EXHIBIT 1

(Declaration of Katherine Fallow)

The White House and the Press Timeline

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The press has always been part of the White House story. The passion with which the news was reported has always been read with great interest inside the president's doors. From George Washington to our 24-hour news cycle of present day, take a look at the history of the media and the White House.

1800s

The White House began to take shape as an institution with a professional executive staff. Reporters frequently waited outside Lincoln's Second Floor White House offices in hopes of hearing the latest news.

1800

The *National Intelligencer* newspaper was founded in Washington D.C., marking the beginning of White House press coverage.

Mid-1800s

Press changed its focus from serving presidential or party interests to getting a sensational story quickly in order to attract more readers.

Late 1800s

The White House became a distinct beat for the press, and presidents began to hold regular meetings with reporters. By 1930, the position of press secretary was established.

1902

The executive offices were moved from the Second Floor of the White House to the newly erected Temporary Executive Offices, later known as the West Wing.

1901-1909

Reporter access during the Theodore Roosevelt administration changed

markedly when he required that cabinet members forward all press requests through his private secretary.

1909-1913

President William Howard Taft's limited interactions with the press, compared to his predecessor, led to accusations of withholding news.

1913

Woodrow Wilson held the first press conference on March 15, 1913.

1914

Reporters who regularly covered the White House became alarmed at rumors that the Congressional Standing Committee of Correspondents would be entrusted with choosing reporters for a series of regular press conferences planned by President Woodrow Wilson. Eleven White House reporters responded to the reports by establishing the White House Correspondents' Association (WHCA) to support "the interests of those reporters and correspondents assigned to cover the White House." Although

the rumors proved to be untrue, the WHCA endured and elected as its president William W. Price, a *Washington Evening Star* reporter who was one of the early journalists to cover the White House on a full-time basis (and the first to write a column of White House news morsels).

1920s

Press conferences became the primary form of direct presidential communication with the American people.

1921

President Warren G. Harding hired professional speechwriter Judson Welliver and began to hold public press conferences twice a week.

1923-1929

President Calvin Coolidge was the first president to use radio to speak directly to the citizens of the nation, broadcasting monthly programs.

1929

President Herbert Hoover formally established the position of the press secretary, hiring George Akerson to the position.

1933-1945

President Franklin D. Roosevelt transformed the modern era of president-press relations by holding long and informal press conferences in the Oval Office. He also began the tradition of an annual press reception modeled after state diplomatic events. FDR was the first president to fully utilize radio as an instrument to promote his programs and policy.

1933

On March 6, 1933, First Lady Eleanor Roosevelt became the first First Lady to hold an official press conference. These became regular media interactions and were often conducted in the Red Room.

1945

President Harry Truman proposed a major West Wing expansion that would add a studio and auditorium for press briefings. The plans lacked Congressional support and were not carried out. Truman moved the meeting place for press conferences from the Oval Office to the Indian Treaty Room in the State Department (today's Eisenhower Executive Office Building). Truman's press conferences were reduced to once a week and became more scripted, usually including a formal presidential statement to outline positions or issues.

1955

After January 19, 1955, President Dwight D. Eisenhower's Press Secretary James C. Hagerty permitted radio, television, and newspaper equipment to record coverage of news conferences. The conferences were held about every two weeks and before the film was released to the public Hagerty edited what were considered the most newsworthy portions.

1961

On January 25, 1961, John F. Kennedy became the first president to hold a

live televised news conference, showing his comfort with members of the media. Briefing books, practice sessions, and increasing amounts of staff time were needed to prepare for conferences that were now major news events as more than half the nation's households had television sets.

1963-1969

President Lyndon B. Johnson changed the nature of press conferences by including impromptu sessions where reporters might ask a few questions rather than the formal forums held in the Indian Treaty Room or State Department (Eisenhower EOB) auditorium.

1969

The White House Office of Communications was established in 1969 to reach out to the nation's reporters and specialty media beyond those with White House credentials, including out-of-town press and the specialty press.

1969-1970

The Creation of the James S. Brady Press Briefing Room by the General Services Administration (GSA), the White House, and the Vosbeck, Vosbeck, Kendrick, and Redinger Firm in Alexandria, Virginia. Now referred to as the 'Press Briefing Room', it is still used for press conferences, workspace, and broadcasting.

1975

Helen Thomas was elected WHCA president, the first woman selected to hold the post.

1977-1981

President Jimmy Carter expanded his press contacts by scheduling bi-monthly meetings with out-of-town journalists in the Cabinet Room. Carter maintained regular monthly press conferences held in the Old Executive Office Building (Eisenhower EOB).

1980

Robert Pierpoint of CBS became the first non-print media journalist to be

elected head of the WHCA.

1981-1989

President Ronald Reagan preferred to present himself and his policies in venues other than a formal presidential press conference. He held about six conferences a year and usually staged them in the East Room at night.

1989-1993

President George H. W. Bush made frequent use of press conferences in the Press Briefing Room during his first three years in office, holding on average about three per month. He also instituted the practice of holding joint sessions with visiting heads of state.

1991

Robert M. Ellison, White House correspondent for the Sheridan Broadcasting Network, became the WHCA's first African-American president.

1995

Press Secretary Mike McCurry started the practice of televising the daily press briefings.

2009

In addition to news conferences, President Barack Obama set out policy priorities and connected with the public through the use of growing social media platforms such as Facebook, Instagram, and Twitter pages as well as accounts on Flickr, iTunes, Tumblr, Vimeo and YouTube. The president has appeared in numerous one-on-one televised interviews and briefer question-and-answer sessions. Despite the growth of digital communication, press conferences continue to remain an important element of presidential communications. As Towson University Professor Martha Kumar, a historian of presidential communications, observed in *Politico* "Press

conferences are a place where presidents establish the legitimacy of their ideas and call for public support."

