

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A____

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES**DECLARATION OF MARCO RUBIO, SECRETARY OF STATE AND ASSISTANT TO
THE PRESIDENT FOR NATIONAL SECURITY AFFAIRS**

I, Marco Rubio, in my capacity as Secretary of State and Assistant to the President for National Security Affairs, hereby declare as follows:

1. I am the Secretary of State of the United States of America and the Assistant to the President for National Security Affairs (National Security Advisor). As Secretary of State, I am the President's chief foreign affairs advisor. I carry out the President's foreign policy through the Department of State and the Foreign Service of the United States. *See* 22 U.S.C. § 2651a. As National Security Advisor, amongst other duties, I advise and assist the President in carrying out his constitutional, statutory, and other official and ceremonial duties pertaining to national and homeland security. *See* National Security Presidential Memorandum-1 (Jan. 20, 2025).
2. The statements made herein are based on my personal knowledge and on information provided to me in my official capacity.
3. I am familiar with the lawsuit *National Trust for Historic Preservation in the United States v. National Park Service, et al.* and the principles at issue therein.

4. The purpose of this declaration is to confirm, in my capacities as Secretary of State and National Security Advisor, that a ruling staying the construction of the East Wing Project would cause significant and irreparable harm to the foreign policy and national security posture of the United States, with a particular focus on events and developments during the last two months while this case has been under submission to the D.C. Circuit.

5. In executing my duties as Secretary of State and National Security Advisor, I am familiar with the standards of development, etiquette, and security maintained in locations intended for conducting the official representative business of the various executive officers of foreign states and international organizations. I am also familiar with the impact such spaces have on the proper regulation and effectuation of the goals of foreign commerce.

6. In the course of diplomatic relations, there is a high degree of importance placed on protocol and etiquette. Such relational forms are often critical to the success or failure of our diplomatic efforts. The dignity afforded to heads of state and senior delegations through ceremonial practices can convey essential, unspoken signals about our seriousness, respectfulness, and influence. Hosting such important guests in outdated and inadequate facilities undermines such critical signaling imperatives.

7. In my work with heads of state and foreign ministers, I am frequently hosted in reception facilities that are visually impressive and reflective of the wealth and beauty of the nations I am visiting. In the United States, by contrast, we currently lack the ability to hold large events of a similar magnitude on White House grounds for those same heads of state and foreign dignitaries. Instead, we must currently host such visits in plastic or canvas tents on the South Lawn with unsafe and unsanitary portable bathrooms and accommodations unbecoming our national stature. For example, on April 28, 2026, we hosted the King and Queen of the United Kingdom. During

that event, we could host only a reception with a limited guest list because of the facility space constraints.

8. Our obligations extend beyond those immediate events, however, to the duty to project an authoritative image of the manifestations of free government and leadership in an era of rapid innovation. First, we risk compromising the reverence for free government and the gravitas of the Executive with trappings unbefitting the President's duties. Moreover, the ceaseless development of complex technologies is core to the modern economy and central to my global conversations. In that regard, it is essential to our global standing to maintain sophisticated physical spaces that combine creative innovation with principled continuity.

9. Finally, in the role of National Security Advisor, I am well aware of the diverse array of threats to which contemporary economic innovations also give rise. In addition to the aforementioned diplomatic demands on our infrastructure, we must also keep pace with the unique nature of rapidly evolving security risks. We do so by continuously implementing the most sophisticated defenses available.

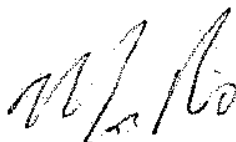
10. Our foreign counterparts offer premier security arrangements for United States officials. It is imperative that we not only offer the same level of elite security services, but offer the world's leading capabilities in an efficient manner on grounds over which we exert permanent control. These safety considerations include protection from natural elements and attacks by drones, projectiles, and other emerging threats. These risks could threaten the area beyond the White House complex and require sophisticated aerial, and other, countermeasures. These risks are also very real. On June 16, 2026, the Department of Justice announced charges against five individuals for a plot to attack and kill government officials attending the Ultimate Fighting Championship Freedom 250 event held at the White House on June 14, 2026. Those individuals

allegedly planned to deploy drones armed with explosives in and around the event, forcing an evacuation during which they intended for snipers to fire upon "high value targets." *See* Department of Justice, Five Men Arrested and Charged in Plot to Attack and Kill Government Officials and Others Attending the Ultimate Fighting Championship at White House (June 16, 2026), <https://www.justice.gov/opa/pr/five-men-arrested-and-charged-plot-attack-and-kill-government-officials-and-others-attending>.

11. We must obviously seek every reasonable means to mitigate both the more predictable risks, including weather and physical incursions, but also emerging threats such as drones. The East Wing Project is essential to that defensive security posture. The Project is absolutely critical not only for the physical safety of guests, but also for advancing our diplomatic relations and the interests and standing of the United States in the world.

I declare that the foregoing is true and correct to the best of my knowledge.

Dated: August 12, 2026.



Marco Rubio
Secretary of State and
Assistant to the President for National Security Affairs

PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A___

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES

**DECLARATION OF GENERAL JOHN DANIEL CAINE, CHAIRMAN OF THE JOINT
CHIEFS OF STAFF**

I, John Daniel Caine, in my capacity as Chairman of the Joint Chiefs of Staff, hereby declare as follows:

1. I currently serve as the 22nd Chairman of the Joint Chiefs of Staff and assumed these responsibilities on April 11, 2025. Per Title 10 U.S.C. § 151, I serve as the principal military advisor to the President, the National Security Council, the Homeland Security Council, and the Secretary of Defense.

2. The statements made herein are based on my personal knowledge and on information provided to me in my official capacity.

3. I declare there is a valid military requirement for a secure, state-of-the-art facility that provides for the physical protection of the President and the command, control, and communication capabilities necessary for the President to carry out his Commander-in-Chief responsibilities over the United States Armed Forces anywhere across the globe at any time.

I declare that the foregoing is true and correct to the best of my knowledge.

401a

PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT

Dated: August 12, 2026.

CAINE.JOHN.DA Digitally signed by
CAINE.JOHN.DANIEL.1183725870
NIEL.1183725870 Date: 2026.08.12 20:05:15 -04'00'

General John Daniel Caine
Chairman of the Joint Chiefs of Staff

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A ____

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES

**DECLARATION OF THE FEDERAL BUREAU OF INVESTIGATION CO-DEPUTY
DIRECTOR CHRISTOPHER G. RAIA**

I, Christopher G. Raia, on this 12th day of August 2026, swear and state:

1. I am the Co-Deputy Director of the Federal Bureau of Investigation ("FBI"), United States Department of Justice ("DOJ"), a component of the Executive Branch of the United States Government. I am responsible, for among other things, overseeing the FBI's criminal, counterintelligence, espionage, cyber, and counterterrorism investigations. As the Co-Deputy Director of the FBI, I have official supervision and control over the files and records of the FBI.

2. The matters stated herein are based on my personal knowledge, my review and consideration of documents and information available to me in my official capacity, and information furnished by the Special Agents ("SA") and other employees of the FBI and the Department of Justice.

FBI Investigations Involving Violent Threats against President Donald J. Trump

3. A review of internal files at the FBI revealed that from 20 January 2025 to present, there have been a total of approximately 1,600 incidents investigated by the FBI that have involved threats of violence to President Trump. This number includes over 1,500 preliminary threat assessments, 45 preliminary investigations, and 11 full investigations spanning multiple programs

to include counterterrorism, counterintelligence, criminal, cyber, and weapons of mass destruction threats. There are many additional threats in the years prior to this period. The below is not an exhaustive detail of all incidents, but summaries of 6 of the most significant and publicly reported threats and investigations addressed by the FBI.

