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 DAVID VIGILANTE**

DECLARATION OF DAVID VIGILANTE

I, David Vigilante, hereby declare as follows:

1. I am over 18 years of age, am competent, and make this declaration based upon my own personal knowledge, my review of CNN's business records, and information obtained in the course of my duties from CNN personnel with knowledge of the matters described.

2. I am the Executive Vice President and Head of Legal of Cable News Network, Inc. (CNN), a Plaintiff in this action. I make this declaration in support of Plaintiffs' Motion for a Further Preliminary Injunction. If called to do so, I could and would competently testify to these matters under oath. In the course of my duties, I am familiar with CNN's White House operations, including its Washington, D.C. bureau, its participation in the White House press pool, the credentials its journalists hold, and the facilities CNN maintains on the White House complex.

3. As Alicia Jennings explained in her declaration (paragraph 10), she identified each occasion between January 20, 2025, and September 30, 2026, on which President Trump appeared before and took questions from members of the press in the James S. Brady Press Briefing Room, in the Oval Office, and aboard Air Force One or on the tarmac before or after boarding Air Force

One. A team of employees working at my direction reviewed the footage and/or accompanying transcript of each of those events and reported the following:

4. In 2025, President Trump made two appearances in the James S. Brady Press Briefing Room, where he fielded a total of approximately 51 questions. By contrast, in 2025 he held 95 press events in the Oval Office, where he fielded no fewer than 1,991 questions, and he made himself available to the press aboard Air Force One or on the tarmac 70 times, where he fielded no fewer than 1,186 questions. This trend has continued in 2026. Through September 2026, the President has appeared in the James S. Brady Press Briefing Room only four times and has taken approximately 96 questions there. During the same period, he has held 43 press events in the Oval Office, where he fielded at least 741 questions, and he has made himself available to the press aboard Air Force One or on the tarmac 51 times, where he fielded no fewer than 865 questions.

5. In total, since the beginning of his second term, President Trump has held 121 press events aboard Air Force One or on the tarmac and 138 press events in the Oval Office—259 press events in all—during which he fielded no fewer than 4,783 questions from reporters. During the same period, he held only six press events in the James S. Brady Press Briefing Room, where he fielded a total of approximately 147 questions. While the James S. Brady Press Briefing Room remains a critical forum for reporters to gather and report the news, of the nearly 5,000 questions the President has entertained from reporters in these three settings, approximately 97 percent were asked in the Oval Office or in connection with his travel aboard Air Force One. Only members of the press pool may attend those events.

6. In connection with this action, a team of employees at my direction identified and retrieved the five video clips described below, which are attached to this declaration as Exhibits A

through E. Each clip has been excerpted from a longer recording in order to isolate the exchange between CNN journalist Kaitlan Collins and the President. The clips have not otherwise been edited or altered.

7. Attached as **Exhibit A** is a true and correct video clip of footage from a press event that President Trump held in the Oval Office on November 10, 2025. The clip captures Ms. Collins's question about a government shutdown and the President's response.

8. Attached as **Exhibit B** is a true and correct video clip footage from of a press event that President Trump held in the Oval Office on February 3, 2026. The clip captures Ms. Collins's questions regarding the victims of Jeffrey Epstein and the President's response, in which he describes CNN as a "very dishonest organization."

9. Attached as **Exhibit C** is a true and correct video clip of footage from a press event that President Trump held on the tarmac of Air Force One on March 23, 2026. The clip captures Ms. Collins's questions regarding the blockade of the Strait of Hormuz and the President's response.

10. Attached as **Exhibit D** is a true and correct video clip of footage from a press event that President Trump held in the Oval Office on April 29, 2026. The clip captures Ms. Collins's questions about a phone call between President Trump and Russian President Vladimir Putin and the ongoing wars in Ukraine and Iran, as well as the President's response.

11. Attached as **Exhibit E** is a true and correct video clip of footage from a press event that President Trump held in the Oval Office on July 13, 2026. The clip captures Ms. Collins's questions about ongoing military attacks in Iran and the President's response.

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 3d day of November 2026 in Washington, D.C.



David ~~Vigilante~~