

**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 acting 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 CHRISTI A. GRIMM

I, Christi A. Grimm, declare as follows:

1. I was nominated as the Inspector General of the U.S. Department of Health and Human Services (“HHS”) by President Biden on June 18, 2021 and confirmed by unanimous

consent of the Senate on February 17, 2022. 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 HHS

2. The work of the HHS Office of the Inspector General (“HHS OIG”) helps to end mistreatment of some of the nation’s most vulnerable citizens. For example, HHS OIG conducted investigative work as part of a June 2024 national enforcement action alongside the Department of Justice, the Federal Bureau of Investigation, and the Drug Enforcement Administration that led to criminal charges against 193 defendants, including 76 doctors, nurse practitioners, and other licensed medical professionals in 32 federal districts across the United States, for their alleged participation in various health care fraud schemes, involving approximately \$1.6 billion in actual losses.
3. As Inspector General, I have focused on ensuring that the Medicare Advantage program operates efficiently, offers quality care for enrollees, and delivers value for taxpayers. As one example of this work, my office published a report in October 2024 that highlighted concerns about practices to add diagnoses to patient profiles that would generate higher payment for plans to care for those seemingly sicker patients, and we made recommendations to the Centers for Medicare & Medicaid Services to address those practices.
4. As Inspector General, I have also prioritized making nursing homes safer for residents. My office uncovered substandard care resulting in costly medical injury, unsafe conditions, and abuse and neglect of residents. We recommended improvements in staffing levels, more fulsome background checks for employees, and the required reporting of harms experienced by residents.

5. I have also directed agents from the HHS OIG to help shut down a nursing diploma fraud scheme, known as Operation Nightingale, that created an illegal licensing scheme and employment shortcut for aspiring nurses. Illegally licensed nurses were working in various health care settings across the country.
6. During my tenure as HHS Inspector General, I also 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 as Vice-Chair and Chair of CIGIE Inspections and Evaluation Committee.
7. I have been in public service for 26 years, serving in numerous roles in the HHS Office of Inspector General (HHS OIG) under Presidents Clinton, George W. Bush, Obama, Trump, and Biden. This includes my tenures as Acting Inspector General and Principal Deputy Inspector General during President Trump's first term.

January 24 Firing

8. Due to the high volume of emails I receive as Inspector General, my email is monitored by staff members. Early on January 25, 2025, my executive officer called me as I was driving. She said that I had received an email and sounded somber, prompting me to ask if I should pull over, which I did. While I was on the shoulder of the road, she read me an email purporting to remove me from office.
9. Later that day, I sent an email to the HHS OIG indicating that the President had purported to terminate me as the Inspector General, effective immediately. I met with my deputies for investigation, audit, evaluation, legal services, and management and policy to let them know what happened and to thank them for their work and partnership over the years. I

then handed over my PIV card, computer, and mobile phone to my former assistant who I understand then provided the equipment to the Office of Management and Policy.

10. The following Monday, January 27, I was told by my Deputy for Management and Policy, Rob Owens, that the HHS Deputy Chief of Staff, Scott Rowell, had demanded that my computer access be turned off. I understand that my PIV card access was also terminated on Monday, likely by an individual in the Program Support Center office. I did not attempt to access my office or otherwise carry out my duties as Inspector General.
11. I have not been permitted to work in my capacity as the Inspector General to the Department of Health and Human Services since receiving notice of the termination email.
12. At the time of my purported removal, there were hundreds of ongoing audits and evaluations, as well as over 2,000 investigations underway. The actions of those acting under the direction of Secretary Kennedy are preventing me from performing the duties assigned to me by law, including those related to audits, investigations, and other critical functions of my office. I remain committed to fulfilling my duties as Inspector General, provided that those operating under the Secretary's authority stop preventing me from doing so.
13. I have experienced reputational harm. I have wrongly been described by a spokesperson for the administration as a rogue, partisan bureaucrat. In reality, I was appointed without regard to political affiliation, and solely on the basis of my demonstrated integrity and ability. During my tenure at HHS OIG—which has spanned the Obama, Trump, and Biden presidencies—and during which I have served as Chief of Staff to the Inspector General, Principal Deputy Inspector General, and Inspector General, and have spanned the Obama, Trump, and Biden Administrations, my oversight work has involved investigations into

administrations of both parties. Throughout my time at HHS OIG, my office did not consider political or partisan interests.

14. The suggestion that I am partisan is particularly damaging: Given my career as an oversight professional, a reputation for non-partisanship is essential to my work. I have already observed that media commentators and conversations on the Internet have amplified President Trump's narrative that I am a partisan and that I have not been effective at conducting oversight as Inspector General.

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

Dated: February 14, 2025



Christi A. Grimm