Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 1 of 108

Exhibit A

Subject: Urgent Action: Contract Termination and Continuation Notifications (Emails

Contracting Officers,

Thank you for logging on – we really appreciate it. Please take a few minutes to read through the information below. I am *not* "Blind Carbon Copying" (BCC'ing) you all, like I usually do. So, if you notice any huge "red flags" in the guidance below, please "Reply All" and Josh, Vanessa, Laurent, and/or I can get you answers as a group. We need to get these Termination Notifications out ASAP.

We have been and will be receiving information on a "rolling" basis. Shortly, you will receive access to a Spreadsheet owned by Mike Gleason (copied here) that includes contract actions for CRE. We will receive Spreadsheets from other Offices / Divisions shortly. Mike G. will do his best to combine those Spreadsheets if/when possible, but since there is time sensitivity here, we are asking you to push forward with what we have.

Here is how we're requesting you issue Termination for Convenience Notifications <u>and</u> Continuation of Services emails in the coming hours (ASAP):

- The Spreadsheets you receive will include contracts where a Termination for Convenience is required (denoted by a "T4C" in the "Disposition" column to the far right within the Spreadsheet) as well as contracts that shall continue (again, as identified in the "Disposition" column).
- We are asking you to send a separate email for <u>each</u> contract that requires a Termination Notification, as well as <u>each</u> contract that is authorized to continue (see below for required email notification wording).
 - We understand that "one-by-one emails" obviously means "more emails to send," but there
 are <u>many</u> logistical entanglements that make sending a "BCC" email to all vendors
 impossible and unadvisable. In particular, we have already identified "overlap" where
 some Vendors have contracts that must be Terminated for Convenience *and* contracts that
 will Continue (essential services or otherwise). We anticipate additional "overlap," as well.
- The Spreadsheets may include Vendor POCs (Contract Manager email addresses) for the contracts at issue, but please confirm they are correct before sending any communications. Please find Vendor POCs in your contracts or emails, if needed.
- For Termination Notifications: Please create a separate "Termination" folder within the Modifications folder, and save the Termination email in it. That way, when the formal Modification to Terminate for Convenience is issued at a later date, the notification is there for easy reference.
- For Continuation of Services notifications: Please save the email in the Post-Award folder used for communications with the vendor/contractor.
- Use the Spreadsheets to denote when you have sent the Termination Notification or the
 Continuation of Services Notification (again, see below for required wording). The Spreadsheets
 will have an "Email Sent to Vendor" column, where you should list "Yes" once you have sent and
 saved the applicable email (Termination or Continuation of Services).
 - We will use these Spreadsheets to Track our progress, and we will discuss these at the Procurement Pipeline Meeting tomorrow (Wednesday) morning.

Required Email Notification Wording

For contracts that require a Termination Notification, please send the following email (one email for each respective contract):

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 3 of 108

Email Subject: Termination for Convenience of the Government – Contract # Insert Contract Number

Pursuant to FAR clause 52.212-4(l), the Consumer Financial Protection Bureau (CFPB) hereby terminates in its entirety the subject contract, effective today. As such, you are directed to immediately stop all work under the subject contract, terminate all subcontracts, and place no further orders. You are also directed to provide by electronic means similar instructions to all subcontractors and suppliers. You are required to keep detailed, individual records of your steps taken and expenditures, if any, you intend to claim as a result of the CFPB terminating this contract. We request that you provide within 30 days the entirety of the termination settlement proposal(s), if any, you will be submitting for the subject contract. Finally, it is necessary that you immediately confirm receipt of this termination for convenience notice via an electronic mail (e-mail) response to me, the Contracting Officer for the subject contract.

For contracts that shall continue, please send the following email (one email for each respective contract):

Email Subject: Continuation of Services Notification – Contract # Insert Contract Number

You might have received a blanket Stop Work Order from the Office of Finance and Procurement yesterday. Please note that you are being instructed to continue work on the subject contract and there will not be a work stoppage. The Office of Finance and Procurement will follow up if there are any additional changes in direction.

Again, thank you so much for your work on these! Please monitor your email for the first (and future) Spreadsheet(s) from Mike Gleason. Thank you!!

Sincerely,

Nick Olson

Procurement Team Lead | Office of Finance and Procurement

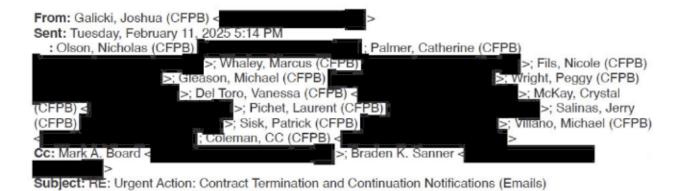
Mobile:

Consumer Financial Protection Bureau

consumerfinance.gov

Confidentiality Notice: If you received this email by mistake, you should notify the sender of the mistake and delete the e-mail and any attachments. An inadvertent disclosure is not intended to waive any privileges. Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 4 of 108

Exhibit B



URGENT UPDATE

Team.

We just received direction to terminate all Enforcement (102 contracts), Supervision (16 contracts), External Affairs (3 contracts), Consumer Response (20 contracts), Office of Director (33 contracts), and Legal Division (all except 2 contracts – FD Online Licenses and litigation data).

I've asked Mike to change the disposition for all these contracts in the shared sheets. We have some changes we'll need to make with CRE, Director's Office, and Supervision since those notifications went out already.

This means we're just now waiting on decisions for the Ops contracts.

Adding our BFS colleagues here as well.

Thx!

Josh

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 6 of 108

Exhibit C

1700 G Street, N.W., Washington, DC 20552

February 11, 2025

MEMORANDUM FOR [EmployeeFirstName] [EmployeeLastName], [JobTitle], [Division]

FROM: Adam Martinez

Acting Chief Human Capital Officer Operations Division, Front Office

SUBJECT: Notification of Termination During Probationary Period

REFERENCES: 5 U.S.C. § 7511

5 U.S.C. § 3321(a)

5 C.F.R. §§ 315.803 and 804

5 C.F.R. § 316.304

This is to provide notification that I am removing you from your position of [JobTitle] and federal service consistent with the above references.

On [AppointmentDate], the agency appointed you to the position of [JobTitle]. As documented on your appointment Standard Form 50 (SF-50), your appointment is subject to a probationary/trial period. The agency also informed you of this requirement in the job opportunity announcement for the position.

Guidance from the Office of Personnel Management ("OPM") states, "An appointment is not final until the probationary period is over," and the probationary period is part of "the hiring process for employees." "A probationer is still an applicant for a finalized appointment to a particular position as well as to the Federal service" "Until the probationary period has been completed," a probationer has "the burden to demonstrate why it is in the public interest for the Government to finalize an appointment to the civil service for this particular individual."

Unfortunately, the Agency finds that that you are not fit for continued employment because your ability, knowledge and skills do not fit the Agency's current needs.

For these reasons, I regrettably inform you that I am removing you from your position of [JobTitle] with the agency and the federal civil service effective [EffectiveDate].

If you believe this action is being taken based on partisan political reasons or marital status, you have a right to file an appeal with the Merit Systems Protection Board (MSPB) under 5 C.F.R. § 315.806. You must file an appeal within 30 days of the effective

3 *Id*

_

¹ OPM, Practical Tips for Supervisors of Probationers.

² See U.S. Merit Systems Protection Board Report to the President and Congress, <u>The Probationary Period:</u> <u>A Critical Assessment Opportunity</u> (August 2005)

date of this decision or 30 days after the date of your receipt of this decision, whichever is later. You should review MSPB regulations at 5 C.F.R. §§ 1201.14 and 1201.24 for instructions on how to file an electronic appeal and content requirements of the appeal, respectively. For more information, please visit www.mspb.gov or contact your local MSPB regional or field office.

You will be sent a postage paid box to return your CFPB ID badge, laptop, iPhone, and other equipment or items owned by CPFB.

For questions related to employee benefits (such as continuation of coverage for health coverage, withdrawal of retirement contributions, etc.) or other matters associated with employee benefits contact CFPB HRBenefits@cfpb.gov.

I appreciate your service to the Agency and wish you the greatest of success in your future endeavors. If you have any questions, please you may contact the CFPB Employee Relations team at CFPB EmployeeRelations@cfpb.gov.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 9 of 108

Exhibit D



Stop Work Notice - Contract

Katie Eelman <					
	_				
Tue, Feb 11, 2025 at 10:27 Pl	M				

Good Evening,

Braden K. Sanner

To: Cc:

You might have received a blanket Stop Work Order from the Consumer Financial Protection Bureau (CFPB), Office of Finance and Procurement yesterday, 02/10/2025. Please note that this is your official notice, in accordance with FAR 52.242-15, with instruction to stop work on the subject contract immediately, incurring no additional costs, until otherwise instructed by the Contracting Officer. Fiscal Service Procurement will follow up if there are any additional changes in direction. This notice is effective immediately, 02/11/2025.

Please confirm receipt of this email as soon as possible.

Braden K. Sanner

Supervisory Contracting Officer

Bureau of the Fiscal Service

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 11 of 108

Exhibit E

From: Martinez, Adam (CFPB)

To: Bishop, James; Paoletta, Mark (CFPB)

Cc: Gueye, Jafnar (CFPB); Szybala, Julia (CFPB); Young, Christopher (CFPB)

Subject: CPF and Funding Transfer

Date: Tuesday, February 11, 2025 12:36:29 PM

Hi Dan and Mark -

I wanted to introduce you both to Jafnar Gueye, our Chief Financial Officer. There are two items he is ready to assist on.

- At your convenience he will be ready to provide you a briefing on the Civil Penalty Fund including the contractor/vendor that serves as the Bureau's intermediary and the process for disbursements of funds to consumers.
- 2. Jafnar is currently in communications with the Federal Reserve regarding the Bureau's ability to return money to either Treasury or the Federal Reserve if needed. He can provide you with an update and perhaps how the money is transferred to us, which is unique.

Adam

Adam Martinez Chief Operating Officer Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 13 of 108

Exhibit F

Subject: FW: DUE AT NOON: Statutory requirement for contract data Tuesday, February 11, 2025 at 11:11:39 AM Eastern Standard Time Date: From: Dorsey, Darian (CFPB) Pfaff, Matthew (CFPB) To: Attachments: CR_Active Contracts List Completed.xlsx Best, Darian Darian Dorsey Deputy Associate Director | Division of Consumer Response and Education Office: Mobile: From: Dorsey, Darian (CFPB) Sent: Tuesday, February 11, 2025 11:10 AM To: Gueye, Jafnar (CFPB) Cc: Johnson, Christopher (CFPB) ; Galicki, Joshua (CFPB) ; Martinez, Adam (CFPB) ; James, Dana (CFPB) Subject: RE: DUE AT NOON: Statutory requirement for contract data Hi Jafnar, Please see attached for Consumer Response and Education. Best, Darian Darian Dorsey Deputy Associate Director | Division of Consumer Response and Education Office: Mobile: From: Gueye, Jafnar (CFPB) Sent: Tuesday, February 11, 2025 10:27 AM To: Pass, Sonya (CFPB) Sokolov, Dan (CFPB) >; Gelfond, Rebecca (CFPB) ; Dorsey, Darian (CFPB) Chang, Jean (CFPB) ; Warren, LaShaun (CFPB) Huggins, Cassandra (CFPB) ; Sutton, Jocelyn (CFPB) ; White, Sonya (CFPB) Cc: Galicki, Joshua (CFPB) ; James, Dana (CFPB) Halperin, Eric (CFPB) ; Salas, Lorelei (CFPB) Johnson, Christopher (CFPB) Martinez, Adam (CFPB) ; Pappalardo, Janis (CFPB) Subject: DUE AT NOON: Statutory requirement for contract data

Deputies,

We have a very quick turnaround data call asking you to identify which of your contracts directly support a statutory requirement, meaning that we would not be able to meet a statutory requirement without this contract.

This is similar to the data call sent earlier but applies to all of your contracts.

Please look at your respective files and mark in col [F] all the contracts that fall under the criteria along with a brief one sentence summarizing the statutory language that supports the requirement. Apologies for the quick turnaround.

Thank you

Respectfully,

Jafnar Gueye Chief Financial Officer (CFO) Office of Finance and Procurement Room 3020 Office: Mobile:

Consumer Financial Protection Bureau consumerfinance.gov

Confidentiality Notice: If you received this email by mistake, you should notify the sender of the mistake and delete the e-mail and any attachments. An inadvertent disclosure is not intended to waive any privileges.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 16 of 108

Exhibit G

Fwd: Termination for Convenience of the Government – Contract 20343021C00006

1 message

Katie Eelman To:	Wed, Feb 12, 2025 at 4:17 PM
FYI on the below.	
Can someone let me know if I should respond to confirm receipt?	
Thanks!	
From: Mark A. Board Date: Wed, Feb 12, 2025 at 3:19 PM Subject: Termination for Convenience of the Government – Contract 20343021C00006 To: Syedain, Jawad (CFPB) > Sanders, Kathy (CFPB)	>, Braden K. Sanner

Good Afternoon,

On 02/11/2025, you were notified to stop work. Pursuant to FAR clause 52.212-4(I), Fiscal Service Procurement on the behalf of the Consumer Financial Protection Bureau (CFPB) hereby terminates in its entirety the subject contract, effective 02/12/2025. As such, you are directed to immediately stop all work under the subject contract, terminate all subcontracts, and place no further orders. You are also directed to provide by electronic means similar instructions to all subcontractors and suppliers. You are required to keep detailed, individual records of your steps taken and expenditures, if any, you intend to claim as a result of the CFPB terminating this contract. We request that you provide within 30 days the entirety of the termination settlement proposal(s), if any, you will be submitting for the subject contract.