A. ***IRGC-Directed Murder-for-Hire and Rally Assassination Plot:*** Asif Raza Merchant, a trained operative of the Iranian Islamic Revolutionary Guard Corps (“IRGC”), arrived in the US in early 2024. At his trial, Merchant admitted the IRGC trained and deployed him to the US to arrange political assassinations. In late 2023, he traveled to the US to identify and vet potential US persons to assist in the IRGC plot. In 2024, Merchant was sent to the US to action the plot, directed to arrange the murder of a US government official or politician. In mid-June 2024, a confidential source introduced Merchant to undercover FBI agents (UCs) whom Merchant recruited to kill a “political person,” stating instructions on who to kill would arrive after his departure. In furtherance of the plot, Merchant performed online searches for Trump rally schedules/locations and reported security protocols back to his Iranian handler. On 21 June 2024, Merchant paid the UCs a \$5,000 advance for the assassination but was arrested by law enforcement agents prior to boarding a flight. On 6 March 2026, a federal jury in NY convicted Merchant of murder for hire and attempting to commit an act of terrorism transcending national boundaries.

B. ***Butler, Pennsylvania Campaign Rally Shooting:*** On 13 July 2024, Thomas Crooks fired eight rounds from an AR-15-style rifle at a campaign rally for then Presidential Candidate Donald Trump at the Butler Farm Show grounds in Butler, Pennsylvania. These rounds struck and wounded President Trump, killed one campaign event attendee, and critically injured two others. A vehicle belonging to Crooks was found in the vicinity of the campaign event and was discovered to contain two improvised explosive devices which were ultimately neutralized by

law enforcement on site. FBI investigation indicates Crooks acted alone as he planned, prepared for, and attempted to assassinate President Trump at the campaign rally. Crooks registered to attend the Butler, Pennsylvania rally and engaged in overt acts that demonstrated intent to target President Trump.

C. *Trump International Golf Club Sniper Plot (West Palm Beach, FL):* In September 2025, after a two-week trial, a jury found Ryan Wesley Routh, 59, guilty of attempted assassination of President Trump, assault of a federal law enforcement officer, and multiple firearms offenses. On 14 September 2024, Routh was observed pointing what appeared to be an AK-47-style rifle at him from a sniper's hide concealed in a fence line bordering the golf course. Law enforcement officers later recovered a Norinco SKS rifle equipped with a scope, a loaded magazine containing 19 rounds of ammunition and one round in the chamber, steel armor plates, and a camera affixed to the fence and pointing at the sixth green of the golf course where President Trump was about to play golf. Testimony at trial also established that Routh had dropped off a box at a witness's residence in April 2024 after making another trip to the area near the golf course. Inside the box was a handwritten letter addressed "Dear World," in which Routh stated, among other things, "This was an assassination attempt on Donald Trump but I am so sorry I failed you."

D. *White House Correspondents' Association Dinner Armed Attack:* On 25 April 2026, the White House Correspondents' Association Dinner was held at the Washington Hilton hotel in Washington, D.C., attended by high-ranking U.S. government officials including President Donald J. Trump, the Vice President, and Cabinet Secretaries. On 6 April 2026, Cole Tomas Allen (31) made a hotel reservation at the Washington Hilton for 24-26 April 2026. On 21 April 2026, Allen traveled by train from Torrance, CA, to Chicago, IL, arriving 23 April. He then boarded a train to Washington, D.C., arriving 24 April and checking into the Washington Hilton. The Dinner

broadcast began at 8:00 p.m., with President Trump and First Lady Melania Trump arriving around 8:00 p.m. at the concourse ballroom. At approximately 8:40 p.m., Allen approached a security checkpoint on the Terrace Level armed with a long gun and ran through the magnetometer. Secret Service personnel heard a loud gunshot as a Secret Service Officer was shot in the chest (but was protected by a ballistic vest). The officer returned fire, and Allen was subdued by nearby officers and arrested.

E. ***UFC Freedom 250 White House Multi-Target Conspiracy:*** On 9 July 2026, eight defendants were charged federally for an alleged plot to carry out a coordinated attack killing government officials and high-profile attendees at the Ultimate Fighting Championship (UFC) Freedom 250 event held at the White House on 14 June 2026. Targets included the President, the Vice President, the Prime Minister of Israel, Elon Musk, and other high-value targets. Beginning in May 2026, the defendants conspired to provide material support and resources (money, firearms, ammunition, body armor, explosives, drones, medical/communication equipment). They utilized encrypted and social media platforms (Signal, SimpleX, Discord, TikTok, Instagram) to plan attacks, recruit, engage in marksmanship/combat training, and establish operational plans. All eight men were indicted on two counts: 1. Conspiracy to provide material support to terrorists. 2. Conspiracy to commit murder on federal government territory and to murder a federal government official.

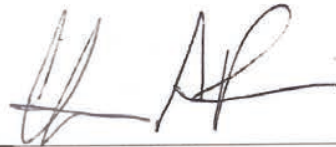
F. ***Trump National Golf Club Los Angeles Infiltration:*** On 31 July 2026, Federal agents conducting a security assessment at Trump National Golf Club Los Angeles (ahead of an August 4 visit by President Trump) observed Jeanine John Taele (38), a Marine Veteran, walking the course wearing an earpiece, filming, and photographing security-planning activities before driving away. On 2 August 2026, Taele returned to the club, approached federal agents, claimed

State Department employment, and admitted to having a loaded firearm in his parked truck. LA County Sheriff's Office deputies arrived and confirmed Taele was wanted for robbery. A search of his vehicle yielded a loaded 9mm pistol with hollow-point ammunition, a loaded magazine, binoculars, a 'security protection agent' badge, and an unregistered short-barreled rifle. Taele was arrested on 2 August 2026. State Charges under the California Penal Code were filed under § 211 (Robbery - Felony), § 32310(a) (Large-Capacity Magazines - Felony), § 33215 (Short-Barreled Rifle - Felony), § 25400(a)(1) (Concealed Loaded Firearm in Vehicle - Misdemeanor). FBI Los Angeles and the USAO deferred to the state prosecution in California while maintaining a federal complaint charging Taele with violation of 26 U.S.C. § 5861(d) (Possession of Unregistered Short-Barreled Rifle). Taele remains in custody.

4. Due to the above facts, and based upon my knowledge, training and experience, the President faces a heightened risk of assassination attempts from both foreign and domestic origins. This heightened risk to the President is unprecedented in recent times and is exacerbated by additional travel to venues outside of the established security of the White House. Over the past nine months, the threat environment facing the President and other political leaders has grown increasingly complex and dangerous. Foreign terrorist organizations, foreign enemies, transnational criminal networks, drug cartels, and others have demonstrated the intent to use sophisticated technologies and terror tactics to attack political leadership and foment unrest. These actors are willing and eager to use violence. For example, the President and other current and former senior US government officials assessed to have been involved in the January 2020 killing of former Iranian Revolutionary Guard Corps Qods Force Commander Qassem Soleimani have been and continue to be a persistent target of the Iranian regime. Since the late February outbreak of hostilities between the US and Iran, and in particular since the killing of Iranian Supreme Leader

Khamenei, we have seen heightened focus on the President in open calls by the Iranians, including an explicit bounty publicly declared, seeking his killing. In the domestic terrorism sphere, we have seen increased activity amongst a wide-set of anti-government and anarchist violent extremist actors, falling under the umbrella of NSPM-7, which includes those motivated to conduct targeted political violence, such as seen with the UFC Freedom 250 plotters, including a specific focus on President Trump and other senior government officials.

5. The East Wing Project has been described as a critical national security facility to protect and promote the security of the President and his guests. Halting this construction may expose the President to increased threats from sophisticated state and non-state actors.

Handwritten signature of Christopher G. Raia in black ink, consisting of a stylized 'C' and 'R' followed by a horizontal line.

