

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CABLE NEWS NETWORK, INC., et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Civil Action No. 1:26-cv-3287

DECLARATION

I, Michael K. Velchik, hereby declare under penalty of perjury as follows:

1. I am over 18 years of age and make this declaration based upon my own personal knowledge and experience. If called to do so, I could and would competently testify to these matters under oath.

2. I am an attorney at the U.S. Department of Justice representing Defendants in the above-captioned case.

3. The attached exhibits support Defendants' conclusions that Plaintiffs have exhibited behavior in violation of the standards of professionalism and decorum expected of those given access to the White House Complex, as explained in Defendants' opposition brief ECF No. 16 at 9-12 and in ECF No. 16-2 at 1.

4. Attached as **Exhibit A** is a true and correct copy of a Truth Social post by President Donald J. Trump, dated September 23, 2026, 8:21 PM, available at <https://truthsocial.com/@realDonaldTrump/posts/117323155721195611>

5. Attached as **Exhibit B** is a true and correct copy of Brian Bennett et al., “Trump aides explore attaching president’s name to Ford’s Theatre,” MSNOW, dated September 23, 2026, available at <https://www.ms.now/news/trump-fords-theatre-name-kennedy-center>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 23, 2026

Respectfully submitted,

/s/Michael K. Velchik

MICHAEL K. VELCHIK

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon Plaintiffs' counsel by the Electronic Case Filing system on September 23, 2026.

/s/Michael K. Velchik

MICHAEL K. VELCHIK