

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN OVERSIGHT,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:25-cv-00883-JEB
)	
PETE HEGSETH, in his official capacity as)	
Secretary of Defense, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**DECLARATION OF GREGORY M. KOCH
CHIEF, INFORMATION MANAGEMENT OFFICE,
OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE**

I, Gregory M. Koch, declare as follows:

1. I am the Chief of the Information Management Office (“IMO”), under the Chief Operating Officer for the Office of the Director of National Intelligence (“ODNI”). I have held this position since October 9, 2020. Prior to my current position, I held various senior and supervisory roles in the ODNI, including as Deputy Director and Acting Director of IMO, Chief of Classification Management, as well as Senior Associate General Counsel for litigation in the Office of General Counsel. As part of my current duties, and pursuant to ODNI Instruction 80.06, *The ODNI Information Management Program*, and Instruction 80.10, *Records Management Program*, I am the designated federal Agency Records Officer for ODNI.

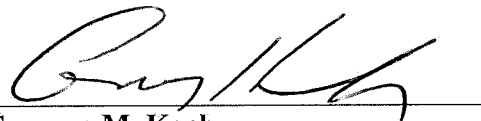
2. Through the exercise of my official duties, I am familiar with the subject of this litigation. I make the following statements based on my personal knowledge and information made available to me in my official capacity.

3. I understand that Plaintiff's claims concern, in part, the disposition of certain messages generated on the Signal platform between March 11 and 15, 2025, which are identified at paragraph 28 of the Complaint.

4. I have been informed that all ODNI officials that were allegedly party to such messages have been advised of the need to comply with agency policies regarding the management and safeguarding of agency records. They have further taken steps to preserve all messages currently in existence that were generated within the timeframe and subject alleged in paragraph 28 of the Complaint. Specifically, they have taken screen shots of the messages currently in existence and transferred said screen shots to an ODNI email address.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 31 day of March 2025.



Gregory M. Koch
Chief, Information Management Office
Office of the Director of National Intelligence