

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

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED
STATES,

Plaintiff,

v.

NATIONAL PARK SERVICE, *et al.*,

Defendants.

Case No. 1:25-cv-04316-RJL

**DECLARATION OF U.S. SECRET SERVICE
DEPUTY DIRECTOR MATTHEW C. QUINN**

I, Matthew C. Quinn declare as follows:

1. I am the Deputy Director of the United States Secret Service (Secret Service).
2. I previously submitted a declaration in this matter, filed on December 15, 2025 (“the Prior Declaration”) (Dkt. No. 14-11). The Prior Declaration is incorporated herein by reference. Except as expressly stated below, to the best of my knowledge the statements contained in the Prior Declaration remain true and correct.
3. This declaration is submitted for the limited purpose of updating the Court regarding the status of security-related projects at the White House Complex.
4. Since the filing of the Prior Declaration, the East Wing Project contractor has made progress on certain elements of the security infrastructure and security projects referenced in the Prior Declaration. *Id.* ¶ 8.
5. While additional efforts are ongoing, crucial security projects remain incomplete. These outstanding security projects are expected to require additional weeks or months to complete.

6. Continued construction work is therefore necessary to maintain and update the security infrastructure of the project site and the White House Complex. For example, continued waterproofing and water management is necessary to maintain the integrity of security elements throughout the Complex as flooding poses risks to infrastructure, utilities, and other critical systems.
7. Until this remaining work is completed, Secret Service's ability to meet its statutory mission of protecting the President, the First Family, and the White House Complex continues to be hampered.
8. In addition, the current open construction site is, in and of itself, a coordinated and managed safety hazard and adds additional challenges to Secret Service operations. For example, the site requires the Secret Service to redirect resources to account for the disruption to existing security procedures caused by construction activities.
9. More broadly, the construction of a new East Wing is beneficial to the long-term security of the President (both current and future) and the White House Complex as a whole. The former East Wing was outdated in terms of security and support for Secret Service operations, and its modernization to today's technological standards will enable the Secret Service to more effectively achieve its protective mission.
10. As an additional example, due to size and infrastructure constraints with the previous East Wing building, tents were often set up on the South Grounds of the White House Complex to host larger events. This process limited screening space and types of security equipment, and the measures necessary to secure the outdoor area were numerous and costly, both in terms of expense and personnel resources. Additionally, these larger events relied on a temporary visitor screening trailer that, due to space and infrastructure

constraints, resulted in a lower throughput of guests and prevented the Secret Service from using the most advanced screening equipment available. Having permanent, updated, and secure structures for screening guests and hosting events will obviate the need to use outdoor tents and the temporary screening building for future events and will also increase the safety and security of all attendees at those events, including the President and foreign leaders and dignitaries.

11. As stated in the Prior Declaration, should the Court request it, the Secret Service is prepared to provide more details, including law enforcement sensitive and/or classified information, in an appropriate setting, such as a classified declaration available for *in camera* review.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 15, 2026.



Matthew C. Quinn
Deputy Director
United States Secret Service