

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

DECLARATION OF JENNIFER BENNETT

I, Jennifer Bennett, declare as follows:

1. I am a principal at Gupta Wessler LLP and am counsel for the plaintiffs in this case.
2. Around 2:30pm ET on April 17, 2025, we began to receive word that the CFPB was sending out reduction-in-force notices. As we understand it, approximately 90% of the Bureau's employees have received these notices.
3. The termination notices state that the employees' access to CFPB's systems will end on April 18, 2025 at 6pm ET.
4. We still do not have complete information about exactly who was terminated. But the information we do have suggests that it at least included everyone or almost everyone in the following divisions, offices, and units:
 - All of consumer response, with the exception of 8 managers
 - Everyone on 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
 - Virtually everyone in the Research, Monitoring, and Regulations Division, including the entire Office of Research, except the Assistant Director; all of Markets, except the

head; virtually all of Regulations; and virtually everyone in the Office of Consumer Populations

- Everyone in the Office of Supervision Policy except the head of the Office
- Everyone in Office of Supervision Examinations except the head of the Office
- Virtually everyone in the Office of Consumer Populations, including the entire Office of Servicemember Affairs and the Office of Older Americans
- Everyone working on natural disaster response
- Everyone in the Office of Fair Lending
- All of the Home Mortgage Disclosure Act operations team
- All of the Office of Civil Rights, with the exception of the Director.
- The entire general law and ethics staff
- The entire Office of Financial Education, except two managers.
- Every staff member in the Disability and Accessibility Program, which ensures that the Bureau can reasonably accommodate people with disabilities and that its public materials are in compliance with the Rehabilitation Act.
- Virtually everyone in each of the following offices: FOIA, Privacy, Records, Security, and Cybersecurity
- The vast majority of enforcement employees, including the entire e-discovery team, all investigators, and all economists
- Virtually everyone in External Affairs
- Everyone in the Office of Community Affairs
- The legal team in the CFPB's front office

5. We do not believe that this is a complete list of the divisions, offices, and units that were eliminated or virtually eliminated.

6. As recently as Monday, April 14, 2025, the CFPB was telling employees that leadership had not made a decision on any reduction-in-force plan. An email from the Office of Human Resources to a CFPB employee to this effect is attached as **Ex. A**. We believe the person who sent

this email has herself received a reduction-in-force notice and will have her access shut off on April 18 at 6pm ET.

7. We have been informed that Chief Operating Officer Adam Martinez repeatedly stated that CFPB leadership would not consult managers of the programmatic units of the Bureau in determining who would be terminated—and that managers were not, in fact, consulted.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed in San Francisco, CA on April 17, 2025.

/s/ Jennifer Bennett
Jennifer Bennett

Exhibit A

From: Varden, Cynthia (CFPB) <[REDACTED]>
Sent: Monday, April 14, 2025 8:05 PM
To: [REDACTED]
Cc: Shen, Daniel (CFPB) <[REDACTED]>
Subject: RE: Retirement Questions

Hi [REDACTED]

Currently, CFPB does not have a policy or decision from senior leadership regarding the following topics:

- Reduction in Force (RIF) plan
- Severance Pay
- Retirement plan provisions/exceptions related to voluntary and involuntary separations

Any new policy or decision will require input and approval from CFPB leadership. While we do not have definitive guidance on these topics at this time, we are collecting Frequently Asked Questions (FAQs) so they can be addressed when we receive new guidance, and shared with CFPB employees as more information becomes available.

The OPM resource for severance and RIF topics, can be found here <https://www.opm.gov/search#severance>

I've copied my Supervisor Dani Shen, as you mentioned this inquiry is urgent, although I don't believe we have any additional information to provide at this time.

Thank you!
Cindy

From: [REDACTED]
Sent: Monday, April 14, 2025 7:30 PM

[REDACTED]