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

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

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity
25 as President of the United States, et al.,
26 Defendants.

Case No. 3:25-cv-03698-SI

DECLARATION OF CHEARICE VAUGHN

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I, Chearice Vaughn, declare the following under penalties of perjury:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the President and a dues paying member of Local 3870 of the American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME Local 3870” or “the Union”), which represents employees at the U.S. Department of Agriculture (“USDA”); Rural Development, Rural Utilities Service; Rural Business and Cooperative Service; Office of External Affairs; Office of the Chief Risk Officer (or the “Risk Office”); and Innovative Center. AFSCME Local 3870 is the exclusive bargaining representative under federal law for a bargaining unit of certain federal employees working for the USDA.

3. AFSCME Local 3870 is affiliated with District of Columbia District Council 20 of the American Federation of State, County and Municipal Employees (“AFSCME District Council 20”). District Council 20, through its constituent local unions like Local 3870, represents federal civilian employees in agencies and departments across the federal government. Both AFSCME Local 3870 and AFSCME District Council 20 are subordinate bodies of the American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME International”). Membership in the Union is voluntary, and all members of AFSCME Local 3870 are also members of AFSCME District Council 20 and AFSCME International. All Union members pay voluntary membership dues, a portion of which are remitted to AFSCME International.

4. AFSCME’s and its subordinate bodies’ leadership is democratically elected by and from among its membership.

5. AFSCME Local 3870 represents a bargaining unit of approximately 286 USDA employees. The employees in our bargaining unit include Financial and Business Loan Specialists, Loan and Grant Analysts, Economists, General Field Representatives, Architects, Engineers, Accountants, Loan and Grant Technicians, Management Analysts, Program Analysts, and Management/Program Analysts, among others.

6. The USDA employees that AFSCME Local 3870 represents work within the Rural

1 Development mission area.

2 7. The Rural Development mission area helps improve the economy and quality of life in
3 rural America. The Rural Development mission area has several subdivisions (sometimes called
4 “agencies”), including Rural Development, Rural Utilities Service; Rural Business and Cooperative
5 Service; Risk Office; Innovative Center; and Office of External Affairs.

6 8. The Rural Development, Rural Utilities Service agency provides financing for
7 infrastructure improvements to rural communities, including water and waste treatment, electric power,
8 telecommunication and broadband services. The Rural Business and Cooperative Service agency
9 supports rural economic development through improving the viability of rural businesses, promoting
10 cooperatives, and creating job opportunities in the rural U.S. by offering financial assistance, technical
11 support, and resources to help rural businesses expand, become more competitive, and promote
12 community development. The Risk Office analyzes and advises on potential and emerging risks that
13 may impair Rural Development’s ability to deliver its mission and works with risk owners to mitigate
14 risk. The Risk Office also administers and implements recommendations to mitigate agency risks and
15 to strengthen the integrity of Rural Development programs. The Innovative Center applies novel
16 techniques to provide innovative Rural Development products and services to rural customers through
17 strategic engagement, data analytics, and regulations management. The Office of External Affairs
18 engages, informs, and educates our stake holders and the public to advance Rural Development’s
19 mission of improving the economy and quality of life for rural Americans.

20 9. I have extensive experience working for the USDA’s Rural Development, Rural
21 Utilities Service agency. In 1994, I received a full college scholarship to Alcorn State University from
22 USDA through the 1890 USDA Scholars Program, which included an internship at USDA that began
23 immediately upon my graduation from high school. I interned at the Rural Development, Rural
24 Utilities Service every summer until I graduated from ASU and began working for the USDA full time
25 in August 1998. I have now been employed by the USDA for more than 32 years as a Financial and
26 Business Loan Specialist with Rural Development, Rural Utilities Service’s Telecommunications
27 Program. In my role, I typically approve and service loans and grants for the telecommunications loan
28 and grant programs administered by Rural Development, Rural Utilities Service. The

1 telecommunications program helps rural communities stay connected by providing application-based
2 financing for eligible construction, maintenance, improvement and expansion of telephone service and
3 broadband in rural areas. Once funds are awarded through loans or grants, I monitor the projects to
4 ensure compliance with applicable loan and/or grant agreements, meet all program requirements and
5 are making efficient use of Federal resources. These projects are all over the country and not specific
6 to any one region.

