

Exhibit A

**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

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 have expertise in SSA systems, data, and fraud efforts based on my current oversight of the agency as well as my prior work history. I previously served as a Senior Advisor in SSA's Office of Program Integrity (OPI), which provides oversight of the agency's anti-fraud program, improper payment initiatives, and related activities. OPI's key workloads include fraud detection analytics and models. I have extensive other work experience in data safeguarding in government projects, to include inter-governmental data encryption efforts as well as serving as

the Chief Information Security Officer for the Recovery Accountability and Transparency Board, created by the American Recovery and Reinvestment Act of 2009.

4. I provide this declaration in response to the March 30, 2025, Declaration of Ann Lewis (ECF No. 77-2) to further explain why it is not feasible to anonymize the data to which the SSA DOGE Team members require access. I previously explained why anonymization is not feasible for purposes of the SSA DOGE Team projects in my March 27 and 28, 2025 declarations (ECF Nos. 62-1 and 74-1), which remain true and accurate.

5. De-identification of large data sets—such as the data sets contained in the Numident, MBR, and SSR schema—is a highly complex technical and statistical skill that takes large amounts of employee and systems resources to complete. In addition to being impracticable, anonymization of large data sets would result in the removal of information relevant to the SSA DOGE Team’s analysis, such as names and Social Security numbers used to connect records between files and dates of birth (which may indicate if a person is living and is directly relevant to the fraud analysis being conducted). SSA made efforts to attempt to anonymize the first access granted to Employee 1 for the Are You Alive Project but found that the data became of a quality that was unusable for the project due to the information stripped from the data set that was needed to conduct the reviews of whether individuals were living or deceased.

6. Even if SSA attempted to anonymize the individual level data to which the SSA DOGE Team currently needs access, the resulting dataset would almost certainly still contain personally identifiable information (PII)—*i.e.*, information that, when combined with other information, could be used to identify a person, because even when individual-level information is stripped, these types of large data sets are often easily used with other programs and data sets to reidentify individuals. This occurs because with large and multi-field individual data sets a person

can use other personal characteristics, beyond direct identifiers (such as name), to identify the individual whose record it is. Moreover, as explained in my March 27 and 28, 2025 declarations (ECF Nos. 62-1 and 74-1), PII is needed for the Are You Alive, Death Data Clean Up, and Fraud Analysis Projects.

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

Date: ____4/1/2025____

Signed: ____/s/_Leland Dudek_____

Leland Dudek
Acting Commissioner
Social Security Administration