

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

AMERICAN FEDERATION OF
TEACHERS, *et al.*,

Plaintiffs,

vs.

SCOTT BESSENT, *et al.*,

Defendants.

Case No. 8:25-cv-00430

DECLARATION OF BRIAN BRYANT

I, Brian Bryant, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts in this declaration.
2. I am the International President of the International Association of Machinists and Aerospace Workers (“IAM”). IAM is an international labor organization and unincorporated membership organization headquartered in Upper Marlboro, Maryland. IAM is one the largest and most diverse labor unions in North America with nearly 600,000 active and retired members. Among IAM’s affiliate organizations is the National Federation of Federal Employees (“NFFE”), which is a national labor organization and unincorporated membership organization headquartered in Washington, D.C.
3. Together, IAM and NFFE represent more than 100,000 federal workers, approximately 13,000 of whom are dues-paying members, from agencies across the federal government. IAM and NFFE also represent many veterans

and veterans' groups, advocate on their behalf, and assist them in receiving their benefits, among other services.

4. IAM and NFFE represent our federal sector members through negotiating collective bargaining agreements and assisting employees with enforcing them. We assert contractual and statutory rights on behalf of our federal sector members by filing grievances, unfair labor practice charges, or other complaints through our negotiated grievance procedure or with various federal agencies, including the Federal Labor Relations Authority, the Merit Systems Protection Board, the Office of Special Counsel, and the Federal Labor Relations Authority. IAM and NFFE file litigation on employees' behalf in the courts. We also advocate on Capitol Hill and in the media on issues of importance to federal workers and to veterans.
5. Both IAM and NFFE have Veterans Committees that advocate on behalf of our members who are veterans. Annually, the IAM sponsors two one-week educational classes. One class teaches our members how to start a Veterans Committee in their community to advocate for their issues in their home state. That class includes a component about what benefits veterans are entitled to receive. The second class focuses on training veteran members on how to assist each other in applying for benefits, while also educating them about the importance of maintaining confidentiality concerning the private records submitted to the government to obtain those benefits.
6. As part of our missions IAM and NFFE also provide extensive services applying for and securing payment of benefits to our members who are veterans. When veteran members are having difficulty obtaining the benefits they earned, we assist them and their family members in the preparation, presentation, and prosecution of claims of benefits with the Department of Veterans Affairs. Benefits include disability compensation, education, Veterans Readiness & Employment, home loans, life insurance, pensions, health care, and burial benefits. These claims include the most sensitive medical and financial information concerning the veteran, such as social security numbers, healthcare records, bank account information and dates of birth.

7. Because federal employees and retirees have extensive amounts of personally identifiable information housed in their personnel records, federal payment systems, and student loan records, IAM and NFFE advocacy efforts include assisting their members in seeking redress for federal agencies' unlawful disclosures of members' sensitive data.
8. For example, we frequently negotiate provisions in our collective bargaining agreements to protect the privacy and accuracy of employees' personnel files by ensuring employees can access, review, and correct errors within their official personnel folders or any other regularly-maintained record or file regarding their employment. Personnel records are often the basis for calculating retirement eligibility or benefits, determining eligibility for career ladder promotions or within-grade increases in pay, assessing whether an employee has vested appeal rights and civil service protections upon completing a probationary period, and placement options in the event of a Reduction-in-Force.
9. IAM and NFFE negotiate into collective bargaining agreements rights for employees to have personally identifiable information and medical information provided only to federal employees with a business need to know. Employees who request reasonable accommodations in connection with their employment due to a health condition often need to submit medical records through processes the union negotiates to maintain confidentiality to the maximum extent possible. NFFE uses our National Consultation Rights at several agencies to comment on proposed changes to agency policies that impact our members' sensitive data. IAM and NFFE regularly train and educate our members on their rights to maintain confidentiality, the extent of those rights, what the agency is lawfully permitted to solicit and maintain, and how to advocate for themselves in the workplace using union-negotiated procedures. NFFE and IAM file and pursue grievances, or litigation, like this one, when members' privacy rights have been violated.

10. I am aware of and can identify individual IAM and NFFE members who have federal student loan debt, and/or are federal employees, and/or who have records housed within OPM and Department of Education records systems and/or who are veterans whose personally sensitive data is submitted in the effort to receive benefits and receive payments from the United States Treasury. Specifically, I am aware of individual members with personally identifiable information contained in the payment systems of Treasury's Federal Disbursement Services; in the federal work files of OPM, including USAJOBS and the Electronic Official Personnel Folder, among others; and in the Department of Education's National Student Loan Data Systems, Common Origination and Disbursement System, FUTURE ACT System, and Financial Management System.
11. I am aware that sensitive information about IAM and NFFE members is contained in these record systems, including Social Security numbers, bank account numbers, medical records, details of personal finances, and personnel information. Improper disclosure of this information increases the risk of access by external actors, doxxing, identity theft, invasion of personal privacy, and financial crimes against IAM and NFFE members. Introducing sensitive personal data into artificial intelligence systems enhances these risks.
12. I am not aware of any IAM or NFFE member who has requested or authorized DOGE or its representatives to access their personal data.
13. I am aware of and can identify individual members whose right to privacy has been violated by such disclosures.
14. I am aware of and can identify individual federal employee members who received an email from OPM on their federal agency account with the subject "Fork in the Road," detailing a plan for federal employees to immediately resign their positions.
15. We have heard from members who are concerned about risks posed by DOGE and its representatives having access to their personally identifiable information. They are concerned about publication or exporting of their

personally identifiable information, including mail and email addresses, phone numbers, bank information, medical records and Social Security numbers. They fear exposure of their salary history, their job application history, and their disciplinary records. They fear their information could be exported for nefarious purposes, used in retaliation, or altered. Some members have told us that in addition to the identity theft and personal safety risks, they are concerned about the national security risk posed if their information were to make it into the hands of foreign governments like China. Our members have expressed concern that access by DOGE and its representatives to their personally identifiable information has made it possible for unauthorized surveillance and corruption of their home networks and personal devices.

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

Executed: February 12, 2025

_____/s/*_____
Brian Bryant

*Counsel hereby certifies that he has a signed copy of the foregoing document available for inspection at any time by the court or a party to this action.