

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL
EMPLOYEES, AFL-CIO, and NATIONAL
ASSOCIATION OF GOVERNMENT
EMPLOYEES, INC.,

Plaintiffs,

v.

SCOTT KUPOR, in his official capacity as
Director of the Office of Personnel
Management, OFFICE OF PERSONNEL
MANAGEMENT, and THE UNITED
STATES OF AMERICA,

Defendants.

Case No. 1:25-cv-13305-GAO

**DECLARATION OF FEDERAL WORKER 2 IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

**DECLARATION OF FEDERAL WORKER 2 IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

I, Federal Worker 2, declare:

1. I am a resident of Colorado, and I am over the age of 18. I have personal knowledge of the facts set forth below and can competently testify to their truth.

2. I am a member of the American Federation of Government Employees.

3. I have worked for the federal government for well over a decade, first in the military and then as a federal civil servant. In the military I was deployed to a combat zone, where I put my life on the line for my country.

4. I currently work for the Department of Education.

5. I love working for the federal government, and until recently I would have described my current job as my dream job. My skills are well-suited to my work, and I enjoy problem-solving to ensure that taxpayer resources are used efficiently.

6. Even though I enjoy my current position, lately I have begun looking for jobs because the Trump Administration has announced its intent to dismantle the Department of Education. Many people I used to work with have been laid off, and I want to find a role with more job security.

7. Although I would ideally like to keep working for the federal government, I have not applied to any federal positions because of the new essay question on job applications that asks:

How would you help advance the President's Executive Orders and policy priorities in this role? Identify one or two relevant Executive Orders or policy initiatives that are significant to you, and explain how you would help implement them if hired.

8. Honesty is important to me, and I cannot in good conscience pretend to agree with President Trump's policies.

9. Even if the question is supposed to be optional, I believe it would be used against me if I don't answer. After all, the question is there for a reason.

10. Because I will not answer the essay question, I have been looking at job opportunities with the state government instead of the federal government.

11. I am using a pseudonym because I believe that if my identity is disclosed, I will lose my job.

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

Dated: November 5, 2025

/s/ Federal Worker 2
FEDERAL WORKER 2

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail.

/s/Warren A. Braunig
Warren A. Braunig