Christopher G. Raia
Co-Deputy Director
Federal Bureau of Investigation

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES

No. 26A_____

**DECLARATION OF GARRETT R. HOFFMAN, DIRECTOR OF THE WHITE HOUSE
MILITARY OFFICE**

I, Garrett R. Hoffman declare as follows:

1. I am the Director of the White House Military Office (WHMO) and am a Major General in the United States Marine Corps. I have served as the Director, WHMO, since 2022. Prior to my current appointment, I have performed duties within the WHMO in a variety of roles to include as a Marine One pilot of the Marine Helicopter Squadron 1 (HMX-1), Assistant Operations Officer (HMX-1), Commander (HMX-1), Chief of Operations (WHMO), and Deputy Director (WHMO). I was commissioned in the United States Marine Corps in 1993, was designated a Naval Aviator in 1996, and have served in a variety of assignments and operational deployments.
2. As the Director of WHMO, I serve as the White House senior official for the management of the Continuity of the Presidency program which ensures the

uninterrupted functioning of the Presidency. In my capacity as Director, WHMO, I oversee an organization that consists of over 4,000 military and civilian personnel, with representation from all six branches of the armed forces. These personnel of the Department of War proudly support the President of the United States, Vice President of the United States, First Lady, and their respective staffs around-the-clock both in the Washington, D.C. area and worldwide.

3. My knowledge of the East Wing modernization project is based on my official duties as the Director, WHMO, which includes frequent briefings and communications with WHMO personnel who are planning for, and executing the WHMO's work as a result of the Project. Because of this, I possess current knowledge of the status, scope and operational security considerations surrounding the Project.
4. The Project includes two inextricably intertwined elements: first, a below-ground modernization of information technology infrastructure, primary and back-up utilities, medical facilities, and operational planning and execution spaces related to protection of the President and the Vice President; second, an above-ground ballroom designed to protect and shield the below-ground infrastructure from aerial or other attacks.
5. The WHMO has been involved in the design of the Project, since its inception, with the United States Secret Service, the National Park Service, the Department of the Army, various engineering and design firms, as well as with the general contractor to ensure the structural and mechanical components of the Project provided the maximum level of protection to the President, Vice President, and members of the Cabinet in the event of an adversary attack.

6. In my judgement, the Project delivers updated WHMO spaces, modernized utility infrastructure, enhanced operational capabilities, and increased resiliency of classified national security programs that are fundamental to successful execution of the Continuity of the Presidency mission as required in National Continuity policy. Additionally, the Project provides extraordinary protection to these spaces that has not been available in the past. This layered, hardened and tested protection shields Cabinet level events and gatherings that thereby significantly reduces the threat to Continuity of the Presidency.

I declare that the foregoing is true and correct to the best of my knowledge.

Dated: August ~~13~~, 2026.



Garrett R. Hoffman

Director

White House Military Office

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A____

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES

**DECLARATION OF STEPHEN MILLER, ASSISTANT TO THE PRESIDENT AND
HOMELAND SECURITY ADVISOR**

I, Stephen Miller, in my capacity as Assistant to the President and Homeland Security Advisor, hereby declare as follows:

1. I am Assistant to the President and Homeland Security Advisor. In this capacity, I serve as the President's principal advisor on homeland defense, domestic security, and counterterrorism policy, which includes ensuring the continuity of government operations and the physical protection of the Executive Residence and the White House complex. As Director of the Homeland Security Council, I am responsible for overseeing the interagency coordination of homeland security operations required to anticipate, deter, and defeat state-sponsored, asymmetric, and domestic threats within the United States and against U.S. persons.
2. The statements set forth in this declaration are based upon my personal knowledge, official briefings, threat assessments, and vetted intelligence reports compiled and provided to me in my official capacity by the nation's intelligence agencies, including the United States Secret Service, the Federal Bureau of Investigation ("FBI"), the Department of Homeland Security ("DHS"), and constituent agencies of the United States Intelligence Community.

**STATE-SPONSORED ASSASSINATION ATTEMPTS, FOREIGN TERRORIST
NETWORKS, AND TRANSNATIONAL GANGS**

3. The contemporary threat environment confronting the President is unprecedented in scope and scale. It includes emboldened lone-wolf extremists with access to advanced technology, domestic assassination plots by those who have been ideologically radicalized, state-directed lethal plots, foreign terrorist proxies, and a wide variety of emerging asymmetric threats.
4. Vetted intelligence and unsealed federal indictments confirm active, state-directed plots to assassinate the President and other high-ranking United States officials.
5. For example, in the case of Asif Raza Merchant, a trained operative of Iran's Islamic Revolutionary Guard Corps was dispatched into the United States to arrange targeted killings of American political leaders. Merchant traveled to the United States to recruit domestic hitmen and to execute murder-for-hire schemes directed at President Trump and other senior officials. His plot was foiled, and he was convicted in the United States District Court for the Eastern District of New York.
6. Vetted intelligence confirms that threats to the President and other senior officials are severe, persistent, and increasingly ambitious.
7. The risk to Executive Branch leadership is further heightened by heavily armed transnational criminal organizations, many designated as Foreign Terrorist Organizations, operating along and across the southern land border of the United States that use military-grade armaments, anti-materiel weapons, sophisticated drone technology, and elite counter-surveillance capabilities to advance their ends.

LOW-ALTITUDE UNMANNED AERIAL SYSTEMS AND AERIAL STANDOFF THREATS

8. Rapid acceleration in drone technology, unmanned aerial systems (“UAS”), and one-way attack drones present an evolving threat to the President, the White House, and senior leadership.
9. The White House is the nerve center of the command-and-control operation for the entire U.S. national security apparatus and the Commander-in-Chief’s leadership of the U.S. defense apparatus. The construction of the East Wing Project (“Project”) is essential to developing the adaptive capabilities necessary to counter UAS threats.

PAST ATTACKS AND HISTORICAL BREACHES OF THE PROTECTIVE PERIMETER

10. The repeated assassination attempts against President Trump make any delay in the construction of this facility an unacceptable risk to the life of the President, the ability of our nation to have command and control of government in a national emergency, and to respond to dynamic threats if the United States government were ever to come under attack. On July 13, 2024, an assassin’s bullet came within millimeters of taking the President’s life, killed a rally attendee, and critically wounded two others.
11. On September 15, 2024, along the perimeter of the Trump International Golf Club in West Palm Beach, Florida, the Secret Service interdicted an armed individual who had positioned himself in a sniper’s nest with a clear line of sight to assassinate the President, and the attack was prevented only when an agent spotted the gunman before he could shoot the President.
12. In February 2026, an armed intruder breached the perimeter at the President’s Mar-a-Lago residence in Florida and was killed in the ensuing confrontation.
13. In April 2026, an armed individual stormed a security checkpoint at the Washington Hilton during the White House Correspondents’ Association dinner, at which the President was

scheduled to speak. Shots were fired before the individual was subdued. He has since been charged with attempting to assassinate the President of the United States.

14. In May 2026, a suspect opened fire toward the White House complex and was killed when Secret Service returned fire.
15. These assassination attempts are matters of public record. There are thousands of other threats that are identified, uncovered, and disrupted before an attack can be effectuated. Domestic terrorists, international terrorists, and American enemies around the world may seek to launch attacks on White House grounds against the President. The intrusion of the judiciary into the security affairs of the White House threatens to prevent development of necessary defenses and has invited new dangers, while limiting the ability of United States counter-terrorism leadership to defend the President from such intolerable risks.

EMPIRICAL INDICATORS OF THREAT ACCELERATION

16. Open-source research and threat monitoring confirm an unprecedented year-over-year surge in indicators of targeted violence directed toward public officials.
17. Secret Service and FBI threat-assessment systems report record volumes of actionable threats directed at protected officials. High-density public events and off-site appearances, including open-air rallies, external summits, and events such as the White House Correspondents' Association dinner, present materially greater operational vulnerabilities than fortified facilities on the White House grounds, a vulnerability the April 2026 attack at the Washington Hilton has now demonstrated in fact.
18. Specific to the White House complex, the President of the United States is the number one target of threats and assassination plots in the world. The protection of the President, his family, and the American government demands unrelenting vigilance and constant adaptation from the

Secret Service. Yet, a federal judge has blocked the very adaptations the Secret Service has deemed necessary to protect the President.