Finally, it is necessary that you immediately confirm receipt of this termination for convenience notice via an electronic mail (e-mail) response to me, the Contracting Officer for the subject contract.

Thanks,

Mark Board Lead Contracting Officer Bureau of the Fiscal Service Office of Shared Services/DPS Office:

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 18 of 108

Exhibit H



1700 G Street, N.W., Washington, DC 20552

MEMORANDUM FOR: JULIA BARNARD

MARKETS & POLICY FELLOW (PROG MANAGER)

DIRECTOR, OFF POLICY PLAN & STRAT

FROM: Adam Martinez

Acting Chief Human Capital Officer Operations Division, Front Office

DATE: February 13, 2025

SUBJECT: Termination of Temporary/Excepted Appointment

On February 27, 2022, you were hired on a Temporary Excepted Service appointment as a/an MARKETS & POLICY FELLOW (PROG MANAGER) in DIRECTOR, OFF POLICY PLAN & STRAT, at the Consumer Financial Protection Bureau for a period not to exceed February 27, 2026.

The purpose of this memorandum is to notify you that your employment will be terminated effective at the close of business on February 13, 2025, due to Executive Order Implementing The President's "Department of Government Efficiency" Workforce Optimization Initiative — The White House dated February 11, 2025.

If you believe this action is in retaliation for your making protected whistleblowing disclosures, you may also seek corrective action from the U.S. Office of Special Counsel (OSC). If you do so, your appeal may be limited to whether the Agency took one or more covered personnel actions against you in retaliation for making protected whistleblowing disclosures, and you will not be able to challenge the decision on other bases in that action. To seek corrective action from the OSC, you may submit your complaint online. More information on or about filing a complaint with the OSC may be found at https://osc.gov/Pages/File-Complaint.aspx. As an alternative, you may communicate in writing to the following address:

Complaints Examining Unit U.S. Office of Special Counsel 1730 M Street, N.W., Suite 218 Washington, DC 20036-4505

If you believe you qualify as an employee under 5 U.S.C. § 7511, you may have the right to appeal this action to the Merit Systems Protection Board (MPSB) no later than 30 calendar days after the effective date. Failure to file a timely appeal could result in dismissal of your appeal absent good cause. Your appeal may be made by mail, facsimile, commercial overnight delivery, personal delivery, or electronically at http://e-appeal.mspb.gov. A downloadable appeal form and additional information are also available at the MSPB website at https://www.mspb.gov/appeals/forms.htm. The date of filing by mail is considered to be the date of the postmark, the date of the filing by facsimile or electronically is the date of successful transmission. If the filing is by personal deliver, it shall be considered filed on the date it is received by the MSPB.

The appeal should be filed with the MSPB Regional Office located closest to the employee's duty station - https://www.mspb.gov/about/contact.htm.

Any appeal to the MSPB must include the following information, which identifies the Agency official to whom the MSPB will send a copy of your MSPB appeal and the Acknowledgement Order issued on your appeal: Assistant General Counsel, Legal Division, CFPB, 1700 G Street, NW, Washington, DC, 20552,

You will be sent a postage paid box to return your CFPB ID badge, laptop, iPhone, and other equipment or items owned by CPFB.

For questions related to employee benefits (such as continuation of coverage for health coverage, withdrawal of retirement contributions, etc.) or other matters associated with employee benefits contact CFPB HRBenefits@cfpb.gov.

You can request a copy of your OPF documents from Bureau of Fiscal Services (BFS) at option 4 or OPFInquiries@fiscal.treasury.gov.

I appreciate your service to the Agency and wish you the greatest of success in your future endeavors. If you have any questions, please you may contact the CFPB Employee Relations team at CFPB EmployeeRelations@cfpb.gov.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 21 of 108

Exhibit I

February 13, 2025 Information Memo for the Acting Director

FROM	Educa	Education , Consumer Response &				
SUBJECT	Divis	Divisional Staffing				
Select Applicable Information	☐Situational Awareness	□Request for Directional Feedback	⊠Reply to Inquiry from Director/FO	☐ Draft Document Feedback		

Issue

This purpose of this memorandum is to provide information about how the staff of the Consumer Response and Education Division align to the Consumer Financial Protection Bureau's (CFPB's) statutory obligations.

Divisional Background

The Consumer Response and Education Division (CRE) is responsible for executing the CFPB's first two statutory functions: (1) conducting financial education programs, and (2) collecting, investigating, and responding to consumer complaints. See 12 USC 5511(c)(1)-(2). CRE is the public face of the CFPB to individuals and their families, delivering scalable services and tools designed to empower consumers to share their experiences in the marketplace, respond to challenges, and make better informed financial decisions.

There are two offices within CRE: the Office of Financial Education and the Office of Consumer Response. Financial Education is responsible for managing a suite of more than 50 educational tools and resources, distributing those tools to users, and researching the effectiveness of financial education programs. Financial Education is also responsible for supporting the Director's membership in the Financial Literacy and Education Commission. Financial Education's content is some of the most frequently visited content on the CFPB's website.

Consumer Response is responsible for answering questions, handling complaints, and sharing data and insights. Consumer Response manages the CFPB's toll-free number and complaint program from end-to-end. Consumer Response is also responsible for assisting complaint process stakeholders (e.g., responding to congressional members with their constituents' complaints, assisting Company Portal users as they respond to their customer's concerns) and sharing complaint information with Federal and State agencies.

The current headcount for CRE is approximately 150-155 full-time employees. The functional areas listed below aligned to statutory responsibilities total approximately 80 to 85.

Office of Financial Education

12 USC 5493(d) requires the Director to "establish an Office of Financial Education, which shall be responsible for developing and implementing initiates intended to educate and empower consumers to make better informed financial decisions." There is one competitive area within the Financial Education, responsible for delivering several statutory obligations:

- Developing and implementing initiatives intended to educate and empower consumers to make better informed financial decisions. See 12 USC 5493(d)(1).
- Developing and implementing a strategy to improve the financial literacy of consumers that includes measurable goals and objectives, in consultation with the Financial Literacy and Education Commission. See 12 USC 5493(d)(2).
- Coordinating with other units within the Bureau in carrying out its functions, including
 working with the Community Affairs Office to implement the strategy to improve financial
 literacy of consumers; and working with the research unit established by the Director to
 conduct research related to consumer financial education and counseling. See 12 USC
 5493(d)(3).
- Submitting a report on its financial literacy activities and strategy to improve financial literacy of consumers See 12 USC 5493(d)(4).

The current headcount for this area is 12.

Office of Consumer Response

12 USC 5493(b)(3)(A) requires the Director to "establish a unit whose functions shall include establishing a single, toll-free telephone number, a website, and a database ... to facilitate the centralized collection of, monitoring of, and response to consumer complaints regarding consumer financial products and or services." 12 USC 5534(a) requires the CFPB "to provide a timely response to consumers, in writing where appropriate, to complaints against, or inquiries concerning, a covered person." 15 USC 1681i(e) establishes a process by which the CFPB must act and report out on certain credit and consumer reporting complaints. Consumer Response must coordinate with certain CFPB offices and personnel, including the Private Student Loan Ombudsman and Office of Servicemember Affairs. See 12 USC 5493(e), 12 USC 5535.

Consumer Response has several competitive areas:

Consumer Resource Center

12 USC 5493(b)(3)(A) directs the CFPB to create establish a single, toll-free number. This team manages a Consumer Resource Center (CRC), which receives more than 40,000 calls per month. The CRC answers consumers' inquiries, accepts and provides status updates on complaints, and directs consumers resources such as state and local services.

The current headcount for this area is 3.

Complaint Handling

12 USC 5534(a) requires the CFPB to timely respond to consumers, including any responses received by the regulator from the covered person. This team directs the complaints to companies for a response.

The current headcount for this area is 7.

Portal Operations

12 USC 5534(b) requires certain covered persons to provide a timely response to the regulator. This team is responsible for responding to stakeholder support tickets, including tickets submitted by company, congressional, and government portal users.

The current headcount for this area is 7.

Mosaic Program

12 USC 5493(b)(3)(A) directs the CFPB to create establish a database to facilitate the centralized collection of complaints. 12 USC 5493(b)(3)(D) requires the CFPB to share consumer complaint information with prudential regulators, the Federal Trade Commission, other Federal agencies, and State agencies. This team manages the technology that facilitates the handling of more than 350,000 complaints per month

The current headcount for this area is 5.

Investigations (Regulatory Compliance, Complaint Monitoring, Research and Analysis,

Escalation Case Management)

12 USC 5511(c)(2) requires the CFPB to "investigate" complaints. Additionally, 12 USC 5493(b)(3)(A) requires the CFPB to "monitor" complaints. This team is responsible for monitoring and investigating the more than three million complaints the CFPB receives annually. This team conducts investigative inquiries received by the Director's Office. This team also conducts analyses that support the Chief of Staff's team efforts to meet the publication of statutory reports and supports rule lookback assessments as required by 12 USC 5512.

The current headcount for this area is 30.

Data Reporting

12 USC 5493(e) and 12 USC 5535 requires Consumer Response to coordinate with the Office of Servicemember Affairs and the Private Student Loan Ombudsman, respectively. This team is responsible for working with these offices for their complaint monitoring work.

The current headcount for this area is 4.

Stakeholder Engagement

12 USC 5493(b)(3)(A) directs the CFPB to "coordinate with the Federal Trade Commission or other Federal agencies to route complaints to such agencies, where appropriate." Additionally, 12 USC 5493(b)(3)(D) requires the CFPB to "share consumer complaint information with prudential regulators, the Federal Trade Commission, other Federal agencies, and State agencies...". This team is responsible for working with federal and state agencies, including state Attorneys General.

The current headcount for this area is 5.

Chief of Staff Team

Consumer Response is responsible for publishing or contributing to the publication of several reports. Those reports include:

- Consumer Response Annual Report (as required by 12 USC 5493(b)(3)(D))
- Fair Credit Reporting Act 611(e) Report (as required by 15 USC 1681i(e)(5))
- Fair Debt Collection Practices Act Report (as required by 15 USC 1692m)
- CFPB Semi-Annual Reports (required by 12 USC 5496)

This team is responsible for the production and publication of these reports, including any followup questions from oversight bodies.

The current headcount for this area is 5.

Management and Operations

This team provided the executive direction for both offices within the division. The current divisional executives each have a dual role both division and office level executives. The office level executive positions remain vacant. The team also provides centralized support to each office regarding resource management functions including budget, acquisition management, training, management reporting, and coordination with internal and external stakeholders, and oversight bodies such as GAO and OIG.

The current headcount for this area is 5.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 26 of 108

Exhibit J

From: CFPB_HCSysOps
Subject: Updated Timekeeping Instructions for PP03

Date: February 14, 2025 at 12:27 PM

To:

Cc: CFPB_WorkLife

Colleagues,

On Monday, February 10th CFPB's Acting Director issued guidance for Bureau staff to pause work tasks. In accordance with the Acting Director's guidance employees should exercise administrative leave until otherwise instructed. For staff who have been asked to work by the Acting Director, the Chief Legal Officer, or another designee (i.e. through their leadership chain, etc.) they should record that time as they normally would. All time not in a working status should be reflected in webTA under the "Admin/Excused Absence" leave transaction category.

Please refer questions to the <u>CFPB_WorkLife@cfpb.gov</u> box so the Office of Human Capital can provide clarifying guidance as needed.

V/R

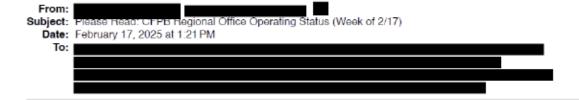
Roland Jacob Human Capital Operations Manager Systems and Operations | Office of Human Capital Office: | Mobile:

Consumer Financial Protection Bureau consumerfinance.gov

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Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 28 of 108

Exhibit K



(This message is sent on behalf of Adam Martinez, Chief Operating Officer, for CFPB Regional Office Staff and Contractors)

Dear Colleagues:

The CFPB Regional Offices will remain closed this week (2/17-2/21). Employees and contractors approved to work should do so remotely unless otherwise instructed.

Thank you.

Adam

Adam Martinez Chief Operating Officer





consumerfinance.gov

Confidentiality Notice: If you received this email by mistake, you should notify the sender of the mistake and delete the email and any attachments. An inadvertent disclosure is not intended to waive any privileges. Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 30 of 108

Exhibit L



Apologies for the unusual email address. These are unusual times, "and I have a request for authorization to work that I'm not sure should be addressed to one or the other of you, so I figured I would keep you both in the loop. I have also co'ed my manager for visibility, so he can be aware if such work is authorized.

