

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

AFL-CIO, *et al.*

Plaintiffs,

v.

Case No. 1:25-cv-00339

DEPARTMENT OF LABOR, *et. al.*

Defendants.

DECLARATION OF ADAM MARTINEZ

1. My name is Adam Martinez. I am currently employed at the Bureau of Consumer Financial Protection (CFPB) serving as the Chief Operating Officer (COO) and Acting Chief Human Capital Officer. I started serving as the COO on February 20, 2023 and have been with the federal government for 25 years. The following is based on my personal knowledge or information provided to me in the course of performing my duties.
2. The CFPB was authorized by the Dodd-Frank Wall Street Reform and Consumer Protection Act with responsibility for consumer protection in the financial sector.
3. On January 20, 2025, President Trump issued an executive order establishing the United State DOGE Service (USDS) to, among other things, modernize government technology and software to increase efficiency and productivity. The executive order mandates that USDS follow rigorous data protection standards and comply with all relevant laws when accessing unclassified agency records, software systems, and IT systems. It likewise directs agencies to ensure USDS has full access to all unclassified agency records and software and IT systems.
4. There are six employees at the CFPB who serve as the core team helping to advance the executive order's initiatives. Those employees regularly interact with and receive assistance from other CFPB employees as needed.
5. The six individuals are detailed to CFPB from other agencies. One is on detail from USDS, and five are on detail from other federal agencies.
6. All six detailees have signed a nondisclosure agreement and were provided privacy and cyber security training as a prerequisite to receiving a laptop and equipment during their

engagement. The CFPB Management followed all established procedures to provision equipment and provide access to the detailees.

7. One detailee was provided access to human capital, finance, and procurement systems containing CFPB data (but managed by Treasury's Bureau of Fiscal Service, Administrative Services Center). The detailee signed all required forms with privacy statements required to be provisioned proper permissions and accesses.
8. To the best of my knowledge, there are written agreements or certifications in place governing the detail of the six detailees to CFPB. Pursuant to these agreements and certifications, the detailees report to the Director of the CFPB or his designee while performing CFPB work.
9. All accesses to CFPB internal systems were authorized by the Chief Information Officer pursuant to CFPB processes and procedures and with authorization from our Acting Director.
10. Like any other government employees, the six detailees are required to abide by all applicable federal rules and regulations regarding data privacy and other topics.
11. My interaction with the detailees has been collaborative, professional and respectful. They have stated multiple times that they were prepared and willing to follow all agency established policies and procedures. Nothing has circumvented our processes or federal regulations. In fact, they have been mindful of our statutory requirements and federal regulations.

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

Executed in Washington, DC this 13th day of February.

Adam Martinez