7 10. On July 24, 2025, Secretary of Agriculture Brooke Rollins issued Secretary
8 Memorandum 1078-015 entitled “Department of Agriculture Reorganization Plan,” (herein “USDA
9 Reorganization Memo”). The USDA Reorganization Memo announced a broad plan to reorganize
10 functions within the USDA. The USDA Reorganization Memo expressed a goal to retain no more than
11 2,000 USDA employees within the National Capital Region, an over 50% reduction. Pursuant to this
12 goal, the Memo stated that the USDA plans to relocate some employees from the National Capital
13 Region to one of five regional hub locations across the country.

14 11. The USDA Reorganization Memo does not mention the Rural Development mission
15 area agencies by name, nor does the Memo mention any areas of work specific to Rural Development
16 agencies.

17 12. On August 26, 2025, in response to USDA’s requests for comments about the
18 reorganization plan, AFSCME International submitted a joint comment with the American Federation
19 of American Employees that, among other concerns, raised the fact that it would make little sense to
20 move Rural Development staff working in the National Capital Region given National Capital Region
21 -based staff specialized and centralized function and the fact that Rural Development already has most
22 of its staff outside of the National Capital Region. The letter also emphasized that relocation would
23 lead to significant staff attrition.

24 13. On December 8, 2025, the USDA published a summary and analysis of feedback it
25 received on its reorganization plan. Nowhere in the document does the USDA respond to concerns
26 about the negative impact that relocation would have on the Rural Development mission area or its
27 subdivisions. The USDA summary does not mention Rural Development agencies at all.

28 14. The Union did not receive any communication from USDA leadership indicating that

1 Rural Development employees would be impacted by USDA’s reorganization, until less than two
2 weeks ago. On June 17, 2026, the USDA issued a press release announcing the reorganization of the
3 Rural Development mission area.¹ This press release stated that the planned Rural Development
4 reorganization was designed to “Align[] With Executive Orders” as part of “USDA’s broader
5 reorganization effort.” However, the press release did not provide specific details on how the Rural
6 Development mission area would be reorganized and which employees would be affected.

7 15. On June 17, 2026, the acting Undersecretary for Rural Development, Todd Lindsey,
8 sent an email message to all Rural Development employees immediately after an all staff meeting that
9 lasted mere minutes. Despite the fact that Rural Development already has “90% of staff close to our
10 customers” with “over 3,000 employees” outside of the National Capital Region, meaning that nearly
11 all Rural Development staff already live near rural communities, the email also states that Rural
12 Development “will be reassigning approximately 175 positions, or about 60% of staff currently located
13 within the National Capital Region” to St. Louis, Missouri and Dallas/Fort Worth, Texas. The email
14 also stated that the RO duties will be moved to other Rural Development offices.

15 16. On June 17, 2026, I received several communications from the USDA in my capacity
16 as the AFSCME Local 3870 President titled “Initial Notice of the Reorganization of Rural
17 Development” from the USDA’s Office of Human Resources Management concerning each of the
18 Rural Development agencies where we represent employees.

19 17. The communications provide that “RD [Rural Development] is restructuring to move
20 positions and resources closer to the rural communities we serve.” The communications also provide
21 that at least 94 “bargaining unit employees in various positions have been identified and will be
22 impacted by the proposed reorganization.” This includes 47 from Rural Development, Rural Utilities
23 Service and Rural Business and Cooperative Service, 6 from the Risk Office, 14 from the Office of
24 External Affairs, and 27 from the Innovative Center. The Rural Development, Rural Utilities Service
25 and Rural Business and Cooperative Service notice further provides that “twenty-five (25) employees
26 have been identified to relocate outside the local commuting area” but that “[t]hese numbers may be
27

28 ¹ <https://www.rd.usda.gov/newsroom/news-release/usda-rural-development-announces-actions-better-serve-rural-america>.