Based on news reports that Gavin Kliger is now at the IRS, it seems like the DOGE Organization is largely done with its technical work at the agency to "improve the quality and efficiency of government-wide software, network infrastructure, and information technology (IT) systems."

As part of this work on improving quality, they also damaged the website by deleting the homepage for some unknown reason. I have heard that CFPB staff were able to persuade them to not delete everything entirely (as they did for USAID). I struggle to understand why this deletion was necessary at all and why they demanded access to the website with extreme urgency late on a Friday night. Despite their stated assurances, it seems they did not follow our processes, nor did they wait for an employee signing on under overtime to onboard them into our website's CMS, Wagtail. From what I understand, it seems that they instead used global admin privileges on our SSO identity provider to force access into our system and make the change on their own. I have many questions still, but I hope to be able to explore them through a more established process rather than relying on hearsay (see below).

I know some teams have been received authorization to continue working despite the general stop-work order from the Acting Director. I would like to request authorization for two scopes of work:

- 1. I would like for my team to repair the website's homepage. The rest of the site does remain accessible to the general public, but having a broken homepage has damaged several aspects of our technical operations already:
 - a. Site crawling by search indices like Google is likely not happening, this will damage our SEO and visibility to the world and cause our content to become less visible in search over time
 - b. There confirmed also that our automated accessibility scanning is now malfunctioning and is unable to verify our site still meets its mandated 508 compliance for accessibility

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 32 of 108

Exhibit M

From: Service Desk (CFPB)

Subject: Service Advisory: Virtual Desktop Access Unavailable After 2/28/2025

Date: Wednesday, February 26, 2025 10:14:16 AM

What's Happening? The Citrix Virtual Desktop will be unavailable after Friday, February 28, 2025, at 11:59 PM EST. You are receiving this notification because you logged into the Virtual Desktop in the past 90 days. Access to the Virtual Desktop via https://work.cfpb.gov and https://csf.cfpb.local will no longer be available.

When: Friday, February 28, 2025, at 11:59 PM EST

Need More Info? Please refer any questions or concerns regarding this event to the <u>CFPB Service and Support Portal</u>, the CFPB Service Desk at 202-435-7777 (external), x57777 (internal), or email <u>ServiceDesk@cfpb.gov</u>.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 34 of 108

Exhibit N

From: CFPBHROps CFPBHROps@fiscal.treasury.gov Subject: Automatic reply: question re separation papers

Date: February 27, 2025 at 9:27 AM

To:

We are working diligently with the agency during this transition to provide necessary documents related to your recent or impending separation.

Please provide a personal email address and updated mailing address to ensure timely and effective communications.

All separated employees will be receiving a copy of their SF-50, Notice of Personnel Action, as well as a separation packet with information regarding unemployment, benefits and lump sum annual leave payment, if applicable.

Employees will have a 31-day extension of their health insurance from the date of separation provided by your health insurance carrier at no cost to you. Dental and Vision benefits will terminate upon the date of separation.

Thank you for your patience.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 36 of 108

Exhibit O

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 37 of 108

From: Date: Triu, Feb 27, 2025 at 11:25 AM

Subject: Pickup of Personal Belongings and Return of Equipment from the CFPB HQ

Io: CC:

Good afternoon,

We recognize that you have personal property, work materials, and federal records in your office or cubicle. To prepare to vacate the building, the Operations team has packed up your personal belongings for pickup at 1700 G Street. They are working closely with your division's leadership to take great care with your personal property, confidential matters, federal records, and other items.

To retrieve your personal belongings, you must schedule an appointment by emailing the following information to

· Your full name

- · Your designee, if needed (see below for additional details)
- Where your property is located (e.g., office/cubicle number, 6th floor locker number, pantry)

A time on March 3rd, 4th, 5th, or 6th between 8am-4pm

 Any additional details related to your personal property that can help us identify or properly handle them (e.g., medications in the refrigerator that need to remain cold, personal papers that contain private information, etc.)

If you have equipment to return to the CFPB, you may return your IT equipment and PIV card during this visit. Please note that you will:

. Need to return all laptops, iPhones, secure thumb drives and any other equipment with an asset tag

- Not need to return printers, keyboard, mice, monitors, docking stations, laptop bags/backpacks, headsets, laptop locks, filing cabinets, paper shredders, or cables
- · Receive a hardware asset receipt identifying the equipment you return

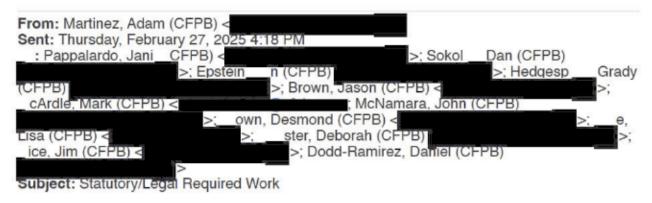
After scheduling an appointment, you will receive a confirmation email with additional details. Except in special situations, items that are not picked up by March 6, 2025 will be considered abandoned and will be disposed of. While we cannot ship items to you, you may designate another staff member with a valid identification to pick up your items on your behalf.

If driving, consider parking at a public parking garage, on the street, or the loading dock area on F Street. The parking garage at 1700 G Street will not be open for these pickups.

We recognize that this is a difficult situation and here to support your transition.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 38 of 108

Exhibit P



Hi RMR Colleagues - Good afternoon.

Thank you for your patience as we continue through transition and our new leadership's review of the Bureau.

On February 8 (email attached), our Acting Director outlined several areas where work stoppage was being implemented at the Bureau. He did exclude areas approved by him or required by law. We want to ensure that you are aware that statutorily required work and/or work required by law are authorized.

Your teams are authorized to continue carrying out these responsibilities. Any actions or communications with outside parties must be sent to Mark Paoletta, Chief Legal Officer and Daniel Shapiro, Deputy Chief Legal Officer.

Should you have any questions at all, please feel free to contact our Chief Legal Officer as directed by the Acting Director. Alternatively, you are always welcome to reach out to me if needed. I am happy to share guidance provided to other leaders and employees regarding authorized work, including my own team.

Thank you for your support.

Adam

Adam Martinez Chief Operating Officer Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 40 of 108

Exhibit Q

From: Brown, Jason (CFPB)
Subject: updates
Date: February 28, 2025 at 5:11 PM
To:

Hi All.

I believe all of you have received the direction from the COO through your section chiefs that we are to fulfill our statutory obligations subject to the limitations provided in the February 8 email from Acting Director Vought. We stopped most of our statutory work, I know, not because of the February 8 email, but because of the February 10 email. I clarified this point with the COO.

I interpret the direction to mean that we should resume conducting research, a statutory responsibility. This means accessing the research servers, cleaning and analyzing data, and writing drafts and reviewing research. I would also include corresponding with coauthors as an essential research function.

This leaves a number of questions, particularly with regards to external engagement. Questions about external engagement include 1) posting data to the Bureau website; 2) publishing Bureau research and SDR; 3) attending outside events, including research conferences; 4) presenting at outside events, including research conferences. In conjunction with the RMR FO, we are seeking guidance on these questions. There are specific activities I am seeking immediate approval for:

- 1. Publication of the Consumer Credit Trends and Mortgage Performance Trends
- Permission for FHFA to field the NSMO
- Household Financial Stability phone call with the Federal Reserve System
- 4. Consumer Finance Round Robin
- Boulder Conference (presenters only)

Because we have not sought approval for anything yet, I would like to hold off for the next few days on seeking approval to post papers on SSRN or submit new pieces to journals. If you have materials already under review at journals, I encourage you to continue working and corresponding with the editors with the expectation that our current posture will have changed by the time publication is imminent.

In other non-research responsibilities (e.g., rulemakings and exam work), there is some conflicting guidance about whether we should move forward or not. We are asking about that.

But this leads to another question: under what conditions should someone in OR continue to take administrative leave, or do we take this direction as instruction to work full-time on research and other approved statutory responsibilities, unless there is nothing research-related for someone to do? How do we code WebTA at the end of the pay period? We are also seeking guidance on this.

Many of you have already jumped at the chance to resume your research. Alas, many of you are finding that the Research Environment is not functioning as before, impairing your ability to fulfill our statutory research obligations. Thank you for noting the difficulties you are encountering and passing them on to your supervisor. I have let the CIO and COO know that we are encountering difficulties in resuming our statutory research obligations because of the functioning of the Research Environment, that we are cataloguing the difficulties, and that we will meet with them next week to explain our challenges so they can help us resolve them.

I know this leaves a lot of questions unanswered, but I hope it gives you a sense of where we are. Please stay in communication with your supervisor so we can try to give you the direction you need.

Jason Brown Assistant Director, Research Consumer Financial Protection Bureau Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 43 of 108

Exhibit R

: He. Statutority mandated Work : February 28, 2025 at 10:37 AM	
Yes, John will likely be reaching out to you shortly. has decided to retire so we need to figure out who is available to continue the work in his absence. I would assume that you will handle the FDCPA report but let's wait to hear from John. Hope you are doing ok.	,
From: Sent: Friday, February 28, 2025 10:33:38 AM To: McNamara, John (CFPB) < > Cc: Subject: Statutorily Mandated Work	_
Hello.	

The other offices in RMR have received notification from their management that Adam Martinez changed his guidance and we are now allowed to work on statutorily mandated work. Will you be providing an update to Markets staff?

If statutorily required work is going forward, I would like to know if I will continue to work on the Card Report and FDCPA report.

Financial Analyst | Consumer Credit, Payments, and Deposits Markets Mobile:

Consumer Financial Protection Bureau consumerfinance.gov

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From: McNamara, John (CFPB)
Subject: FW: Statutory/Legal Required Work
Date: February 28, 2025 at 11:20 AM
To:

See below from Adam Martinez. This is for your awareness, and I ask that you let your manager and me know of any statutorily required work.

We have data collections and CARD Act for our Credit Card Team and the FDCPA Annual Report for our Debt Collections Team.

More broadly we have market monitoring for all Markets teams.

I have an email in to Adam Martinez letting him know that I plan to recommence work on all areas. I also have a question about what types of communications Mark Paoletta and Daniel Shapiro wish to be copied. I told Adam that I assumed they would only want to be copied on substantive matters and be made aware of meetings Markets was having with external stakeholders.

This email is for your awareness. Stay tuned for more guidance.

John McNamara Assistant Director, Consumer Credit, Payments, and Deposits Markets Division of Research, Monitoring & Regulations

Consumer Financial Protection Bureau

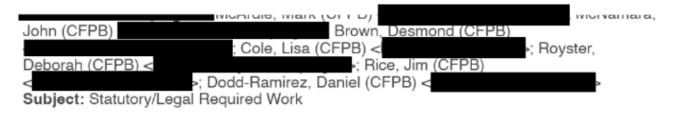
1700 G Street NW Washington, DC 20552 Office Mobile

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Sent: Thursday, February 27, 2025 4:18 PM

To: Pappalardo, Janis (CFPB) ; Sokolov, Dan (CFPB) ; Epstein, Ann (CFPB) ; Hedgespeth,

Grady (CFPB) ; Brown, Jason (CFPB)



Hi RMR Colleagues – Good afternoon.

Thank you for your patience as we continue through transition and our new leadership's review of the Bureau.

On February 8 (email attached), our Acting Director outlined several areas where work stoppage was being implemented at the Bureau. He did exclude areas approved by him or required by law. We want to ensure that you are aware that statutorily required work and/or work required by law are authorized.

Your teams are authorized to continue carrying out these responsibilities. Any actions or communications with outside parties must be sent to Mark Paoletta, Chief Legal Officer and Daniel Shapiro, Deputy Chief Legal Officer.

Should you have any questions at all, please feel free to contact our Chief Legal Officer as directed by the Acting Director. Alternatively, you are always welcome to reach out to me if needed. I am happy to share guidance provided to other leaders and employees regarding authorized work, including my own team.

Thank you for your support.

Adam

Adam Martinez Chief Operating Officer



From:	McNamara, John (CFPB)	
Subject:	RE: Statutorily Mandated Work	
Date:	February 28, 2025 at 2:11 PM	
To:		
Cc:		

Thanks for asking. Wait for guidance. I am waiting for a response from Adam Martinez.

John McNamara Assistant Director, Consumer Credit, Payments, and Deposits Markets Division of Research, Monitoring & Regulations

Consumer Financial Protection Bureau

1700 G Street NW Washington, DC 20552 Office-Mobile-

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Sent: Friday, February 28, 2025 1:54 PM

To: McNamara, John (CFPB)

Cc:
Subject: Re: Statutorily Mandated Work

To clarify, should I get started or wait for guidance?

From: McNamara, John (CFPB) <
Sent: Friday, February 28, 2025 10:57 AM

To:
Cc:
Subject: RE: Statutorily Mandated Work

Stay tuned for guidance. As I see it, the FDCPA Annual Report is statutorily mandated work, and I would like to get started on it.