THE PROTECTIVE NECESSITY OF THE EAST WING PROJECT

19. The East Wing Protective Project is an urgent national security imperative engineered to defeat documented and rapidly evolving twenty-first-century threat vectors.
20. First, the Project incorporates advanced structural features, including military-grade ballistic shielding, blast-deflection geometry, and advanced air-filtration systems designed to safeguard the President and essential national security personnel during a major kinetic attack or siege conditions. The Project thereby also serves continuity-of-government interests by ensuring that the President and senior national security staff are able to operate from a protected facility during any attack on the nation's capital.
21. Second, a core architectural feature of the Project is an automated counter-UAS installation situated atop the facility. That installation integrates cutting-edge technology to provide necessary comprehensive coverage and air-defense for the entire White House complex and President's Park.
22. Third, the establishment of a fully fortified, multi-use secure venue on the White House grounds materially reduces the frequency with which the President, visiting heads of state, and Cabinet officials are exposed to high-risk public venues elsewhere in the Washington metropolitan area. As the events of July and September 2024 demonstrate, off-site venues can pose a significantly elevated threat to protectees, a threat which would be mitigated by finalization of the Project.

HARM FROM ANY INJUNCTION HALTING CONSTRUCTION

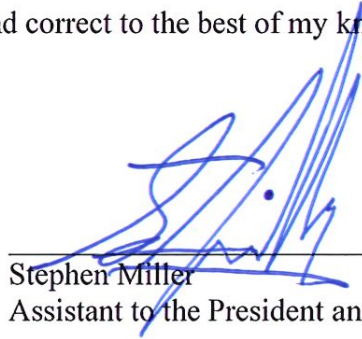
23. The harm from an injunction is immediate and compounding, and it cannot be remedied by any later judgment. Each day the Project is enjoined extends the period during which the President and senior officials lack the necessary physical security to address the evolving threat profile outlined in this declaration.
24. An injunction not only perilously delays the construction of facilities that have been deemed vitally necessary by Secret Service, the White House Military Office, and the government's entire national security apparatus, but it also creates a new and immediate threat by forcing the government to tolerate an open construction site on the White House lawn. The lower courts have effectively required the Commander-in-Chief of the United States military to leave an exposed excavation site at the foot of the most important facility in the United States.
25. A partially completed excavation and construction site immediately adjacent to the Executive Residence is itself a protective vulnerability because it further exposes the President's daily movements to outside observers and also requires additional Secret Service resources and adjustments to safeguard the White House complex.
26. Threats are dynamic, constantly evolving, and fast moving. Defending the life and security of the President requires instantaneous decision-making and is completely incompatible with the application of injunctions that freeze the security apparatus of the United States for weeks and months and jeopardize the secure operation of government. In my professional understanding of the complex way that threats evolve, the mere fact of, and publicity related to, the judiciary's intrusion into the Project have elevated risk to the President, senior officials, and the continuity of government.

CONCLUSION

27. For the foregoing reasons, halting or delaying construction of the East Wing Protective Project would compel the Executive Branch to protect the President against a rapidly escalating and highly sophisticated threat environment, would freeze the White House complex in a state of needless vulnerability, and would extend the exposure window well beyond the term of any injunction. In light of active foreign assassination plots, repeated attempted assassinations of the President, including the April 2026 attack at the Washington Hilton, the demonstrated capabilities of designated terrorist and cartel organizations, and the accelerating proliferation of weaponized drone technology; any judicial injunction of the Project directly compromises the security of the Chief Executive and inflicts immediate, severe, and irreparable harm upon the national security and homeland defense of the United States.

I declare that the foregoing is true and correct to the best of my knowledge.

Dated: August 13, 2026.



Stephen Miller
Assistant to the President and Homeland Security Advisor

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A ____

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES**DECLARATION OF JEREMY EICHBERGER, SPECIAL AGENT IN CHARGE OF
PRESIDENTIAL PROTECTIVE DIVISION AT UNITED STATES SECRET SERVICE**

I, Jeremy Eichberger, in my capacity as the Special Agent In Charge of the Presidential Protective Division at the United States Secret Service, hereby declare as follows:

1. I am the Special Agent In Charge (SAIC) of the Presidential Protective Division (PPD) at the United States Secret Service (Secret Service). As the SAIC of PPD, I oversee the Secret Service component directly responsible for protecting the President of the United States and members of his immediate family at all times, conducting protective security surveys, and performing numerous special projects pertinent to Presidential and First Family protection. I have been a Special Agent with the Secret Service since 2002 and have served in all five Special Agent roles in PPD during my three assignments: Special Agent, Assistant to the Special Agent In Charge, Assistant Special Agent In Charge, Deputy Special Agent In Charge, and Special Agent In Charge. During my tenure in PPD, I have been tasked with protecting then-Presidents Obama, Trump (first term), and Biden, as well as current-President Trump (second term). As a result, I possess current

knowledge regarding the status, scope, and operational security considerations related to threats to the President and First Family, as well as the White House Complex.

2. The Secret Service is charged with ensuring the safety of the President, Vice President, their families, other high-ranking government officials, and foreign heads of state visiting the United States. *See* 18 U.S.C. §§ 3056, 3056A. As part of that mission, the Secret Service also protects the White House Complex, the Vice President's residence at the United States Naval Observatory in Washington, D.C., and the foreign diplomatic missions located in and around Washington, D.C.
3. Today's threat environment has reached unprecedented levels of danger for the President amid the alleged assassination attempt of the President at the White House Correspondents' Dinner in April 2026, two shooting incidents near the White House Complex/Holocaust Museum in May 2026, and an alleged plot to attack the Ultimate Fighting Championship Freedom 250 event at the White House Complex in June 2026. In addition, during the President's recent trip to Turkey in July 2026, the Secret Service became aware of a specific threat to the President, requiring the Secret Service to utilize specific tactics and procedures to ensure the President's safety. Moreover, since January 1, 2026, security incidents involving the White House Complex have caused the White House Incident Notification System condition level to be elevated 12 times.
4. But this is not the only year in which high-profile threat incidents have occurred against this President. On September 15, 2024, an individual was seen aiming a rifle on the golf course at the Trump International Golf Club in West Palm Beach, Florida. He was eventually found guilty of attempting to assassinate a presidential candidate, among other felonies. And, of course, on July 13, 2024, an individual fired several shots at then-

Candidate Trump in Butler, Pennsylvania, in an attempt to assassinate him. This threat environment demands a robust and heightened protective response to fulfill the Secret Service's solemn Congressional mandate to ensure the safety of the President.

5. The East Wing Project incorporates critical and overdue security enhancements to the White House Complex that will strengthen the Secret Service's ability to protect the President and First Family. The new East Wing will include much-needed space to house Secret Service protective operations, including offices for agents/officers and the storage of law enforcement equipment, in a location that is connected to the White House and thus near the President at his residence and primary place of work. Having Secret Service assets in close physical proximity to the President is key to enabling specialty teams and individual agents/officers to respond quickly to a threat or other critical incident.
6. The infrastructure of the new East Wing will be hardened and provide a protected environment for official events and other activities, including alternative or additional secured areas if there is a national emergency. The new East Wing has been designed with ballistic- and blast-resistant walls; counter unmanned aerial systems capabilities; and chemical, biological, and radiation countermeasures, among other security features. Thus, the ability to hold large events in the new East Wing will offer important security advantages over current options, which generally consist of private venues that the Secret Service does not own and did not participate in the design from a security vantage point.
7. Halting work in the midst of a complex construction project at the White House Complex poses substantial security risks that the Secret Service and other government entities will be forced to ameliorate. The East Wing Project utilizes an integrated engineering process

with a layered approach that would prove difficult, if not impossible, to achieve in a piece-meal process with a stop-and-go tempo. In addition, there is a distinct possibility that the supply chain will be disrupted if vendors are prohibited from manufacturing and supplying construction and security-related materials for the East Wing Project for an unknown or lengthy period of time. Similarly, during any work stoppage, construction workers with crucial experience and skills may depart for other jobs. Construction workers at the White House Complex undergo extensive security vetting and are not easily replaced. This uncertainty and instability also creates an opportunity for foreign adversaries to exploit the situation.

8. As the SAIC of PPD, I am well aware of the serious threats and dangers facing the President and First Family on a daily basis. Completion of the East Wing Project will augment security countermeasures at the White House Complex to enhance the safety of the President, other officials, and guests occupying the new East Wing.

I declare that the foregoing is true and correct to the best of my knowledge.

Dated: August 13, 2026.



