YOUR NAME

Mailing Address

City, State, ZIP

Phone Number

Your Name

Plaintiff in Pro Per

### IN THE UNITED STATES DISTRICT COURT FOR THE \_\_\_\_\_\_\_ DISTRICT OF \_\_\_\_\_\_\_

| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,  Plaintiff/Petitioner,  v.  ELON MUSK, DOGE (DEPARTMENT OF GOVERNMENT EFFICIENCY, UNITED STATES TREASURY and DOES 1-#,  Defendant/Respondent | Case No.:  DECLARATION IN SUPPORT OF TEMPORARY RESTRAINING ORDER  Cal. Code of Civ. Proc. 526(a)    Date: Hearing Date]  Time: Hearing Time  Location: Dept. Department  Judge: Hon. Judge's Name  Date Action Filed: Date Filed    Trial Date: Not Yet Set |
| --- | --- |

I, **[Your Full Name]**, declare as follows:

1. **Introduction**I am the Plaintiff in this matter, and I submit this declaration in support of my Motion for Temporary Restraining Order (TRO) against the Department of Government Efficiency (DOGE), its leader Elon Musk, and the United States Department of the Treasury, with respect to their control over the Treasury payment system. I am filing this suit to challenge the constitutionality of DOGE’s actions under the separation of powers doctrine, the nondelegation doctrine, and other constitutional provisions.
2. **Personal Harm and Injury**I have been receiving unemployment benefits under the laws of the United States, specifically designed to aid individuals during times of economic hardship. Though I have not yet been directly affected by the control DOGE and Elon Musk hold over the Treasury payment system, the mere threat of disruption is a matter of immediate concern.  
   My unemployment benefits, which are vital for my financial stability, could be interrupted or rerouted in the future due to DOGE’s control over Treasury disbursements. While no direct action has been taken against me, the mere threat of such interference, compounded by the uncertainty of a new, unaccountable federal agency—DOGE—managing these vital functions, creates a legitimate fear of harm.  
   The possibility of such disruption impacts my ability to make long-term financial decisions and places me under significant anxiety and stress. If DOGE’s control over the Treasury payment system continues, there is no guarantee that future benefits will be safely disbursed or protected from arbitrary interference. Such interference is harmful, not only to me but also to other Americans who rely on these payments for basic necessities.
3. **Urgency and Imminence of Harm**As outlined in my Complaint, DOGE’s actions raise immediate constitutional concerns, especially in light of the **Separation of Powers Doctrine** and **Nondelegation Doctrine**. The current uncertainty surrounding the structure and functioning of DOGE suggests that any disruption of the Treasury payment system could occur with little to no notice, and without sufficient checks and balances to ensure fairness or accountability.  
   Should this Court fail to issue a Temporary Restraining Order, DOGE’s unchecked control over Treasury disbursements could potentially disrupt my livelihood and harm me irreparably before this matter can be properly adjudicated.
4. **Legal Precedent for Granting TRO**Under the standards set forth in **Winter v. Natural Resources Defense Council**, 555 U.S. 7 (2008), the movant seeking a TRO must demonstrate:  
   (a) A likelihood of success on the merits,  
   (b) A likelihood of suffering irreparable harm in the absence of preliminary relief,  
   (c) That the balance of equities tips in the movant’s favor, and  
   (d) That an injunction is in the public interest.  
   In this case, I have demonstrated a substantial likelihood of success on the merits due to DOGE’s unconstitutional delegation of legislative powers without a clear intelligible principle, as laid out in **Gundy v. United States**, 588 U.S. \_\_\_ (2019), and the clear violation of the **Separation of Powers** doctrine, as discussed in **Seila Law LLC v. Consumer Financial Protection Bureau**, 591 U.S. \_\_\_ (2020). Moreover, the imminent and irreparable harm I face—namely, the uncertainty surrounding my benefits—meets the second prong of the test. Finally, the public interest strongly favors upholding constitutional principles and protecting individuals from unlawful governmental actions.
5. **Conclusion**For the reasons set forth above, I respectfully request that the Court issue a **Temporary Restraining Order** against DOGE and the U.S. Department of the Treasury, preventing them from continuing to control Treasury disbursements until this matter can be fully adjudicated.

**I declare under penalty of perjury that the foregoing is true and correct.  
Executed this [Day] of [Month], [Year], at [City, State].**

**Signature:**[Your Full Name]  
[Your Address]  
[Your Contact Information]