John McNamara Assistant Director, Consumer Credit, Payments, and Deposits Markets Division of Research, Monitoring & Regulations

Consumer Financial Protection Bureau

1700 G Street NW Washington, DC 20552 Office-Mobile-

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From:

Sent: Friday, February 28, 2025 10:34 AM

To: McNamara, John (CFPB)

Cc:

Subject: Statutorily Mandated Work

Hello,

The other offices in RMR have received notification from their management that Adam Martinez changed his guidance and we are now allowed to work on statutorily mandated work. Will you be providing an update to Markets staff?

If statutorily required work is going forward, I would like to know if I will continue to work on the Card Report and FDCPA report.

Best.

Consumer Credit, Payments, and Deposits Markets

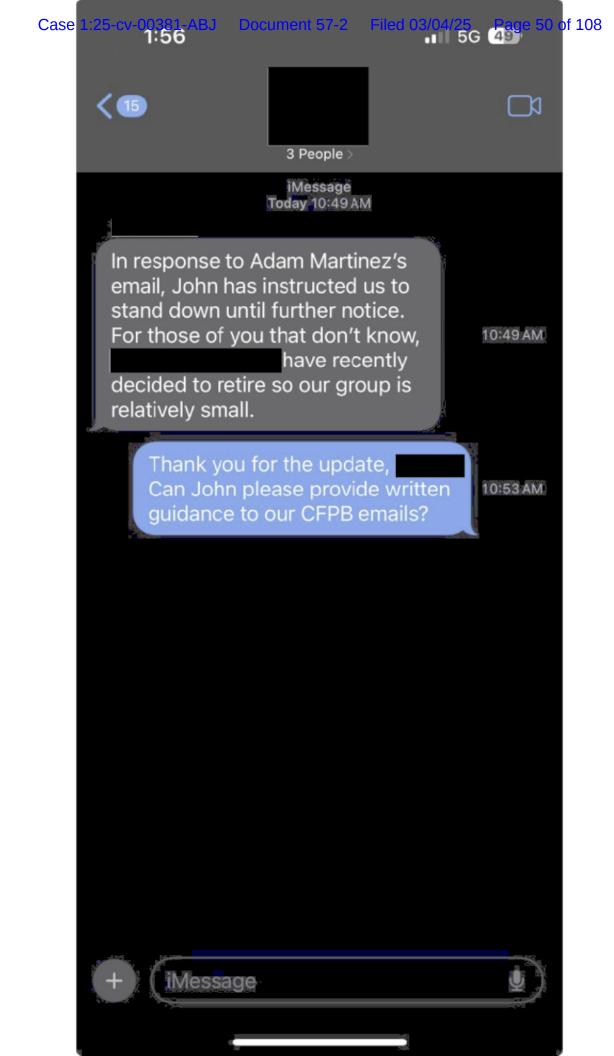
Mobile:

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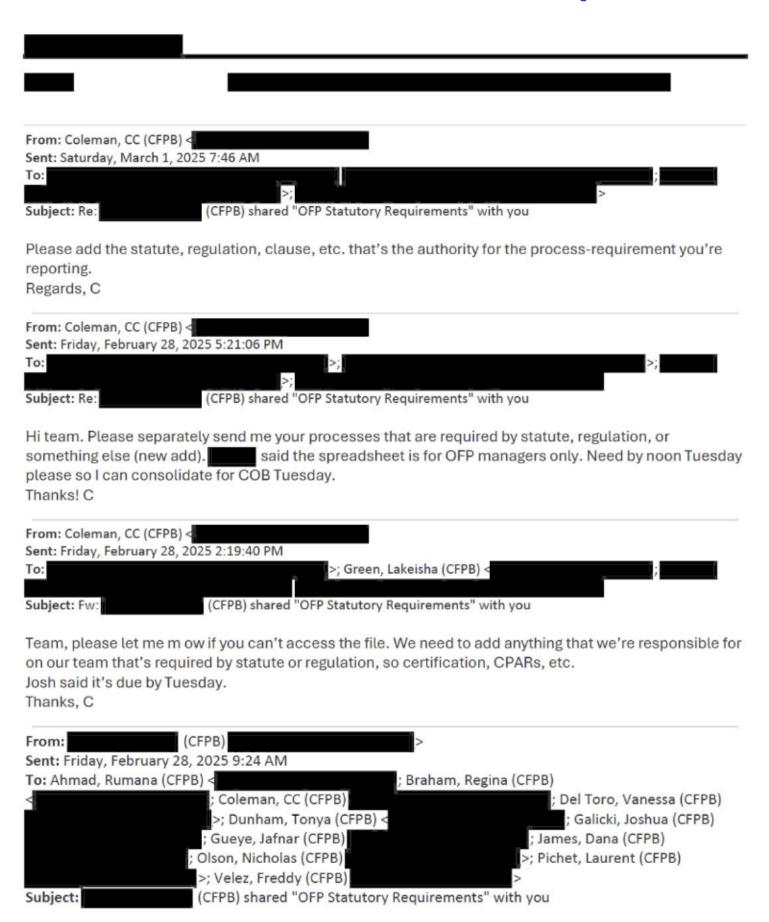
Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 49 of 108

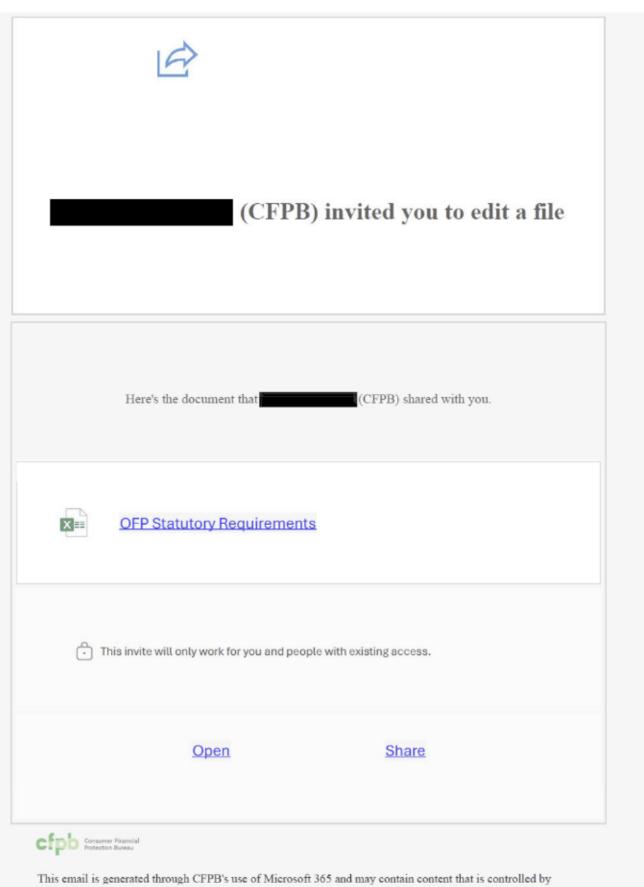
Exhibit S



Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 51 of 108

Exhibit T





CFPB.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 54 of 108

Exhibit U

From: (null)

Subject: FW: All Hands Message re: Work Required by Law

Date: March 4, 2025 at 3:52 PM

To:

From: Schroeder, John (CFPB) <

Sent: Monday, March 3, 2025 10:13 AM

To: _DL_CFPB_Examiners Midwest <

Subject: FW: All Hands Message re: Work Required by Law

Casey and Calvin are seeking clarity from new agency leadership re the below email, and will pass along direction as soon as they can receive it. In the meantime please refrain from all work activity other than ministerial tasks as previously approved by Adam Martinez.

I apologize for the continued confusion being caused by multiple misleading and inconsistent email. Please stand by for additional direction from SPV leadership. Thank you.

John J. Schroeder

Regional Director – Midwest Region Supervision, Enforcement and Fair Lending Consumer Financial Protection Bureau

230 South Dearborn Street, Suite 1590

Chicago, IL 60604

Mob:

consumerfinance.gov

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From: Martinez, Adam (CFPB)

Sent: Sunday, March 02, 2025 3:33 PM

Cc: Paoletta, Mark (CFPB)

Subject: All Hands Message re: Work Required by Law

Message from Mark Paoletta, Chief Legal Officer

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8th email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless "required by law" or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational

control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta Chief Legal Officer CFPB

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Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 57 of 108

Exhibit V

From: Sellers, Katelyn (CFPB)

Sent: Monday, March 3, 2025 8:45 AM

To:

Subject: FW: follow-up on Qs about informal guidance to entities

Hi Team.

FYSA on the note below to Casey. I will let you know what I hear back. In the meantime, please continue to comply with the stop work order and stand by for further instruction from me regarding whether you should engage in any ILSA or NMLS work. Thank you!

Katelyn

Katelyn Sellers Program Director, Systems & Registrations Office of Supervision Examinations (m)

From: Sellers, Katelyn (CFPB)

Sent: Monday, March 3, 2025 8:42 AM

To: Huggins, Cassandra (CFPB) Subject: RE: follow-up on Qs about informal guidance to entities

Hi Casey,

Pursuant to Adam Martinez's email yesterday, 3/2/25 regarding performing statutorily mandated work, I am resurfacing the email below to inquire as to whether we ever got any response from leadership. As you know, the SES items below are only "mandated" to the extent that exams are being performed and require technical support and tools. And I believe NBR would also be in the category of "supervision" class of activities that are under the stop work order.

However, the NMLS and ILSA items are not related to whether exams/supervision activities are occurring, and they are required by statute (Secure and Fair Enforcement for Mortgage Licensing [SAFE] Act and Interstate Land Sales Disclosure Act, respectively).

My team is standing by and is ready to resume minimally required work on these programs if authorized. Please note that a routine (daily) part of running these two programs requires external stakeholder engagement (with registrants, CSBS/NMLS, contractors, etc.), and we are unsure whether each instance of external outreach would need to be authorized.

Thank you, Katelyn

Katelyn Sellers Program Director, Systems & Registrations Office of Supervision Examinations (m)

From: Sellers, Katelyn (CFPB)

Sent: Wednesday, February 5, 2025 4:10 PM

To: Huggins, Cassandra (CFPB)

Cc: Bleicken, David (CFPB) <

Subject: FW: follow-up on Qs about informal guidance to entities

Hi Casey,

This might be more than was being asked for, but the systems/programs are somewhat different, so I'm breaking the examples out program by program:

Supervision Examination System (SES)

- The most common questions the SES team receives from external parties are centered around the Supervision Portal, which is the secure portal Supervision uses for the Entities to respond to requests from the Exam teams. Examples:
 - o I forgot my password, can you reset it?
 - o I got a new phone and the MFA no longer works, can you fix it?
 - o I am having trouble logging into the portal, can you help?
- Impact: If we do not answer these questions/provide this support over email, the Entity user would not be able
 to log into the CFPB Supervision Portal and provide information to the Exam teams, which would stop exams
 from moving forward.

Nonbank Registry (NBR)

- Example questions:
 - I am unable login to my NBR account (i.e., password/multi-factor authentication (MFA) errors or I need change my email address). Can CFPB help?
 - If we don't respond, user is not able to access their NBR account and cannot comply with the NBR rule (i.e. cannot submit or update their required filing)
 - I entered an incorrect value in the company's identifying information (e.g., typo in NMLS ID). Can CFPB correct it?
 - If we don't respond, Company's unique identifying information remains incorrect in the Nonbank Registry and leads to data quality issues in CFPB use of the identifying data to support the Supervision program.
 - I can't access my company's CFPB Consumer Response account, how do I reply to a complaint I received from the CFPB on behalf of a consumer?
 - If we don't respond, Company representative does not learn the correct way to respond to a complaint, and their customer who originally submitted the complaint does not get a response through CFPB's complaint system.
- Holding scheduled external meetings styled as "office hours" to provide guidance and updates for Nonbank Registry
 - During these meetings with state regulators, state attorneys general, and Tribal Governments, the NBR team provides updates on NBR metrics (e.g., number of registered companies, number of registered orders), solicits input of "data sharing and data use" ideas from attendees, and talks about steps toward potential publication in the future.
 - If we don't hold these meetings, work may slow down on the implementation of the NBR rule, including potential publication.

Interstate Land Sales Act (ILSA)

Example questions from developers trying to comply with ILSA/Regulation J:

I usually get an email from CFPB confirming my submission (i.e., 1) register lots to sell in a new subdivision, 2)
 add lots to sell in an existing registered subdivision, and/or 3) amend information regarding lots to sell in an

existing registered subdivision) – did CFPB receive my submission and/or is there any additional information I'm required to submit?

- If we don't respond, developer may reach out to other CFPB offices or political representatives because they have not received communication from the CFPB ILSA office.
- What is the ILSA # CFPB is assigning to my subdivision?
 - If we don't respond, the Property Report may be noncompliant with ILSA/Regulation J and/or the purchaser/consumer does not receive information on the Property Report as required by ILSA/Regulation J.
- What is the effective date of the Property Report we are required to provide to purchasers so that we may sell the lots?
 - If we don't respond:
 - Developer may lose income because they are not sure if they can legally sell the lots in the subdivision due to potential non-compliance with the ILSA/Regulation J.
 - Purchasers may not receive the Property Report required by the ILSA/Regulation J or one that
 appears to be noncompliant; this could result in a developer being sued by a purchaser due to
 the Property Report not being properly filed with the CFPB.

