

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

<b>DKT INTERNATIONAL, INC.</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>Civil Action Case No.</b>
	)	
	)	
<b>UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, <i>et al.</i></b>	)	
	)	
	)	
<b>Defendants.</b>	)	
	)	
	)	

**DECLARATION OF JILL SHEFFIELD**

1. I am the founder and President of Family Care International, an international non-governmental organization based in the United States. FCI seeks to ensure that women and adolescents have access to the high-quality information and services they need to improve their sexual and reproductive health, experience safe pregnancy and childbirth, and avoid unwanted pregnancy and HIV infection.

2. I have served as President of Family Care International since I founded the organization in 1986. I am an educator with more than thirty years' experience in the design and implementation of health and education projects in developing countries.

3. In my capacity as President, I have conceptualized and guided FCI's global and country-level programs, including the organization's HIV/AIDS prevention programs.

Family Care International works to prevent the spread of HIV among young people by advocating for policies and programs that provide adolescents with the knowledge, information and services they need to protect themselves from HIV and other sexually transmissible infections. Our total annual budget of \$6 million is funded in part by private donors, foreign government donors, and multilateral institutions. We do not receive grants from USAID.

4. Recently, we have become aware that USAID is requiring that private organizations offering HIV/AIDS programming must certify that they have adopted a policy “opposing prostitution and sex-trafficking” as a condition to receiving USAID grant funds, even to continue funding for on-going projects that are already in place.

5. Family Care International has never had a policy on prostitution. As an international public health organization, we do not adopt policies on particular political or social issues. Especially since we operate in a variety of countries and often provide services to clients from multiple cultures and backgrounds even within a particular country, we make every effort to remain neutral on matters of political conflict.

6. Family Care International joins in the universal condemnation of all forms of trafficking in human beings.

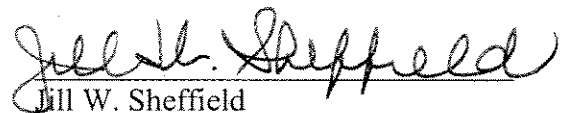
7. Family Care International will not adopt a policy on prostitution, and believes that it would violate our constitutional right to freedom of speech to be required to do so.

8. Family Care International agrees with the vast majority of NGOs providing HIV/AIDS services that it would be harmful to our organization to adopt a policy opposing prostitution. Were an organization offering HIV/AIDS programs to adopt such a policy, it would likely be seen as an organization that stigmatizes vulnerable and marginalized

sex workers, and the organization's ability to offer meaningful help to that population would be compromised. We know that the challenges of reaching sex workers are vast. We also believe that the programs that have been most successful in reaching out to sex workers to prevent the spread of HIV have been those that approach sex workers not with a message of condemnation of the situations in which the men and women find themselves, but rather in a non-judgmental fashion designed to address their health and other needs. We understand that our refusal to adopt a policy opposing prostitution will, standing alone, make us ineligible for USAID funding in HIV/AIDS work were we to seek it.

9. Because Family Care International functions in the public policy arena of sexual and reproductive health, our interests as a member of the public will be harmed by the USAID requirement. By compelling HIV/AIDS grantees to adopt U.S. policy as their own, as a condition of receiving funding, the U.S. is effectively blocking those organizations that are in the best position to see and understand the effects of prostitution from speaking about those effects in any way contrary to U.S. policy. These organizations will be forced to censor their own findings and publications for fear of violating U.S. policy. Thus, the U.S. government has issued a gag order, eliminating the voices of organizations and individuals with the most meaningful information, research, and conclusions from the public debate on the best ways to address the health and social issues resulting in and stemming from prostitution.

Pursuant to 28 U.S.C. § 1746, I swear or affirm, under penalty of perjury, that the foregoing is true and accurate to the best of my knowledge.

  
Jill W. Sheffield

DATED this 8<sup>th</sup> day of August, 2005