IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CABLE NEWS NETWORK, INC. MS NOW CABLE, LLC, POLITICO LLC, ET AL., *Plaintiffs,* v. DONALD J. TRUMP, ET AL., *Defendants.*	Civil Case No. 1:26-cv-03287-TJK **DECLARATION OF BETSY KLEIN**

DECLARATION OF BETSY KLEIN

I, Betsy Klein, hereby declare as follows:

1. I am over 18 years of age, am competent, and make this declaration based upon my own personal knowledge and experience. I am a Plaintiff in this action, together with Cable News Network, Inc. (CNN). I make this declaration in support of Plaintiffs' Motion for a Preliminary Injunction. If called to do so, I could and would competently testify to these matters under oath.

2. I am a senior reporter and writer for CNN, based in Washington, D.C., where I cover the White House. My title is Senior White House Reporter, and I have been in that role since April 2025. I joined CNN in August 2014 as a political planning editor in its Washington bureau. I have covered the White House for CNN in some capacity since 2015, during the Obama Administration—first as a producer, and now as a reporter. From April 2015 to January 2017, I was a CNN campaign embed covering the 2016 presidential election; from January 2017 to January 2024, I was a White House producer; from January 2024 to April 2025, I was Senior White House Producer; and since April 2025 I have served in my current role. During my time

at CNN, I have covered the Obama Administration, the first Trump Administration, the Biden Administration, and the second Trump Administration. Before joining CNN, I worked in the Washington bureau of ABC News from July 2012 to August 2014 as a desk assistant, production assistant, and assignment editor. I have worked as a journalist for 14 years.

3. CNN's White House team is led by Chief White House Correspondent Kaitlan Collins and includes Senior White House Correspondent Kristen Holmes, Chief National Affairs Correspondent Jeff Zeleny, Senior White House Reporter Kevin Liptak, White House Correspondent Alayna Treene, and myself, together with the producers, photojournalists, camera operators, and technicians who support them.

My White House Hard Pass

4. I have held a White House hard pass continuously since February 2018. To obtain and renew it, I have held a credential from the Radio and Television Correspondents' Galleries of the U.S. Senate and House of Representatives since 2014 and have submitted to Secret Service background checks. Hard passes are subject to periodic renewal and, in my experience, are renewed as a matter of course so long as the holder continues to cover the White House regularly. My submission for renewal was made and accepted in June 2026, and made effective when the prior pass expired at the end of August 2026. The hard pass that was taken from me on September 19, 2026, bore an expiration date of August 31, 2027. Before September 19, 2026, my hard pass had never been suspended, revoked, or deactivated, and no one has ever told me that I posed a security concern or violated any rule of conduct governing the White House press facilities or otherwise questioned or suggested in any way that I might not remain eligible to hold my hard pass.

5. Until September 19, 2026, my hard pass allowed me to enter the White House complex on short notice and with minimal delay. Each day that I worked at the White House, I would arrive at the intersection of 17th Street NW and Pennsylvania Avenue, show my hard pass at a Secret Service checkpoint there, walk past the Eisenhower Executive Office Building to the Northwest Gate, put my belongings through an airport-security-style conveyor belt, tap my badge on a card reader, and enter a four-digit personal identification number. Every Secret Service officer on the complex recognizes the hard pass on sight, and hard-pass holders move among the parts of the White House complex open to credentialed journalists without escort. Because many White House events are announced the same day, and briefings or gaggles are often announced no more than half an hour in advance, a journalist without a hard pass is frequently unable to cover them at all. As a practical matter, a hard pass is essential to my work as a White House correspondent for a national news organization such as CNN.

6. On the morning of September 19, 2026, my hard pass was deactivated and taken from me by a United States Secret Service officer at the White House gate, as I describe in Paragraph 13 below. It was not returned to me until shortly before noon on September 24, 2026, as I describe in Paragraphs 16 through 19 below.

My Reliance on Access to the White House

7. In my view, my ability and the ability of other CNN journalists to access the White House on a regular basis is essential to the depth, accuracy, and timeliness of our coverage of the President and the administration. Hard-pass access enables CNN journalists to attend the daily press briefing and ask questions of the Press Secretary and other top officials; to attend events in the Brady Briefing Room, Oval Office, East Room and elsewhere on the grounds that are open to hard-pass holders; to report live from the North Lawn; to speak face to face with

White House officials and staff; to develop and maintain sources; and to report immediately on events as they occur.

