

**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 CARDELL K. RICHARDSON

I, Cardell K. Richardson, declare as follows:

1. On July 26, 2023, I was nominated by President Biden to be the Inspector General of the U.S. Department of State. I was confirmed by voice vote of the Senate on May 2, 2024.

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 the State Department's Inspector General

2. As the Inspector General of the State Department, I conduct inspections, evaluations, and investigations to detect and prevent waste, fraud, abuse, and mismanagement within the Department, overseeing programs funded by more than \$87 billion in annual appropriations. My ability to effectively oversee the Department's programs and lead the Office of the Inspector General ("OIG") hinges on my hard-earned reputation for nonpartisanship and independence.
3. During my tenure, the OIG issued 44 reports that delivered a monetary impact of \$16.7 million. Monetary impact refers to the financial benefits, recoveries, or cost savings resulting from the audits, investigations, and reviews conducted by the IG. I also led investigations that led to three arrests, nine indictments, and four convictions, including of individuals that have defrauded the U.S. government.
4. The work of the OIG advances U.S. foreign policy objectives and the nation's national security. For instance, my office was responsible for overseeing programs that provided funding to support Ukraine in its war against Russia. Overseeing programs that fund initiatives in other countries makes OIG's work uniquely challenging.
5. This crucial work is ongoing, and my unlawful termination has prevented me from continuing to supervise it during my lawful term of office.
6. I have been widely recognized for my public service by both Republican and Democratic administrations, earning the prestigious Presidential Rank Award—an honor given to high-

performing public servants for “sustained extraordinary accomplishment”—from President Obama in 2009 and President Trump in 2017.

7. Prior to serving as the State Department’s Inspector General, I served for more than 20 years at the National Geospatial-Intelligence Agency (“NGA”), including as the agency’s Inspector General. Over that period, I held several senior leadership roles, including as NGA’s Director of Source Operations and Deputy Chief Operating Officer. The NGA is a combat support agency whose primary mission is collecting, analyzing, and distributing geospatial intelligence in support of national security.
8. I was honorably discharged from the U.S. Air Force in 2003 as a Colonel with more than 26 years of active-duty service. During that time, I served as Base Commander and Support Group Commander of Bolling Air Force Base in Washington, D.C. My time in the military confirmed for me the importance of public service to the United States. Indeed, I have served my nation in various roles for more than 48 years.

January 24 Firing

9. On January 24, 2025, at 7:39 p.m., I received an email from Sergio Gor, the Director of the Office of Presidential Personnel, stating:

Dear Cardell,

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 State is terminated, effective immediately.

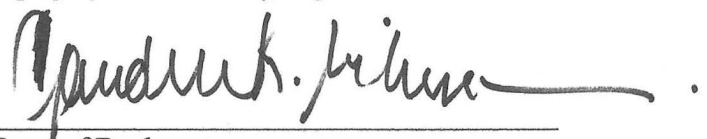
Thank you for your service.

10. I have not received any direct communication from President Trump regarding my purported removal.

11. Upon receiving the email, I notified the then-Deputy Inspector General of the State Department that the agency had purportedly terminated me. The day after, on January 25, 2025, I collected my personal effects from my office. Three days later, I met with agency staff to return my government-issued equipment.
12. I have not been permitted to work in my capacity as the Inspector General of the State Department since receiving notice of the termination email.
13. My purported termination has left me without a job or a dependable salary. I have not accrued salary since January 24, 2025. Moreover, because of the uncertainty produced by my purported termination, I am unable to move forward with my career and other aspects of my life, as the State Department's Office of the General Counsel has not yet determined how to classify my current personnel status. I fear that the publicity generated by my purported termination has harmed my reputation.
14. I am committed to fulfilling the duties of the Inspector General so long as I am legally appointed to that role. The actions of those acting pursuant to the direction of Secretary Rubio are preventing me from performing the duties assigned to me by law.

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

Dated: February 14, 2025


Name of Declarant