

EXHIBIT B

DECLARATION OF ANDREW C. WILSON

I, Andrew C. Wilson, declare as follows:

1. I am the Executive Director of the Center for International Enterprise (“CIPE”). The statements made in this declaration are based on my personal knowledge and the information made available to me pursuant to my duties as Executive Director of CIPE.

2. CIPE is a core institute of the National Endowment for Democracy (“NED”) and was founded in 1983. As envisioned by President Ronald Reagan, NED and its core institutes reflect the principles of American democracy, balancing the interests of political parties, labor, and business in programs that support democracy around the world.

3. CIPE’s work is rooted in the belief that democracy and private enterprise are mutually reinforcing. A democratic system provides the competitive environment and predictability necessary for businesses to thrive, while the private sector helps democracy deliver on its promises. Through fair competition, entrepreneurs drive economic independence, fostering openness, ethical business practices, innovation, and freedom.

4. By partnering with private sector leaders, business associations, and civil society organizations worldwide, CIPE ensures that businesses of all sizes have the opportunity to compete in a system based on fairness, the rule of law, good governance, and ethical practices. CIPE has played a key role in supporting democratic resilience in fragile states, fostering anti-corruption mechanisms, strengthening the rule of law, and empowering local business advocacy groups. Through these efforts, CIPE advances market-oriented reforms and promotes sustainable economic growth.

The NED Funding Freeze and its Impacts on CIPE’s Operations

5. CIPE has several active annual grants from NED funded by congressional appropriations, which are specifically earmarked by Congress for distribution to the core institutes, including CIPE. As a core institute of NED, CIPE receives a significant share—between 55-60 percent of CIPE’s annual budget, which in Fiscal Year 2024 amounted to \$32,215,450 allocated to CIPE. This includes \$28,918,450 in NED Core funds and \$3,300,000 in NED Strategic Funds. For Fiscal Year 2025, NED allocated \$6,362,059 for the first quarter of Fiscal Year 2025 under the current Continuing Resolution that expires March 14, 2025. These allocations were from funds appropriated to NED by Congress. NED makes disbursements from these appropriated funds to CIPE monthly to fund CIPE’s operations and grantmaking activities.

6. Since January 2025, CIPE’s funding has been severely impacted, and CIPE has not received over 90 percent of the program funding from U.S. grants and agreements due to stop work orders, suspensions, and terminations.

7. Although NED programs are not within the scope of the President’s Executive Order or USAID’s January 24, 2025, memorandum suspending grants and contracts, CIPE’s NED funding has been frozen, as well. CIPE has received no funding or disbursements from the NED since February 4, 2025. CIPE receives monthly disbursements from the NED to cover upcoming expenses. CIPE has several payment requests pending with NED, including a request for \$600,000 to cover expenses through March 2025.

8. Each NED grant year runs on a three-year cycle. For example, a fiscal year 2022 NED Core grant allotment appropriated by Congress is available through fiscal year 2025. Currently, a total of \$27.99 million in funding remains allocated to CIPE from the NED Core funds appropriated by Congress in fiscal years 2022, 2023, and 2024. This funding was allocated for active CIPE projects. Absent the funding freeze, CIPE would receive \$27.99 million in funding from NED through the core funding appropriated from fiscal years 2022, 2023, and 2024 to the end of those three-year cycles. CIPE is also due \$6 million in funding for fiscal year 2025 programming as approved by the NED board and allocated through the Continuing Resolution that expires March 14, 2025. CIPE has not received this funding due to the funding freeze. All of the funding that has been allocated to CIPE is critical to organization's ongoing operations. NED's financial freeze has thus left CIPE unable to fulfill its grant and contractual obligations or to continue its critical mission-driven work globally.

9. The funding freeze has caused widespread disruptions for CIPE and its partners. CIPE has suspended all programming that was supported by NED or U.S. government funding. This includes good governance initiatives, anti-corruption projects, and business advocacy programs across all regions where CIPE operates. For example, due to a lack of cash flow resulting from the stoppage of NED payments to CIPE, CIPE has been unable to pay partners for satisfactory work performed, resulting in significant damage and loss to CIPE partners globally. CIPE's inability to pay for past work under contract also exposes CIPE to legal risk of lawsuits from partners CIPE has been unable to pay. CIPE has also been forced to suspend key programs related to governance reform, anti-corruption, and business advocacy around the world. The funding freeze has frustrated CIPE's ability to support economic reform in emerging markets, and it has halted CIPE's collaboration with business associations and policy reform initiatives.

10. As a result of the funding freeze, CIPE has reduced its staff by 232 positions through reductions in force, layoffs, and furloughs. CIPE's global headcount as of January 2025 was 293, meaning 79 percent of staff have been affected by the funding freeze. This presents an enormous loss of professional and programmatic expertise developed over decades in key practice areas such as anti-corruption, economic empowerment, digital economy, accountable investment, and regional and country expertise. CIPE is also closing eleven regional and field offices, severely weakening CIPE's global presence and impact and presenting a loss of substantial programmatic and regional expertise and investment.

11. As a direct result of CIPE's loss of funding, CIPE is at risk of having to cease all operations and is currently consulting with legal counsel on potential next steps. Without immediate funding relief, CIPE will need to make difficult decisions about its future, including the viability of the organization, by early April 2025.