Nationwide Multistate Licensing System and Registry (NMLS)

To effectively oversee the contract between the CFPB and the NMLS's State Regulatory Registry, LLC (SRR), our office has taken a proactive approach to communicating with the SRR during the Background Investigation Process for new and renewal of ~177 contractors (in a constant state of onboarding/offboarding). In our emails, we communicate such things as: confirm the receipt of a request of a background check, ask for more information to complete a background check, provide status updates on certain individuals, confirm temporary authorization to work, and confirm final approval of a person being thoroughly vetted so they may continue work on the system.

- If we no longer communicate the items above:
 - SRR's overall ability to perform under its contract with CFPB could be negatively impacted.
 - SRR may reach out to other CFPB offices in confusion and/or may complain that CFPB is no longer providing information on the process.
 - SRR could be unaware that information is missing and the background investigation process is paused/individuals would be able to work on the system as needed by CFPB
 - Information required to complete the background investigation remains incomplete and/or the background investigation may time out and require re-initiation of process.

Katelyn Sellers	
Program Director, S	ystems & Registrations
Office of Supervision	n Examinations
(m)	

From: Huggins, Cassandra (CFPB)

Sent: Wednesday, February 5, 2025 11:25 AM

To: Sellers, Katelyn (CFPB)

Subject: follow-up on Qs about informal guidance to entities

Importance: High

Hi Katelyn- We had submitted the question the other day about whether we could provide certain types of informal guidance to entities. Legal is going to run this question up to the Acting Director, but wants some examples of the types of questions that typically fall into these categories and the impact if the Bureau does not respond to it. Would you/your team be able to put that together? It's a tight turn-around- would need it by the end of today.

- Answering questions from supervised entities to provide user support for Supervision Examination System, Nonbank Registry, Nationwide Multistate Licensing System (NMLS), and Interstate Land Sales Act (ILSA) programs
- Holding scheduled external meetings styled as "office hours" to provide guidance and updates for Nonbank Registry

Thanks, Casey

Cassandra Huggins
Principal Deputy Assistant Director | Supervision Policy & Operations
Mobile:

Consumer Financial Protection Bureau consumerfinance.gov

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Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 62 of 108

Exhibit W

From: Huggins, Cassandra (CFPB) <	>	
To: _DL_CFPB_Supervision_ALL <		
Subject: FW: All Hands Message re: Work Required by Law		
Supervision staff,		

Calvin and I know that there is quite a bit of confusion surrounding the message we received from Adam Martinez/Mark Paoletta on March 2. We have requested and received clarification that their message was <u>not</u> Intended to authorize the reinstatement of supervision/examination activity, even though the Bureau is required by law to carry out these activities. We are also not to resume any functions that support the supervision/examination program, and are not to communicate with parties outside of the Bureau on Bureau matters without receiving approval from the Chief Legal Officer.

It has been communicated to me that Supervision staff should continue to operate on administrative leave as directed by the Acting Director unless you have received express permission to work on a task. In general, this permission will come from Calvin, me, or your supervisor. Please do not work on anything else without authorization. If you have a question about whether you've been authorized to perform a task, please reach out to your supervisor. As a reminder, staff have been given permission to conduct some administrative tasks such as validating/certifying timecards in WebTA and submitting/approving vouchers in Concur. Some staff have also been authorized to work on discrete tasks and may continue to work on those as directed.

OSPO managers- if your teams are responsible for carrying out any other statutorily-mandated activities and you aren't sure whether they fall under the broader umbrella of supervisory or examination activity or activities that support this function, please send me an email with the activity and the specific statutory language that requires it, and I will send a request to the Chief Legal Officer.

Thanks,

Casey

Cassandra Huggins

Principal Deputy Assistant Director | Supervision Policy & Operations

Mobile:

Consumer Financial Protection Bureau consumerfinance.gov

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From: Martinez, Adam (CFPB)

Sent: Sunday, March 2, 2025 3:33 PM Cc: Paoletta, Mark (CFPB)

Subject: All Hands Message re: Work Required by Law

Message from Mark Paoletta, Chief Legal Officer

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8th email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless "required by law" or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta

Chief Legal Officer

CFPB

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 65 of 108

Exhibit X

Filed 03/04/25

60

Thanks Chris.

To add to that, we're getting a lot of requests to turn contracts back on. I will send out guidance shortly but for your awareness we are not turning back on every contract we've had. We're taking a very narrow approach: if without the contract the Bureau can't meet a statutory requirement then it will be considered for reactivation. Meaning that a contract enhancing our ability to meet a statutory requirement is not enough to get it back on. It needs to be the only way the bureau can currently meet that requirement.

Also as you're providing justifications please be prepared to have to defend those to external parties. We've been routinely asked to provide for names of the people providing the justification.

Respectfully,

Jafnar

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 67 of 108

Exhibit Y

From: (null) Subject:

Date: March 4, 2025 at 9:57 AM

To:

From: Brown, Jason (CFPB) <

Sent: Monday, March 3, 2025 6:07 PM

To: _DL_CFPB_OR < Subject: updates

Hi OR,

Just wanted to give you a status update.

Jan submitted a proposal to Mark Paoletta outlining how RMR would comply with the directive to resume statutory responsibilities. She proposed that:

- RMR would bring nearly everyone back to work, because nearly all of RMR
 engages in statutorily required work. Given that research responsibilities are well
 documented in Dodd-Frank and all of the research work we do is linked to fulfilling
 Dodd-Frank's requirements, this would mean that anyone who could support the
 research functions of Dodd-Frank should return to work. This is consistent with
 what I shared last Friday.
- Communications within the federal government, with contracted entities, and within the Federal Reserve system that help us fulfill our statutory responsibilities will be pre-approved and not require involvement of the DFO.
- Engagement with outside researchers and other parties to advance the Bureau's
 research responsibilities would resume. This would include discussing research
 findings in meetings, workshops, and conferences with other government agencies,
 presenting research findings at academic conferences, and attending research
 conferences. She noted that we would follow usual Bureau procedures for
 authorizing and clearing any presentations and conference attendance and would
 inform him and Dan Shapiro prior to any presentation or attendance at a nongovernmental conference.
- Refreshing data on the Bureau website, specifically the CCT and Mortgage Performance Trends, will continue. We will await further guidance on Bureauhosted publications.
- Dissemination of research findings through the SSRN page and through academic journals would resume.

Jan has not received a response yet. But I will pass it on as soon as I get it. In the meantime, please continue (or resume) fulfilling the non-public aspects of your work to the extent possible.

There are questions on timecards. We expect further guidance on Thursday.

I know that as we are resuming our work, we are confronting a few challenges, including:

Loss of personnel. The firing of much of our staff impacts our ability to complete
assignments as planned. We are trying to make sure we have access to the files of
the staff who have left. The OR management team also will be looking to reassign
staff from work streams that have stopped. If you find you have capacity, please
alert your chief. And if you need additional staff support for your projects, please

alert your chief.

- Loss of IT resources. Several contracts that have supported our work have been cancelled. We have seen some impairment in our ability to do our work, and in some cases we can't tell if the struggles we're facing are because of cancelled contracts or glitches, and the people who would ordinarily help us out have themselves been terminated. Many thanks to those who have been documenting your experiences and sharing workarounds. Kat has been running point on this. The CIO knows we're having issues and once we get a full picture of the situation and the extent to which we cannot fulfill our responsibilities, we will share with him and work with him on how to fix it.
- Loss of data. Several of our data contracts have been cancelled. Also, because the IT systems have been in flux while data were being migrated (or even just stored), there is some question as to where some of the data and how to access them.
 Shaista will be working with the data stewards of each of our data assets to ensure that the data are accessible and complete.
- Loss of other tools to conduct research. These include the qualitative researcher contract and the lab contracts. We're assessing how the loss of these other contracts affects our ability to fulfill our duties.

Thank you for your patience and cooperation as we try to sort all this out.

Finally, I know many of you submitted promising work to the Consumer Finance Round Robin. Because of the uncertainty of our participation, the other agencies moved forward without including papers that were authored only by CFPB researchers. Assuming we get the go-ahead to continue engagements like the Round Robin, we are welcome to nonetheless attend. We're looking to plan an alternate Round Robin for our submissions that didn't make it on to the program.

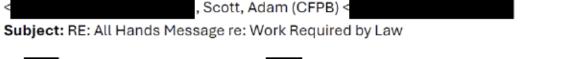
Jason

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 70 of 108

Exhibit Z

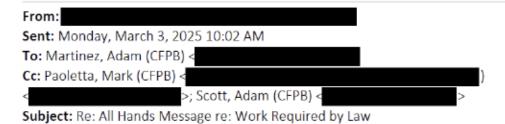
From: To: Subject: Date:	FW: All Hands Message re: Work Required by Law Monday, March 3, 2025 5:29:52 PM
,	
of this work CCDB/CG0	horization below, is looking into getting the CCDB back up and running. As part a, we're also authorizing you and to help assess the state of things across GP/complaints products, identify people and resources that are remaining to ese platforms, and understand the backlog in light of the new state of things.
as Adam m complaints	gwith the other D+D leads to assess the state of work and resources more broadly, entioned in his email this afternoon. A read from you, and of the portfolio will be invaluable as we figure out next steps. Reach out to me any time if help, provide more guidance, etc.
Thanks,	
	ry Notice: If you received this email by mistake, you should notify the sender of the mistake and delete any attachments. An inadvertent disclosure is not intended to waive any privileges.
From:	> day March 3, 2025 at 5:04 PM
To:	day, March 3, 2025 at 5:04 PM
Subject: F	W: All Hands Message re: Work Required by Law
Hi Folks,	
	e email thread I referenced regarding authorization to "shift any resources comply with the statute and any applicable laws/regulations" as noted by
Best,	
F	

Date: Monday, March 3, 2025 at 10:21 AM
To: Chilbert, Christopher (CFPB)
<
Cc: >, Scott, Adam (CFPB)
> Subject: RE: All Hands Message re: Work Required by Law
Minus Adam and Mark,
Irina please check with Steve once he comes online please let me know if anything is needed from Infrastructure or other teams to address the issue.
Thanks,
Deputy Chief Information Officer Technology & Innovation Mobile:
Consumer Financial Protection Bureau consumerfinance.gov
Confidentiality Notice: If you received this email by mistake, you should notify the sender of the mistake and delete the e-mail and any attachments. An inadvertent disclosure is not intended to waive any privileges.
From: >
Sent: Monday, March 3, 2025 10:11 AM To Montage Adam (SERR)
To: Martinez, Adam (CFPB) >; Chilbert, Christopher (CFPB) >; Malik, Irfan (CFPB)
Cc: Paoletta, Mark (CFPB) >; Sayre, Stephen (CFPB)
>; Scott, Adam (CFPB)
Subject: Re: All Hands Message re: Work Required by Law
Will do. Thanks.
Chris and
All of the contractors are gone, am I correct?
The first issue I see is that EXT Jenkins is returning 502. That is where the pipelines run. I
wonder if it because some other service got shut down. I lack access privileges.
would need to take a look to see if we can get it back up and I can try to take it from there.
I don't know how to reach him though, would need to reach out when he is back online.
From: Martinez, Adam (CFPB)
Date: Monday, March 3, 2025 at 10:05 AM
To: >, Chilbert, Christopher (CFPB)
Cc: Paoletta, Mark (CEPR) <



Hi . Please work with Chris and to shift any resources needed to comply with the statute and any applicable laws/regulations. Thank you.

Adam Martinez Chief Operating Officer



Hi Adam,

Based on every email starting 2/10 the unambiguous guidance was to stop all work tasks, no stipulation of statue requirements was made.

As of today, Consumer Complaint Database(CCDB) has not had been refreshed with new data since 02/22/2025 and displays an eror banner:

https://www.consumerfinance.gov/data-research/consumer-complaints/search/? chartType=line&dateInterval=Month&dateRange=3y&date_received_max=2025-02-21&date_received_min=2022-02-

21&lens=Product&searchField=all&subLens=sub_product&tab=Trends

Dodd Frank mandates:

The Consumer Financial Protection Bureau (CFPB) to maintain a public database where consumer complaints against financial institutions are recorded and published, ensuring transparency in the financial marketplace; this database is commonly referred to as the "CFPB Consumer Complaint Database".

I am seeking authorization to fix underlying issue with data pipelines which load data for CCDB. Since the Data Products team lost all other developers when all contracts were canceled, I am also seeking authorization to utilize other member of D&D and EDA to assist as needed.

Thanks for your prompt attention,

From: Martinez, Adam (CFPB) < Adam. Martinez@cfpb.gov >

Date: Sunday, March 2, 2025 at 3:33 PM

To:

Cc: Paoletta, Mark (CFPB) <

Subject: All Hands Message re: Work Required by Law

Message from Mark Paoletta, Chief Legal Officer

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8th email.

