

**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 4 IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

**DECLARATION OF FEDERAL WORKER 4 IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

I, Federal Worker 4, declare:

1. I am a resident of the State of New York, 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 Department of Veterans Affairs for over two years. This is my first federal government job; prior to taking this job, I worked in state and local government.

4. I enjoy my job because it enables me to serve the public, especially veterans. I have expertise in my line of work, and it makes me feel fulfilled and useful. I like working for the federal government.

5. That said, I have been applying to new federal jobs, at different federal agencies, because I would like to be closer to my family. I've applied broadly to positions similar to mine, both within and outside my agency.

6. I have applied to over 10 jobs with the federal government.

7. Many of the job postings I have applied for include the question: "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. I am upset to see this question on job applications I'm filling out. As a federal employee, I have been careful not to discuss political affiliation, wear political items, or engage in political activity at work.

9. I did not want to answer this question because I don't want to talk about politics at work, I don't agree with most of what President Trump is doing, and I think the question is illegal to ask.

10. But I decided to answer the question anyway, because I was afraid not answering—or answering in a way that is not favorable to President Trump—would hurt my applications. To answer, I had to look through President Trump’s executive orders, the vast majority of which I disagreed with, to find one that I could discuss at least somewhat positively. I would not have done so if not for the question on job applications.

11. I am submitting this declaration under a pseudonym because I fear retribution if I speak out. I fear that if I were identified, I would face adverse employment action at work. I also fear that if I include my name or too much identifying information, it will become known to the agencies I am applying to for jobs, and I will not get the roles.

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

Dated: November 5, 2025

/s/ Federal Worker 4
FEDERAL WORKER 4

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