

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO, *et al.*,

Plaintiffs,
vs.

SOCIAL SECURITY ADMINISTRATION,
et al.,
Defendants.

Civil Action No. 1:25-cv-00596

SUPPLEMENTAL DECLARATION OF LELAND DUDEK

I, Leland Dudek, hereby declare upon penalty of perjury:

1. I am the Acting Commissioner at the Social Security Administration (SSA), in Woodlawn, Maryland, and I have served in this role since February 16, 2025.
2. In my role as Acting Commissioner, I am responsible for the exercise of all powers and the discharge of all duties of the agency and have authority and control over all personnel and activities thereof. This includes assigning duties and authority to act to officers and employees of the agency, including information and systems access by SSA's DOGE Team.
3. I provide this declaration to provide the supplemental clarification sought in the Court's March 27, 2025, Letter to Counsel (ECF 64). These statements are made with my personal knowledge, discussion with SSA staff, and review of documents and information furnished to me in the course of my official duties.

4. During the March 27, 2025, telephone conference with the Court, I represented that paragraph 11 of my March 26, 2025, declaration (ECF 62-1) did not accurately describe the complete nature of this project. Paragraph 11 reads:

Employee 8 is working on direct-deposit change, new claim, and wage-reporting fraud detection (hereafter, “Fraud Detection”). The Fraud Detection Project is aimed at finding new ways to identify fraud in the foregoing areas. The Project involves looking for patterns of fraud in these filings on an individual case level. Anonymization is not feasible because it could obscure information useful for identifying fraud: for instance, name matching would not be possible. The data schemas to which Employee 8 needs access to obtain information necessary for this Project are the Numident, MBR, SSR, PROME, PCHIP, PVIP, and PVIPR schemas. These schemas are the lowest schemas available containing the information needed for this effort—i.e., there is no more restrictive schema that would provide access to the data.

5. The reason paragraph 11 of my earlier declaration was not complete was because I did not provide details about specifics of fraud detection efforts, due to their sensitive nature. Public dissemination of known fraud, fraud technique, or specific actions to combat specific types of fraud would assist bad actors in further perpetrating harm against the government.
6. This project is designed to respond to specific instances of known fraud in direct-deposit change (i.e., allowing an individual to change what bank account benefits payments are deposited into), new claims (e.g., claims for Supplemental Security Income (SSI) and Old-Age, Survivors and Disability Insurance (OASDI)) and wage-reporting (i.e., the amount of wages an individual reports to SSA, which directly impacts the amount of benefits the

person is entitled to receive). It is also designed to identify whether we can develop new ways to identify fraud. For example, we would like to identify if a higher-than-expected number of wage reports come from extremely young and extremely old individuals, as this would be suspicious and indicative of likely fraud.

7. The agency has a strong business need to identify fraud that it has not yet identified to ensure stewardship of agency funds. Even outside the SSA DOGE Team efforts, SSA employees pursue efforts, on an ongoing and daily basis, to detect fraud in agency programs.
8. Employee 8 plans to work with non-DOGE Team SSA employees in order to retrieve anonymized, aggregated data for the Fraud Detection Project, in order to look for anomalies that may be indicative of fraud. Employee 8 needs access to discrete individual data only when anomalies are identified, in order to detect fraud in specific instances.
 - a. The non-DOGE Team SSA employees creating the anonymized aggregate data sets would compile these aggregates from the following EDW schema: Numident, MBR, SSR, PVIPR, PVIP, PCHIP, PTCAS, PMISCS, PT16SI, PTCAS, PDIPS, HRODS, MT2, PERSUB, PMEF, PROME, PIMG and PNDRED. The non-DOGE Team SSA employees may also use other schemas housing program integrity-specific information, which are used in anti-fraud work.
 - b. Employee 8 would only directly access individual records from a small subset of these schema when a case-specific anomaly is indicated. The subset of these schema to which Employee 8 may need individual level access, in specific instances where anomalies indicate possible fraud, are: Numident, MBR, SSR, PROME, PCHIP, PVIP, and PVIPR.

I declare the foregoing to be true and correct, upon penalty of perjury.

Date: 3/28/2025

Signed: /s/ Leland Dudek

Leland Dudek
Acting Commissioner
Social Security Administration