Team established under the January 20 Executive Order. Tom Krause is the Treasury DOGE Team Lead, and he is primarily responsible for administering its day-to-day work. Mr. Krause reports to me with respect to his duties as Treasury DOGE Team Lead.<sup>1</sup> Although he, and other members of the Treasury DOGE Team, collaborate closely with staff at the U.S. DOGE Service (USDS) consistent with direction from the Secretary and myself, they do not report to anyone outside of the Treasury Department.
4. Secretary Bessent and I are strongly supportive of the President's DOGE mission, and we seek to leverage the unique skill set of the Treasury DOGE Team to make the Treasury Department more effective, more efficient, and more responsive to the policy goals of this Administration through the use of cutting-edge technologies. In support of the American taxpayer, we are also seeking to ensure that the Treasury DOGE Team tackles certain longstanding issues identified by the Government Accountability Office (GAO), including on the topic of improper and fraudulent payments. We are strongly committed to ensuring that all the actions of the Treasury DOGE Team are fully in compliance with the law, including relevant court orders like the one in place in this case.

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<sup>1</sup> Mr. Krause has also been delegated the duties of the Fiscal Assistant Secretary. With respect to those duties, he currently reports directly to the Secretary.

5. In order to address these longstanding issues, it is crucial to Secretary Bessent and me that the work of the Treasury DOGE Team proceeds as quickly as possible, consistent with all applicable legal and regulatory requirements. We recognize that the ambitious and transformative nature of the President's DOGE mission cannot be achieved without continuous and industrious effort, as the USDS is a temporary organization with a limited remit and every day that passes is one less day we have in this Administration to achieve these ambitious goals in service of the President's policy priorities. We take this responsibility to move the Treasury DOGE Team's work forward in a constructive, fastidious, and expeditious manner extremely seriously.
6. There is no Memorandum of Understanding (MOU) or other agreement between Treasury and USDS regarding the Treasury DOGE Team. Although, as noted above, we coordinate with the White House and with USDS to set high-level policy direction and priorities, it is the Office of the Secretary, and my office, that are responsible for overseeing the Treasury DOGE Team—not anyone at USDS or elsewhere at the White House. There is nothing particularly unusual about this arrangement. For example, the Treasury Department offices with a national security mission similarly rely on, and coordinate closely with, the National Security Council (NSC) within the Executive Office of the President, which sets high-level policy direction and priorities. However, staff within these Treasury offices do not report to anyone at the White House, except through that Treasury chain of command.
7. At present, the members of the Treasury DOGE Team are Thomas Krause, Linda Whitridge, Ryan Wunderly (who replaced Marko Elez following his resignation), Sam Corcos, and Gavin Kliger. Ms. Whitridge, Mr. Krause, Mr. Wunderly, and Mr. Corcos are

Treasury employees, and they currently report to me (as did Mr. Elez before his resignation) within the Office of the Chief of Staff. Mr. Kliger is a detailee to the Internal Revenue Service from the Office of Personnel Management. Consistent with the terms of his detail agreement, Mr. Kliger reports to Assistant Secretary for Management John York or his designee for the duration of his detail.<sup>2</sup>

8. I have instructed Michael J. Wenzler, the Associate Chief Human Capital Officer for Executive and Human Capital Services at the Departmental Offices of the Department of the Treasury, to assign all current and future Treasury DOGE Team members – regardless of the hiring authority used to onboard them (including whether they are detailed from other agencies, or hired as temporary consultants) – the following trainings:
  - a. Annual Privacy Awareness Training
  - b. Annual Cybersecurity Awareness Training
  - c. Sexual Harassment Prevention in the Workplace
  - d. Treasury No FEAR Training (New Hire)
  - e. New Employee Ethics Training
  - f. Fundamentals of Record Management
  - g. Treasury Insider Threat Awareness
  - h. Bureau of Fiscal Service Rules of Behavior.
  - i. 2025 Safeguarding Financial Tax Information

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<sup>2</sup> Because, as described above, time has been of the essence in launching and operationalizing the Treasury DOGE Team, it has been necessary to use differing hiring authorities and reporting structures to bring members of the Treasury DOGE Team onboard quickly. Accordingly, although it was necessary for logistical and personnel reasons to have Mr. Kliger report to Mr. York for the duration of his detail to IRS, he nonetheless coordinates closely with the rest of the Treasury DOGE Team led by Mr. Krause.

The only exception to this instruction is that, in the case of a detailee that has already taken a training on the same topic at their agency, the detailee would not be required to take a duplicative training.

I hereby attest that the foregoing is true and correct, under penalty of perjury.

Dated: March 4, 2025

Signed: \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'Daniel Katz', written over a horizontal line.

Daniel Katz  
Chief of Staff  
U.S. Department of the Treasury