Download the Timeline

MEDIA CONTACTS

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For all media inquiries, contact press@whha.org.

ABOUT THE WHITE HOUSE HISTORICAL ASSOCIATION

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Founded in 1961 by First Lady Jacqueline Kennedy, the White House Historical Association is the nonprofit, nonpartisan organization entrusted with preserving and sharing the history of the White House. Supported entirely by private philanthropy and the sale of educational books and products, the Association reaches millions of students, teachers, and lifelong learners through research and scholarship initiatives, public programming, and the authoritative titles published by its independent press. Throughout each presidency, the Association works with the Offices of the First Lady and the White House Curator to acquire and preserve historic objects for the White House Fine and Decorative Arts Collection. The Association also operates The People's

House: A White House Experience, a free, immersive, educational museum in Washington, D.C., which welcomes hundreds of thousands of visitors annually.

To learn more about the White House Historical Association, please visit WhiteHouseHistory.org.

EXHIBIT 2

(Declaration of Katherine Fallow)

The President, the Press, and Proximity

THE CREATION OF THE WHITE HOUSE PRESS CENTER

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JAMES A. JACOBS

The James S. Brady Press Briefing Room has been the on-grounds quarters for the White House correspondents and news photographers since its construction in 1969–70. Although generally referred to as the White House Press Briefing Room, one of the early project names—the West Terrace Press Center—more accurately takes in its trio of primary functions: press briefings and conferences, workspace, and broadcasting. Authorized by President Richard M. Nixon, this facility stands as the culmination of decades of increased press presence at the White House. Its construction was both an acknowledgment that the press had become an integral part of the presidency and an effort to provide a more casual alternative for communication between the West Wing and the White House press corps. The General Services Administration (GSA) worked in collaboration with the White House and the Alexandria, Virginia, architecture and engineering firm of Vosbeck, Vosbeck, Kendrick & Redinger to complete the project, which incorporated a one-story Briefing Room installed over the swimming pool built for President Franklin Delano Roosevelt in 1933 and two floors of work and broadcasting areas to the east of the pool, toward the White House proper.

In light of the relationship between the press and the president, the James S. Brady Press Briefing Room holds both symbolic and functional significance. Its location in one of the oldest parts of the White House, nestled between the fabled residence and the West Wing, is evidence alone of the key role the news media has come to play as an intermediary between the public and the executive branch of the United States government. Indeed, the location and extent of

the press quarters in history documents the evolution of this relationship over the course of the twentieth century as it was impacted by changes in technology, media, and reporting methods used by the press and the president throughout the twentieth century.



Reporters use telephones located in the White House Press Room to call the day's stories into their news desks, c. 1937.

LIBRARY OF CONGRESS

Workspace for the Emergent White House Press Corps

Members of the press have had dedicated workspace at the White House since completion of the West Wing's first iteration in 1902, but the type and frequency of access to the sitting president varied during the first half of the twentieth century. [1] For most of the nineteenth century, newspaper reporters concentrated most of their government coverage on Congress and

its activities. Presidents occasionally granted interviews or their secretaries might speak more often with favorites, but there was no specific group assigned to cover the White House. During President Grover Cleveland's second administration (1893–97), William "Fatty" Price emerged as the first reporter known to regularly visit the White House for news stories—initially standing outside the gate waiting to query exiting visitors about their business there. President William McKinley later allowed reporters to work inside at a Second Floor corridor table, and his secretary began a long tradition of more-or-less regular press briefings that is still a primary source of news to this day.[2]

President Theodore Roosevelt created the first designated office for correspondents at the White House. This unprecedented step in press relations provides some support for the debated claim that he was "the first President … to develop a clear idea of press management."[3] Aside from the Press Room itself, Roosevelt's major innovation in the press-president relationship was that he would often meet with correspondents directly in addition to daily briefings by his secretary. These meetings were not in the same realm as the later press conferences, for he "courted" particular reporters and "played to their egos" during meetings with small groups in an effort to shape favorable stories; if the result was not acceptable, Roosevelt denied future access.[4] It is not a coincidence that the Roosevelt presidency can be considered a vanguard administration in its dealings with the press. In the early twentieth century, newspaper circulation increased significantly across the country, and many of the nation's major cities opened Washington bureaus with staffs that were particularly skilled in news reporting. A 1904 publication entitled *Washington Correspondents Past and Present* noted: "The larges [*sic*] dailies, such as those of New York, Chicago, Baltimore, Philadelphia, St. Louis and Boston send their very best political writers. Many of these special correspondents have the privilege of signing their names to their dispatches and letters. These newspapers maintain offices in the northwest portion of the city, close to the departments, White House, and the leading hotels."[5]

Around this time, the Washington correspondents headquartered in these dispersed offices were allotted a dedicated room in the new Executive Office Building, which has since been replaced by the enlarged West Wing. Charles McKim of the famed architectural firm of McKim, Mead & White designed the proto–West Wing as part of a comprehensive renovation and expansion campaign at the White House undertaken by Theodore Roosevelt.[6] The modest workspace for the press was located just off the lobby of the new building. Although small, it

provided the White House correspondents with an indoor space equipped with three telephones and strategically positioned near the president and his staff. It was located at the building's main entrance, which, in theory, allowed for easy interception of visitors arriving for and departing from executive appointments. [7] Unfortunately for the correspondents, guests of the president could also quietly proceed from another White House entrance, along the private West Terrace Colonnade, into his office, avoiding the gauntlet at the public entrance. [8] Despite this built-in circumvention, Roosevelt's assignment of a room for members of the press in proximity to himself and his staff established an unprecedented level of access and conveyed his acknowledgment of the emerging press-president relationship.