Jeremy Eichberger
Special Agent In Charge
Presidential Protective Division
United States Secret Service

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A ____

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES

**DECLARATION OF SEAN M. CURRAN, DIRECTOR OF THE UNITED STATES
SECRET SERVICE**

I, Sean M. Curran, in my capacity as the Director of the United States Secret Service, hereby declare as follows:

1. I am the Director of the United States Secret Service (Secret Service), responsible for the successful execution of the agency's integrated investigative and protective missions. I lead more than 8,200 Special Agents, Uniformed Division Officers (Secret Service Police), Technical Law Enforcement, and Mission Support personnel.
2. The Secret Service is charged with ensuring the safety of the nation's highest-ranking officials, most notably the President of the United States. *See* 18 U.S.C. §§ 3056, 3056A. As part of that mission, the Secret Service also protects key locations where the nation's highest-ranking elected leaders live and work, as well as the foreign diplomatic missions located in and around Washington, D.C. Among these locations of national importance is the White House Complex, which includes the President's residence and office.
3. In my capacity as the Secret Service Director, I oversee the Secret Service's protective and investigative operations, including the directorates and offices responsible for the

protection of the President, as well as the security of the White House Complex. As a result, I possess current knowledge regarding the status, scope, and operational security considerations related to threats to Secret Service protected persons and sites.

Prior Declarations

4. The Secret Service Deputy Director previously submitted four declarations in this matter, filed on December 15, 2025; January 15, 2026; April 13, 2026; and April 27, 2026.
5. In his prior declarations, the Deputy Director addressed the need for continued construction “to maintain and update the security infrastructure of the project site and the White House Complex” and stated that, “[u]ntil 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.” 1-15-26 Quinn Decl. ¶¶ 6, 7. Three months later, the Deputy Director re-emphasized that “[l]eaving the project site unfinished imperils that ability of the Secret Service to meet its statutory mission to protect the President, First Family, and White House Complex.” 4-13-26 Quinn Decl. ¶ 9.
6. The Deputy Director explained that “the current unfinished construction site compromises the ability of Secret Service personnel, including Emergency Response Teams and tactical K-9 handlers to readily traverse the White Complex” 4-13-26 Quinn Decl. ¶ 4. This includes the danger that Secret Service Police “will be hindered to effectively secure/defend the east side of the White House Building from an attack or security breach due to the current construction debris and large holes.” *Id.* ¶ 5.
7. The Deputy Director also addressed the security risks from an unfinished East Wing Project. He stated that “any delay in construction of the project may permit adversaries

to view the elements of construction, identify vulnerabilities, and pose ongoing national security risks to a critical piece of White House infrastructure that is necessary to safeguarding the President on a prospective basis.” 4-13-26 Quinn Decl. ¶12.

8. More broadly, the Deputy Director provided the Secret Service’s informed assessment about the long-term security benefits that the new East Wing will afford current and future Presidents and the White House Complex as a whole. *See* 1-15-26 Quinn Decl. ¶
9. He explained that “the current plans include threat resistant building materials such as bullet- and blast-proof glass and windows that enhance security measures” 4-13-26 Quinn Decl. ¶ 8.

Current Threat Landscape

9. Since the filing of the Deputy Director’s last declaration on April 27, 2026, the threat landscape has evolved. Acts of violence against the President and protected sites are occurring at an ever-increasing pace. Threats against Secret Service protectees are up about 40% compared to this time last year. These individuals are not merely making verbal threats; they are taking concrete steps to carry them out.
10. In his declaration filed on April 27, 2026, the Deputy Director addressed the recent assassination attempt of the President at the White House Correspondents’ Dinner (WHCD) at the Washington Hilton Hotel on April 25, 2026. He explained the security limitations of large off-site venues and the security advantages of holding large events at the White House Complex, not least because the White House Complex is a controlled facility with a permanent security infrastructure, whereas the Secret Service does not control the buildings at private venues. Moreover, holding large events at the White House Complex as opposed to a private venue such as a hotel will be less disruptive to

the D.C. community and local businesses—as there will be fewer geographical restrictions at and around the event site—while also providing the highest-level security possible for all attendees while minimizing the impact to the public and ultimately reducing government-related expenditures over time.

11. Numerous serious security incidents have occurred in the short time since the WHCD, exacerbating these factors. Just this month, on August 2, 2026, an individual was arrested at the Trump National Golf Club in Los Angeles, California, while possessing ammunition on his person and a loaded firearm in his pickup truck. This individual was identified during a security assessment at the golf club taken in advance of a visit to the club by the President on August 4. He was seen walking throughout the golf course, was wearing an earpiece, and took photographs and filmed videos of federal agents' security-planning activities. In addition, earlier this summer, eight individuals have been charged criminally in connection with an alleged plot to attack the Ultimate Fighting Championship Freedom 250 event at the White House Complex on June 14, 2026. They are charged with conspiracy to provide material support to terrorists and conspiracy to commit murder on federal government territory and to murder a federal government official. There were also significant security incidents on May 23, 2026, when an individual fired shots within yards of the White House Complex, and on May 4, 2026, when an individual shot at Secret Service Agents near the Holocaust Museum in Washington, D.C.

12. The ongoing Iran conflict has also significantly heightened the threat environment in the United States. As noted in the June 22, 2025, Department of Homeland Security National Terrorism Advisory System Bulletin, Iran has a long-standing commitment to target U.S.

Government Officials. Iranian leadership have publicly affirmed their posture of “Death to America” as a guiding principle and explicitly called for the assassination of President Trump.

13. The airborne threat vector against the President and protected sites, in particular, is persistent and substantial, and underscores the need for secure and hardened facilities for the President and other protectees. Since January 1, 2026, the Secret Service’s Aviation and Airspace Security Division (ASD) has identified 54 unmanned aircraft systems (UAS) detections, resulting in 27 mitigation actions and 25 operator intercepts, in the National Capital Region (NCR), which includes the White House Complex. These efforts led to 23 seizures, 13 of which were processed by the Secret Service’s Washington Field Office. The increase in air surveillance activity, particularly involving UAS, presents a continued and evolving security concern for protective operations.

East Wing Project

14. The former East Wing was an aging building—originally constructed during the Second World War—in need of critical renovations and upgrades to basic systems, including security infrastructure. The East Wing Project, once completed, will provide substantial security improvements to the White House Complex that will enhance the safety of the President, other protectees, and visitors. The new East Wing will include enhanced protection against ballistic, blast, UAS, chemical, biological, and radiological threats. For example, the Secret Service will be able to reinforce UAS countermeasures on the east side of the White House Complex, and increase UAS defenses to fortify against one of the nation’s largest emerging threats. In addition, the increased height and overall size of the new East Wing will drastically improve security at the White House Complex by

reducing line-of-sight during the President's transport on Marine One and for events on the White House South Lawn. This will reduce the risk of a targeted shooting from locations on 15th Street, N.W.

15. The new East Wing will improve Secret Service operations by delivering much needed space for offices, equipment, and response teams in a location that will allow rapid deployment during a critical incident. The security apparatus around the President—which includes the Secret Service's Presidential Protective Division and the Secret Service Police at the White House Complex—has grown substantially over the years and is sorely in need of additional space to support the protective mission. It is vital that the Secret Service has adequate space in close proximity to the President to effectively execute its protective mission. The East Wing Project will provide these additional hardened facilities necessary for the Secret Service to accomplish its statutory mission to protect the President.
16. The new East Wing will strengthen the White House's Continuity of Operations program by providing alternative and additional space to perform essential functions, including critical national security functions, in a secure building during an emergency, particularly in the event other parts of the White House Complex become unusable.
17. The Screening Facility component of the East Wing Modernization Project will upgrade the Secret Service's security posture at the White House Complex. Instead of temporary tents or trailers, the new Screening Facility will be a secure, underground facility with state-of-the-art technology to screen visitors. Visiting foreign dignitaries, other high-level officials, and guests will be better protected during screening in this new hardened structure than in previous screening locations.

