



U.S. Department of Justice
Civil Division
950 Pennsylvania Ave. NW
Washington, DC 20530

June 16, 2026

Clifton Cislak, Clerk of Court
U.S. Court of Appeals for the District of Columbia Circuit
E. Barrett Prettyman U.S. Courthouse
333 Constitution Avenue NW
Washington, D.C. 20001

RE: *National Trust for Historic Preservation v. National Park Service et al.*, Nos. 26-5123, 26-5134

Dear Mr. Cislak:

Defendants write to advise the Court of a development that confirms the National Security imperative of staying and reversing the district court's lawless injunction and judgment.

Today, the DOJ announced charges against five men for an alleged plot to carry out an attack to kill President Trump, his family, dignitaries, and others attending the UFC event held on the South Lawn of the White House this Sunday. According to the charges, the men "planned to deploy drones armed with explosives in and around the [UFC] event in order to force an evacuation of the event and then planned to deploy snipers to fire upon 'high value targets' within the fleeing crowd."¹ Law enforcement detected and disrupted the plot on Thursday, June 10, just a few days before it was to be launched. *Id.*

This latest assassination plot against President Trump and dignitaries at the White House demonstrates the compelling need for the East Wing Project, with a Ballroom designed to defend against just such

¹ <https://www.justice.gov/opa/pr/five-men-arrested-and-charged-plot-attack-and-kill-government-officials-and-others-attending>

attacks. *See* Opening.Br.2-3. The Project will support a highly sophisticated Drone Port and Sniper Nests atop the Ballroom that would destroy any effort to launch such an attack. Reply.Br.1-2. The knitted, unified, cohesive Ballroom will also have many other critical strategic features—a heavy steel drone proof roof, missile resistant columns, bullet, ballistic, and blast proof glass windows, military grade and hermetically sealed venting for air conditioning and heating, and far more. Opening.Br.2.

The Ballroom’s mass and height will shield the White House grounds from attack, and give the Secret Service the visibility needed to identify attackers. Opening.Br.2-3. It will protect the President and guests at major events that are currently held in “plastic tents that cannot even protect highly esteemed guests from inclement weather, let alone high caliber bullets or kamikaze drones,” Reply.Br.2—*exactly* the attack that this Sunday’s would-be assassins plotted to launch.

In short, the repeated assassination attempts and plots against President Trump and those around him demonstrate the National Security imperative for a bullet proof, drone proof Ballroom to protect the President, all future Presidents, their Cabinets, staffs, families, and guests.

Sincerely,

/s/ Brett A. Shumate

Brett A. Shumate

Counsel for Appellants

cc: All counsel