

DECLARATION OF JASON DEJESUS

I, Jason DeJesus, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Acting Administrative Officer for the United States Attorney's Office for the District of New Jersey (USAO-NJ). In this role, I am familiar with the allocation to USAO-NJ of funds appropriated to the Department of Justice (DOJ) and the funding sources for personnel engaged in litigation in USAO-NJ and other expenses associated with that litigation.

2. I submit this affidavit in response to the Court's January 28, 2026 order in the *Naviwala* and *Torres* cases directing the Government to:

a. "identify the source of the appropriations that have funded and will continue to fund litigation occurring in the District of New Jersey while led by the 'triumvirate'; and

b. "address whether the leadership, Assistant United States Attorneys, and other Department of Justice staff operating in the District of New Jersey were compensated using appropriations earmarked for 'necessary expenses of the Offices of the United States Attorneys,' or 'expenses necessary for the legal activities of the Department of Justice'" in the relevant appropriations acts.

3. After Congress appropriates funds for DOJ, DOJ allocates those funds to its components, including the Executive Office for United States Attorneys (EOUSA) and individual United States Attorneys' Offices, through the Department's financial management system.

4. USAO-NJ uses the Department's financial management system, in conjunction with other nationwide software, to manage and monitor payroll expenditures. These systems, by design, limit the types and amount of funding available to USAO-NJ. Administrative personnel in USAO-NJ ensure that individuals' positions and assigned duties are aligned with the appropriate funding source made available through these systems.

5. Payroll transactions are processed through the National Finance Center (NFC), which disburses compensation to individuals from the applicable appropriations. This sequence, from congressional appropriation through payroll disbursement by NFC, represents the standard funding and payroll process for all Offices of the United States Attorneys, including the USAO-NJ.

6. To compile the information the Court's order directed the Government to provide, I relied on records and data from these systems and consulted with individuals in USAO-NJ's Human Resources and Budgeting Offices, whom I supervise, and who are familiar with these systems. Additionally, I submitted the information I compiled to officials within EOUSA and DOJ's Justice Management Division to confirm the information's accuracy.

7. Litigation conducted by any component of DOJ in the District of New Jersey USAO-NJ is funded through appropriations enacted by Congress for DOJ. In some cases, however, detailees from other federal agencies, or from state or local agencies, support that litigation. When such details are not reimbursable, the funding for the detailee comes from whatever appropriation funds the detailing agency's operations.

8. Since December 8, 2025, DOJ has been funded by:

a. The Department of Justice Appropriations Act, 2024, Pub. L. No. 117-42, § 6, div. C, tit. II, 138 Stat. 25, 134-35 (2024), extended by the Continuing Appropriations Act of 2025, Pub. L. No. 118-83, §3, div. A, 138 Stat. 1524 (2024), and further extended by the Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act of 2026, Pub. L. No. 119-37, § 5, div. A, § 101, 139 Stat. 495, 496 (enacted Nov. 12, 2025); and

b. The Department of Justice Appropriations Act, 2026, Pub. L. No. 119-74, § 5, div. A, tit. II (enacted Jan 23, 2026).

9. Under these appropriations, USAO-NJ salary and operating expenses are charged primarily to the DOJ appropriation heading entitled “Salaries and Expenses, United States Attorneys.” That appropriation, which is for “necessary expenses of the Offices of the United States Attorneys,” funds most of USAO-NJ’s operations.

10. But DOJ also provides USAO-NJ with targeted, program-specific funding to support particular initiatives and enforcement priorities. These funds are established and tracked as separate funding streams within DOJ financial systems and are restricted to authorized purposes tied to the applicable initiative or program. Examples of such program-specific funding streams include health care fraud funds, asset forfeiture funds, affirmative civil enforcement funds, and other initiative-based funds provided for designated enforcement priorities.

11. Funding for the three officials constituting what this Court calls the “triumvirate” comes from the following appropriations with DOJ’s annual appropriations act:

a. Philip Lamparello, Senior Counsel—Mr. Lamparello is a Schedule C DOJ attorney assigned to USAO-NJ. Since joining DOJ, he has been compensated from the “Salaries and Expenses, United States Attorneys” appropriation.

b. Jordan Fox, Chief of Staff to the Deputy Attorney General, Associate Deputy Attorney General, and Special Attorney—Ms. Fox is also a DOJ attorney. Since joining DOJ, she has been compensated the “Justice Operations, Management, and Accountability Salaries and Expenses” appropriation. That appropriation is for “expenses necessary for the operations, management, and accountability of the Department of Justice.”

c. Ari B. Fontecchio, Executive Assistant United States Attorney—From December 14, 2025, through the present, Mr. Fontecchio has been

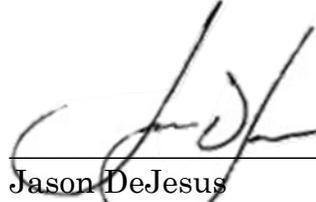
compensated from the “Salaries and Expenses, United States Attorneys” appropriation. Before December 14, 2025, he was compensated using mandatory healthcare fraud funds in accordance with his prior responsibilities as USAO-NJ’s Chief of the Healthcare Fraud & Opioid Enforcement Unit and Acting Deputy Chief of the Office’s Criminal Division.

12. Many other people within USAO-NJ are assigned to, exercise or had since December 8, 2025 exercised supervisory authority over the *Nawiwala* or *Torres* litigation. They include: George Brandley, Chief, Healthcare Fraud & Opioid Enforcement Unit; Mark Coyne, Chief, Appeals Division; Samantha Fasanello, former Chief, Organized Crime/Gangs Unit; Bradley Harsch, Chief, Criminal Division; Eli Jacobs, Assistant United States Attorney; Timothy Lanni, Chief, Organized Crimes/Gangs Unit and Acting Deputy Chief, Criminal Division; Elaine Lou, Deputy Chief, Criminal Division; Lauren Repole, Deputy Chief, Criminal Division; Matthew Specht, Assistant United States Attorney; Andrew Trombly, Chief, Cyber Unit; David Walk, Deputy United States Attorney; Aaron Webman, Deputy Chief, Economic Crimes Unit.

13. With one exception, all those current or former Supervisory Assistant U.S. Attorneys and Assistant U.S. Attorneys have been or were compensated since December 8, 2025 from the “Salaries and Expenses, United States Attorneys” appropriation. The one exception is Mr. Brandley, who since December 8, 2025 has been compensated using discretionary healthcare fraud funds.

14. None of the leadership, Assistant United States Attorneys, and other Department of Justice staff operating in the District of New Jersey are compensated from funds appropriated under the “General Legal Activities, Salaries and Expenses” heading in DOJ’s annual appropriations act, which cover “expenses necessary for the legal activities of the Department of Justice.”

I declare, under penalty of perjury, that the foregoing is true to the best of my knowledge and belief.



Jason DeJesus
Acting Administrative Officer
USAO-NJ

Date: January 30, 2026