8. As a White House producer, I worked from the White House every day. In my current role, I divide my time between CNN's Washington bureau and the White House: I work from the White House on days when I am assigned to the morning or afternoon reporter shift there, as I was for most of July and August 2026 and as I was scheduled to be on Monday, September 21, Tuesday, September 22, and Wednesday, September 23, 2026, and I otherwise work from the bureau. I was not able to work from the White House during my shifts on September 21, 22, and 23, 2026 because of the ban. On the days I am at the White House, like CNN's other White House journalists, I report and write from the White House grounds themselves. Immediately inside the Northwest Gate are the camera positions on the North Lawn from which CNN's live reports are conducted. Adjacent to the Brady Briefing Room is the "lower press" area, where White House press staff interact continuously with correspondents and where the networks' workspaces, called "booths," are located; CNN's booth is where I do much of my work when I am at the White House. Steps from the Oval Office is the "upper press" area, which includes the offices of the Press Secretary and the Communications Director; it is guarded by Secret Service officers but readily accessible to hard-pass holders with appointments because the Secret Service recognizes the credential. When the President travels, my workplace travels with him: the hard pass is the credential that gets a journalist through security at Joint Base Andrews, onto the travel manifest, aboard Air Force One, and into the secured areas of presidential events.

9. The access my hard pass provided cannot be replicated from outside the White House. A reporter who is not in the Brady Briefing Room cannot ask the Press Secretary a

question or follow up on an answer. A reporter who is not on the grounds cannot approach the White House officials and staff who are available in person but not otherwise reachable, cannot overhear or join the informal conversations from which much White House reporting develops, and cannot observe for herself what the President and his aides do and say. In addition to scheduled briefings, "gaggles" between reporters and the Press Secretary or other officials in the upper press area or outside the West Wing are a daily occurrence and take place with little or no notice; reporters speak with the Press Secretary and deputy press secretaries one-on-one, on and off the record; and off-camera background briefings are frequently held in the Briefing Room without advance notice. The material from those exchanges is available only to a reporter who is physically present. Pool reports and pool video, even when CNN is permitted to receive them, are a substitute for a reporter's own observation only in the way that a secondhand account is a substitute for being present. And because news at the White House is time-sensitive and often occurs with little or no notice, coverage that must be conducted from outside the gates is slower, less complete, and frequently impossible. An event a reporter could not attend cannot be covered after the fact. Much of what happens at the White House happens with little or no notice: a briefing is called; the President takes questions from reporters at an event; a visiting head of state arrives; or a statement is issued and reporters are summoned to the Briefing Room. A reporter who is not already at the White House when that happens simply misses it.

10. The ability to cover the President aboard Air Force One is particularly important, especially with President Trump. The President rarely holds press conferences in the White House press briefing room; instead, he frequently briefs the press and takes questions from journalists in locations like the Oval Office and aboard Air Force One.

The September 18, 2026 Ban

11. On September 18, 2026, I learned that the President had announced on Truth Social, in a post published at approximately 3:04 p.m. Eastern Time, that he was "banning" CNN from the White House "effective immediately" "as a result of their constant 'reporting' FAKE NEWS."

12. Based on my own reporting on September 18, 2026, White House staff—including members of the White House press office—were not given advance notice of the President's post and were left scrambling to learn how the ban would be carried out.

13. On the morning of Saturday, September 19, 2026, at approximately 9:30 a.m., I went to the White House to work, as I do whenever I am scheduled to cover the White House. I followed my usual routine: I showed my hard pass at the Secret Service checkpoint at 17th Street and Pennsylvania Avenue, walked past the Eisenhower Executive Office Building to the Northwest Gate, put my belongings through the security conveyor belt, tapped my badge on the card reader, and entered my PIN. This time, when I tapped my badge, the reader beeped several times, flashed red, blue, and green, and did not accept my PIN. The Secret Service officer in the guardhouse asked to see my badge and I handed it to him. He told me that it had been deactivated. I asked him whether he could provide an explanation as to why it had been deactivated. He said he had no further information. I asked him once more whether he had any more details he could share and he referred me to the White House Press Office for more information. I asked whether I could have the badge back. He said he would be keeping it. He handed back only the clear plastic case and lanyard in which the badge had been carried. I collected my belongings and left through the gate I had entered. I was not permitted to enter the White House complex. No one at the White House gave me any advance notice that my hard

pass would be deactivated, and no one has since explained why it was revoked or offered me any opportunity to respond. A CNN camera operator, Jonathan O'Beirne, accompanied me. After my badge was confiscated, he did not provide his badge, and departed with me. I described the encounter in a live report to CNN anchor Kasie Hunt from outside the White House shortly afterward, approximately one hour after journalists for MS NOW were also turned away.

14. Before being turned away from the White House on September 19, 2026, neither I nor, to my knowledge, any other CNN journalist had received a written statement of the reason for the denial, an opportunity to respond, or any information about the duration of the ban or how access might be restored. The only instruction any of us received was to direct questions to the White House Press Office.

15. I have since reviewed a letter dated September 22, 2026, sent on behalf of the White House to CNN and filed in this action as ECF No. 16-1. Among the CNN reporting the letter identifies is an article I wrote, entitled "Inside Plans to Rebuild the 'Top-Secret' Bunker Beneath the White House East Wing," which CNN published on January 19, 2026. As outlined in Paragraph 4, my submission for my hard pass renewal was made and accepted in June 2026, approximately five months after that article was published. At no time between January 19, 2026 and September 18, 2026 did anyone at the White House tell me that the article, or any other reporting of mine, violated any rule or standard governing hard-pass holders, or that it could result in the loss of my hard pass.

