

Exhibit 2

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

AMERICAN OVERSIGHT,)

Plaintiff,)

v.)

PETE HEGSETH, in his official capacity as)
Secretary of Defense, *et al.*,)

Defendants.)
_____)

Case No. 1:25-cv-00883-JEB

**DECLARATION OF ROBERT A. NEWTON
DEPUTY CHIEF OPERATING OFFICER
OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE**

I, Robert A. Newton, declare as follows:

1. I currently serve as the Deputy Chief Operating Officer for the Office of the Director of National Intelligence (“ODNI”). I have held this position since 2021. As part of my current duties, I oversee ODNI’s Information Management Office.

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 the course of my official duties.

3. I understand that the Court has ordered ODNI to specify the date that ODNI officials searched for and took screen shots of certain messages generated on the Signal platform, as described in paragraph 4 of the Declaration of Gregory M. Koch, dated March 31, 2025 (“Koch Declaration”).

4. I have been informed in the course of my official duties that the above-referenced search and preservation actions described in paragraph 4 of the Koch Declaration were taken on March 28, 2025.

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

Executed this 14th day of April, 2025



Robert A. Newton
Deputy Chief Operating Officer
Office of the Director of National Intelligence