18. From the perspective of the Secret Service's protective mission, the East Wing Project presents an advantageous opportunity to install and upgrade security countermeasures at the White House Complex in a way that likely will reduce overall costs compared to renovating existing structures, as well as maximize their efficacy due to being specifically procured to function as part of the new facility through an integrated engineering design. Such upgraded security measures have been long contemplated over several decades by the Secret Service for the East Wing in consultation with other departments and agencies of the Executive Branch. Once completed, these improvements will enhance security at the White House Complex for current and future Presidents.
19. The East Wing Project currently is an unfinished structure without permanent exterior walls or roof, inherently presenting safety and security risks at the White House Complex. Delays in construction continue to pose operational challenges for Secret Service personnel protecting the President and other protectees at the White House Complex, who must navigate through and around a construction site to provide a secure perimeter. Delays in construction also continue to increase the opportunity for bad actors to detect security and other design features being incorporated into the facility using aerial surveillance. As the Deputy Director noted in his prior declarations, "the current open construction site is, in and of itself, a coordinated and managed safety hazard [that] ... requires the Secret Service to redirect resources to account for the disruption to existing security procedures caused by construction activities." 1-15-26 Quinn Decl. ¶ 8. This remains true today.
20. Unfinished construction of this magnitude at the White House Complex presents enhanced risks to the Secret Service's protective operations. Given the heightened, real,

and dynamic threat environment of today, a partially constructed building attached to the White House poses a security and safety vulnerability that challenges the Secret Service's ability to fulfill its statutory mandate to protect the President and the White House Complex.

I declare that the foregoing is true and correct to the best of my knowledge.

Dated: August 13, 2026.

A handwritten signature in black ink, appearing to read 'SMC', is written above a horizontal line.

Sean M. Curran
Director
United States Secret Service

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A__

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES**DECLARATION OF SECRETARY OF THE ARMY DANIEL P. DRISCOLL**

I, Daniel P. Driscoll, declare as follows:

1. I currently serve as the 26th Secretary of the Army. I submit this supplemental declaration to update and further clarify information contained in the declaration I signed on April 17, 2026. This declaration is based on my personal knowledge, my professional experience, and information made available to me in my official capacity.
2. While the East Wing Project has been the subject of ongoing political discourse, this supplemental declaration is exclusively focused on the non-discretionary, national security imperative to protect our nation's pinnacle command and control node. My assessment and recommendations are driven solely by the physical security requirements of the National Command Authority (NCA).
3. The Department of the Army recommends immediate and uninterrupted completion of the White House East Wing construction to mitigate identified threat vulnerabilities and resolve what is fundamentally a critical defensive posture emergency. Planned construction and security enhancements establish robust, passive defense-in-depth architecture specifically engineered to harden the Presidential Emergency Operations Center (PEOC) against modern multi-domain threats. This is a mandatory security improvement designed to counter a sophisticated, modern

Unmanned Aerial System (UAS) threat vector that did not exist at scale in prior years, and which continues to increase. This project provides a vital, long-term capability that will benefit all Americans and all future administrations.

4. The global security environment continues to become increasingly volatile and dangerous. State and non-state actors increasingly employ commercially available and military-grade UAS carrying both improvised and purpose-built explosive payloads and capable of precision attack, penetration of lightly protected structures, and coordinated mass or swarm attacks. These tactics have been observed extensively in active theaters, including in the current conflict in Ukraine, and in the Middle East in current conflicts involving Israel, Iran and its affiliated actors, and across the broader region. These conflicts also demonstrate persistent adversary use of UAS to conduct surveillance, identify activity and signatures associated with command-and-control locations, and enable or conduct subsequent attacks against command nodes. Such employment demonstrates the particular risk posed to fixed, nationally significant command-and-control facilities whose locations and functions are publicly known, thereby bridging the gap between foreign battlefields and domestic homeland defense. Updated intelligence threat assessments validate the significant security concerns implicated by our adversaries' deployment of UAS. For example, during the World Cup, the United States experienced over 300 UAS incursions, some of which required kinetic engagement to eliminate the threat. This persistent threat of UAS attacks continues to increase, and our defensive measures must increase correspondingly. The current White House East Wing schematics are designed to mitigate identified vulnerabilities, including incursion by UAS, and resolve what is fundamentally a defensive posture emergency.

5. As stated in my previous declaration, the United States Army has been deeply involved in the East Wing construction project since its inception. The Army funded a portion of the structure

given that protection of the PEOC directly affects the ability to command and control the United States military. The U.S. Army's Engineer Research and Development Center (ERDC) has supported the White House East Wing design and construction since its inception as the world's premier expert in military engineering, installations and operational environments, civil works, geospatial research and engineering, and engineered resilient systems. In this heightened threat environment, the national security equities of protecting national leadership and strategic command and control directly implicate the Department's non-discretionary constitutional and statutory obligations to protect the National Command Authority, which must be given paramount consideration in this proceeding.

6. A dual-layered system comprising a sacrificial outer cover coupled with a hardened inner structural element is one of the most effective passive design measures to defeat emerging kinetic threats, particularly explosively armed UAS. Active counter-UAS capabilities provide important layers of protection but cannot eliminate this threat. Dense urban environments complicate UAS detection and engagement because of physical obstruction, electromagnetic congestion, and extensive legitimate use of the radio-frequency spectrum. Additionally, increasingly autonomous, pre-programmed, and non-radio-frequency-controlled UAS may reduce the effectiveness of traditional electronic countermeasures. Passive structural protection therefore provides an essential final layer of defense against UAS that evade, overwhelm, or are otherwise not defeated by active counter-UAS systems. The sacrificial overhead cover pre-detonates the explosive charge before it can reach the primary inhabited structure. From a civil engineering perspective, this outer layer forces the detonation to occur at a designated distance, creating a critical air gap known as standoff or "attic depth." The system effectively converts a localized, high-intensity near-contact detonation into a distributed, lower-magnitude blast wave that decays exponentially over distance. This

mitigation can only be accomplished with sufficient attic depth as currently engineered, and any reduction in this depth will fundamentally compromise mathematically validated blast-attenuation parameters and lead to catastrophic structural failure of the underlying node.

7. Currently, the West Wing is optimized for daily executive operations rather than engineered to withstand modern asymmetric attacks, necessitating a layered, hardened East Wing to protect the President and key staff. Furthermore, relying on emergency evacuation is tactically flawed; moving the President off-site activates classified movements and Continuity of Operations (COOP) assets that can often only be used once because their operational security and classified locations are permanently compromised upon activation, exposing the National Command Authority to transition risks during transit. Securing this reinforced subterranean node guarantees uninterrupted command and control in place. Finalizing this defense-in-depth architecture is a non-discretionary prerequisite to ensure the President can maintain continuity of government, uninterrupted operations, and effectively exercise National Command Authority during an attack or global crisis.

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

Executed on August 13, 2026.

A handwritten signature in black ink, appearing to read 'D. Driscoll', is written over a horizontal line.

DANIEL P. DRISCOLL

Secretary of the Army

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants,

v.

No. 26A____

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED
STATES

Respondent.

DECLARATION OF

JAY CLAYTON, DIRECTOR OF NATIONAL INTELLIGENCE;
JOHN RATCLIFFE, DIRECTOR OF THE CENTRAL INTELLIGENCE AGENCY;
KASHYAP PATEL, DIRECTOR OF THE FEDERAL BUREAU OF INVESTIGATION;
MARKWAYNE MULLIN, SECRETARY OF HOMELAND SECURITY

I. Introduction

I, Jay Clayton, in my capacity as Director of National Intelligence, hereby declare as follows:

1. I am the Director of National Intelligence ("DNI"). The DNI oversees the United States Intelligence Community ("IC") and serves as the principal intelligence adviser to the President. I previously served as the United States Attorney for the Southern District of New York, where I oversaw matters to include terrorism, espionage, money laundering, bribery, extortion, and threats to our nation's critical infrastructure.