1 subject to change.” For the Risk Office, Office of External Affairs, and Innovative Center, the
2 communications provide that “no employees have been identified to relocate and will remain within
3 the current office they occupy” but that “[t]hese numbers may be subject to change.” Finally, the
4 communications provide that “Management plans to begin implementation of the Rural Development
5 reorganization and reassignments in the coming months.”

6 18. The USDA Reorganization Memo has caused much confusion and anxiety among the
7 AFSCME Local 3870 members because the USDA has not provided employees detailed information
8 about the imminent USDA reorganization and the reorganization’s effects on their lives. These
9 members have expressed their concerns directly to me, and I explain some of those concerns below.
10 While Undersecretary Lindsey’s email message to all Rural Development employees and the vague
11 communications to the Union may seem to provide important details about the reorganization
12 announced last summer, they only add more anxiety for our bargaining unit members because the email
13 message and other communications do not provide the detailed information necessary for employees
14 and the union to know the effect of the USDA reorganization on employees, sowing confusion and
15 forcing bargaining unit members to make difficult decisions whether to remain in their jobs.

16 19. I have heard from AFSCME Local 3870 members that this confusion has been
17 especially harmful for employees at Rural Development, Rural Utilities Service and Rural Business
18 and Cooperative Service who were already issued relocation orders.

19 20. Immediately after the Undersecretary’s email message on June 17, 2026, bargaining
20 unit employees who work for Rural Development, Rural Utilities Service and Rural Business and
21 Cooperative Service were blindsided by receiving relocation orders changing their duty station to
22 Dallas/Fort Worth, Texas. At least 45 bargaining unit employees have reported that they received a
23 relocation order, further sowing confusion and anxiety within our union, since the proposed relocation
24 is now much larger than the 25 employees USDA’s notice specified would be ordered to relocate.
25 Employees have expressed to me that they feel that anyone could be moved at any time, and this is
26 causing them to have to plan around that uncertainty, including by seeking alternative employment
27 now and planning to quit their job at USDA as soon as another job is lined up.
28

1 21. I was one of the employees who received an order to relocate to Dallas/Fort Worth,
2 Texas. After 32 years of working for the Rural Development, Rural Utilities Service in the National
3 Capital Region, I must decide whether to uproot my life, sell or rent my house, and move across the
4 country to Texas or to give up my career at the USDA and risk my retirement plan. In a few years, I
5 will be eligible to receive my full retirement benefits from my federal service, and I count on these
6 benefits for a stable life in retirement. Because of the uncertainty of the USDA reorganization, making
7 a decision to uproot my life and relocate to Dallas/Fort Worth, Texas or to retire early will be
8 undertaken under duress.

9 22. Making the decision whether to relocate from the National Capital Region is extremely
10 stressful and difficult for me for several reasons. For one, it is very difficult to determine whether to
11 sell or rent my current home because the National Capital Region housing market has been negatively
12 impacted by the massive reduction and exodus of the federal workforce within the National Capital
13 Region since President Trump took office. Relocation will place a large financial burden on me just to
14 be able to keep my job of 32 years and to be able to retire with dignity. More importantly, I have built
15 a life in the National Capital Region for the last 32 years and it will be extremely difficult to leave my
16 support system and start a new life in a new state.

17 23. I am not the only employee harmed by the USDA's reorganization and relocation orders
18 and I fear employees will leave their jobs at USDA rather than relocate to another state, since that is
19 what many of our union's members have told me they will do. Some employees who received
20 relocation orders expressed to me that they cannot relocate because of serious or long-term health
21 issues, including cancer, that require them to stay close to their trusted health care providers and their
22 family support system. These employees are now faced with the threat of losing both their jobs and
23 their health care coverage when they cannot relocate as ordered. Other employees with family ties to
24 the National Capital Region expressed that they could not possibly leave the National Capital Region
25 because of the need to care for family members or because they are dependent on family to manage the
26 high cost of childcare.

