

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ROBERT P. STORCH; MICHAEL J.
MISSAL; CHRISTI A. GRIMM; CARDELL
K. RICHARDSON, SR.; SANDRA D.
BRUCE; PHYLLIS K. FONG; LARRY D.
TURNER; HANNIBAL “MIKE” WARE;

Plaintiffs,

v.

PETE HEGSETH, *in his official capacity as
Secretary of Defense*; DOUGLAS A.
COLLINS, *in his official capacity as
Secretary of Veterans Affairs*; ROBERT F.
KENNEDY, JR., *in his official capacity as
Secretary of Health and Human Services*;
MARCO RUBIO, *in his official capacity as
Secretary of State*; DENISE L. CARTER, *in
her official capacity as Acting Secretary of
Education*; GARY WASHINGTON, *in his
official capacity as Acting Secretary of
Agriculture*; VINCENT MICONE, *in his
official capacity as Acting Secretary of Labor*;
EVERETT M. WODEL, JR., *in his official
capacity as Acting Administrator of the Small
Business Administration*; DONALD J.
TRUMP, *in his official capacity as President
of the United States*;

Defendants.

Civil Case No. 1:25-cv-00415 (ACR)

DECLARATION OF LARRY D. TURNER

I, Larry D. Turner, declare as follows:

1. I was nominated as the Inspector General of the U.S. Department of Labor (“DOL”) by President Biden on May 28, 2021 and confirmed by unanimous consent of the Senate on

December 2, 2021. Based on my experience, I have personal knowledge of the facts set forth below and am competent to testify to these facts if required.

Tenure as Inspector General of DOL

2. During my tenure as Inspector General, I served as a statutory member of the Pandemic Response Accountability Committee of the Council of the Inspectors General on Integrity and Efficiency's ("CIGIE") and on CIGIE's Employee Engagement and Innovation Committee Work Group.
3. The DOL Office of the Inspector General ("DOL OIG") does critical work related to unemployment insurance fraud. To take just one example, during the pandemic, federal and state governments distributed over \$888 billion in unemployment benefits to support Americans in crisis. However, my office uncovered that an estimated \$191 billion in pandemic unemployment benefits may have been improperly paid—with a substantial portion of that money attributable to fraud.
4. I testified before congressional committees three times in four years to highlight the fraud that had been perpetrated on the unemployment insurance program. On January 8, 2025, I issued a news release announcing a significant milestone, more than 2,000 individuals had been charged with UI fraud since the COVID 19 Pandemic began. This is a historic accomplishment that was applauded by our stakeholders. Republicans from the House Ways and Means Committee recently asked me to testify again, to remind Congress and the American people that the statute of limitations requires prosecutions of unemployment insurance fraud to be initiated by March 2025. The Ways and Means Committee indicated its intention to provide additional funding for OIG to augment our staff and address a

backlog of 160,000 investigative matters. This is a bipartisan issue that has received support on both sides of the aisle.

5. A week before my purported termination at DOL IG, the Wall Street Journal ran an article commending my team and me on the great work we were combatting unemployment insurance fraud. It also mentioned the need to extend the statute of limitations. The article highlighted a U.S. Government Accountability Office report, estimating that \$135 billion in funds had been stolen from the unemployment insurance program in a two-year span. *Time is Running Out to Recover Up to \$135 Billion in Pilfered Jobless Benefits*, Wall St. J. (Jan. 16, 2025).

January 24 Firing of Inspectors General

6. On January 25, I received an email from the Deputy Director of the Office of Presidential Personnel, Trent Morse, stating:

Dear Larry,

On behalf of President Donald J. Trump, I am writing to inform you that due to changing priorities your position as Inspector General of the United States Department of Labor is terminated, effective immediately.

Thank you for your service.

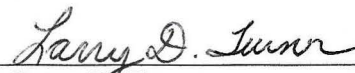
7. By the afternoon of January 26, I no longer had computer access. I was informed by the OIG Assistant Inspector General for the Office of Management and Policy that she was told by the Acting Secretary of Labor that my access had been terminated at midnight.
8. When I realized my access had been terminated, I chose not to report to my office. I did not return to the office until Thursday, January 30 when a DOL staff member escorted me

to my office so that I could pack my belongings. I have not been permitted to act in my role as the Inspector General since my purported removal.

9. At the time of my purported removal, there was critical work underway under my direction, including the work discussed above regarding unemployment insurance fraud.
10. My reputation has been harmed by the purported termination, as being fired by the President would be a national embarrassment. Because my scheduled appearance to testify before the Ways and Means Committee was canceled due to my purported termination, there is a perception that I did something wrong.
11. The purported termination has also deprived me of lost opportunities. I was scheduled to participate in a leadership panel for the Senior Executive Association, which was sponsored by the Partnership for Public Service. Marketing, with my biography and photo, had already been released to promote the event. After my purported termination, my invitation was rescinded.
12. In addition, I am being considered for the Nash/Edgecomb County Hall of Fame, Rocky Mount, North Carolina. I am concerned that the negative press about me and my purported termination will have an adverse effect on my nomination.
13. The actions of those acting under the direction of acting Secretary Micone are preventing me from performing the duties assigned to me by law. I am committed to carrying out the responsibilities as Inspector General so long as those acting under the direction of the Secretary stop obstructing me from doing so.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 13, 2025


Larry D. Turner