

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 SARAH TAMMELLEO**

I, Sarah Tammelleo, 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 Senior Director of Research and Strategic Initiatives for the American Federation of Teachers. In my role I oversee the national union's Research Strategic Initiatives and Economic issues department which is responsible for AFT's work related to research and economic issues including but not limited to, student debt, consumer issues, wages, healthcare benefits, and retirement security.
3. The American Federation of Teachers is a national labor organization headquartered in Washington, D.C., representing over 1.8 million members who are employed as pre-K through 12th-grade teachers, early childhood educators, paraprofessionals and other school-related personnel; higher education faculty and professional staff; federal, state, and local government employees; and nurses and other healthcare professionals.

4. For over a decade, AFT has been fighting to help teachers and nurses burdened by student debt receive Public Service Loan Forgiveness (“PSLF”) through the Department of Education. The national union has hosted hundreds of student debt clinics for tens of thousands of its members and has helped its members apply for relief through the PSLF program. In addition, AFT assists its members in applying for and securing payment of various federal employment, disability, and retirement benefits. For example, many local affiliates offer clinics and webinars to advise members how to obtain and file for benefits including but not limited to, Medicare and Social Security.
5. Because part of the process by which member teachers and nurses apply for federal loans, benefits, and employment involves sharing members’ personal data, AFT also advocates for the ethical use of artificial intelligence and enforcement of government regulations that protect its members’ personal data. Stated differently, as part of AFT’s mission and purpose of supporting educators who interface with the federal government, AFT advocates for the protection and safeguarding by various federal agencies and departments of AFT members’ personal data. For example, AFT has been working with an external organization to train leaders and members to secure and protect data, and AFT offers cyber insurance through the union’s extensive national member benefits program.
6. I am aware of and can identify individual AFT 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.

7. I am aware that sensitive information about AFT 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 AFT members. Introducing sensitive personal data into artificial intelligence systems enhances these risks.
8. I am not aware of any AFT member who has requested or authorized DOGE or its representatives to access their personal data.
9. I am aware of and can identify individual members whose right to privacy has been violated by such disclosures.
10. 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.
11. I have personally heard from student loan borrower members who are concerned about the risks to their privacy and data security posed by unvetted and unqualified people associated with DOGE going through their personal and financial data.

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

Executed: February 12, 2025

\_\_\_\_\_/s/\*\_\_\_\_\_  
Sarah Tammelleo

\*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.