

EXHIBIT A

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

CENTRO DE TRABAJADORES
UNIDOS, et al.,

Plaintiffs,

v.

SCOTT BESSENT, in his official
capacity as Secretary of the Treasury, et
al.,

Defendants.

Civil Action No. 25-677 (DLF)

DECLARATION OF KATHLEEN EVEY WALTERS

I, Kathleen Evey Walters, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am employed as the Chief Privacy Officer in the Internal Revenue Service (IRS). The Chief Privacy Officer oversees the Office of Privacy, Governmental Liaison and Disclosure (PGLD), a business unit within the IRS. PGLD is responsible for protecting the privacy of sensitive return and return information of taxpayers and employees, and enforcing the confidentiality provisions of 26 I.R.C. § 6103.
2. As the Chief Privacy Officer, my duties include overseeing the management of this multi-faceted privacy program, ensuring compliance with the Privacy Act, the Freedom of Information Act, the Federal Records Act and 26 U.S.C. § 6103. In addition, I also oversee data exchanges with federal, state and local government agencies and IRS authentication activities, as well as safeguarding federal tax return and return information in the possession of the IRS exchange partners. As

part of this program, I am required to review certain requests to share tax return information and determine, in coordination with the IRS Office of Chief Counsel, whether such disclosures would be permissible under 26 U.S.C. § 6103.

3. As of March 17, 2025, the IRS has not disclosed to the Department of Homeland Security any of the tax return information discussed in the complaint.
4. To the best of my knowledge, and based on my review of the IRS's records, between January 20, 2025, and March 17, 2025, neither President Trump nor the White House has made any requests to the IRS for tax return information for immigration enforcement under Section 6103(g)(1) or otherwise.

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

Executed on March 17, 2025

Kathleen E.
Walters

Digitally signed by Kathleen E.
Walters
Date: 2025.03.17 22:39:16
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