The Temporary Restraining Order and the White House's Subsequent Conduct

16. At approximately 12:58 a.m. on September 24, 2026, this Court granted Plaintiffs' motion and entered a Temporary Restraining Order directing Defendants (other than the President) and their agents to "immediately return, reinstate, and restore" the White House

hard passes held by employees of CNN, MS NOW, and POLITICO that were revoked on or about September 18, 2026. ECF No. 24. I learned of the Court's Order at 4:30 a.m. on September 24, 2026.

17. At approximately 6:10 a.m. on September 24, 2026, I went to the Secret Service checkpoint at 17th Street and Pennsylvania Avenue to enter the White House complex for work. The Secret Service officer at the checkpoint told me that my name was not in the system. I showed the officer a copy of the Court's Order. The officer consulted a supervisor and then denied me access. At 6:37 a.m., I submitted a request for access through the White House's visitor-entry (WAVES) system to the White House press wranglers at wranglers@who.eop.gov, the process by which a person who does not hold a hard pass may be cleared onto the complex. At 6:40 a.m., I sent a text message to Defendant Steven Cheung, the White House Communications Director, following up on that request. I did not receive a response from Mr. Cheung.

18. At approximately 6:42 a.m., I received a phone call from CNN photojournalist, Scott Pisczek. Mr. Pisczek told me that he had attempted to enter the White House complex at the Northwest Gate and his hard pass was deactivated and confiscated by the Secret Service officer at the gatehouse. Mr. Pisczek and I then attempted together to enter at the 17th Street and Pennsylvania Avenue checkpoint at approximately 7:59 a.m., 9:00 a.m., and 11:28 a.m. We were denied access each time. I understand that at approximately 9:47 a.m., Plaintiffs' counsel filed a notice informing the Court that Defendants had not complied with its Order. Our 11:28 a.m. attempt to enter came more than an hour and a half after that notice was filed, and we were turned away. At 11:30 a.m., I resubmitted my WAVES request to the White House press wranglers.

19. At 11:45 a.m., a White House press wrangler, Georgia O'Neil, emailed me that "[a]s of 9:45am this morning, your badge was active," that I was "active in the USSS System," and that the press office was "working with Secret Service to allow [me] entrance." She asked whether I was "stuck at a certain checkpoint." I replied at 11:46 a.m. that I was at 17th Street and Pennsylvania Avenue and had been denied access within the hour. At 11:48 a.m., Ms. O'Neil replied that she would come out to get me and asked whether anyone else from CNN was stuck; I told her that Mr. Pisczek was with me. At approximately 11:56 a.m., Ms. O'Neil arrived at the checkpoint and escorted us to the guardhouse, where, after we presented our driver's licenses, our hard passes were returned to us. We then went through security and entered the White House complex shortly before noon after being turned away four times that morning.

The Harm to Me

20. The ban harms me directly. I was unable to enter the White House complex for my shifts on September 19, 21, 22, and 23, 2026, and the morning of September 24, 2026. During that time, I could not attend the daily briefing or ask questions of the press team, could not work from CNN's booth or the press workspaces, could not attend events open to hard-pass holders, could not speak in person with the White House officials and staff who are my sources, and could not serve in the pool or travel with the President. The ban prevented me from doing my job as a White House reporter. Once the Court's temporary restraining order expires, absent a preliminary injunction, I will again be unable to enter the White House to do my job and will miss these critical opportunities to gather and report the news.

21. The Court's temporary restraining order remains in effect for only fourteen days, through on or about October 8, 2026. If the ban is reinstated when the order expires, I will again be shut out of the White House complex. On each day that I am assigned to work White House

reporter shifts while the ban is in effect, I would be unable to attend the daily briefing or ask questions of the press team, work from CNN's booth, attend events on the grounds open to hard-pass holders, speak in person with the White House officials and staff who are my sources, or observe for myself what the President and his aides do and say. I would also be unable to take my turn in the pool rotation or travel with the President. Because the President so often takes questions from journalists aboard Air Force One rather than in the briefing room, exclusion from Air Force One, in particular, would deprive me of one of the few regular opportunities to ask questions of the President directly. President Trump has said he plans to significantly scale up his campaign travel ahead of the midterm elections. I expect to be assigned a significant amount of that not-yet-announced travel for CNN, as well as pool shifts and White House reporter booth shifts, in the coming months. Because news at the White House happens with little or no notice and cannot be covered after the fact, each day I am excluded when I am assigned to work at the White House is a day of reporting that is permanently lost.

22. But for the ban announced on September 18, 2026, I would continue to hold my White House hard pass and would continue to report from the White House, attend briefings and events, serve in the pool, and travel with the President, as I have done for more than a decade.

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

Executed on this 27th day of September 2026 in Washington, D.C.



Betsy Klein