

# Exhibit 9

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL TREASURY  
EMPLOYEES UNION, *et al.*,  
*Plaintiffs*,

v.

RUSSELL VOUGHT, in his official capacity  
as Acting Director of the Consumer Financial  
Protection Bureau, *et al.*,

*Defendants.*

Case No. 25-cv-381-ABJ

**DECLARATION OF ERIC HALPERIN**

I, Eric Halperin, declare:

1. I served as Enforcement Director at the Consumer Financial Protection Bureau (“Bureau”) from October 24, 2021 to February 11, 2025.
2. As Enforcement Director, I was the senior executive responsible for management of the Bureau’s Enforcement Division. The Enforcement Division brings enforcement actions against depository institutions, companies, individuals, and other entities subject to our enforcement authority when these entities break the law.
3. Bureau enforcement actions have resulted in orders for nearly \$20 Billion in consumer relief.
4. On February 8, 2025 and February 10, 2025, the Bureau’s Enforcement staff received a stop work order.
5. The Enforcement staff immediately halted all enforcement-related activity, including communications with: consumers, subjects of federal investigation, and partner state and federal regulators; all fact-gathering activities including but not limited to review of consumer complaints, documents, and data; and, with the exception of seeking stays in all of our matters, all litigation-related activity including but not limited to ongoing discovery, expert preparation and work on pending motions and briefs.
6. While I was Enforcement Director under Acting Director Vought, virtually all Enforcement activity had come to a complete and indefinite stop. The only exception of which I am aware is in an active case in which a requested stay was denied.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed in Washington, DC  
February 13, 2025

/s/ *Eric Halperin*  
Eric Halperin