

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF COLUMBIA**

JOHN DOE,)	
)	Civil No.: _____
Plaintiff,)	
)	
v.)	
)	
FEDERAL DEMOCRATIC REPUBLIC OF)	
ETHIOPIA,)	
)	
Defendant.)	
)	

**DECLARATION OF JOHN DOE (AKA “KIDANE”) IN SUPPORT OF MOTION FOR
LEAVE TO PROCEED IN PSEUDONYM**

1. I, John Doe, also known by the pseudonym “Kidane” am a U.S. citizen, and a former citizen and resident of Ethiopia. I have personal knowledge of the matters stated in this Declaration and, if called upon to do so, I am competent to testify to all matters set forth herein.

2. I am one of several siblings in my family. I was born in Ethiopia and lived there for decades until the early 1990s, during which time I visited the United States on vacation.

3. While in the U.S., the political situation in Ethiopia changed rapidly, and I was fearful to return to the country. Thus, I filed for, and was quickly granted, asylum to remain in the U.S.

4. I have subsequently lived in the U.S. and obtained U.S. citizenship. Many of my siblings and extended family, including minor children, continue to live in Ethiopia to the present day.

5. I have, from time to time for approximately the last five years, provided technical and administrative support to other members of the Ethiopian diaspora. Some of my contacts

participate in a movement to protest and raise awareness of the current state of political corruption and human rights abuse occurring in Ethiopia.

6. I consistently use the pseudonym “Kidane” in my work with the Ethiopian diaspora to protect the physical and mental well being of both myself and my family members who may be targeted by the Ethiopian government and members of the Ethiopian diaspora sympathetic to the government in response to my association with other Ethiopian expatriates. Indeed, not even all of my closest, most immediate family members know about my work providing support to the diaspora.

7. I would be extremely hesitant to continue to seek legal redress in this case should I be denied this request to proceed pseudonymously, as I fear the litigation would put my life and the lives of my family at substantial risk.

8. One particular organization was formed outside of Ethiopia within the diaspora community in order to protest abuses by the Ethiopian government. The organization came to be known as “Ginbot 7,” a reference to the month and date of a repressed election in Ethiopia. Ginbot 7 has subsequently organized a democratic opposition to the Ethiopian government, and operates as way for members of the diaspora movement to protest against the abuses of Ethiopian government in a collective fashion.

9. I am not a leader of Ginbot 7, nor am I a member of the organization. I have provided some technical support and assistance to members of the organization for the past few years. During all such times, I have communicated via the pseudonym of “Kidane” in order to protect myself and members of my family from retaliation from the Ethiopian government.

10. Many members of my family, including a number of my siblings some with children themselves, currently reside within Ethiopia. My family members are not involved in the

democratic opposition movement, and they themselves are unaware of my own work with the diaspora.

11. Additionally, while I am not a minor, several of my family members are.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Signed this ____ day of _____, 2014, at _____, _____.
City State

"Kidane"