I, John Ratcliffe, in my capacity as the Director of Central Intelligence Agency, hereby declare as follows:

2. I am the Director of the Central Intelligence Agency ("CIA"). In that capacity, I lead the CIA and manage human intelligence collection and analysis, covert action, counterintelligence

collection, and liaison relationships with foreign intelligence services. I have held this position since January 2025. Before becoming Director of the CIA, I served as the DNI from May 2020 until January 2021. As Director of the CIA, I serve as the executive head of the Agency, pursuant to the National Security Act of 1947. That Act charges me with the duties of (1) collecting intelligence through human sources and other appropriate means; (2) correlating and evaluating intelligence related to the national security and providing appropriate dissemination of such intelligence; (3) providing overall direction for and coordination of the collection of national intelligence outside the United States through human sources and, in coordination with other elements of the United States Government, ensuring that the most effective use is made of authorized collection resources and that appropriate account is taken of the risks to the United States and those involved in such collection; and (4) performing such other functions and duties related to intelligence affecting the national security as the President or the DNI may direct.

I, Kashyap Patel, in my capacity as the Director of the Federal Bureau of Investigation, hereby declare as follows:

3. I am the Director of the Federal Bureau of Investigation ("FBI"). I have held this position since February 20, 2025. As the Director of the Federal Bureau of Investigation, I serve as the head of the agency pursuant to 28 U.S. Code § 532 and am authorized to conduct criminal and national security investigations pursuant to 28 U.S. Code § 533, and other authorities granted by statute and Executive Order. In that capacity, I oversee all operations and investigative activities, including national security and intelligence operations. Before becoming the Director of the FBI, I served as a public defender in Florida, where I was responsible for litigating criminal matters in federal and state courts, and in the Department of Justice, National

Security Division as a national security prosecutor where I led investigations and oversaw the successful prosecution of terrorism subjects. I also served as the national security advisor and the senior counsel for the House Permanent Select Committee on Intelligence where I led congressional oversight of sensitive programs for the Intelligence Community and U.S. Special Operations Forces. During the first Trump Administration, I served in multiple roles to include as deputy assistant to the president on the National Security Council, as deputy director of National Intelligence, and as the chief of staff to the Department of Defense.

I, Markwayne Mullin, in my capacity as the Secretary of Homeland Security, hereby declare as follows:

4. I am the Secretary of Homeland Security. I oversee all Department of Homeland Security intelligence matters, including Counter-Terrorism, Counterproliferation of Weapons of Mass Destruction, and Critical Infrastructure Protection. Prior to serving in President Trump's Cabinet, I represented the people of Oklahoma for 13 years in both the United States Senate and House of Representatives.

Each declarant, Jay Clayton, John Ratcliffe, Kashyap Patel, and Markwayne Mullin, hereby declares as follows:

5. The statements made herein are based on my personal knowledge and on information provided to me in my official capacity, including without limitations, discussions among our various agencies at varied times regarding the matters herein.
6. The purpose of this declaration is to describe certain national security threats that would be posed by a ruling staying the construction of the East Wing Project ("Project"). The construction of the Project is designed to mitigate national security threats including lethal plotting and to increase the national security capabilities, defensive and offensive, of the White

House Complex (“Complex”). The suspension of construction on the Complex, would not only delay these objectives, but could create greater opportunities for foreign adversaries to harm national security.

II. National Security Threats Mitigated by the Project and National Security Threats Posed by Delay of Construction

7. The Project is critical for ensuring that the White House can serve as a secure location for the gathering of the President, gathering of senior government officials, and gatherings that further the interests of the United States. The Project on the Complex also will improve the level of protection and ability to manage and mitigate threats to the President and senior government officials and will enhance the handling, management, and utilization of IC information, including the conduct of IC-directed support to the Complex.
8. United States (“US”) officials, including the President and other senior leaders who often meet at the Complex, continue to face a multifaceted threat landscape from state and non-state terrorist actors, which have various motivations and use a variety of tactics. A stay in the Project delays the ability to mitigate these threats. In addition, a delay substantially increases the risk of foreign malign actors gathering intelligence on the Complex.
9. For example, Iran’s Government remains committed to retaliating against US officials, whom they blame for the death of Supreme Leader Ali Khamenei. They have explicitly named President Trump and US officials as targets in public statements. Tehran is coordinating a public messaging campaign that describes vengeance as a “strategic and religious duty” for individuals and groups to justify revenge.

10. In addition, domestic actors inspired by terrorism ideologies pose an enduring threat to elected officials, as indicated by the shooting at the White House Correspondents' Dinner in April and assassination attempts against the President.
11. Also, state-sponsored cyber actors remain highly active in targeting the Complex and the broader US political apparatus through email breach operations, executive route surveillance, and persistent cyber espionage.
12. Foreign Intelligence Services typically utilize a variety of tactics, techniques, and procedures against sensitive US facilities, such as the Complex, to try to gain information that they believe can position their respective governments to undermine US national interests. During the suspension of construction, tactics, techniques, and procedures may be employed within the Complex by US adversaries. These could include but are not limited to: the recruitment of human intelligence assets within the construction crew or among personnel within the Complex to position technical surveillance devices; leveraging Unidentified Aerial Systems to conduct remote imaging or technical collection activities against the halted construction site; and/or utilizing space-based imaging capabilities against the halted construction site within the Complex to determine pattern of life, progress, identification of changes, or potential equipment loadouts contained at the site. There are also concerns with US adversaries exploiting vulnerabilities in global supply chains, which are highly complex and intertwined, during the construction to gain enduring access to the Complex.
13. In addition to these national security threats, the delay in construction introduces a greater prospect for national security vulnerabilities to emerge. The proximity of the Complex to a number of hotels and event spaces in Washington D.C. provides a direct line-of-sight to the construction and presents counterintelligence threats that are difficult to mitigate, particularly

during a construction phase. This phase provides adversaries with time to collect on the potential layout of the facility, construction tactics, and materiel, which could enable foreign intelligence services' collection. Additionally, the longer the construction continues, the more opportunities exist for these intelligence services' actors to recruit construction personnel to collect information about the layout, compromise the structure, or implant collection devices. Finally, the knowledge from observing how the Complex is built can also inform these actors about how to more effectively destroy the facility in the event of an armed conflict.

III. Conclusion

14. Two of the objectives of the project are to mitigate lethal plotting and to increase the national security capabilities, defensive and offensive, of the Complex. The delay increases the time to achieve these objectives and, as a result, increases the physical risks to the President and others, and more generally, delays improvements to the national security capabilities of the Complex. The delay also substantially increases the opportunities for adversaries to undermine these important objectives through collection, infiltration, and other actions.

UNCLASSIFIED

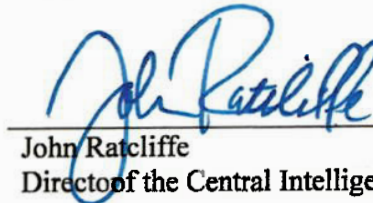
I declare that the foregoing is true and correct to the best of my knowledge.

Dated: August 13, 2026.



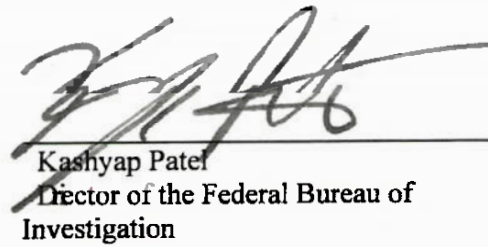
Jay Clayton
Director of National Intelligence

Dated: August 13, 2026.



John Ratcliffe
Director of the Central Intelligence Agency

Dated: August 13, 2026.



Kashyap Patel
Director of the Federal Bureau of Investigation

Dated: August 13, 2026.



Markwayne Mullin
Secretary of Homeland Security

UNCLASSIFIED

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A____

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES

DECLARATION OF JOSHUA FISHER, DIRECTOR FOR WHITE HOUSE
MANAGEMENT AND ADMINISTRATION

I, Joshua Fisher, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration. This declaration is based on my personal knowledge and information provided to me in my official capacity by others.

2. I am the Director for White House Management and Administration (“M&A”) and the Director of the Office of Administration (“OA”). In addition, I am responsible for managing the East Wing Modernization Project (“the Project”) on behalf of the President of the United States. In this role, I meet regularly with the President, federal officials within the Office of the Executive Residence (“EXR”) Chief Usher’s Office, the United States Secret Service (“USSS”), the White House Military Office (“WHMO”), and other agencies, as well as contractors, architects, and engineers associated with the Project. The Project is being built not principally for President Trump, as construction will be completed only a short number of months before the end of his Term. Rather, the Project will primarily benefit future Presidents and world leaders who will enjoy its protections for generations.

