

**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 ROBERT P. STORCH

I, Robert P. Storch, declare as follows:

1. I was nominated as the Inspector General of the U.S. Department of Defense (“DoD”) by President Biden on November 15, 2021 and confirmed as Inspector General by a 92-3 vote of the Senate on November 30, 2022. I assumed my responsibilities as Inspector General

for the DoD on December 6, 2022. Prior to assuming my duties at the DoD, I was nominated by President Trump, confirmed by unanimous consent by the Senate, and served for almost five years as the first presidentially appointed, Senate-confirmed Inspector General at the National Security Agency (“NSA”). 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 DoD

2. Starting on or about January 1, 2023, I served as the Chair of the Technology Committee of the Council of the Inspectors General on Integrity and Efficiency (“CIGIE”) and on the CIGIE Executive Council. As the DoD Inspector General, I also chaired the Defense Council on Integrity and Efficiency, which comprises Inspectors General, Auditors General, the heads of Military Criminal Investigative Organizations, and others who conduct oversight across the DoD enterprise.
3. The work of DoD’s Office of the Inspector General (“OIG”) helps to safeguard U.S. national security. For example, as Inspector General, I was the Lead Inspector General, and then the congressionally-designated Special Inspector General for Operation Atlantic Resolve (“SIG OAR”), which operation includes U.S. assistance to Ukraine. I worked closely with colleagues from the Offices of Inspector General for the State Department, the U.S. Agency for International Development, and others from across the oversight community on this and the other two ongoing overseas contingency operations, which relate to countering ISIS and assisting local partners in Iraq and Syria (Operation Inherent Resolve) and to furthering U.S. policy goals in Afghanistan (Operation Enduring Sentinel).

4. As SIG OAR, I was responsible for all oversight related to U.S. security assistance to Ukraine, and for coordinating and reporting on oversight of all aspects of U.S. assistance. One of many areas where my office's programmatic oversight has been particularly consequential is evaluating DoD's efforts to ensure the accountability of the most sensitive equipment and technology provided to Ukraine. As has been publicly reported, assistance to Ukraine became a highly partisan issue, and it was only because of the non-partisan nature of the OIG that we were able to do this impactful oversight and to do it authoritatively and credibly. All told, as of January 2025, during my tenure as Inspector General, my office had (1) issued approximately four dozen programmatic oversight reports covering all aspects of U.S. security assistance, and (2) coordinated with our oversight colleagues on dozens more, all as transparently reported on the public website whose development I led, www.UkraineOversight.gov.
5. Another example of recent work in which the independence of my office was essential is the review into the handling of the hospitalizations of former Secretary of Defense Lloyd Austin III. The investigation identified multiple instances where transfers of authority should have been considered or notifications of transfers that occurred were not made as required by law and policy, leading to recommendations for important improvements to DoD's ability to carry out its critical national security mission in situations where the secretary might be unavailable.
6. Through my long history of public service, both as Inspector General and elsewhere in the federal government, I have developed deep relationships and substantive knowledge about the operations of the DoD, the NSA and the U.S Intelligence Community of which DoD is a part, and the U.S. Department of Justice with whom we engage regularly, as well as

expertise leading and directing oversight professionals, including administrative and criminal investigators, auditors and program evaluators, and critical support personnel.

7. Particularly given the nature of the work done by Inspectors General, our oversight cannot be effective or credible if we are seen as partisan. Thus, the Inspector General, being non-partisan, is well-situated to conduct impactful oversight. The role is grounded in the DoD OIG's core values of independence, integrity, excellence, and transparency (the latter of which was added during my tenure to reflect the importance of this aspect of our work).

January 24 Firing

8. On January 24, 2025, I received an email indicating that it was sent at 7:51 p.m. from Sergio Gor, the Director of the Office of Presidential Personnel, with the subject line: "White House Notification." The email stated:

Dear Robert,

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

Thank you for your service.

9. After reading the email and over the ensuing weekend, I contacted the Principal Deputy Inspector General of the Department of Defense and the Counsel to the Inspector General to discuss the situation, but I conducted no further substantive work as Inspector General and did not attempt to access my office or otherwise carry out my duties as Inspector General.
10. On Monday, January 27, I was invited to speak briefly as a guest by video teleconference at the regularly scheduled meetings of my Front Office and Senior Staff, and later by


telephone to OIG personnel regarding the termination notice. That same afternoon, the Senior Advisor to the Inspector General came to my residence and collected my government-issued devices and access cards. I sent an email to the Counsel to the Inspector General to memorialize that, per our discussion earlier that day, “in agreeing to provide my devices and access cards to the office, I did not and do not concede the effectiveness of the email termination that I received from the Office of Presidential Personnel ..., which did not reflect any effort to comply with the Inspector General Act, as amended.” On Wednesday, January 29, I returned to the office to collect my personal belongings, then immediately left.

11. I have not been permitted to work in my capacity as DoD IG since reading the termination email. At the time of my purported removal, there were numerous pending audits, evaluations, administrative and criminal investigations underway, as well as our ongoing responsibility to prepare quarterly reports for my role as SIG OAR and Lead Inspector General for two other overseas contingency operations.
12. I am just starting to consider what my future holds. Aside from two brief periods in private practice in 1986-1987 and 1994-1995, I have spent my entire career in public service, serving for some two dozen years as a federal prosecutor and then more than a dozen years in the Inspector General community in the leadership of the Department of Justice OIG, the NSA OIG, and the DoD OIG. I have been privileged throughout my many years of federal service to work every day to do the right thing on behalf of the American public, and my purported termination as DoD Inspector General is an ill-fitting stain on that long career of public service.

13. I am committed to fulfilling the duties of the Inspector General so long as I am legally in that role. The actions of those acting under the direction of Secretary Hegseth are preventing me from performing the duties assigned to me by law, thereby eliminating my ability to lead the DoD OIG in conducting our important work.

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

Dated: February 14, 2025



Robert P. Storch