The White House correspondents remained in this workspace through the beginning of the Hoover administration, when they moved across the lobby into larger quarters with new furniture. [9] The press photographers—"previously slouched on chairs in the public vestibule"—were also given a room of their own at the northwest corner of the West Terrace. [10] In 1934, when the West Wing was gutted and expanded by Franklin Delano Roosevelt, the Press Room was completely rebuilt in roughly its original location, although larger. [11] The new room was later described as being "equipped with desks, typewriters, direct telephone connections to the offices of the telegraphic press associations, and such recreational facilities as card and chess tables." [12] Although enlarged, the Press Room remained only a place where White House correspondents worked and waited; communication with the president and his staff for the most part occurred beyond the room.



When the camera-shy pilot Charles Lindbergh tried to exit the White House after a visit with President Franklin Roosevelt in 1939, he found all the doors covered by news cameramen. He is seen here running the photographer's gauntlet as he emerged from a side door of the West Wing. The location of the Press Room at the time allowed reporters easy access to the president's visitors.

LIBRARY OF CONGRESS

The Press Conference and Its Need for Space

From the time of Woodrow Wilson's administration through World War II, open presidential meetings with credentialed members of the press, or "conferences," increasingly became a preferred form of communication. These were held mostly in the president's office and, although each president's approach and demeanor were distinct, evolved into something of a controlled free-for-all. By 1950, Harry S. Truman felt that the in-office press conferences had run their course and decided to move them to the ornate Indian Treaty Room in what is now known as the Eisenhower Executive Office Building. A May 1950 *Washington Post* article presented an impression of the Oval Office press conferences as justification enough for the move.

"The informal procedure at the conferences in the oval room of the Executive Offices, with the reporters swarming around the presidential desk, had of course certain advantages. It enabled the President to become personally acquainted with the correspondents who were covering the White House beat, it made for a certain liveliness in the character of the questions and answers, and it often elicited unexpected bits of news. But these advantages gradually vanished as the number of newspapermen, American and foreign, regularly attending the conferences began to mount into the hundreds. The oval room on conference day began to resemble a Times Square subway platform at the rush hours." [13]

Truman had expressed dissatisfaction with this arrangement almost immediately upon moving into the Oval Office in 1945. His thwarted proposal to extend the West Wing southward called for an addition that would have included a large auditorium intended primarily for press conferences and briefings. [14]

It was five years before Truman and his staff identified and secured a location large enough and near enough the West Wing for holding regular conferences with the press. While spacious, the Indian Treaty Room did not necessarily appeal to postwar architectural sensibilities. A writer for the *Washington Daily News* lamented in an April 1950 article that it "resembles the interior of a Chicago meat packer's mansion, or possibly the main reception room of a lady engaged in another business in San Francisco about the time of the earthquake." [15] The questionable decor notwithstanding, Truman saw the move to a bigger room, with seats, as an opportunity to change press conference protocol. Instead of anonymously shouting out questions from the crowd around the president's desk, correspondents would, in the future, be required to rise and state their name and the newspaper or agency they represented before speaking. [16] Because the conferences occurred outside the West Wing, correspondents no longer had quick access to the "batteries of private line telephones and PBX extensions into their respective offices." [17] When news of the move became public, the eight largest American press syndicates requested and were granted eleven PBX (private branch exchange) extensions, which were installed in booths in the corridor outside the Indian Treaty Room; the government also installed one public pay telephone. [18] Dwight D. Eisenhower continued to use the room for conferences during his administration, although initiating a somewhat more rigid format for questioning and, in 1955, "permitting TV and newsreel cameramen to record his news conference on sound film for the first time in history." [19]



The large table in the lobby of the West Wing, seen in 1942, was a gift from Philippine President Emilio Aguinaldo in 1934.

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

The next administrations departed the Indian Treaty Room, with John F. Kennedy most often using the State Department Auditorium and Lyndon B. Johnson holding his news conferences in a number of different locations. [20] During those years, the White House correspondents were still working out of their 1930s room, which had been augmented by six broadcast booths installed in a small adjacent space entered from the central lobby. With Kennedy's arrival, the Press Room received its first cosmetic renovation since 1934 in the form of new and more numerous desks and a coordinated paint scheme. [21] A credentialed *Evening Star* writer described the Press Room environment in 1964 while on assignment covering a White House event.

"We made a right turn into the press room where the glamorous White House correspondents live and have their being—that is when they are not on the road with the President. . . . The room is lined on either side, and up and down the center, by rows of cubicles large enough for a desk, typewriter, telephone and even a correspondent—if he isn't very much overweight." [22]

This observation not only provides a welcome account of what the West Wing Press Room looked like near the end of its life but also gives some sense of the way in which the working lives of the White House correspondents and news photographers were changing by the 1960s.



It became clear to presidential advisers by at least the Johnson administration that staging press conferences outside Washington was a savvy idea.

Once Kennedy made the milestone first press conference broadcast live on television in 1961, the location and environment for those conferences became less fixed. Expanded jet travel more frequently took the president and members of his staff on the road, with correspondents in tow to report on the travel and associated conferences outside of Washington. It became clear to presidential advisers by at least the Johnson administration that staging press conferences outside Washington was a savvy idea. Not only would the conference get coverage from White House correspondents and news photographers making the trip with the president, but the local media also tended to give far more attention to the event than it would otherwise garner in the national capital. [23] Although formal press conferences in Washington still took place, the flexibility offered by mass communications, fast long-distance travel, and mobile White House

correspondents and news photographers contributed to a shift in how information passed between the West Wing and the press. This shift affected the design and intent of the White House Press Center and its later changes.



