

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATIONAL TREASURY
EMPLOYEES UNION, *et al.*,

Plaintiffs,

v.

RUSSELL VOUGHT, in his official capacity
as Acting Director of the Consumer Financial
Protection Bureau, *et al.*,

Defendants.

Case No. 25-cv-381-ABJ

**NOTICE OF DECLARATIONS IN SUPPORT OF MOTION FOR
ORDER TO SHOW CAUSE**

This afternoon, the plaintiffs filed a motion for an order to show cause after learning that the defendants were in the process of issuing reduction-in-force notices to nearly all of the CFPB's employees. Since that motion was filed, the plaintiffs have learned more about the scope of the RIFs. The attached declarations are being filed to provide the Court with a fuller picture of the defendants' actions, which include firing all or virtually all employees in divisions, offices, units, and teams necessary to fulfill the Bureau's statutory functions. For example, we believe that the Bureau fired all or virtually employees in:

- The Office of Servicemember Affairs. *Contra* 12 U.S.C. § 5493(e)(1).
- The Office of Older Americans. *Contra* 12 U.S.C. § 5493(g)(1).
- The Office of Fair Lending. *Contra* 12 U.S.C. § 5493(c)(1).
- The Office of Community Affairs. *Contra* 12 U.S.C. § 5493(b)(2).
- The Office of Consumer Response, with the exception of 8 people. This includes the supervisor of the escalated case management team and at least 6 of his 7 direct reports (the last one is on vacation and so has not determined whether they received a RIF

notice). *Contra* 12 U.S.C. § 5493(b)(3)(A).

- The Research, Monitoring, and Regulations Division. *Contra, e.g.,* 12 U.S.C. §§ 5493(b)(1), 5512(c); 15 U.S.C. §§ 1616, 1637(r)(3).
- The Office of Supervision Policy except the head of the Office, and everyone in Office of Supervision Examinations except the head of the Office. *Contra* 12 U.S.C §§ 5514(b), 5515(b).
- The Home Mortgage Disclosure Act operations team, which ensures that the Bureau can fulfill its obligations under the Home Mortgage Disclosure Act and Truth in Lending Act. *See* 15 U.S.C. § 1639c(b)(2)(B).
- The Office of Financial Education. *Contra* 12 U.S.C. § 5493(d)(1).
- The Disability and Accessibility Program. *Contra* 29 U.S.C. § 794 (CFPB is obligated to comply with the Rehabilitation Act).

In addition to violating the provisions of this Court’s order regarding terminations and work stoppages discussed in the plaintiffs’ motion, this evidence demonstrates that the defendants have violated other provisions too. The defendants must, for instance, ensure that they do not “impair any data or other CFPB records.” Dkt. 88 ¶ 4. But among the employees that the defendants just sent RIF notices to, and immediately stopped from working, are every employee from the team “that oversees the contractors managing the CFPB’s network, including the system in which CFPB data is stored, which requires regular maintenance and back-up.” Bennett Decl. ¶ 4. The defendants also must continue to fulfill their statutory obligations in the Office of Consumer Response and provide escalated case management. *See* Dkt. 88 ¶ 6. But they’ve just fired all but 8 of the employees that work in the Office of Consumer Response, including the supervisor of the escalated case management team and at least 6 of his 7 direct reports. Bennett Decl. ¶ 4; Emory Doe Decl.

¶¶ 4–5.

Respectfully submitted,

/s/ Deepak Gupta

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