

INTRODUCTION

Plaintiff Travis Adkins presided over one of the most corrupt federal agencies in recent memory. During his tenure as president of the United States African Development Foundation,¹ the Senate Foreign Relations Committee named him personally as potentially “complicit in, corrupt and potentially unlawful practices” and placed a congressional hold on the agency’s funding. His own chief financial officer pleaded guilty to public corruption for acts that ran through every year of Plaintiff’s leadership. The USAID Office of Inspector General issued a management advisory addressed to Adkins personally, finding that senior officials under his watch had known of or suspected grant fund misuse and failed to report it to the proper authorities. The U.S. Government Accountability Office found that the agency had no strategic approach to fraud prevention and that its procurement officials had engaged in “questionable practices.”

Defendant Jasmine Battle, a seasoned and well-respected administrative professional, whose career included working with former cabinet-level officials witnessed this dysfunction firsthand, served as Plaintiff’s assistant for seven months in 2022. What she saw troubled her, and she did what conscientious public servants are supposed to do. She reported it to Plaintiff, to the EEOC, and to oversight bodies like Congress. Plaintiff, now under a microscope for what occurred during his tenure as president, is seeking to silence her. And now Defendant Battle finds herself in a seemingly partisan crossfire because she had the courage to be a whistleblower. The irony here is that she is not even the most prominently featured whistleblower in Plaintiff’s Amended Complaint.

¹ The USADF president also holds the title of chief executive officer. For purposes of this motion, this additional title will be omitted.