

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GWYNNE A. WILCOX,
Plaintiff,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,

and

MARVIN E. KAPLAN, in his official
capacity as Chairman of the National
Labor Relations Board,

Defendants.

Case No. 1:25-cv-00334-BAH

DECLARATION OF GWYNNE A.
WILCOX

I, Gwynne A. Wilcox, declare as follows:

1. I was nominated by President Joseph R. Biden and confirmed by the United States Senate as a member of the National Labor Relations Board for a five-year term expiring on August 27, 2028.
2. On January 27, 2025, at 10:38 PM ET, I received an email from Trent Morse, Deputy Director, Office of Presidential Personnel, transmitting a letter “on behalf of President Donald J. Trump.” The letter stated that I was “hereby removed from the office of Member[] of the National Labor Relations Board.” A copy of that email is attached to this declaration as Exhibit A.
3. Neither President Trump’s letter, nor any other communication from him, has sought to justify my removal on the ground that I committed any neglect of duty or malfeasance in office.
4. I was not given either advance notice or a hearing concerning the reasons for my removal from the Board.

5. The morning after I received the letter, the Board's Director of Administration began the termination process, cutting off my email access and telling me to clean out my office or it would be cleaned out for me.

6. The following day, the agency requested that I return my government laptop, phone, and iPad.

7. As a result of these actions, I am unable to carry out my duties as a Senate-confirmed member of the National Labor Relations Board.

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

Executed in New York, New York on February 8, 2025.


Gwynne A. Wilcox