

1 Scott A. Kronland (SBN 171693)
2 Stacey M. Leyton (SBN 203827)
3 Eileen B. Goldsmith (SBN 218029)
4 Danielle E. Leonard (SBN 218201)
5 Robin S. Tholin (SBN 344845)
6 James Baltzer (SBN 332232)
7 ALTSHULER BERZON LLP
8 177 Post Street, Suite 300
9 San Francisco, CA 94108
10 Tel. (415) 421-7151
11 Fax (415) 362-8064
12 skronland@altber.com
13 sleyton@altber.com
14 egoldsmith@altber.com
15 dleonard@altber.com
16 rtholin@altber.com
17 jbaltzer@altber.com

18 *Attorneys for Plaintiffs*

19 [Additional Counsel not listed]

20 UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO;
25 AMERICAN FEDERATION OF STATE
26 COUNTY AND MUNICIPAL EMPLOYEES,
27 AFL-CIO; et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF MAJOR GENERAL
(RET.) PAUL EATON, USA**

DECLARATION OF MAJOR GENERAL (RET.) PAUL EATON, USA

1
2 1. I, Major General (Ret.) Paul Eaton, USA, hereby declare as follows:

3 2. I am Chairman at Vote Vets Action Fund Inc. (“VoteVets”). In that position, I provide
4 strategic leadership by overseeing the board of directors, ensuring effective governance, and guiding
5 the organization's long-term vision. I also act as a bridge between the board and executive
6 management, facilitating decision-making, accountability, and stakeholder engagement. I make this
7 statement based on personal knowledge and if called as a witness could and would testify
8 competently thereto.

9 3. VoteVets is a non-partisan, non-profit organization incorporated under the laws of the
10 District of Columbia. Its purpose is to lift up the voices of veterans on matters of national security,
11 veterans’ care, and everyday issues that affect the lives of those who served as well as their families
12 including foreign policy, veterans’ unemployment, robust investment in care for veterans, energy
13 security, protecting the rights of those who serve, and upholding the Constitution and democracy that
14 every military member swore to uphold and protect. VoteVets has nearly 2 million supporters across
15 the country, in all 50 states, with whom it regularly communicates about issues affecting veterans,
16 including the operations, programs, and services available through the U.S. Department of Veterans
17 Affairs (“VA”).

18 4. Approximately 417,000 of VoteVets’ supporters live in California, including 131,000
19 in Northern California.

20 5. As of February 2025, many veterans, including hundreds of VoteVets’ supporters,
21 were employed as federal employees in probationary positions until they were recently
22 terminated. Military veterans, many of whom have service-related disabilities, comprise a large
23 percentage of the federal workforce.

24 6. The termination of probationary employees has had a severe impact on VoteVet’s
25 supporters. Veterans constitute approximately 30% of the federal workforce. The recent mass layoffs
26 have disproportionately affected them, leading to job losses and increased uncertainty. Many veterans
27 rely on federal employment for stability, and these cuts have disrupted their livelihoods.
28

1 7. In addition, the termination of tens of thousands of probationary federal employees has
2 had an adverse impact on the services provided to veterans, leading to staffing shortages, diminished
3 support for critical programs, and increased uncertainty for veterans and their families.

4 8. The VA has dismissed over 1,000 probationary employees across various roles,
5 including those in mental health research, cancer treatment, addiction recovery, prosthetics, and burn
6 pit exposure studies. These layoffs have raised concerns about potential staffing shortages and the
7 quality of care provided to veterans.

8 9. The Veterans Crisis Line (“VCL”) is the VA’s crisis hotline that provides emergency
9 mental health care (including suicide prevention) and support for military veterans, service members,
10 their families, and caregivers, and is supposed to be available 24/7. It handles tens of thousands of
11 crisis calls each month. The VCL is extremely important in light of the high rates of post-traumatic
12 stress disorder and suicide rates among veterans. The layoffs have hindered the recruitment of
13 essential support staff for VCL positions such as trainers and quality assurance personnel. This
14 shortage has overwhelmed existing supervisors and affected the VCL’s ability to provide timely
15 assistance to veterans in crisis.

16 10. In response to these developments, VoteVets established an online platform designed
17 to collect and amplify stories from veterans affected by the layoffs. Since launching the tipline on
18 February 16, 2025, VoteVets has received more than 200 submissions from veterans and military
19 family members negatively impacted by cuts to the federal workforce, including loss of their job and
20 associated health care.

21 11. The February 2025 probationary terminations have had a significant impact on the
22 organizational activities of VoteVets. The time of VoteVets’ staff and consultants has been diverted
23 from VoteVets’ regular activities to field and respond to inquiries from veterans and their families and
24 to connect them with case workers in congressional offices. This has taken almost all of our
25 resources since the probationary terminations began, and has prevented us from performing our
26 regular activities to meet the needs of veterans and their families.

1 12. I am able to recount three examples of experiences reported by individuals to
2 VoteVets. Because of the potential for retaliation, the individuals are not being identified, but I am
3 using general descriptors rather than their names.

4 13. With over three decades of military service, VETERAN transitioned to a civilian role
5 at the VA, beginning employment there in early 2025. However, in February 2025, VETERAN was
6 unexpectedly terminated via an email that stated the termination was for “poor performance.” This
7 job was critical for VETERAN’s family’s financial stability, as VETERAN was the sole wage earner,
8 and VETERAN’s military retirement income is not sufficient to support the family’s basic
9 needs. VETERAN is now struggling to make ends meet with no current employment.

10 14. Veterans’ Transportation Service is a VA program that provides safe and reliable
11 transportation to veterans who require assistance traveling to and from VA health care facilities and
12 authorized non-VA health care appointments. The Veterans’ Transportation Service was already
13 facing significant staffing shortages as of February 2025, and as a result, veterans were already
14 experiencing transportation denials in some cases. However, the VA position overseeing the
15 Veterans’ Transportation Service was not included in the hiring freeze exemption list and the person
16 in the position was terminated from employment.

17 15. VETERAN anticipates that this decision will have severe consequences—veterans
18 will face even greater challenges in accessing the care and resources they need. The removal of key
19 personnel in an already strained system will only worsen these issues.

20 16. VETERAN’S WIDOW recently secured a position at the Census Bureau, only to
21 receive a call stating that the hiring freeze would prevent the job from starting. As the widow of a
22 totally disabled service-connected veteran, VETERAN’S WIDOW receives Dependency and
23 Indemnity Compensation (DIC) and has CHAMPVA healthcare coverage. These benefits are the
24 only things preventing her from becoming homeless. VETERAN’S WIDOW’s spouse gave their life
25 for this country, passing away due to service-related injuries after two decades of dedicated
26 care. After a long period of unemployment, VETERAN’S WIDOW finally had secured a job, only to
27 have it taken away.

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