The large table in the lobby of the West Wing provided a convenient place for reporters to store their coats and hats in 1942.

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

Advances in communication and transportation lent greater flexibility to where press conferences could be scheduled; at the same time, the character of those still held in Washington also changed because of a steady increase in the number of White House correspondents and news photographers. A 1970 *Washington Post* article summarized the evolution.

"With the much larger Washington press corps, the situation has changed drastically since FDR held conferences in his office, or even since Presidents Truman and Eisenhower held them in the

Indian Treaty Room. . . . Today any presidential news conference announced even an hour in advance will draw several hundred reporters, more than can fit into any available White House space but the East Room, where the televised conferences are held. With several hundred reporters present, any informality the President may have desired is lost." [24]

Increased numbers reduced informality; so, too, did television, whose programming dictated a set amount of time and somewhat rigid structure for each conference. These general trends and a well-known, mutually antagonistic relationship with the press led Richard Nixon to curtail the number of televised press conferences. [25] His decision to construct a new Press Center seems to have been in part an effort to facilitate greater interaction between him and the Washington correspondents without increasing the number of formal conferences. At the time of its opening, the *New York Times* reported that the president "has privately expressed a wish to use the new briefing room for informal chats and news conferences," a sentiment echoed by the *Washington Post*: "Presidential aides report that Mr. Nixon will continue to hold occasional televised conferences and will from time to time drop into the new briefing room to hold more informal conferences without the intrusion of television." [26] With the stated desire to bring the White House correspondents nearer to him in an environment that might encourage casual interaction, Richard Nixon authorized the design and construction of a new and modern press facility in the West Terrace.



The spacious press room provided a welcome change from crowded gatherings of reporters around the President's desk in the Oval Office as seen in 1945.

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION

The West Terrace Location

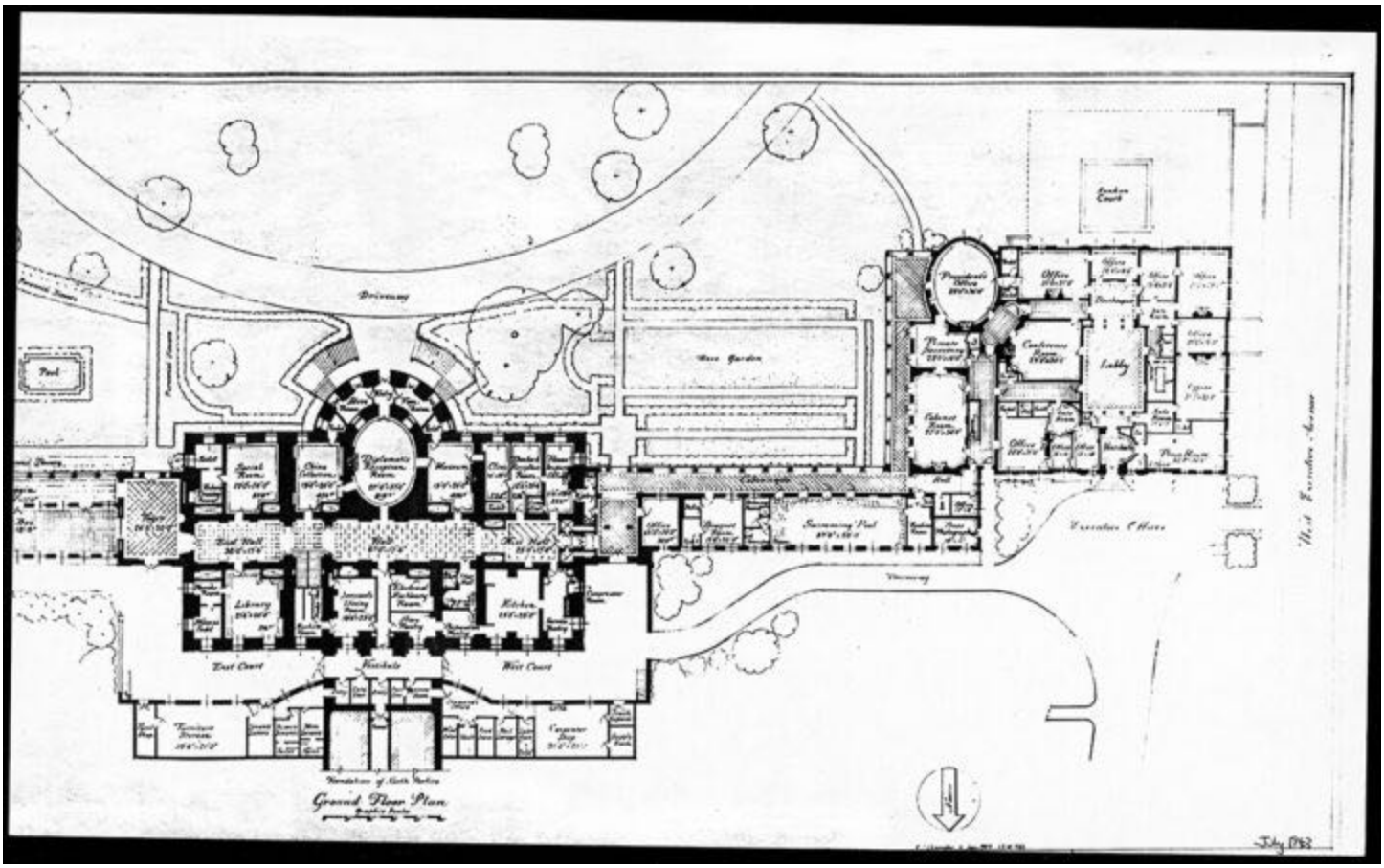
The White House Press Center was the latest use of space in the West Terrace, one of two, one-story wings conceived by Thomas Jefferson as extensions to the Executive Residence, not unlike the ones he had earlier built at Monticello. Construction of what came to be known as the East and West Terraces began in 1805.[27] While never fully realizing Jefferson's scheme, the terraces were a functional triumph and afforded successive administrations the space to accommodate needs as they arose. At the time of the Press Center construction, the West Terrace was principally composed of a flower room renovated in 1962, a sauna built in 1969 at the beginning of the Nixon administration, and, most notably, an indoor swimming pool and its associated changing or "massage" rooms and mechanical equipment installed in 1933 to provide some relief to President Franklin D. Roosevelt's physical handicaps.[28] At the end of September 1969, the White House announced that President Nixon had decided to deck over the swimming pool

