

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 KRISTOFER GOLDSMITH
IN SUPPORT OF MOTION FOR TRO**

I, Kristofer Goldsmith, 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 New York and currently work as the president and CEO of Task Force Butler Institute, whose mission is to combat domestic extremists.
3. I am a military veteran. From 2004 to 2007, I served in the U.S. Army. I joined as a Forward Observer, deployed to Iraq in 2005, and left as a Sergeant.
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 student loans from the Department of Education.
6. As a result of my military service and the financial benefits I currently and have previously received, federal government agencies, including the Department of Education and the Department of Treasury, have sensitive personal information about me in their record systems.
7. 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, as well as job loss and demographic data, in addition to similar information for my family members.

8. I provided this personal information in order to access essential services like 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.
9. 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.
10. I am deeply concerned that my personal information has been compromised and angry that federal agencies appear to have facilitated this breach of my privacy. I am worried that my personal information, having been exposed to unauthorized individuals, may be exploited by domestic extremist organizations to harass, intimidate, and harm me and my family.
11. My concerns are only heightened by the presidential pardons of many domestic extremists who participated in the January 6 insurrection, and Elon Musk's apparent support of those pardons. Indeed, news reports indicate that DOGE representatives have amplified content from white supremacist Nick Fuentes, been associated with a cybercriminal network that engages in hacking and extortion, and have promoted explicit racial hatred. The reported support by DOGE representatives for entities that I target in my work combating domestic extremism makes it all the more likely that these individuals would leak my personal information to these malicious actors. As a result, I fear those malicious actors will seek to target me using my breached personal information.
12. While I had already taken some proactive measures to protect my personal information and physical security, I have taken additional remedial measures in

response to the government-facilitated breach of my privacy to DOGE representatives. Fearing that my data may have already been released by DOGE to domestic extremists, I am more protective of my physical security. I previously carried a firearm on my person in my home when a neo-Nazi threatened my family. Because of the DOGE breach, as of last week, I am now carrying in my own home again. I also called my local police station earlier this week to alert them that there's an increased risk of an attempted SWATing attack or other security event to try to encourage a measured response. And my wife and I are much more vigilant about checking our security cameras since the breach. She has asked me to cancel my work trips because she is scared of being at our home alone in light of the elevated security risks from the breach.

13. This unlawful data access puts my life and my family at risk. These are not abstract concerns—they're potentially deadly. I have already been targeted by domestic extremist groups in the past. Reports of DOGE representatives' links to white supremacist networks and cybercriminals only make the risk more acute. I feel that the risk of my data being leaked and weaponized against my family has never been higher. The psychological toll of this privacy breach is immense.

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

Executed: February 11, 2025.

_____/s/*_____
Kristofer Goldsmith

*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.