On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless "required by law" or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta Chief Legal Officer CFPB

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 75 of 108

Exhibit AA



Hi all,

We have some updated guidance on a few items:

- Mandated Reports: Adam has approved (see attached) to work on all reports that fulfill a legal requirement. See below for a list of reports due through June. Please have your teams restart work on these items through the normal drafting, review with stakeholders, and clearance (Ops FO and Exec. Sec.). If there are items missing from this list, please let me know.
- Statutory Requirements: New guidance is instructing us to work on all statutory requirements for the Bureau. Our Ops work ties to this work (directly and indirectly). We are working (with Legal) to develop a framework on what is required and how Ops work is implicated.

We know there's many questions around this - so we're going to schedule a couple of meetings to ensure we're all aligned on this.

Scott

OFFICE OR TEAM	REPORT/PUBLICATION TITLE	DESCRIPTION AND ACTION(S) REQUIRED	LEGAL REQUIREMENT	RECEIVING ORGANIZATION	FY25 PUBLICATION DUE DATE(S)	DUE DATE STATUTORILY REQUIRED
OFP/CFO	Annual Performance Plan and Report, and Budget Overview (Managed by OSPP)	The report describes the resources needed to accomplish our goals and measure our performance against our strategic plan. Strategy owns this document. The document also includes a budget section which the OCFO is responsible for. Budget section fulfills statutory requirement of 1017(a)(4)(A) financial operating plans and forecasts.	Dodd-Frank §1017(a)(4)(A) - Director shall provide to the Director of the Office of Management and Budget copies of the financial operating plans and forecasts of the Director, as prepared by the Director in the ordinary course of the operations of the Bureau, S.1016 also requires that a justification of the budget request of the previous year be provided with the semiannual report to Congress, (Note: there may be other requirements that govern the publication of strategic plans and performance information)	FRB OMB Congress	2/15/2025	N
OFP/CFO	DATA Act	Submission of reconciliations of financial	Public Law 113-101, dated May 9, 2014	USAspending.gov	2/15/2025	N

	Case 1.2	SanGAyroQu386bt And Shat sup@6UME USASpending.gov	Accountability and Transparency Act of 2014"	Page 77 of 108	5	
OFP/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	2/18/2025	N
CRO	GAO-IG Act Reporting	Annual report of external findings from GAO and OIG	Good Accounting Obligation in Government Act (GAO-IG Act) (Public Law 115-414)	Congress GAO OIG	2/28/2025	N
OFP/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	2/28/2025	N
OFP/PROC	Service Contract Inventory	Presents an analysis on CFPB's service contract inventory to determine if contract labor is used appropriately and the mix of Federal employees and contractors is balanced.	FY 2010 Consolidated Appropriations Act- Public Law 111-117 OMB memo, Dated Dec 19, 2011	OMB, MAX.GOV	2/28/2025	Y
OFP/CFO	Annual Independent Performance Audit	Annual independent audit of the operations and budget of the Bureau. The purpose of this audit is to provide objective analyses to improve program performance and operations, reduce costs, facilitate decision-making, and contribute to public accountability	12 USC § 5496a	Public (published on cfpb.gov)	2/28/2025	N
OFP/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 10172	Public (published on cfpb.gov)	2/28/2025	N
OFP/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	2/28/2025	N
OCDO	Federal Electronic Records and Email Management Maturity Model Report	Report to determine how federal agencies manage electronic records.	The Federal Records Act (44 U.S.C. 31)	NARA	3/15/2025	N
Admin Ops	Records Management Self- Assessment	The goal of the self assessment is to determine whether federal agencies are compliant with statutory and regulatory records management requirements.	The Federal Records Act (44 U.S.C. 31)	NARA	3/15/2025	N

Admin Ops	Senior Agency Official of Records Management Report	Report documents how the Bureau is managing RIM activities and goals established by NARA	The Federal Records Act (44 U.S.C. 31)	NARA	3/15/2025	N
OFP/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled *Agency Reporting Requirements for the Financial Report of the United States Government*	OMB Treasury	3/18/2025	N
OFP/CFO	Quarterly Transfer Requests	Letters requesting transfer of funds from the Fed Reserve to CFPB	Dodd-Frank § 1017(a)(1)	FRB Congress	3/20/2025	N
CRO	OIG Semiannual Report	OIG Federal Reserve provides seminannual report of significant activities, finds, and recommendations during a six month period.	P.L. 95-452	HFSC and BHUA	3/31/2025	Y
OHC	Financial Literacy and Education Plan (for Bureau Employees)	OPM requires agency benefits representatives to submit an annual financial literacy and education plan for agency employees.	Thrift Savings Plan Open Elections Act of 2004 (Public Law 108-469)	ОРМ	3/31/2025	N
OHC	Student Loan Repayment Incentives	Agencies must submit an annual written report to the U.S. Office of Personnel Management (OPM) on their use of student loan repayments during the previous calendar year (CY), as required by 5 U.S.C. 5379(h).	5 U.S.C. 5379(h)(1) and 5 CFR 537.110(b)	ОРМ	3/31/2025	Y
OCDO	Chief FOIA Officer Report	In accordance with the FOIA, each agency Chief FOIA Officer must "review and report to the Attorney General, through the head of the agency, at such times and in such formats as the Attorney General may direct, on the agency's performance in implementing [the FOIA].	The Freedom of Information Act (FOIA), 5 U.S.C § 552(j)(2)(D).	DOJ	3/31/2025	Υ
OHC	Annual Data Call for Pathways Programs and Early Career Talent Hiring Reporting	Under Section 6 of Executive Order 14035: Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce, the Biden-Harris Administration directs	5 CFR 362.109	ОРМ	4/1/2025	Y

	Case 1:2	6-cv-00381-ABJ Docume agencies to increase availability of paid internships, fellowships, apprenticeships, and other early career programs.	nt 57-2 Filed 03/04/25 P	age 79 of 108		
OHC	Telework Data Call	Participation in this annual survey is a requirement under the Telework Enhancement Act of 2010, Public Law 111-292 (the Act and is reported by OPM to Congress. The questions in this survey ask for information about agencies' telework program.	Telework Enhancement Act of 2010, Public Law 111-292	OPM	4/10/2025	N
OFP/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	4/18/2025	N
T&I	Fiscal Year 20XX-20XX Guidance on Federal Information Security and Privacy Management Requirements - EO14028 Metrics (Q1 & Q3) & Chief Information Officer Metrics (Q2)	FY XX Q1 - Q3 Reporting via Cyberscope.	FY24 FISMA Guidance is not yet released. OMB M-23-03 - FY23 (MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES)	DHS OMB	4/18/2025	Y
T&I	Strengthening the Cybersecurity of Federal Agencies by Enhancing the High Value Asset Program	FY2X HVA list report on a quarterly basis and provide updates and modifications via Homeland Security Information Network (HSIN)	OMB M-19-03	DHS	4/18/2025	Y
T&I	Improving Vulnerability Identification, Management, and Remediation	BOD 20-01 Vulnerability Disclosure Policy reporting via Cyberscope	OMB-M-20-32	DHS	4/18/2025	Υ
Admin Ops	Quarterly FOIA Report	In accordance with the FOIA, the Department of Justice requires agencies to provide quarterly reporting of four key FOIA statistics so that they can be posted on FOIA.gov.	5 U.S.C. § 552(e)(5), (j)(2)(D)	DOJ	4/25/2025	Y
T&I	Migrating to Post-Quantum Cryptography (Inventory)	By May 4, 2023, and annually thereafter until 2035, or as directed by superseding guidance, agencies are directed to submit a prioritized inventory of information systems and assets, excluding national security systems, that contain CRQC-vulnerable cryptographic systems to ONCD and the Department of Homeland Security Cybersecurity and Infrastructure Security Agency (CISA)	M-23-02	DHS OMB	5/3/2025	Y
OFP/CFO	DATA Act	Submission of reconciliations of financial and procurement data that supports USASpending.gov	Public Law 113-101, dated May 9, 2014 and the official title is "Digital Accountability and Transparency Act of 2014"	USAspending.gov	5/15/2025	N

OFDICEO		5-cv-00381-ABJ Docume		age 80 of 108		
OFP/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	5/18/2025	N
OFP/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	5/30/2025	N
OFP/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	5/30/2025	N
OFP/CFO	Quarterly Financial Reports (CFO Updates)	Budget execution by Budget Category, Division, and largest obligations for each quarter.	Dodd-Frank § 1017?	Public (published on cfpb.gov)	5/30/2025	N
OCDO	Financial Stability Oversight Council (FSOC) Data Inventory	The Interagency Data Inventory is a product of the Data Committee of the Financial Stability Oversight Council (FSOC). The inventory catalogs the data collected by FSOC member organizations. The inventory contains information — metadata — about each data collection. It does not contain the underlying datasets. For each data collection, the inventory has basic information, such as a brief description of the collection, collecting organization, and the name and number of the form used to collect the data.	Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010	FSOC	5/31/2025	N
OFP/CFO	Semiannual Report of Payments Accepted from a Non-Federal Source	As required by the statute, the Bureau must submit to the Director of the Office of Government Ethics reports of payments of more than \$250 accepted from non-Federal sources for travel, subsistence, and related expenses with respect to an employee's attendance at any meeting or similar function relating to the official duties of the employee.	31 U.S.C. 1353	OGE	5/31/2025	Υ
T&I	Migrating to Post-Quantum Cryptography (Funding Estimates)	By June 4, 2023, and annually thereafter until 2035, or as directed by superseding guidance, agencies are required to submit to ONCD and OMB an assessment of the funding required to migrate information systems and assets inventoried under this memorandum to post-quantum cryptography during the following fiscal year.	M-23-02	DHS OMB	6/4/2025	Y
T&I	Update to Memorandum M-22-18, Enhancing the Security of the Software Supply Chain through Secure Software	Agencies must submit metrics on collected attestation letters for all software subject to the requirements of M 22.19, as amonded by this	OMB M-23-16	ОМВ	6/9/2025	Y

	речениринения насачен Case 1:2	5•6V-00381 ABJy unDocume memorandum., as well as the on agency approval of POA&Ms AND number of extensions and waivers in place at each agency.	nt 57-2 Filed 03/04/25 P	age 81 of 108	3	
OFP/CFO	GTAS	Submission of monthly financial and budget execution data; fulfill statutory requirement of 1017(a)(4)(A) quarterly reports of financial condition and results of operations	Chapter 4700 of the TFM entitled "Agency Reporting Requirements for the Financial Report of the United States Government"	OMB Treasury	6/18/2025	N
OFP/CFO	Quarterly Transfer Requests	Letters requesting transfer of funds from the Fed Reserve to CFPB	Dodd-Frank.§ 1017(a)(1)	FRB Congress	6/20/2025	N
OFP/PROC	Federal Activities Inventory Report (FAIR)	The Inventory depicts the CFPB's workforce by functions (or activities) performed by Bureau employees. The Inventory further breaks down these activities into Inherently Governmental (activities that can only be performed by a Federal employee) and Commercial (Activities that can be performed by Federal or contract employees) categories. The number of Full-Time Equivalents (FTEs) is also displayed by location.	Federal Activities Inventory Reform Act of 1998 (P.L. 105-270) and OMB Circular A- 76 - Competitive Sourcing	Congress, OMB, MAX.GOV	6/30/2025	Y

Scott Lee

Senior Advisor to the Chief Operating Officer - Operations

Consumer Financial Protection Bureau (CFPB)

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 82 of 108

Exhibit BB

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 83 of 108

From: "Tabitha L. Bond"

Date: March 4, 2025 at 7:50:37AM EST

To:

Subject: SF50 attached

Reply-To: 9

New ZixCorp secure email message

Open Message

To view the secure message, click Open Message.

The secure message expires on May 03, 2025 @ 11:50 AM (GMT).

Do not reply to this notification message; this message was auto-generated by the sender's security system. To reply to the sender, click Open Message.

If clicking Open Message does not work, copy and paste the link below into your Internet browser address bar.

Want to send and receive your secure messages transparently? Click here to learn more.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 84 of 108

Exhibit BB

Date: March 4, 2025 at 7:50:37 AM EST

Subject: SF50 attached

New ZixCorp secure email message

Open Message

To view the secure message, click Open Message.

The secure message expires on May 03, 2025 @ 11:50 AM (GMT).

Do not reply to this notification message; this message was auto-generated by the sender's security system. To reply to the sender, click Open Message.

If clicking Open Message does not work, copy and paste the link below into your Internet browser address bar.

Want to send and receive your secure messages transparently? Click here to learn more.

