

**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 SANDRA D. BRUCE

I, Sandra Bruce, declare as follows:

1. On June 11, 2021, I was nominated by President Biden to be the Inspector General of the U.S. Department of Education. I was 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 the U.S. Department of Education

2. As the Department of Education’s Inspector General, I lead a team of approximately 220 employees in the Department of Education Office of the Inspector General (“ED OIG”), which oversees the U.S. Department of Education’s \$103 billion budget. My office (“ED OIG”) is responsible for the independent, non-partisan oversight of federal programs and the proper disbursement of federal funds.
3. The work of ED OIG helps to ensure that federal funding reaches its intended recipients. For example, to strengthen controls in Federal Student Aid, ED OIG made 178 recommendations, analyzed over 12,000 hotline complaints, closed 128 investigations, prompted 191 criminal actions, and produced over \$344 million in monetary results between Fiscal Years 2019 and 2024.
4. ED OIG also partners with other entities to protect students and educational institutions. In January 2024, my office assisted in an investigation alongside the Federal Bureau of Investigation, the Indiana State Police, and the Indiana Office of the Inspector General that led to criminal charges against four individuals for their alleged roles in a conspiracy to defraud the Indiana Department of Education of more than \$44 million.
5. As Inspector General, I have also focused on pandemic-aid oversight. To this end, my office has conducted independent audits and investigations, and worked with law enforcement agencies across the country to address fraud and return more than \$1.2 million in pandemic-related funds.

6. During my tenure as Inspector General, I served as Chair of the Employee Engagement and Innovation Committee of the Council of the Inspectors General on Integrity and Efficiency (“CIGIE”) and Chair of CIGIE’s GAO, State, and Local Subcommittee of the Pandemic Response and Accountability Committee. My office has received numerous CIGIE Awards for Excellence, Special Act Awards, Distinguished Achievement Awards, Exceptional Performance Awards, and Letters of Commendation.

January 24 Firing

7. On January 24, 2025, at 7:48 p.m., I received an email from Trent Morse, the Deputy Director, Office of Presidential Personnel indicating that my position as the Inspector General to the U.S. Department of Education had been terminated, effective immediately.
8. I have not received any direct communication from President Trump regarding my purported removal.
9. Upon reading the email, I notified senior staff members in ED OIG of the termination and refrained from accessing my government-issued email, files, and equipment. I subsequently met with staff, under escort, to return the government-issued equipment and pack up my personal belongings.
10. I have not been permitted to work in my capacity as the Inspector General of the Department of Education since receiving notice of the termination email. I have not accrued salary since January 24, 2025.
11. At the time of my purported removal, there were a significant number of ongoing investigations and audits underway.

12. I have experienced reputational harm. The President of the United States, for example, recently commented to the press that some Inspectors General “were not doing their jobs.” This suggestion has had real impact on my professional reputation.
13. 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 under the direction of Acting Secretary Carter 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



Sandra D. Bruce