

**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 HANNIBAL “MIKE” WARE**

I, Hannibal “Mike” Ware, declare as follows:

1. On October 16, 2017, I was nominated by President Trump to be the Inspector General of the U.S. Small Business Administration (“SBA”). I was confirmed by unanimous consent of the Senate on April 26, 2018. I was sworn in on May 24, 2018 (by which time I had served as acting SBA Inspector General for approximately 16 months). Since September

2024, I have also served as the Acting Inspector General of the General Social Security Administration (“SSA”). I have also served since January 1, 2025, as chair of the Council of the Inspectors General on Integrity and Efficiency (“CIGIE”). 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 SBA Inspector General**

2. As SBA Inspector General, I am responsible for identifying and rooting out waste, fraud, and abuse within the agency. I audit the agency’s operations, making recommendations for improved efficiency and cost savings to the U.S. taxpayers. My job is to provide independent and nonpartisan oversight of the government’s most important small business programs.
3. During my time as Inspector General, I have returned over \$40 billion to the U.S. Treasury in fraudulent loans issued under pandemic relief programs, including the Paycheck Protection Program and Economic Injury Disaster Loan program. More broadly, I uncovered over \$200 billion in potential fraud within these pandemic relief programs, which could lead to billions more cost savings for the U.S. government. I have also helped pass measures that made it easier for the government to tackle fraud in the future. That vitally important work is ongoing, and my unlawful termination has prevented me from continuing to supervise it during my lawful term of office.
4. I played a key role in advocating for a bipartisan bill that doubled the statute of limitations for pandemic relief fraud from five to ten years, ensuring the government can more effectively hold fraudsters accountable.
5. I have been in the Inspector General community for my entire adult life, starting in 1990 and serving under U.S. presidents from both political parties. I have received multiple

awards for my work in the Inspector General community, including the 2023 Certified Fraud Examiner of the Year Award.

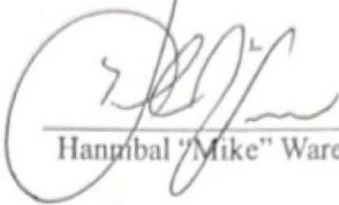
6. I also served as the Audit Chair for the CIGIE for 6 years and the Chair of the Pandemic Response Accountability Committee's audit subcommittee for 5 years. I also serve as the Chairman Emeritus of the Association of Certified Fraud Examiners' Board of Regents.

### **January 24 Firing**

7. On the evening of January 24, 2025, I received calls from other Inspectors General that they had received a notice stating that they had been removed from their positions, effective immediately. Around 7:40 p.m. that evening, I checked my email to find that I had received such a notice from Sergio Gor, the Director of the Office of Presidential Personnel.
8. Later that evening, in my role as Chair of CIGIE, I wrote a letter to Mr. Gor informing him of the legal requirements necessary to remove an Inspector General from office, including the requirement of 30-day notice to Congress and of providing substantive, case-specific reasons for such removal. A copy of this letter is attached as Exhibit 1.
9. I have not received a response to my letter to the Office of Presidential Personnel.
10. After I received the Gor email, the SBA shut off my access to its facilities and systems. SBA staff also retrieved my computers, phones, and PIV cards. I met with my staff at the agencies to notify them of the purported removal.
11. I have not been permitted to work in my capacity as either the Inspector General to the SBA or the Acting Inspector General to the SSA since the agencies shut off my access to the SBA and SSA facilities and systems.
12. I am committed to continuing to fulfill my responsibilities as Inspector General if those acting under Acting Administrator Woodel's direction no longer hinder me from doing so.

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

Dated: February 14, 2025



Hannibal "Mike" Ware