Standard Form 50 Rev 7/91 U.S. Office of Personnel Management

FPM Supp. 296-33, Subch. 4

NOTIFICATION OF PERSONNEL ACTION

1. Name (Last, F)	MILES			2.0-1-10	In . N	2.70	ate of Birth	4 700	C. cl. Po. c
L. Name (Last, F)	irst. Middle)			Social Secur	ity Number	3.10	ale of Biffh		fective Date 1-2025
FIRST AC	TION			SECOND	ACTION	N .		02-1	1-2020
5-A. Code 385	5-B. Nature of Action TERM DURING PROB	TRIAL PE	ERIOD	6-A. Code		ture of Action			
5-C. Code L4M	5-D. Legal Authority REG 315.804 EO			6-C. Code	6-D. Leg	gal Authority			
5-E. Code	5-F. Legal Authority			6-E. Code	6-F. Le	gal Authority			
7 EDOM Positi	on Title and Number			15. TO: Positio	n Title and N	and a			
7, FROM: Positio	on I title and Number			15. TO: Positio	n Title and Ni	umber			
8. Pay Plan 9. Occ	Code 10, Grade or Level 11, Ster	p or Rate 12, To	otal Salary 13, Pay Ba	sis 16. Pay Plan	7. Occ. Code 1	8. Grade or Level	19. Step or Rate	20. Total Salar	y 21. Pay Basi
12A. Basic Pay	12B. Locality Adj.	12C Adi B	Nasic Pay 12D. Other Pay .00	20A. Basic Pay .00		0B. Locality Adj.	20C. Ad .00	dj. Basic Pay	20D. Other Pay .00
	ocation of Position's Organization		•	22. Name and	ocation of Po	osition's Organiza	tion		•
CONSUMER	R FINANCIAL PROTECT	BUREAU							
EMPLOYE	EE DATA								
23. Veterans Pres	ference			24. Tenure			Agency Use	26. Veterans	Preference for RIF
1 - Non 2 - 5 Po			10 Point/Other 10 Point/Compensable/30%	0 - Nor 1 - Peri	manent 3 - Inc	nditional definite		YES	NO NO
27. FEGLI				28. Annuitant l	ndicator			29. Pay Rate	Determinant
30. Retirement P	lan	31. Service C	Comp. Date (Leave)	32, Work Sche F FUL	dule L TIME				e Hours Per Biweekly Period
POSITION	DATA								
2 - Excepte	itive Service 3 - SES General 4 - SES Career Re		FLSA Category E - Exempt N - Nonexempt	36. Appropriat	ion Code			37. Bargainii	ng Unit Status
38. Duty Station	Code	39. Di	uty Station (City-County-S	tate or Overseas Loca	tion)				
40. Agency Data	41.		42.	43.		44.			
DIRECTIVE HEALTH BE ELIGIBLE T	AND THE STOP WORK IS ON BUREAU ACTIVITY ENEFITS COVERAGE IS TO CONVERT TO INDIVITY OF ADDRESS-	TIES" DTD S EXTENDE IDUAL PO	2/10/2025. ED FOR 31 DAYS DUR LICY (NONGROUP C	RING WHICH YOUTRACT).					
	epartment or Agency					and Title of Appr			
	R FINANCIAL PROTECT			_		SIGNED BY	:		
47. Agency Code	48. Personnel Office II		Approval Date -13-2025	ADAM MA ACTING C		MAN CAPITA	AL OFFICE	R	

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 87 of 108

This is your copy of the official notice of a personnel action. Keep it with your records because it could be used to make employment, pay, and qualifications decisions about you in the future.

The Action

- Blocks 5-B and 6-B describe the personnel action(s) that occurred.
- Blocks 15-22 show the position and organization to which you are assigned.

Pay

- When the personnel action is an award or bonus, block 20 shows the amount of that one-time cash payment. When the action is not an award or bonus, block 12 shows your former total annual salary, and block 20 shows your new total annual salary (block 20C plus 20D). The amounts in blocks 12 and 20 do not include any one-time cash payments (such as performance awards and recruitment or relocation bonuses) or payments that may vary from one pay period to the next (such as overtime pay), or other forms of premium pay.
- Block 20A is the scheduled amount for your grade and step, including any special salary rate you receive. It does <u>not</u> include any locality-based pay. This rate of pay serves as the basis for determining your rate of pay upon promotion, change to a lower grade, or reassignment, and is used for pay retention purposes.
- Block 20B is the annual dollar amount of your Interim Geographic Adjustment or, beginning in 1994, your locality-based comparability payment.
- Block 20C is your Adjusted Basic Pay, the total of blocks 20A and 20B. It servers as the basis for computing your retirement benefits, life insurance, premium pay, and severance pay.
- Block 20D is the total dollar amount of any Retention Allowances, Supervisory Differentials, and Staffing Differentials that are listed in the remarks block. These payments are made in the same manner as basic pay, but are not a part of basic pay for any purposes.

Block 24 - Tenure

 Identifies the nature of your appointment and is used to determine your rights during a reduction in force (RIF). Tenure groups are explained in more detail in subchapter 26 of FPM Supplement 296-33 and RIF is explained in FPM Supplement 351-1; both should be available for review in your personnel office.

Block 26 - Veterans Preference for RIF

- Indicates whether you have preference for reduction-in-force purposes.

Block 30 - Retirement Plan

- FICA -Social Security System

- CS -Civil Service Retirement System

- CS-Spec -Civil Service Retirement System for law enforcement

and firefighter personnel

FS -Foreign Service Retirement and Disability System

-FERS -Federal Employees' Retirement System

-FERS Reserve

Tech -Federal Employees' Retirement System for National

Guard Reserve Technicians

-FERS

ATC -Federal Employees' Retirement System for Air Traffic

Controllers

-FERS

Spec -Federal Employees' Retirement System for law

enforcement and firefighter personnel

-FSPS -Foreign Service Pension System

Block 31 - Service Computation Date (Leave)

- Shows when your Federal service began unless you have prior creditable service. If so, this date is constructed to include your total years, months and days of prior creditable civilian and military service.
- Full-time employees with fewer than 3 years of service earn 4 hours of annual leave each pay period; those with 3 or more years but less than 15 years earn 6 hours each pay period; and those with 15 or more years earn 8 hours each pay period
- Your earnings and leave statement or your time and attendance card will show the rate at which you earn leave and your current unused leave balance.

Block 32 - Work Schedule

- Your work schedule is established by your supervisor.
- A full-time employee works on a prearranged scheduled tour of duty that is usually 40 hours per week. A part-time employee has a prearranged scheduled tour of duty that is usually between 16 and 32 hours per week. An intermittent employee has no prearranged scheduled tour of duty and works when needed.
- Full-time and part-time employees whose appointments are for 90 days or more are usually eligible to earn annual leave; intermittent employees are not.
- Seasonal employees work on an annually recurring basis for periods of less than 12 months each year; they may have a full-time, a part-time, or an intermittent schedule during their work season.
- On-call employees work during periods of heavy workload and are in pay status for a t least 6 months of each year; they may have either a full-time or a part-time schedule when they are in pay status.

Block 33 - Part-time Hours Per Biweekly Pay Period

 Indicates the number of hours a part-time employees is scheduled to work during a two-week pay period.

Block 34 - Position Occupied

- Identifies the employment system under which you are serving the Competitive Service, the Excepted service, or the Senior Executive Service (SES).
- The employment system determines your eligibility to move to other jobs in the Federal service, your rights in disciplinary and adverse actions, and your eligibility for reemployment if you leave Federal service.

Block 35 - FLSA Category

 Exempt employees are not covered by the minimum wage and overtime law (the Fair Labor Standards Act); nonexempt employees are covered.

Block 37 - Bargaining Unit Status

 Identifies a bargaining unit to which you belong; whether or not you are actually a member of a labor organization. Code "7777" indicates you are eligible but not in a bargaining unit; code "8888" indicates you are ineligible for inclusion in a bargaining unit.

Blocks 38 and 39 - Duty Station

Identifies the city, county and state or the overseas location, where you actually work.

OTHER INFORMATION

- If your appointment entitles you to elect health benefits or life insurance, and you have not been provided materials explaining the programs available and the enrollment forms, contact your personnel specialist.
- -Your personnel specialist will also tell you if your position is covered by an agreement between an employee organization (union) and agency. If you are eligible to and elect to join an employee organization, you can elect to have
- your dues withheld from your salary.
- If you have questions or need more information about your rights and benefits, ask your supervisor or your personnel office.
- Definitions for any coded data in Blocks 1-24, 27-39 and 45-50 may be found in Federal Personnel Manual Supplement 292-1.

It is your responsibility to read all the information on the front of this notice and tell your personnel office immediately if there is an error in it.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 88 of 108

Exhibit CC

Good Morning,

Attached you will find your Separation SF50 that was pulled from your eOPF.

Thank you,

Jeremy A. Crouse

Jeremy A. Crouse

Human Resources Assistant

Bureau of the Fiscal Service

Personnel Actions Processing Branch

Phone:

CONTROLLED UNCLASSIFIED INFORMATION

<image001.png>

NOTE: Please be aware that if you email documents containing personally identifiable information (PII), the information may not be secure and your email may be intercepted or otherwise viewed against your wishes. ARC strongly encourages you not to use unsecured email as a means to communicate sensitive information to us. To help secure your data, please contact me and request that I send you an encrypted email message; you can then open and respond to the message and this will then encrypt your message and any attachments you send me.

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 90 of 108

<ORourke-Owens Term SF50_Redacted.pdf>

Standard Form 50

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25

Page 91 of 108

Rev. 7/91 U.S. Office of Personnel Management

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5-C. Code ZLM	5-D. Legal Authority EO 14210 DTD 2/11/25				6-C. Co	le	6-D	. Legal Au	thority				
5-E. Code	5-F. Legal Authority				6-E. Co	le	6-F	. Legal Au	thority				
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8. Pay Plan 9. Occ. Code	10. Grade or Level 11. Step or R	tate 12. Total	Salary	13. Pay Basis	16. Pay Pi	an 17. Occ	. Code	18. Grade o	r Level 19	Step or Ra	te 20. Total Sala	ry/Award	21. Pay Basis
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2 - Excepted Servi 38. Duty Station Cod				(City – County	– State or	Overseas L	ocation)						
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40. Agency Data	41.	42.		43.		44.							
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Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 92 of 108

Exhibit DD

Subject: Date:	Chilbert, Christopher (CFPB) RE: Request to fix the consumerfinance.gov homepage March 4, 2025 at 8:45 AM Scott, Adam (CFPB) Adam.Scott@cfpb.gov,
8	Thanks Adam,
	Chris Chilbert
5	From: Scott, Adam (CFPB)
Ş	Subject: Re: Request to fix the consumerfinance.gov homepage
	Thank you,
	Please note, we have made this request as recently as yesterday and it was denied at that time.
-	Adam
7	From: Sent: Monday, March 3, 2025 8:37:05 PM To: Scott, Adam (CFPB) Subject: Request to fix the consumerfinance.gov homepage
ŀ	Hey Adam and,

The homepage of www.consumerfinance.gov has been returning a 404 (Not Found) error since Feb 7th. I believe this negatively impacts our statutorily mandated reporting requirements (eg for research) and subverts the statutorily mandated initiatives developed for consumer education and engagement. By returning a 404, our homepage has been removed* from google search results for "cfpb" whereas previously it was above the fold on the first page (and usually the first result). This will negatively impact consumers, business groups, and government partners attempting to orient themselves on our site, as the homepage was specifically designed to guide these users to the information and data we are legally obligated to provide.

I am therefore requesting work authorization to republish the <u>www.consumerfinance.gov</u> homepage with the content from Feb 6th, to ensure users can find what they need on our website.

Thanks and regards,

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 94 of 108

Exhibit EE

From: Gueye, Jafnar (CFPB) < Sent: Tuesday, March 4, 2025 8:58 AM	
To: Chilbert, Christopher (CFPB) <	>; Galicki, Joshua (CFPB)
<, Olson, Nicholas (CFPB) <	>
Cc: Malik, Irfan (CFPB) <	erine (CFPB)
< >; Wilson, Peter (CFPB) <	>; Files, Shannon
(CFPB) <	<; James,
Dana (CFPB) <	FPB) <
Subject: RE: Google Cloud Platform & APIs: Payment was de-	clined for

Good morning Chris,

I suspect for all requests I'll have very similar questions as the one below so feel free to preemptively answer them moving forward. For some context in addition to the overall requirements around tightened standards for non-pay spending, PCards have an additional complication. There is only one Pcard exception approved by GSA for the entire bureau with a very limited total limit. We are triaging Pcard purchases.

For all the justifications please let me know who's name to put.

A few questions:

- Is this payment for services already incurred or for renewal? If renewal do we have an ability to safeguard the
 past data?
- What is this data and what is it used for?
- · Are these records?
- What, if any, statutory requirement will the Bureau not be able to meet <u>at all</u> without this purchase? This is a threshold (yes/no) not a level (well/poorly) question.

1	ш	cu	ш	CO	

Thonks

Respectfully,

Jafnar

Case 1:25-cv-00381-ABJ D	ocument 57-2	Filed 03/04/25	Page 96 of 108
From: Chilbert, Christopher (CFPB) Sent: Tuesday, March 4, 20 5 8:38 A : Gueye, Jafnar (CF S Olson, Nich c: Malik, Irfan (CFPB) >son, I FPB)	nol CF; Mullin ; Mullin Pe CFPB) gel, Jonathan APIs: Payment v	Salicki, Joshua (C , Katherine (CFPB) FPB) vas dec ined for n this case, we will	>; Fileannon
Chris Chilbert			
Chins Childen			
From: Files, Shannon (CFPB) Sent: Monday, March 3, 2025 5 To: Chilbert, Christopher (CFPB B) > Subject: Platform & A	APIs: Payment v		athan (CFPB)
Hi Chris,			
I don't believe we want to lose all our his understand what we are losing and how payment if possible.			
Thank you,			
Shannon Files			
	nology and Inv	aration	
Director of Data and Analytics Tech		iovation	
Consumer Financial Protection Burea	iu (CFPB)		
From: CFPB_DigitalAnalytics			

Date: Monday, March 3, 2025 at 3:44 PM Filed 03/04/25 Page 97 of 108

To: Files, Shannon (CFPB)

Flugel, Jonathan (CFPB)

Subject: Fw: Google Cloud Platform & APIs: Payment was declined for

Forwarding for awareness. We will loose all historical data if this is not update with valid payment.