inside the West Terrace in an effort "to provide expanded quarters for the press corps." [29]

A combination of spatial and functional factors shaped this decision in addition to Nixon's relationship with the press. The inadequacy of the West Wing Press Room, described around the time that the new facility opened as "a cramped room off the visitors' lobby," was a major factor. [30] Despite a recent renovation, the room had quickly become too small for the burgeoning White House press corps. [31] After having occupied the executive offices for more than half a year, Nixon's staff realized they needed additional workspace in the West Wing. In particular, Henry Kissinger, Nixon's national security adviser, required something better than a basement office with no reception area for meeting with ambassadors and other callers. [32] The underused swimming pool in the West Terrace offered an ideal solution for both problems; since occupying the White House, Nixon had rarely used it. In its stead, the press would move to spatially and functionally enlarged quarters in a location still near the president, and members of his staff would be free to take over a considerable piece of valuable West Wing real estate.

Presumably comprehending not only FDR's sustained popularity in the American psyche, but also that the swimming pool, which had been paid for by public subscription, was one of his better-known physical legacies remaining at the White House, Nixon moved the idea forward delicately. Randall Vosbeck, one of the architects of the Press Center, recalled: "We were told in no uncertain terms that Nixon did not want any harm done to the pool, and the design of the Press Room must be done in such a way that the pool could be restored easily, apparently in case he received comments that he had destroyed the FDR pool." [33] From the very first public announcement, it was repeatedly made clear that the changes would be reversible should a later administration desire to use the pool again. Even Nixon's brief remarks at the opening of the facility made such a reference: "All the pool equipment is preserved and in storage if a future President wants to put the press outside again." [34] Concern over public relations for the project also extended to the legacy of another revered Democratic president—John F. Kennedy. In 1962, he oversaw the cosmetic renovation of the pool area, which included the installation along three walls of a large mural by artist Bernard Lamotte depicting the harbor at Christiansted, Saint

Croix, U.S. Virgin Islands. [35] Period press and Nixon's opening-day speech clearly stated that the murals, which had been a gift from Kennedy's father, had been preserved and were in storage. [36] Perhaps because of his preemptive explanations, Nixon's proposal appears to have generated no major controversy, although the White House press corps would have had little incentive to say anything that might impact plans for its quarters. [37]



A ground floor plan made in 1943 shows the location of the Press Room in the northwest corner of the West Wing and the swimming pool in its original location at the center of the West Terrace.

