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16 **UNITED STATES DISTRICT COURT FOR THE**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19
20 AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
21 et al.,

22 Plaintiffs,

23
24 v.

25 UNITED STATES OFFICE OF
MANAGEMENT AND BUDGET, et al.,

26 Defendants.
27
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Case No. 3:25-cv-08302-SI

**SUPPLEMENTAL DECLARATION
OF CRYSTAL TAYLOR**

Pursuant to 28 U.S.C. § 1746, I, Crystal Taylor, declare as follows:

1. I am the Acting Chief Human Capital Officer and Director, Office of Human Resources Management at the Department of Commerce (Commerce), headquartered in Washington, D.C. I have served in this position since September 25, 2025.
2. In my role at Commerce, I am responsible for personnel management. I have the responsibility for tracking and recording personnel actions, including Reductions-in-Force (RIFs). I assist in ensuring that all personnel actions comply with court orders and federal law.
3. I am aware of and have reviewed the following orders issued by the Court in this action:
 - a. The October 15, 2025 Temporary Restraining Order (TRO); and
 - b. The October 17, 2025 Order Clarifying Temporary Restraining Order and Granting Plaintiffs' Motion to Modify (Modified TRO).
4. I understand that under the Modified TRO, the entities benefited by the TRO now include five national unions—AFGE, AFSCME, NFFE, SEIU, and NAGE—and two local California-based chapters, AFGE Local 1236 and AFGE Local 3172. Together, these seven entities are referred to below as “Plaintiffs.”
5. I also understand that, among other things, the Modified TRO provides definitions of terms used in the original October 15 TRO.
6. The Modified TRO requires Defendants to file, by 9:00 a.m. Pacific time on October 20, 2025, “the ‘accounting of all RIFs actual or imminent, that are enjoined by this TRO,’ consistent with the clarifications and modification herein, including by providing agency declarations that identify any RIFs that have been or are being

planned or prepared to be issued during the federal government shutdown, and including the information required to be included by the provisions of the October 15, 2025 TRO ('a description of the agency ... , the number of employees included in the enjoined RIF, and description of the PPAs that Defendants included in the enjoined RIF')."

7. I make this supplemental declaration to update certain information in my declaration of October 17, 2025, in response to the Modified TRO.

8. As stated in my declaration of October 17, 2025:

- a. Between October 1 and October 14, 2025, Commerce issued specific 60-day RIF notices to 281 people informing them that their positions would be abolished and they would be separated at the conclusion of the 60-day period.¹
- b. Between October 1 and 15, 2025, Commerce issued general RIF notices to 159 people informing them that Commerce was conducting a RIF, there was a possibility of separation as a result of the RIF, and they would be provided specific notice in the future if it was determined that they would be part of the RIF.

9. At present, there are two bureaus with employees represented by Plaintiffs at which Commerce has issued RIF notices.

10. First, as stated in my declaration of October 17, 2025, the U.S. Census Bureau, which has employees represented by AFGE, issued 108 RIF notices. The actual number of impacted employees is 102, as the U.S. Census Bureau erroneously sent out notices to six individuals who had recently separated from the agency. The PPAs involved are: (a) Current Surveys and Programs; and (b) Periodic Censuses and Programs.

¹ On Friday, October 17, 2025, Commerce reported that it had issued specific 60-day RIF notices to 282 people. The correct number is 281 as updated in this supplemental declaration.

1 11. Second, the Minority Business Development Agency (MBDA), which has employees
2 represented by NFFE and is subject to the Modified TRO, has issued 23 RIF
3 notices. The PPA involved is Minority Business Development.
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5 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
6 and correct.

7 Dated: October 20, 2025

8 /s/ CRYSTAL
9 TAYLOR

Digitally signed by
CRYSTAL TAYLOR
Date: 2025.10.20
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10 CRYSTAL TAYLOR
11 ACTING CHIEF HUMAN CAPITAL OFFICER
12 DIRECTOR, OFFICE OF HUMAN RESOURCES
13 MANAGEMENT
14 U.S. DEPARTMENT OF COMMERCE
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