

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL TREASURY  
EMPLOYEES UNION, *et al.*,  
*Plaintiffs,*

v.

RUSSELL VOUGHT, in his official capacity  
as Acting Director of the Consumer Financial  
Protection Bureau, *et al.*,

*Defendants.*

Case No. 25-cv-0381-ABJ

**SECOND DECLARATION OF ALEX DOE**

I, Alex Doe, declare as follows:

1. I am a member of the CFPB RIF team. The statements made in this declaration are based on my personal knowledge and statements made to me in the course of my duties.

2. I am submitting this declaration pseudonymously because I fear retaliation. But if the Court would like to know my name, I would be willing to provide it ex parte and under seal.

3. Following my testimony at the hearing, the CFPB has excluded me from participation in RIF team meetings.

4. However, other members of the RIF team have informed me about the RIF that just occurred.

5. Because this RIF was even larger than the one that was previously going to take place on February 14, the CFPB had to get another exception to the requirement of 90-day notice from OPM. I expect that there is a memorandum, as well as emails and Teams messages about that.

6. DOGE member Gavin Kliger managed the RIF. He kept the team up for 36 hours straight to ensure that the notices would go out yesterday (April 17). Gavin was screaming at

people he did not believe were working fast enough to ensure they could go out on this compressed timeline, calling them incompetent.

7. Team members raised the concern with Adam Martinez that there was a court order requiring that they do a particularized assessment, but they were told that all that mattered was the numbers. The direction to ignore the concern came from Mark Paoletta, who said that the numbers-based RIF should move forward, and that leadership would assume the risk.

8. I understand that Acting Director Russell Vought may have emailed Adam Martinez a similar direction.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 18, 2025, in Washington, D.C.

/s/ Alex Doe  
Alex Doe