

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 WILLIAM SHACKELFORD

I, William Shackelford, 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 President of the National Active and Retired Federal Employees Association (“NARFE”). NARFE is a nonprofit organization founded in 1921, incorporated in the District of Columbia, and headquartered in Alexandria, Virginia, with a membership of approximately 128,000 current and former federal employees as well as spousal annuitants.
3. NARFE’s mission is to promote the general welfare of current federal civilian employees and federal retirees and their survivors, to advise and assist them with respect to their federal benefits, to represent their interests before appropriate authorities, and to support legislation and regulations beneficial to such employees and retirees and to oppose those detrimental to their interests. As part of this mission, NARFE assists its members in various ways in applying for and securing the payment of federal employment and retirement benefits.
4. Because federal employees and retirees have extensive amounts of personally identifiable information housed in their personnel records, payment systems, and student loan records, it is part of NARFE’s mission and purpose to call on federal

agencies to vigorously protect the privacy of NARFE members' digital information.

5. I am aware of and can identify individual NARFE 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 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.
6. I am aware that sensitive information about NARFE members is contained in these record systems, including Social Security numbers, bank account numbers, 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 NARFE members. Introducing sensitive personal data into artificial intelligence systems enhances these risks.
7. I am not aware of any NARFE member who has requested or authorized DOGE or its representatives to access their personal data.
8. I am aware of and can identify individual members whose right to privacy has been violated by such disclosures.
9. 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.
10. Throughout NARFE, our members have expressed that unauthorized access to their personal information by DOGE and its representatives creates a risk of identity theft and financial fraud. Many of our members had high-level security clearance and were involved in sensitive matters while performing their daily duties. As such, they are concerned about political targeting, retribution and legal action being initiated against them. Our members are concerned that the information in the secure federal databases could be compromised and that their annuities and social security benefits would be impacted. Additionally, many of

our members are also veterans of the military and are concerned that healthcare benefits could be affected by delay or cancellation.

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

Executed: February 12, 2025

_____/s/*_____
William Shackelford

*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.