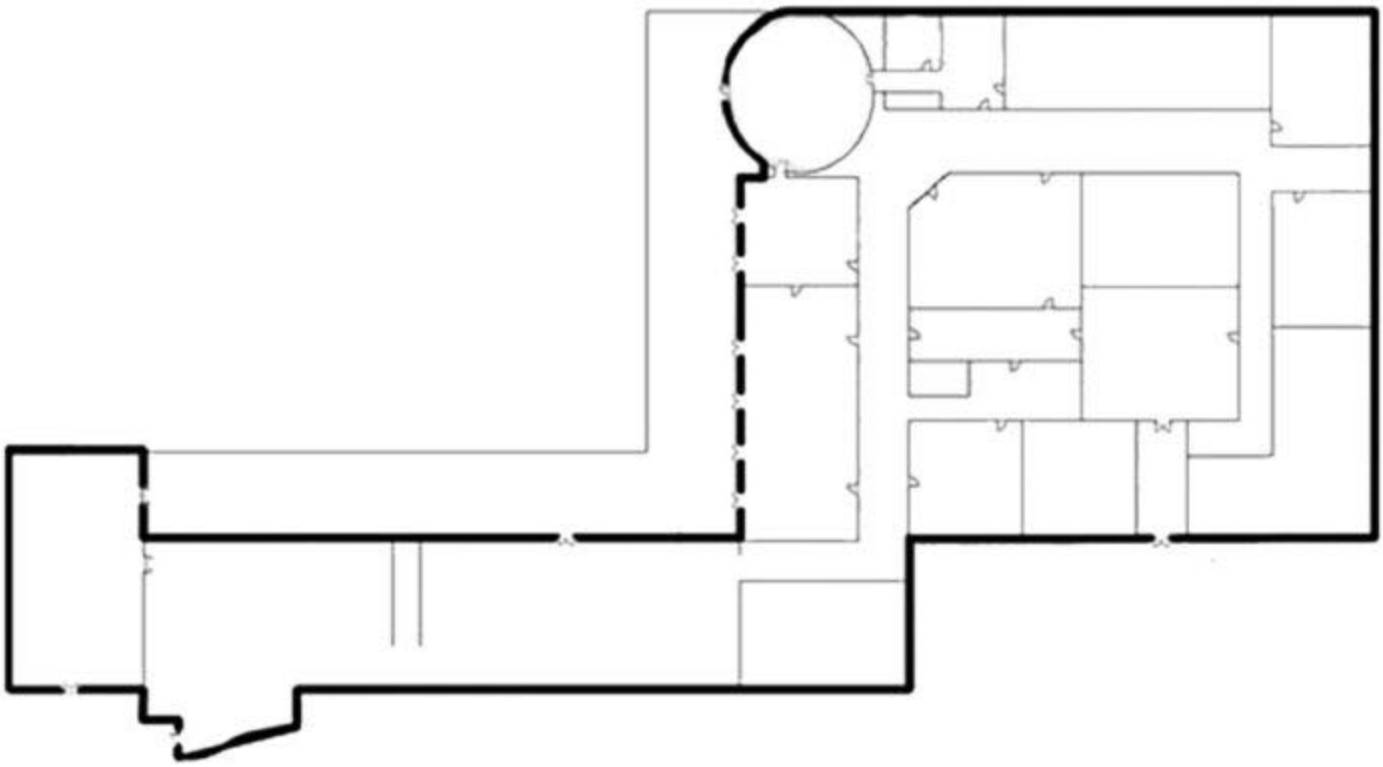
THE WHITE HOUSE COLLECTION

The swimming pool area represented a major portion of what became the new facility; space was also gained from adjacent rooms and a new basement. The Briefing Room proper corresponded more or less to the large room that housed the swimming pool and its small deck, which were covered over with a wood floor. The work areas, broadcasting booths, and lounges occupied a two-story area immediately to the east. A handful of rooms with different functions were eliminated for the ground floor portion. Just beyond the pool to the east were the men's and women's changing rooms, which according to period newspapers articles had also

functioned as "massage" rooms. [38] Four months into his administration, Nixon had a "sauna bath" installed in a portion of the changing room area; the Press Room construction displaced this sauna, which was reinstalled at Camp David. [39] Next along the line was the "flower shop," which had been completely renovated and updated by First Lady Jacqueline Kennedy in 1962. This was where the flower arrangements were created for daily and special events for the White House. The final room given over to the upper level of the press quarters was a dog kennel. [40]

The lower-level workspace and broadcasting booths of the facility were situated in a new basement. Initially planned to encompass only a single story, the November 1969 discovery of below-grade rooms dating from the West Terrace's earliest history prompted an expansion of the project's scope. [41] Period newspaper articles reported that experts suggested the two rectangular cellar rooms had originally been used for storage of coal or fodder and the cylindrical one, or "silo," "could have been a water storage tank." [42] On his own plans of the terraces, Thomas Jefferson indicated that the silo was built for use as an icehouse. [43] By the mid-twentieth century, the three spaces had ceased functioning in any practical manner as they had been in-filled with dirt in some previous time; this in-fill, however, did preserve an array of nineteenth-century artifacts unearthed by workers as they continued excavating. The objects dated mostly from a period spanning the Franklin Pierce and Ulysses S. Grant administrations; these were collected and cataloged by James Ketchum, the White House curator.

Despite knowledge at the time that the wall fragments and vaulting likely dated back directly to Jefferson, the remnants were not viewed as salvageable historic fabric or at least not so important that they should be retained at the expense of an expanded concept for the Press Center. Indeed, notice of likely revisions to the plan accompanied breaking reports about the discovery, as reported in an *Evening Star* article entitled "Vintage 1800s: White House Rooms Found Under Pool," which stated: "White House aides said the discovery has caused some 'replanning and rethinking.' . . . 'We're playing around with this new space and doing some replanning,' one aide said. 'We don't know what's going to come out of it all now.'" [44] The Truman reconstruction of the Executive Residence established a precedent for subterranean expansion as a way to augment space while retaining the historic appearance of the White House ensemble if not necessarily its historic fabric. A lower level would double the workspace for members of the press with no obvious exterior changes. It is quite possible that Nixon also backed this enlargement precisely so that the pool might later be reopened—only the briefing room portion of the new facility would be lost with such a reversion and the press could continue working in its bi-level home next door.



A plan of the West Wing, c. 2014, shows the current location of the Press Corps Offices, Press Briefing Room, and Press Staff Offices in the West Terrace, which were built over the swimming pool during the Nixon administration. Offices for the president's advisers are now in the former location of the Press Room.

WHITEHOUSE.GOV

The Design of the Press Center

While it was reported that Richard Nixon had the Press Center "prepared to his own specifications" [45] and his Press Secretary Ronald Ziegler "helped design the quarters," [46] the facility also involved the ideas and energies of a number of government and private-sector professionals. The GSA oversaw the entire project and acted as liaison between the White House and the other parties. Founded in 1949, GSA was in part created to manage government buildings and the space needs of federal agencies. It is one of the governmental entities collectively responsible for the function and maintenance of the White House complex. GSA hired Alexandria, Virginia, architects Randall Vosbeck and William Vosbeck to work with the agency on realizing the project, as noted in a 1970 Washington Post article: the "new [press] quarters . . . were designed by Alexandria architects Vosbeck & Vosbeck for the General Services Administration to White House specifications." [47]

Brothers Robert Randall Vosbeck (b. 1930) and William Frederick Vosbeck Jr. (b. 1924) established an architectural practice in 1962. [48] Both had earned degrees in architecture from the University of Minnesota. In 1967, they merged their office with the Arlington engineering firm of Kendrick & Redinger, forming Vosbeck, Vosbeck, Kendrick & Redinger. [49] Although the 1970 *Washington Post* article mentioned only "Vosbeck & Vosbeck," the larger firm existed at the time of the Press Center project. [50]