3. Construction on the Project has been under way since October 20, 2025. The Project is currently ahead-of-schedule and under budget. To date, \$335 million of an expected \$400 million has been raised from private parties in connection with the Project, and has been donated to NPS pursuant to its donation-acceptance authority. The ballroom is funded by contributions from President Trump and some of the most prominent and successful corporations and people in America. As it stands today, on a daily basis, roughly 250 people are working on site. Construction on the Project is taking place roughly 20 hours a day, 7 days a week.

4. The Project has made remarkable progress. The concrete-and-steel superstructure is already at roof level, rising as high as 70 feet above ground in places, with a footprint of nearly 50,000 square feet and extensive above-ground works throughout. The structural foundation extends another 50 feet below ground with steel, concrete and rebar interconnecting the entire superstructure. Given the current progress, the superstructure is beyond the point of return. The freestanding concrete shear walls on-site cannot be left as-is without being tied together with the designed structural steel. These walls are engineered to work as a team—they do not have the necessary stability or strength to handle wind and heavy loads on their own. Until the structural steel is installed to connect them into one solid frame, leaving them partially built creates a major safety risk, and leaves the structure vulnerable.

5. Around 80% of the rebar has been placed, and concrete poured, for the Project. Altogether, the Project is approximately 65% finished, and it has passed the point where major changes to its design are feasible. The superstructure is scheduled to be completed by November 2026 and much of its façade will be substantially completed by April 2027. The entire Project is scheduled to be completed by August 2028. These estimates (and those below) are based on the assumption the Project will continue on schedule, and at the same pace as existing construction.

6. If the district court's injunction goes into effect, it will cause massive construction-related problems for the Project. Those problems are independent from the national-security hazards that also will accompany the injunction, and which are addressed in other declarations.

7. As indicated by the attached photos (Attachment A), construction of the underground facilities structure is nearly complete, and construction above ground is well underway. The second story of the building is presently under construction, with its above-ground features visible from the streets surrounding the White House, including Pennsylvania Avenue, Constitution Avenue, 15th Street and H Street, although not from President's Park. By way of comparison, the second attached photos (Attachment B) shows a mockup of the final design.

8. With respect to the concrete structure, we have already placed 6.4 million pounds of rebar; poured 18,000 cubic yards of concrete, this concrete is the hardest and strongest concrete there is, the type used in nuclear power plants- it is impermeable, and virtually impossible to deconstruct. The materials used, both in concrete and steel (and even glass), are meant to stop bombs, rockets, missiles, and even nuclear blasts. It is, in a very large way, a 'safe room' for the Presidency and the continuity of government. We have completed work in the Colonnade as well as the North Ballroom and are on schedule to complete the South Ballroom concrete structure by August 21st. With respect to the structural steel work, which predominately occurs above the 2nd floor ballroom level, installation has been completed in the Colonnade, and fabrication is on track for the Ballroom structural steel to commence during the month of August. In total, over 3 million pounds of structural steel have been procured and are being prepared for installation on the Project.

9. By August 21—the date when the injunction is set to go into effect under the D.C. Circuit's order—we expect to install another 1 million pounds of rebar; pour another 3,000 cubic yards of concrete; and make substantial progress on filling the remaining concrete into the structure, plus

erecting the steel for the Ballroom roof. This is consistent with a project of this scale, and the pace with which our schedule is advancing.

10. As for the façades, we have already procured 1 million pounds of steel; 58,000 square feet of glass; 60,000 pounds of aluminum finishes; and have quarried almost all of the required limestone. We have also made substantial progress on preparing the molds, panels, and other materials necessary for the façades, and have commenced fabrication of the precast concrete façade panels.

11. By August 21, we expect to make substantial progress on fabricating precast concrete façade panels, carving the limestone façade ornamentation and Corinthian columns, fabricating insulated glass window units, and preparing these building envelope materials for delivery to the site.

12. As for the mechanical, electrical, and plumbing (MEP), we have installed 5 miles worth of conduit; procured 1,700 linear feet of plumbing pipe; and installed 500 linear feet of such pipe.

13. By August 21, we expect to install another mile of conduit; another 300 linear feet of plumbing pipe; and to have installed another 200 linear feet of such pipe.

14. As the above indicates, the Project has progressed efficiently and expeditiously, with a substantial amount of its work already completed. At our current pace, the structure should be substantially finished by November 2026, the facades by April 2027, and the commissioning of mechanical systems will commence in early 2028. Key features of the Project are finished and installed, including all below grade structures, the grand staircase structure, kitchen structure, and Colonnade movie theatre structure. Mechanical and electrical rough-in is progressing in all areas below the ballroom level, including in the kitchen, FLOTUS suite, and the below-grade mission spaces.

15. If work is ordered to stop, severe construction-related problems will follow—again, separate and apart from the national-security problems that others have detailed.

16. As for the structure and facade, if work is stopped for an extended period of time, the free-standing walls currently constructed will not be permanently tied-in to the forthcoming roof structure, leading to susceptibility to strong winds during extreme weather. There is a significant risk of water intrusion into the below-grade spaces and the adjacent White House residence. In the ordinary course, the Construction team can take measures to mitigate the effects of wind and weather during construction until the project is fully watertight; however, in the event of an extended stoppage, the Project will be susceptible to damage. The site is in an unfinished state and is also vulnerable to soil erosion and the deterioration of foundational elements. In short, the structure has made significant progress, but cannot be largely left alone at this point, and if we have to do that, it will endure tremendous setbacks that will fundamentally compromise the integrity of everything currently built there.

17. As for building systems, including the mechanical, electrical, and plumbing work, the temporary facilities in place are not equipped for long-term use, leaving the site without a stable power source, thus putting at risk, among other things, critical infrastructure and important HVAC work (which if left unaddressed, could lead to potential bacteria growth and other hazards within the structure or at/around the site).

18. In short, if work is stopped in line with the district court's injunction, it will be a disaster. Quite frankly, if the building were tragically ordered to be taken down, or even altered, by the court, there would be no way to do so. The Project is considerably on its way to being completed, with critical steps already finished. Stopping now—after so much foundational work having been finished—is beyond impractical. It will degrade and compromise what has already been done, to

the point where it is uncertain that the significant work completed to date will even be usable for whatever building is allowed to occupy the site. Pausing work now, as the district court has ordered, will jeopardize everything we have done so far; and depending on how long that freeze persists, it might force us to tear down everything we have done as a degraded mass, to allow for whatever comes next—something that would be disruptive and extremely dangerous.

19. None of this is meaningfully redressed by the district court's purported exception for national-security-related construction. The Project is an integrated whole, where each major aspect works in tandem with another. Should the structure or façade be stalled, it risks water contamination everywhere else. If we cannot pour concrete and lay steel in line with the Project's current plans, then we cannot do the electrical work necessary to install heating and air-conditioning systems that will (among much else) prevent contaminating mold, freezing lines, or degradation within the building. Without a water-tight building, we cannot install the critical infrastructure required to make below-ground facilities operational. The Project follows a single coherent design, and we have built consistent with that design for months. Its core pieces cannot be disentangled now. Work has progressed too far to go back to the drawing board.

20. I have worked closely on this project and have the highest opinion of its final appearance. This building is already being adjudged to be one of the most beautiful of its kind, anywhere in the country. To that end, the Supreme Court of the United States and, in particular, its magnificent Corinthian columns—considered the highest column order in architecture—have served as the inspiration for the monumental columns that front the military/ballroom complex. These columns are made from the highest-grade Indiana limestone, which was shipped to Italy, and are being carved by some of the greatest artists anywhere in the world. Delivery and installation will begin shortly.

21. I declare that the foregoing is true and correct to the best of my knowledge.

Dated: August 13, 2026



Joshua Fisher
Director for White House Management and Administration
Director of the Office of Administration
Executive Office of the President