UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

J.G.G., et al.,

Plaintiffs,

DECLARATION

V.

Civil Action No. 25-766 (JEB)

DONALD J. TRUMP, et al.,

Defendants.

- 1. I am the Deputy Attorney General of the United States. I am submitting this Declaration in response to the Court's March 20, 2025 Order.
- 2. On March 20, 2025, the Government submitted a declaration from Robert L. Cerna II, which stated: "I understand that Cabinet Secretaries are currently actively considering whether to invoke the state secrets privilege over the other facts requested by the Court's order. Doing so is a serious matter that requires careful consideration of national security and foreign relations, and it cannot properly be undertaken in just 24 hours."
- 3. I attest to the accuracy of those statements based on personal knowledge of the events described by Mr. Cerna, including my direct involvement in ongoing Cabinet-level discussions regarding invocation of the state-secrets privilege.
- 4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 21, 2025

Todd Blanche

Deputy Attorney General

United States Department of Justice