Randall Vosbeck explained in 2007 that, at the time of this commission, the firm "was making a name for itself, and were doing a variety of work in the DC area." [51] This mentioned "variety" seems to relate to both building type and aesthetic approach. For example, in the 1960s the firm designed neo-traditional buildings for Tavern Square in Alexandria, Virginia, a controversial block-size redevelopment around historic Gadsby's Tavern. About the same time, the firm was also involved with the near-total Modern reconstruction of Arlington, Virginia's, Rosslyn area, which was launched in 1961. [52] Among their more prominent designs during their early period were buildings for George Mason College (now University), a high-rise office building for Fairfax County, and an addition for the Charles Barrett Elementary School in Alexandria, for which the firm won a local design award. [53] The Press Center was one of a number of White House projects the firm completed for GSA around that time. Randall Vosbeck could not recall in 2007 exactly why GSA chose his firm but observed that "we were doing quite a bit of government work back then." [54]



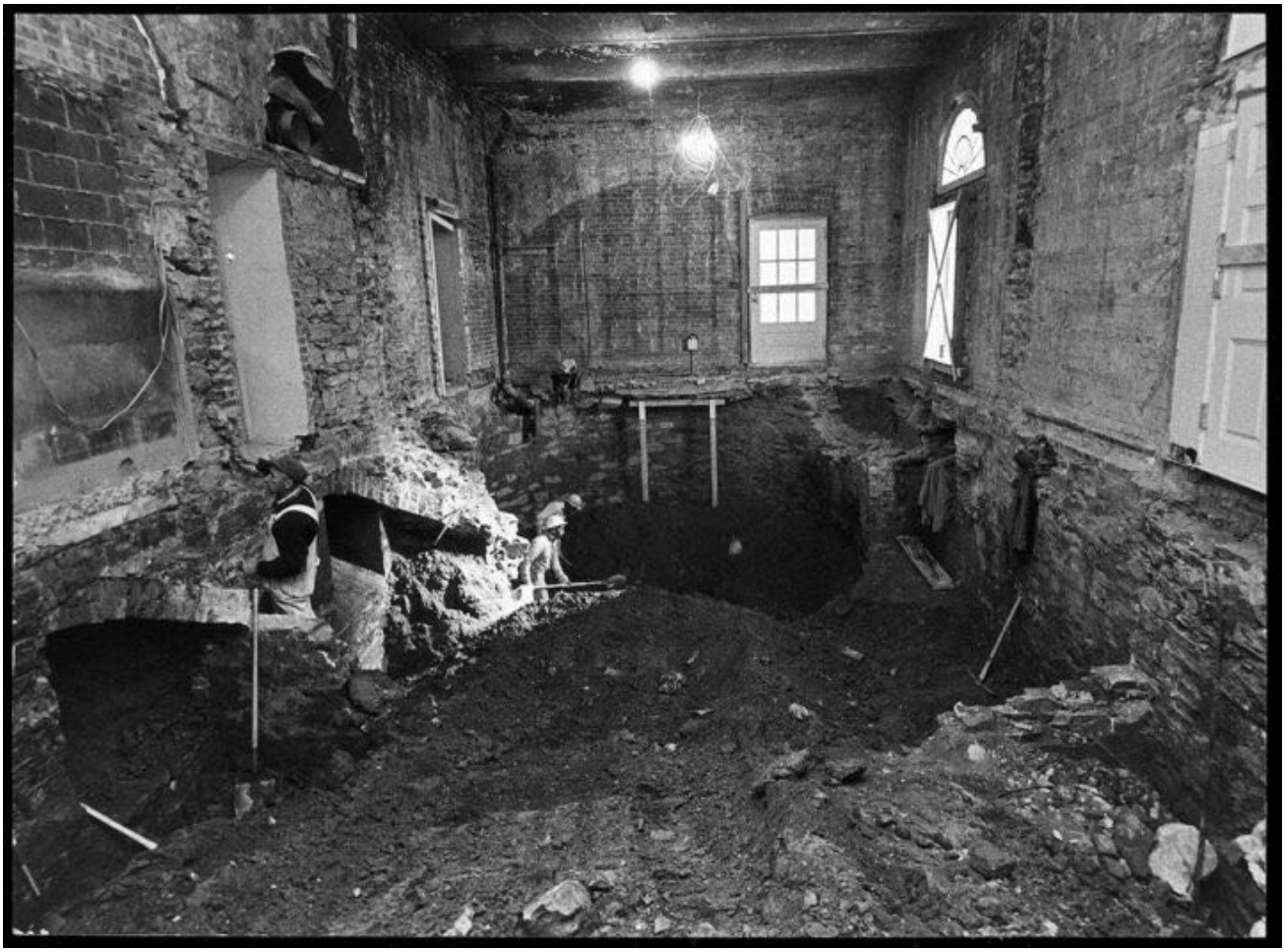
President Nixon ensured no harm was done to the swimming pool (seen here during the Kennedy administration) when it was decked over to provide greatly expanded space in the West Colonnade for the White House press corps in 1970.

THE WHITE HOUSE COLLECTION

As the plans moved forward, Randall Vosbeck recollected, "most of our design meetings were with GSA staff, but we did meet on several occasions with Press Secretary Ron Ziegler," and at least once "with representatives from the networks who had booths at the rear and had some technical requirements." [55] This necessary collaboration, the absolute physical limitations of the space, and the functional needs of the White House correspondents and news photographers contributed to what Nixon felt was a slower-than-expected construction schedule.

Approximately six months passed between the public announcement of the planned facility and its completion. In January 1970, the *Washington Post* suggested that the president believed there had already been "months of delay" with construction. [56] Randall Vosbeck provided later confirmation of this report, observing: "I was involved with a brief meeting on the site with Nixon, who was a little upset that the construction was moving so slow." [57] Although it is not

known what timetable the president was initially presented for the project, progress was interrupted by the November 1969 discovery of the Jefferson-era underground rooms and their subsequent excavation as well as the additional time needed to expand the plans to include a lower level.