The Impacts of the Funding Freeze on CIPE's Partners

12. CIPE has been forced to halt funding to hundreds of partners all over the world. In addition to hardships and potential legal action against CIPE, including its country directors who run offices in many countries, this stoppage has had several serious consequences. For example:

- Abandonment of Economic Security Work in Europe: CIPE's office closure in Bratislava, established with NED support, halts efforts to counter China's economic influence and coercion in Southeastern Europe. In particular, processes to pass or implement legislation in Albania, Bulgaria, and North Macedonia to screen foreign investment have been stopped.
- Economic Security and Resilience Work Halted in Ukraine: CIPE's Kyiv office was only possible with NED support. Its closure ends a decade of business advocacy support and halts economic resiliency and security projects, weakening American influence on economic policymaking and reform.
- Threats to U.S. Supply Chains and National Security: CIPE has been forced to stop its NED-supported work countering authoritarian investment in international trade and supporting supply chain resilience and security around the globe.
- Countering Malign Economic Influence: American firms face stiff competition from the Chinese in securing contracts across Africa, where China has invested over \$91 billion, building infrastructure in transportation, energy, and mining. Unlike investment from the US and other established democracies, these projects not only leave the recipient countries economically vulnerable, but disadvantage private American companies that operate by the rule of law and without significant government funding as compared to the Chinese state-owned enterprises. The halt in NED funding disrupted CIPE's investment screening analysis of Chinese investments in Nigeria, Ghana, and Ethiopia as part of an effort to understand and counter unfair Chinese business and infrastructure investments.
- Free Enterprise Democracy Network (FEDN) Shut Down: With NED support, CIPE established the Free Enterprise Democracy Network (FEDN) to ensure that the private sector participates in democratic transitions around the world and to create linkages between freedom, prosperity, and democracy. This network is made up of leading businesspeople, representatives of government, and leaders of pro-market civil society organizations and risks shutting down. This will weaken the ability of the United States to connect with leaders in emerging markets and for the United States to contribute to democratic development focused on how markets, economic opportunity, and business contribute to democratic development.
- Failure of Free Market Think Tanks in Asia: U.S.-backed think tanks in Nepal, Sri Lanka, and Cambodia that were supported by CIPE with NED funding will collapse.
- Loss of Local Governance Reform in Iraq: NED-funded and CIPE-supported coalitions improving governance and rule of law are halted, increasing risks of resurgence of Iranian-backed militias and ISIS.
- Loss of Private Sector Network in Egypt: The loss of NED funding is forcing CIPE's exit from Egypt, weakening private sector advocacy and opening an economic vacuum for China and other American adversaries to fill.
- Sahel: Loss of business and entrepreneur networks and advocacy efforts to reestablish democratic rule that were supported by CIPE with NED funding will undermine the

ability for the countries to counter violent extremism and insecurity in the region, which faces a humanitarian crisis and political instability.

- Africa: The collapse of Ethics 1st™, a U.S.-based business integrity system that supports African businesses in emerging markets, will result in shrinking U.S. influence in shaping business practices and countering corruption, organized crime, and illicit financial activity.
- Pacific Island Countries More Vulnerable to PRC Coercion: The NED stoppage has significantly impacted CIPE by forcing the suspension of an important economic security project involving the Solomon Islands, Kiribati, Samoa, and Fiji. This project was designed to equip government officials, business leaders, and civil society organizations with essential knowledge and practical tools to effectively screen investments and strengthen economic resilience against coercive economic practices by PRC. The initiative would have empowered local stakeholders to pursue critical legal reforms and policy measures, bolstering their ability to withstand external economic interference.
- Central America Faces Increased Migration Pressure: CIPE's NED-funded programs in the region that were suspended disrupt efforts to foster economic opportunities, weakening local job creation and business development. Without viable alternatives, more individuals will seek migration to the U.S., exacerbating border security challenges and regional instability.


13. The NED funding freeze has forced CIPE to cease activities with partners and stakeholders all over the world, suspending or terminating partnerships CIPE has built over more than 40 years. As a result, CIPE's partners have lost trust, undermining CIPE's hard-earned credibility with its partners and affected communities. And because CIPE has been unable to pay some contractors as well as partners for costs they had already incurred, those partners have at times had to take out loans to recover these costs, and some have even threatened to take legal action against CIPE. These consequences undermine CIPE's ability to resume work in these countries and with these partners.

14. Moreover, several organizations CIPE has worked with face the significant risk that the funding freeze could jeopardize both their security and their mission. For example, the immediate cessation of funding puts field offices, employees, and local partners at heightened financial, reputational, and physical risk. In many countries, CIPE's designated legal representatives bear personal liability and face potential legal consequences, as state security agencies actively monitor foreign-funded activities. In jurisdictions such as Egypt, abruptly ceasing operations could trigger intense national security scrutiny. Local laws treat bankruptcy as a criminal offense, placing legal representatives at risk of asset freezes, imprisonment, or other legal repercussions. Additionally, the suspension of CIPE's programs designed to counter authoritarianism leaves partners exposed to government retaliation.

15. Without an immediate restoration of funding, CIPE cannot fulfill its mission or support NED's critical work in advancing democracy and market-driven reforms. But the true danger is even greater: if funding is not restored soon, CIPE will be forced to shut down, dismantling decades of work and progress, abandoning frontline partners, and ceding ground to authoritarian influence. The absence of funding would silence a vital voice for democratic resilience and economic freedom, leaving a void that repressive regimes are eager to fill.

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

Executed on March 5, 2025, in Washington DC.

A handwritten signature in black ink, appearing to read "A. C. Wilson", written over a horizontal line.

Andrew C. Wilson
Executive Director
Center for International Private Enterprise