

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

Alliance for Retired Americans, et al.,

Plaintiffs,

v.

Scott Bessent, in his official capacity as
Secretary of the Treasury, et al.,

Defendants.

Civil Action No. 25-313 (CKK)

PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Plaintiffs Alliance for Retired Americans, American Federation of Government Employees, AFL-CIO, and Service Employees International Union, AFL-CIO, move for an order granting summary judgment in favor of Plaintiffs and against Defendants Secretary of the Treasury Scott Bessent, the Department of the Treasury, and the Bureau of the Fiscal Service.

As set forth in more detail in the accompanying memorandum, declaration, exhibits, and statement of undisputed material facts, Defendants have unlawfully implemented and are unlawfully maintaining a system that enables records and information about individuals to be accessed by and disclosed to unauthorized parties in violation of the Privacy Act of 1974 and the Internal Revenue Code. Defendants' actions should be enjoined because they are contrary to law, in excess of Defendants' statutory authority, and arbitrary and capricious.

A proposed order is attached.

Dated: April 25, 2025

Respectfully submitted,

/s/ Nandan M. Joshi

Nandan M. Joshi (DC Bar No. 456750)
Nicolas Sansone (DC Bar No. 1686810)
Allison M. Zieve (DC Bar No. 424786)
Public Citizen Litigation Group
1600 20th Street NW
Washington, DC 20009
(202) 588-1000

Norman L. Eisen (DC Bar No. 435051)
State Democracy Defenders Fund
600 Pennsylvania Avenue SE
#15180
Washington, DC 20003