

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 JASON CAIN
IN SUPPORT OF MOTION FOR TRO**

I, Jason Cain, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts in this declaration.
2. I live in North Carolina and currently work as an instructor of political science at Wake Technical Community College.
3. I am a military veteran. From 2000 to 2010, I served in the U.S. Army, as Sergeant First Class in the U.S. Army Special Operations Command and the 82nd Airborne. In that role, I had a Top Secret security clearance.
4. I currently receive financial benefits from the federal government, including veterans' disability compensation from the Veterans Administration.
5. I have previously received other financial benefits from the federal government, including GI bill benefits and a home loan from the Veterans' Administration and student loans from the Department of Education.
6. I also worked for the federal government from 2012 to 2015 as Director of Intergovernmental Affairs at the Veterans Administration.

7. As a result of my military service, employment in the civil service, and the financial benefits I receive, federal government agencies, including the Office of Personnel Management, the Department of Education, and the Department of Treasury, have sensitive personal information about me in their record systems.
8. At the Office of Personnel Management, this information includes my social security number, employment history, address, phone number, demographic information. At the Department of Treasury, this information includes my social security number, date of birth, bank account information, and home address. At the Department of Education, this information includes my social security number, bank records, tax returns, home address, employment data, documentation of marital status, family financial status and records, and demographic data, in addition to similar information for my family members.
9. I provided this personal information in order to access essential services like employment, disability payments, and funds to help with educational expenses. When I provided the information, I expected that the data would be used to facilitate my access to these services and only for legally authorized purposes. I also expected that the government would zealously safeguard access to that information.
10. I feel that my right to privacy has been violated by the government's choice to disclose information to DOGE representatives, who appear to be using it for purposes that have nothing to do with why I provided the data. I did not request disclosure of my personal information to DOGE representatives or provide written access authorizing such disclosure. My concerns are amplified because, based on news reports, at least some of the DOGE representatives are recent high school graduates or college students with a checkered history on data security. Further, I am concerned about the potential disclosure of my information to AI tools and software.
11. My federal government benefits accounts have been previously hacked. As a result, my disability and education benefits were diverted to criminal enterprises. When that happened, I experienced both fear and helplessness as my funding was inaccessible to me and depleted by third parties.
12. I am anxious about repeating this ordeal, now made more likely by DOGE's recent unauthorized access to my personal information. I am outraged that the federal government facilitated this data breach at all, given the extreme caution with which I was trained to handle sensitive information both during my time in

the military and when I worked at the Veterans Administration. And I am especially galled that my personal information has been transmitted to individuals who appear to have little regard for data privacy.

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

Executed: February 11, 2025.

_____/s/*_____
Jason Cain

*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.