27 24. Rural Development employees who are considering relocation have expressed to me
28 that they are facing the very difficult decision of choosing between the harm of losing their job and the

1 harms caused by relocating across the country. Employees have expressed to me that if they do relocate,
2 they would have to pull children from the schools and communities they know and their spouses will
3 have to decide if they can leave their employment and relocate to another state. Employees who are
4 close to retirement have also expressed to me that they must either retire early and lose the ability to
5 accrue full retirement benefits or uproot their lives to protect their retirement plans.

6 25. The USDA reorganization will harm the Rural Development mission area functions by
7 increasing attrition without providing benefits to agency functions. It appears from the communications
8 the Union has received from the employees who received relocation orders that most of the employees
9 who are being ordered to relocate are Loan or Grant Specialists like me who do not engage in public
10 facing work within Rural Development, Rural Utilities Service, as well as some others who likewise
11 do not have public-facing jobs. These employees are thus are not being moved “closer” to any
12 constituency with whom they actually do or would interface with in person as part of their job. As
13 AFSCME noted in its comment to the USDA Reorganization Memo and Undersecretary Lindsey
14 recognizes in his email message, the Rural Development mission area already has 90% of its staff in
15 the field outside of the National Capital Region and it does not make sense, nor has the USDA provided
16 any reasonable justification, to move those back-office positions (including mine) like Loan Specialists
17 out of the National Capital Region area when the majority of the Rural Development staff is already
18 serving rural communities in the field. In fact, my supervisor currently lives in a different state and I
19 work with field staff all over the country as a Loan Specialist. By relocating to Texas, the back-office
20 nature of my work will not change, and I will still work with staff spread all over the country. The only
21 effect that the relocation orders will have is to lose experienced and knowledgeable employees,
22 increasing the burdens on the remaining employees, and harming the important services that the USDA
23 provides to rural communities.

24 26. Our bargaining unit has already lost members from deferred resignation and buyouts,
25 voluntary early retirement programs, and those who chose to look for other job opportunities in light
26 of threatened cuts to federal employee jobs. This along with the attrition of the workforce faced by the
27 recent relocation orders puts a strain on the functions of the Rural Development mission agencies to be
28 able to deliver services to rural communities, to the point of breakage. For the Rural Development,

1 Rural Utilities Service where I work, this means that the processing time of grants and loans for
2 important utilities needed in rural communities are getting longer and longer, with a backlog of
3 applications building up. With less staff due to the USDA reorganization, rural communities are being
4 harmed because services are being delayed, and these relocations will exacerbate that harm due to the
5 attrition they will cause immediately.

6 27. Undersecretary Lindsey’s email to all Rural Development employees, together with the
7 relocation notices provided to the Union, makes clear that USDA’s reorganization is intended to reduce
8 the Rural Development workforce through attrition by requiring employees to relocate to designated
9 USDA hub locations.

10 28. AFSCME Local 3870 administered an anonymous online survey for bargaining unit
11 employees following the USDA’s June 17, 2026 Rural Development reorganization announcement. Of
12 the 82 employees whose responses that were received by the Union, 65% would consider quitting their
13 jobs at the USDA rather than uprooting their lives to relocate to another state.

14 29. The uncertainty of the relocation announcement itself is causing attrition. While the
15 USDA has only officially identified 25 bargaining unit employees for relocation as of right now,
16 relocation is still an imminent threat to other bargaining unit employees who have been identified as
17 being affected by the USDA reorganization. For example, the vague communications sent to the union
18 provide little details about how the Rural Development will be reorganized aside from the number of
19 employees affected but also state that “[t]hese numbers are subject to change.” It appears that the
20 number changed almost immediately as at least 45 employees have reported to the Union that they
21 received relocation orders. This means that the USDA may at any moment decide to relocate any
22 number of Rural Development employees in the National Capital Region in the future. Because of this
23 uncertainty, Rural Development employees are actively seeking other job opportunities or considering
24 retirement early. This not only harms them by coercing them to make major life decisions under the
25 threat of duress with uncertainty but also will have a negative impact on the services the USDA
26 provides to the public as these employees leave their jobs, which will continue to happen unless and
27 until this reorganization is actively put on pause.

