

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

Democratic National Committee,

Plaintiff,

v.

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

Defendants.

Case No. 1:26-cv-03506

DECLARATION OF LIBERTY SCHNEIDER

I, Liberty Schneider, declare as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts and information set forth in this declaration.
2. I am the Deputy Executive Director at the Democratic National Committee, or the “DNC.” Before I was promoted to my current role, I served as the DNC’s Chief of Staff.
3. In my role as Deputy Executive Director, I oversee many of the DNC’s program teams, including organizing, communications, training, fundraising, political strategy, and coalitions. In my previous role as Chief of Staff, I was also heavily involved in programming, committee-wide initiatives, and the DNC’s day-to-day operations.
4. The DNC is the Democratic Party’s national committee and is dedicated to electing Democratic candidates at the national, state, and local levels. In support of its mission, the DNC encourages and assists Democratic Party members and supporters in successfully casting ballots and fights to preserve the legal rights of its members and voters.
5. The DNC has approximately 450 formal members who are nationwide, including

State Party leaders, elected officials, and Democratic voters. These formal members come from all 50 States, Washington D.C., and the five U.S. territories. In fact, 200 of the DNC's formal members are elected to their positions with the DNC specifically to represent those jurisdictions across the country.

6. The DNC also considers any registered Democrat to be a member of the DNC and the Democratic Party, because Democratic voters influence and ultimately determine the DNC's strategic and political direction by electing DNC members and Democratic candidates to local, state, and federal offices.

7. Both the DNC itself and DNC members who are candidates for office have an interest in a fair and lawful electoral process for its members' campaigns. Even if these DNC members succeed in their campaigns, the DNC and its members are harmed by unlawful election rules, as they deprive the DNC and its candidate members of a fair process and an accurate result.

8. The DNC is actively budgeting, strategizing, and executing its plans for the 2026 midterm election cycle, which is already underway, in all 50 States, Washington D.C., and the five U.S. territories.

9. On September 23, 2026, President Trump began airing political propaganda ads created by the White House and paid for by the federal government. From the DNC's perspective, the President's propaganda ads enable the President to reserve funds held by MAGA Inc., a super PAC he claims to control, for other political efforts adverse to Democratic candidates and the DNC.

10. President Trump's use of taxpayer funds to air partisan political propaganda is an extraordinary and unprecedented attempt by the President to influence American elections.

11. Over the last two weeks, the DNC has heard from members that they are extremely

concerned about President Trump's use of their federal tax dollars for President Trump's partisan political purpose and its impact on the November 2026 elections.

12. The reputational interests of the DNC depend on public confidence in free and fair elections.

13. President Trump's propaganda ad campaign undermines fair and free elections and poses a direct threat to the DNC, DNC members who are candidates for office, and all other DNC members who are voters and volunteers for Democratic candidates.

14. President Trump's propaganda campaign funded by federal spending alters the campaign spending rules by permitting President Trump to use federal funding to advance his and Republicans' electoral interests.

15. For every taxpayer dollar President Trump spends on his propaganda campaign, it is a dollar that MAGA Inc. can instead invest in paid media, get-out-the vote efforts, and direct voter communications. Each and every dollar matters in tight political elections. As a result, the DNC and its candidate members will necessarily suffer from the President's federally funded propaganda.

16. President Trump's brazen use of federal funding poses a severe risk to the DNC's campaign efforts for the 2026 election cycle and beyond. Indeed, President Trump's use of federal funding for partisan communications threatens a broader use of funds in the future in an attempt to promote Republican candidates in 2028, including at the presidential level.

17. As of October 5, 2026, President Trump had reportedly spent at least \$11 million of the \$20 million that was misappropriated for the propaganda campaign. The DNC cannot wait until President Trump exhausts the entirety of the \$20 million that was diverted to pay for the ads.

18. The resources that the DNC and its candidate members have is finite in any given

election cycle. If the President can order money to be diverted from the federal fisc to spend on partisan propaganda, the DNC will inevitably be harmed.

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

Executed on: 10 / 09 / 2026

Liberty Schneider

Liberty Schneider, Deputy Executive Director
Democratic National Committee



Audit trail

Title	Trump ads declaration
File name	20261009_Schneider_Declaration_Final.pdf
Document ID	ea21016a2394c1cbc15f4b919c72339b1161b9ac
Audit trail date format	MM / DD / YYYY
Status	● Signed

Document History



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10 / 09 / 2026

15:23:28 UTC

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