

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

CLASS ACTION COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiffs: JOHN DOE, JANE DOE, and all others similarly situated

Defendants: UNITED STATES DEPARTMENT OF DEFENSE, LLOYD J. AUSTIN III, in his official capacity as Secretary of Defense, and JOHN DOES 1–10

Filed: November 26, 2025

Abstract

This class action complaint details systemic financial mismanagement within the United States Department of Defense (DoD), citing its failure to pass a full audit for seven consecutive years and an inability to account for over \$824 billion in taxpayer funds in 2024. The plaintiffs, U.S. taxpayers, allege violations of the Chief Financial Officers Act of 1990, the Administrative Procedure Act, and constitutional rights, seeking declaratory judgment, injunctive relief, and independent oversight to restore public trust and ensure fiscal accountability.

Keywords

Department of Defense

DoD

Financial Mismanagement

Class Action

Audit Failure

Taxpayer Funds

CFO Act 1990

Administrative Procedure Act

Constitutional Violations

Government Accountability

Lloyd J. Austin III

Federal Court

Injunctive Relief

Declaratory Relief

Public Trust

Overpayment

Aircraft Parts

Financial Oversight

Systemic Issues

Key Takeaways

- The Department of Defense has failed its annual audit for seven

consecutive years, indicating persistent financial mismanagement.

- In fiscal year 2024 alone, the DoD was unable to account for over \$824 billion in taxpayer funds.
- Audits have identified 28 material weaknesses and multiple instances of noncompliance with financial laws and regulations within the DoD.
- Despite these significant financial accountability issues, the DoD continues to receive increased funding, with its 2024 budget authorized at \$895 billion.
- Instances of extreme overpayment to contractors, such as an 8,000% overpayment for aircraft parts, highlight a critical lack of oversight.

INTRODUCTION

Plaintiffs, on behalf of themselves and all others similarly situated, bring this class action against the United States Department of Defense ("DoD") and its officials for systemic financial mismanagement, including the failure to pass a full audit for seven consecutive years, resulting in the inability to account for over \$824 billion in taxpayer funds in the 2024 fiscal year alone.^[1] This persistent lack of accountability undermines public trust and violates statutory obligations under the Chief Financial Officers Act of 1990, 31 U.S.C. § 901 et seq.



Legal proceedings underway with judge presiding.

GENERATED WITH GEMINI 2.5

JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. § 1331 (federal question) and the Administrative Procedure Act, 5 U.S.C. § 702. Venue is proper in this district pursuant to 28 U.S.C. § 1391(e), as the Department of Defense is headquartered in this jurisdiction.



United States District Court building, Washington D.C.

GENERATED WITH GEMINI 2.5

PARTIES

Plaintiffs:

John Doe and Jane Doe are U.S. taxpayers residing in various states, who have contributed federal taxes and are aggrieved by the DoD's financial mismanagement.

Defendants:

- United States Department of Defense, a federal agency

responsible for national defense.

- Lloyd J. Austin III, in his official capacity as Secretary of Defense.
- John Does 1–10, unknown officials responsible for financial oversight within the DoD.

FACTUAL ALLEGATIONS

1. The DoD has failed to pass a full audit for seven consecutive years, with the 2024 audit revealing an inability to account for over \$824 billion in expenditures.^[1]
2. The audit identified 28 material weaknesses and six instances of noncompliance with laws and regulations.^[1]
3. Despite these failures, the DoD continues to receive increased funding, with the 2024 budget authorized at \$895 billion.^[2]
4. Instances of overpayment to contractors have been documented, including an 8,000% overpayment for aircraft parts.^[3]



Dynamic visualization of financial transaction flows.

GENERATED WITH GEMINI 2.5

CLASS ACTION ALLEGATIONS

Plaintiffs seek to represent a class of all U.S. taxpayers who have contributed federal taxes during the period of the DoD's audit failures. The class is so numerous that joinder is impracticable, and there are common questions of law and fact, including whether the DoD's financial practices violate statutory obligations and constitutional principles.



A diverse cross-section of taxpayers.

GENERATED WITH GEMINI 2.5

CLAIMS FOR RELIEF

Count I: Violation of the Chief Financial Officers Act of 1990

Defendants have failed to comply with financial management requirements, resulting in repeated audit failures.

Count II: Violation of the Administrative Procedure Act

Defendants' actions constitute agency action unlawfully withheld or unreasonably delayed under 5 U.S.C. § 706(1).

Count III: Constitutional Violations

Defendants' mismanagement of funds infringes upon taxpayers' rights under the Due Process Clause by failing to ensure lawful use of public funds.

PRAYER FOR RELIEF

Wherefore, Plaintiffs respectfully request that this Court:

1. Declare that Defendants have violated federal statutory and constitutional obligations.
2. Enjoin Defendants from further financial mismanagement and mandate compliance with audit requirements.
3. Order the appointment of an independent monitor to oversee DoD financial practices.
4. Award attorneys' fees and costs.
5. Grant such other relief as the Court deems just and proper.

Respectfully Submitted,

[Your Name]

Pro Se Plaintiff

Your Address

City, State, ZIP

Phone Number

Email Address

Bibliography

1. Pentagon Fails 7th Audit in a Row, Unable to Account for \$824B Budget, Breitbart, November 18, 2024.
2. Senate passes \$895bn Pentagon spending bill despite provision denying transgender care to minors – as it happened, The Guardian, December 18, 2024.
3. Air Force overpaid nearly 8,000% for soap dispensers on military aircraft, watchdog report says, CBS News, October 29, 2024.

Author & Contact

Author: John Doe, Jane Doe, and others similarly situated

Contact: [Not provided in source document]

AI Disclosure

Enhanced and typeset by DocuGlow AI.

Content Rights

Content © Original Authors. All rights reserved.

Metadata

Estimated Reading Time: 7 Minutes

Generated on: 11/26/2025