

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 CLIFFORD “BUZZ” GRAMBO  
IN SUPPORT OF MOTION FOR TRO**

I, Clifford “Buzz” Grambo, 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 Maryland and am currently retired.
3. I am a military veteran. I served in the U.S. Navy for 20 years, retiring as Chief Petty Officer.
4. I currently receive financial benefits from the federal government, including veterans’ disability compensation and a military pension, both from the Veterans Administration.
5. As a result of my military service and the financial benefits I receive, federal government agencies, including the Department of Treasury, have sensitive personal information about me in their record systems.
6. At the Department of Treasury, this information includes my social security number, date of birth, bank account information, and home address.
7. I provided this personal information in order to access essential services like disability payments and my military pension. 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.

8. 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.
9. I worry that the unauthorized disclosure of my personal information makes it more likely that I will be targeted for doxxing, identity theft schemes, or other harmful uses of my data.
10. I am also deeply offended by the federal government facilitating this unauthorized disclosure of my personal information. It is a violation of the rule of the law for the government to enable access of my personal information to an unelected so-called "department" head who appears to be a threat to national security and the DOGE representatives who do not seem to have been subjected to an actual background check. This lawlessness by the federal government betrays the democratic values I sought to protect through my military service.

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

Executed: February 11, 2025.

\_\_\_\_\_/s/\*\_\_\_\_\_  
Clifford "Buzz" Grambo

\*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.