

**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.

Civil Action No. 1:25-cv-883

DECLARATION OF CHRISTOPHER PILKERTON

I, Christopher Pilkerton, declare under penalty of perjury:

1. I am the Acting General Counsel at the Department of the Treasury (Treasury), and I have served in this role since February 27, 2025. From January 27, 2025 until becoming Acting General Counsel on February 27, 2025, I served as Counselor to the Treasury Secretary. I am a non-career appointee, reporting directly to the Secretary. In my current role, I am the primary aide to the Secretary concerning legal matters and am responsible for exercising supervision over the Treasury Legal Division.
2. I am familiar with the claims asserted against Secretary Scott Bessent, in his official capacity as Secretary of the Treasury, in the above-captioned action regarding “the Signal chat,” as referenced in the Complaint ¶ 28 n.1, ECF No. 1. Based on personal knowledge and information provided to me in the course of my official duties, I provide this declaration in support of the Defendants’ Opposition to the Plaintiff’s Motion for a Temporary Restraining Order.

3. On March 26, 2025, I sent separate but identical memoranda to Secretary Bessent and Treasury Chief of Staff Daniel Katz, instructing them to take any steps necessary to preserve all existing communications they have sent or received related to the conduct of Treasury business using any electronic messaging application, including but not limited to Signal. I further instructed them that their obligation to preserve records also extends to messages created in the future, and that the preservation requirement applies regardless of whether the messages were created or received using a Treasury-issued device or a personal one.
4. On March 27, 2025, images were taken from the phones of both Secretary Bessent and Mr. Katz of all existing messages from the Signal chat and emailed to both Secretary Bessent and Mr. Katz. The existing messages from the Signal chat consist of all messages from the Signal chat beginning with a message from Michael Waltz at 1:48pm on March 15, 2025. These messages are now preserved in the email accounts of both Secretary Bessent and Mr. Katz.

Executed on: 3/27/25

Signed:



Christopher Pilkerton
Acting General Counsel
U.S. Department of the Treasury