From: Google Payments <payments-noreply@google.com>

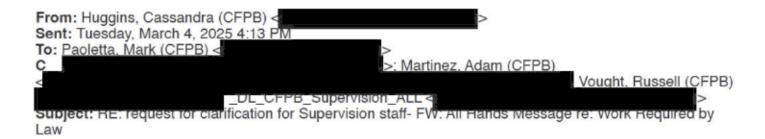
Sen

To:

Subject: Google Cloud Platform & APIS: Payment was declined for

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 98 of 108

Exhibit FF



Mark,

I am acknowledging that I received and read your email.

I am attaching, as requested, the email that I sent to Supervision staff. I did not provide this email to the media, and I do not know who did.

I did not intend to undermine the new administration's ability to supervise agency staff- my only intention was to ensure that our staff did not act against the direction in the February 8 email from Acting Director Vought to cease all supervisory and examination activity. I will work with Supervision leadership to prepare the reports you have requested, and will request that all supervision staff provide the information you requested, by the stated deadline.

Thank you.

Cassandra Huggins Principal Deputy Assistant Director | Supervision Policy & Operations Mobile:

Consumer Financial Protection Bureau consumerfinance.gov

Confidentiality Notice: If you received this email by mistake, you should notify the sender of the mistake and delete the e-mail and any attachments. An inadvertent disclosure is not intended to waive any privileges.

```
From: Paoletta, Mark (CFPB) <
Sent: Tuesday, March 4, 2025 4:51 PM

To: Huggins, Cassandra (CFPB) <
IMARTINEZ, Adam (CFPB)

Vought, Russell (CFPB)

Subject: RE: request for clarification for Supervision staff- FW. All Hands Message re: Work Required by

Law
```

Good afternoon, Cassandra,

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 100 of 108

I am writing to raise significant concerns regarding an internal agency communication you apparently sent yesterday that directly contradicts an email from me to all CFPB staff about my direction for all staff to perform all statutorily required work.

In an email Adam Martinez sent on Sunday (March 2nd) conveying a message from me to the entire CFPB staff, I directed ALL CFPB staff to perform all work required by law and that they did not need to seek prior approval to do so. Nothing I have said or written since then contradicts that. You reached out to me yesterday, and as I am dual hatted and have job duties at OMB, I was not able to review and respond to your email yesterday. But I read a news report in Reuters that you reportedly sent an internal agency communication claiming that "We have requested and received clarification that their message was not intended to authorize the reinstatement of supervision/examination activity, even though the Bureau is required by law to carry out these activities."

Importantly, you did not receive that message from me. You apparently relied on an email from Adam, but his email refers you to Acting Director Vought's February 8th email which specifically states that you are to perform any work "required by law." And he encouraged you to communicate with me, and presumably, wait to hear from me before sending out an email that directly contradicted my message on March 2nd to CFPB employees.

I am concerned that you sent out an internal agency communication on such an unfounded basis that is false and directly contradicts my March 2nd message without first getting confirmation directly from me. Your actions severely undermine the Agency leadership's ability to supervise the agency staff and to ensure that statutorily required duties are being performed.

Moreover, your internal communication somehow made its way to the press, further undermining our efforts to supervise agency staff.

Let me be clear to you and the entire supervision office, which I have cc'd on this email: You are authorized and directed to work on matters specifically required by statute. That said, it is of course within the new leadership's discretion as to what matters CFPB will focus on.

The Bureau's new leadership seeks to understand the status of all of the agency's actions so it can align such actions to the Bureau's new priorities consistent with law. We have been aided in doing so by reports prepared by the Enforcement Division, Legal Division, and Office of Regulations showing the status of all actions within their respective purview, upcoming deadlines, statutory requirements, and other relevant matters. Such information is vital to allowing new leadership to ensure the Bureau is faithfully executing the law. And in fact, I have approved numerous requests from these and other divisions to perform work that is statutorily required or mission-aligned with the new leadership.

Accordingly, I am directing you to prepare a report for the Bureau's leadership providing a description of all pending examination actions, including their current status. Provide the name of the lead CFPB examiner on each matter, and the contact information for the lead attorney for the company under examination.

As part of this report, please flag any particular actions that you believe are specifically required by statute. Leadership will review it and determine which actions to continue to pursue and to close.

Additionally, please notify every employee in your division to provide to me a written summary of the specific matters they are working on, with the name of the entity being examined, how the matter was commenced and approximately how many hours they have spent on the matter.

Please submit your report and direct every employee in your division to submit their response to me by COB Monday, March 10th.

Please confirm by 6 pm today that you have received and read this email.

Please forward to me by 6 pm the internal agency communication you reportedly sent that is quoted in the Reuters news report.

Finally, did you provide your internal agency communication to the media or do you know who provided it? Please provide your answer to me by 6 pm today.

Thank you for your prompt attention to this matter.

Mark

Mark Paoletta Chief Legal Officer CFPB

From: Huggins, Cassandra (CFPB) < Sent: Monday, March 3, 2025 10:33 AM

To: Paoletta, Mark (CFPB) < Cc: Hagins, Calvin (CFPB) <

Subject: request for clarification for Supervision staff- FW: All Hands Message re: Work Required by Law

Good morning Mark,

I've received a number of messages from staff who are understandably confused by the information in the email sent by Adam Martinez. I would like to get clarification on what exactly Supervision staff is expected to be doing. I did reach out to Adam, and although he did say that supervision/examination activity is not to resume, he encouraged me to reach out to you directly for confirmation.

The Acting Director's February 8 message directed the stoppage of all supervision and examination activity, despite the fact that the work is required by law (12 CFR 1024, 1025, and 1026 require the Bureau to conduct such supervisory activities). We've also stopped all work supporting supervision and examination activity, including operational activities such as policy/procedure development; quality management reviews; systems and registration oversight; reporting, analytics, monitoring, exam prioritization/scheduling; and human capital activities that support supervision. We've also told staff to not engage in activities requiring coordination with parties outside of the Bureau, including coordination with other federal/state regulatory agencies, participation on FFIEC task forces/subcommittees, or engagement with supervised entities.

Supervision staff has been authorized to work on some isolated tasks (unwinding the larger participants payments rule, a handful of briefings/information gathering for Sr. leadership, and administrative tasks like WebTA/Concur approval), but otherwise it is my understanding that they should continue to operate on administrative leave unless a discrete activity has been approved. Please confirm that the message you sent is not intended to authorize the reinstatement of supervision/examination activity and the activities that support this function despite the fact that the Bureau is required by law to conduct these activities.

Thanks, Casey Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 102 of 108

Cassandra Huggins

Principal Deputy Assistant Director | Supervision Policy & Operations

Mobile:

Consumer Financial Protection Bureau consumerfinance.gov

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From: Martinez, Adam (CFPB) < Sent: Sunday, March 2, 2025 3:33 PM

Cc: Paoletta, Mark (CFPB) < >
Subject: All Hands Message re, vvork Required by Law

Message from Mark Paoletta, Chief Legal Officer

On behalf of Acting Director Vought, I am writing to you to ensure that everyone is carrying out any statutorily required work, as he set forth in his February 8th email.

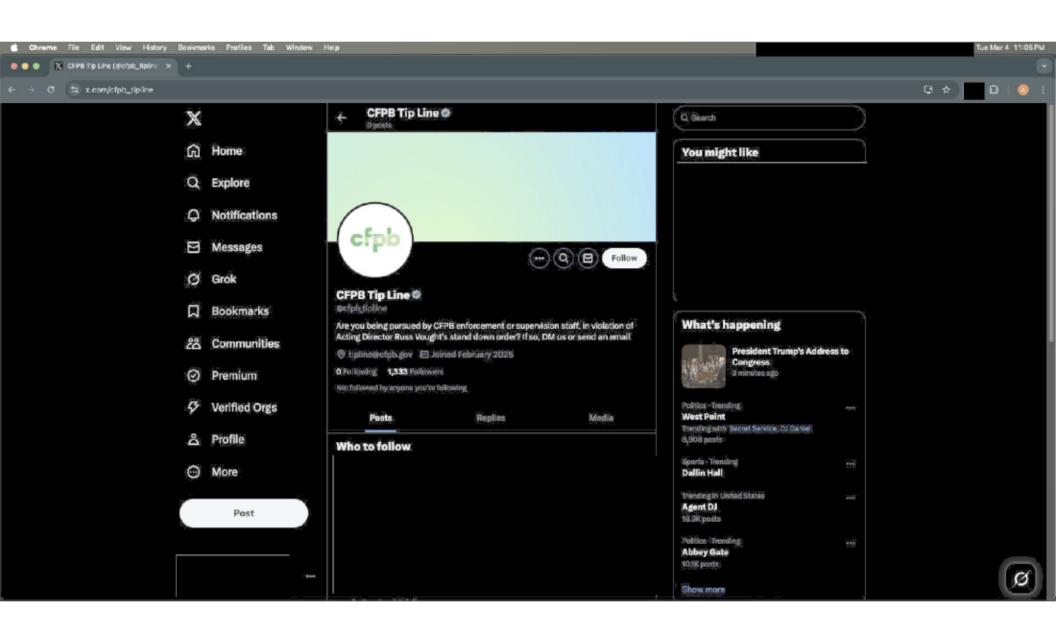
On February 8, 2025, you received an email from Acting Director Vought directing you to halt several classes of work unless "required by law" or expressly approved by the Acting Director. On February 10, 2025, you received an email from Acting Director Vought directing you to reach out to me for the authorization required by the February 8 email. These measures were intended to ensure that new leadership could establish operational control over the agency while ensuring that it would continue to fulfill its statutory duties. Many of you understood this and continued to perform functions required by law and sought approval from me to perform work, which I have promptly granted.

It has come to my attention, however, that some employees have not been performing statutorily required work. Let me be clear: Employees should be performing work that is required by law and do not need to seek prior approval to do so. If you have any questions, please reach out to me immediately, and I will promptly give you an answer and authorization if warranted. If you are aware of other employees that are needed to assist you in performing a statutorily required task but are not doing so, please raise this with me immediately.

Thank you for your attention to this matter.

Mark Paoletta Chief Legal Officer CFPB Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 103 of 108

Exhibit GG



Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 105 of 108

Exhibit HH

LIVE NOW



March 4, 2025

President Donald J. Trump immediately undertook a bold, necessary effort to downsize the federal government by ending the waste, fraud, and abuse that has permeated virtually all aspects of the bureaucracy — making sure government works for the taxpayers who fund it.

President Trump <u>established</u> the Department of Government Efficiency
 (DOGE) to maximize government productivity and ensure the best use of
 taxpayer funds — which has already achieved <u>billions of dollars in</u>
 <u>savings</u> for taxpayers.

- President Trump <u>commenced</u> his plan to downsize the federal bureaucracy and eliminate waste, bloat, and insularity.
 - President Trump <u>ordered</u> federal workers to return to the office five days a week.
 - President Trump <u>ordered</u> federal agencies hire no more than one employee for every four employees who leave.
 - President Trump <u>ended</u> the wasteful Federal Executive Institute,
 which had become a training ground for bureaucrats.
 - President Trump <u>ordered</u> the termination of all federal Fake News media contracts.
- President Trump is reigning in agencies overtaken by unelected bureaucrats.
 - President Trump stopped the <u>waste, fraud, and abuse within</u>
 <u>USAID</u> ensuring taxpayers are no longer on the hook for funding the pet projects of entrenched bureaucrats, such as sex changes in Guatemala.
 - President Trump <u>ordered</u> the Consumer Financial Protection Bureau

 the brainchild of Elizabeth Warren, which <u>funneled</u> cash to left-wing advocacy groups to halt operations.
 - The Environmental Protection Agency <u>canceled</u> tens of millions of dollars in contracts to left-wing advocacy groups, <u>announced</u> an investigation into a scheme by Biden EPA staffers to shield billions of dollars from oversight and accountability, and <u>put</u> 168 "environmental justice" employees on leave.
 - President Trump <u>reversed</u> the massive <u>over-expansion</u> of the IRS that took place during the Biden Administration.
 - President Trump <u>ordered</u> a review of funding for all nongovernmental organizations so taxpayers are no longer funding

Case 1:25-cv-00381-ABJ Document 57-2 Filed 03/04/25 Page 108 of 108 those that undermine America's interests.

- The review <u>identified</u> 15,000 grants worth \$60 billion for potential elimination.
- The Department of State issued a "pause" on existing foreign aid grants to ensure accountability and efficiency.
- President Trump <u>shut down</u> the wasteful Biden-era "Climate Corps" program.
- President Trump <u>lifted</u> last-minute collective bargaining agreements issued by the Biden Administration, which sought to impede reform.

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