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 SCOTT WALDMAN**

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I, Scott Waldman, hereby declare as follows:

1. I am a White House reporter employed by POLITICO LLC (POLITICO). I am over 18 years of age, am competent, and make this declaration based upon my own personal knowledge and on information available to me in my role at POLITICO. 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 have covered the White House as a reporter for POLITICO since October 2016. I have held a White House press credential known as a "hard pass" since approximately June 2026. A hard pass is a credential that allows a journalist to enter the White House complex on a regular basis to cover the President and the administration. Before September 19, 2026, my hard pass had never been suspended or revoked.

3. On September 18, 2026, I learned that the President had announced on Truth Social that he was "banning" POLITICO, along with CNN and MS NOW, from the White House "effective immediately." No one from the White House contacted me or, to my knowledge, anyone else at POLITICO about that announcement or about my hard pass before that ban went into effect.

4. 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 6 a.m. on September 24, 2026.

5. At approximately 7:22 a.m. on September 24, 2026, I attempted to enter the White House complex for work for the first time since the "ban" went into effect. Upon presenting my hard pass, a Secret Service officer told me that I was not cleared to enter using my hard pass. I raised the Court's Temporary Restraining Order and said that I should be allowed to enter, to no avail. The Secret Service officer on duty said there was nothing he could do about it and that I had to surrender my pass. The officer then took my hard pass. I asked if I could get my hard pass back once the Secret Service had clarity on the requirements of the Court's order. The officer responded by gesturing towards a stack of hard passes and saying that he would put my hard pass with the others. The officer told me that while I could not enter using my hard pass, I might be able to enter with a day pass. I was forced to leave the premises since I did not have the clearance to be there and went back home to attempt to cover the White House from off-campus. Because I was blocked from my access to the White House, I was unable to witness the arrival of Chinese President Xi Jinping at the White House, a major global news event.

6. At approximately 12:28 p.m. on September 24, 2026, I learned that Alex Gangitano, another POLITICO White House reporter, had been admitted to the White House complex using her hard pass.

7. At approximately 12:59 p.m. on September 24, 2026, I returned to the White House complex and was granted entry. At that point, my hard pass was returned to me.

8. Absent a preliminary injunction, if the ban is reinstated when the Temporary Restraining Order expires, I will again be shut out of the White House complex, with no indication

of when, if ever, my access would be restored. I am currently scheduled to work White House reporter shifts on October 2, 8, 17, 18, 20, 29 and I expect to be assigned to those shifts on a regular basis for as long as I hold my current position. For each day the ban is in effect, I am unable to attend the daily briefing or ask questions of the Press Secretary, 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. Without these critical opportunities to gather the news, I will be unable to do my job covering the White House and reporting to the public.

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 28th day of September 2026 in Washington, D.C.

Scott Waldman