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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

E.K. and S.K., minors, by and through their)
parent and next friend, LINDSEY KEELEY, *et*)
al.,)

Plaintiffs,

v.

DEPARTMENT OF DEFENSE EDUCATION)
ACTIVITY, *et al.*,)

Defendants.

Case No. 1:25-cv-637 (PTG/IDD)

DECLARATION OF TIMOTHY D. DILL

Pursuant to 28 U.S.C. § 1746, I hereby declare, under penalty of perjury as follows:

1. I am currently the official performing the duties of the Assistant Secretary of Defense for Manpower and Reserve Affairs (ASD(M&RA)) of the Department of Defense (“Department”), headquartered in Washington, D.C. I have served in this position since January 22, 2025. The information below is based on my personal knowledge and information available to me in my role at the Department.

2. In this role, as established by DoD Directive 5124.10, “Assistant Secretary of Defense for Manpower and Reserve Affairs,” March 14, 2018, I am the principal advisor to the Secretary of Defense, the Deputy Secretary of Defense, and the Under Secretary of Defense for Personnel and Readiness, on all matters related to manpower and reserve affairs, including civilian and military personnel policies; military community and family policy; Total Force manpower, requirements, and resources; and Reserve Component integration. Among other responsibilities, these include oversight of the Department of Defense Education Activity (DoDEA), a DoD

component established as a DoD Field Activity pursuant to 10 U.S.C. § 191 and its chartering Directive, DoD Directive 1342.20, "Department of Defense Education Activity (DoDEA)", July 7, 2020.

3. DoDEA operates the Department's prekindergarten through 12th grade educational school system for eligible dependents in certain areas of the United States pursuant to 10 U.S.C. §§ 2164-2164b and overseas pursuant to 20 U.S.C. §§ 921-932. DoD operates such a school system to further military readiness and the quality of life of service members so that they can be sure that their children will receive a quality education no matter where their military assignments may have them living. The DoDEA chartering directive, DoD Directive 1342.20, describes its mission as follows:

"The mission of DoDEA is to provide an exemplary education by effectively and efficiently planning, directing, and overseeing the management, operation, and administration of DoDEA, which provides instruction from preschool through grade 12 to eligible dependents as prescribed by law and policy. In order to attain the highest levels of student achievement, DoDEA uses performance-driven, efficient management systems and establishes a network of partnerships and alliances with such groups as parents, students, teachers, the military communities, local school systems, institutions of higher education, and professional organizations."

4. The DoDEA Director, currently Dr. Beth Schiavino-Narvaez, is under the authority, direction, and control of the Under Secretary of Defense for Personnel and Readiness (USD(P&R)), through the ASD(M&RA).

5. Following the issuance of Executive Order 14190 (EO 14190), *Ending Radical Indoctrination in K-12 Schooling*, signed on January 29, 2025, and Executive Order 14168 (EO 14168), *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*, signed January 20, 2025, I directed DoDEA to establish a process to identify and review any materials that may be inconsistent with EO 14190 and EO 14168 and with Departmental educational policy objectives.

6. The Department has the responsibility of ensuring the quality education of military-connected children worldwide. This includes ensuring that resources available in DoDEA schools serve an educational purpose and are age appropriate.

7. As the organization responsible for K-12 education in the Department, DoDEA is best positioned to establish an identification and review process of information center and curricular materials. As such, I rely on DoDEA's subject matter expertise in childhood education and school administration when developing and implementing policy directives impacting DoDEA schools.

8. The DoDEA Director provides interim progress updates to me on a regular basis. Based on this information, I understand that DoDEA has identified a small portion of DoDEA information center and curricular resources as requiring further review and consideration.

9. To conduct this review, DoDEA established a panel of librarians, educators, and other professionals. This review will include analysis of: (1) the educational suitability and value of identified resources for K-12 children in the DoDEA school system, (2) the factual nature of the material, and (3) whether the material contains discriminatory or divisive content. The review process established by DoDEA is subject to my review and approval.

10. DoDEA's review of certain of its information center and curricular resources is ongoing. Upon completing that review, the DoDEA panel will provide recommendations to the DoDEA Director concerning the final disposition of the reviewed materials. The DoDEA Director will provide her assessment of the recommended final disposition of these materials, including analysis from the panel, to me for final review and approval of the disposition of these materials.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 22, 2025

A handwritten signature in blue ink, appearing to read "T. D. Dill", is written above a horizontal line.

Timothy D. Dill
Performing the Duties of the
Assistant Secretary of Defense for
Manpower and Reserve Affairs