Work was interrupted in late 1969 by the discovery of the underground rooms from Thomas Jefferson's time and their subsequent excavation. The curved stone wall may show what remained of Jefferson's ice house.

THE WHITE HOUSE COLLECTION

The Press Center as Completed

The president welcomed the press corps to its new, "pubby-clubby" quarters on April 2, 1970.[58] It would take four more days before the White House revealed its full cost of $574,000, but the first descriptions—likening the space to anything from a pub to a posh hotel lobby—made it

clear that the facility was very nicely appointed. [59] The *New York Times* commented that it was "part fancy hotel lobby, part English taproom," while *The Washington Post* observed that the "new press briefing room with a built-in stage and spotlights resembles the lobby of a fake Elizabethan steak house when the stage is hidden behind curtains." [60] The "ye olde" theme of the decoration and furnishings of the Briefing Room proper was no accident. Judith Farrington, "the government's interior designer . . . on loan from the General Services Administration to supervise the White House project," referred to the concept as "English pubby." [61] A White House press release noted that the decor was "developed from English and early American Public Houses and Inns." [62] Beige suede Chesterfield sofas, burnished tin coffee tables, reproduction antique chairs, ginger jar lamps, colonial molding and paneling, and thick curtains and carpeting all worked in concert to give the impression of an opulent and rarified, masculine environment appropriate for those (mainly male) members of the press holding a much-sought-after White House post. [63] This environment was purposefully planned to create a comfortable stage set for what was hoped would be a more laid-back relationship between top White House officials and the press.



Workers begin to frame in the new press corps facility in the White House. Work was interrupted in late 1969 by the discovery of the underground rooms from Thomas Jefferson's time.

THE WHITE HOUSE COLLECTION

While on a tour of the new facility only days after its opening, former President Lyndon Johnson is reported to have commented that the Press Room is "a wonderful improvement," and chided the press by asking, "Is there the same improvement in the stories?" [64] Perhaps thinking that the elegant space was not enough to convince the press that he at least superficially desired to facilitate greater communication (and, hopefully, "improvement in the stories"), cut flowers "as beautiful as any of the floral arrangements that adorn the Red, Green and Blue Rooms for formal parties" were to be placed throughout the Briefing Room daily on "President Nixon's personal instruction." [65]

As the most public space and with no precedent in earlier quarters, the Briefing Room unsurprisingly received the most media attention. It was, however, only one-third of the total facility; the remainder was fully equipped to serve the modern needs of the White House correspondents and news photographers. A 1971 study of reporting in the national capital

provided a description of the then brand-new press quarters beyond the Briefing Room.

"The new press facilities provide multiple-room space on two levels for reporters' desks, direct-line telephones, broadcast booths, two comfortably furnished lounges, coin venders for snacks and drinks, and other comforts and conveniences. Glass-partitioned rooms or booths are built-in for the Associated Press, United Press International, and the major foreign news agencies, and newspapers that maintain full-time staff for reporters at the White House. Desks and telephones are available for reporters who appear there on a part-time basis." [66]



President Nixon first welcomed reporters to the new Press Room and work space in April 1970. Interior designer Judith Farrington described the concept as "English pubby." The masculine decor and laid-back ambience was fitting for the nearly all-male press corps of the time.

OFFICIAL WHITE HOUSE PHOTO

A newspaper article covering the facility's opening counted twelve enclosed broadcast booths and forty desks arranged throughout "two working press rooms" on the two floors. [67] As first

assigned, American networks and wire services had the pick of the "big, glassed-in booths," while major newspapers and foreign news services, such as Reuters and Agence France-Presse, received large carrels with file drawers and individual telephones. [68] A 1981 book on the presidency and the news media detailed the major American networks' portion of the space: "Reporters for the three national television networks may be found in three long but narrow booths, each of which has a rear compartment that may be shut off and used as a sound studio for radio broadcasts. The booths are located at the back of the area that the White House staff has set aside for reporters to work in." [69] Outside these booths, the north wall of the upper workroom was fitted with telephones in groups of three between the windows and a row of eight further along, all of which included ledges for writing and leaning. These phones were allotted to representatives of smaller newspapers. [70] Enclosed booths on the lower level were allocated mainly to radio broadcasters, with much of the remaining space on that level given over to work carrels.

Two smaller lounge areas provided places to take a break, rest, or wait for the next piece of news. The one on the upper level contained a snack bar, which "alone makes [the] move worthwhile for the press, who have served through many a lunchless and dinnerless day of crisis with only a soft drink machine to sustain them." [71] In addition to soft drinks, the vending lounge included a machine for sandwiches and one for snacks as well as "fresh-made coffee at all hours in glass pots." [72] This area occupied space in an irregular extension to the north that corresponds with the three easternmost bays of the West Terrace. Restrooms and a secondary stair down to the lower level were also positioned in this extension. Constructed in the mid-1940s, the one-story addition had been built up against and incorporated an existing wall enclosing the below-grade, L-shaped court at the northwest corner of the Executive Residence. [73] The north wall of the extension was curved to follow the contour of the driveway. In plan, it seems a conspicuous protrusion, but its below-grade location largely masks a low-lying profile with a roof that is several feet below that of the West Terrace roof. The other small lounge was located on the lower level. A period photograph of this lounge, situated at the foot of the principal stair, shows a space with a relaxed arrangement of casual furniture and a drinking fountain, the "family room" foil to the formal "living room" atmosphere of the Briefing Room upstairs. Ashtrays are conspicuously evident in every historic image—from the Briefing Room to the desks and telephone ledges to the lounge area—recording smoking's social acceptability and one strategy for managing a high-stress job.

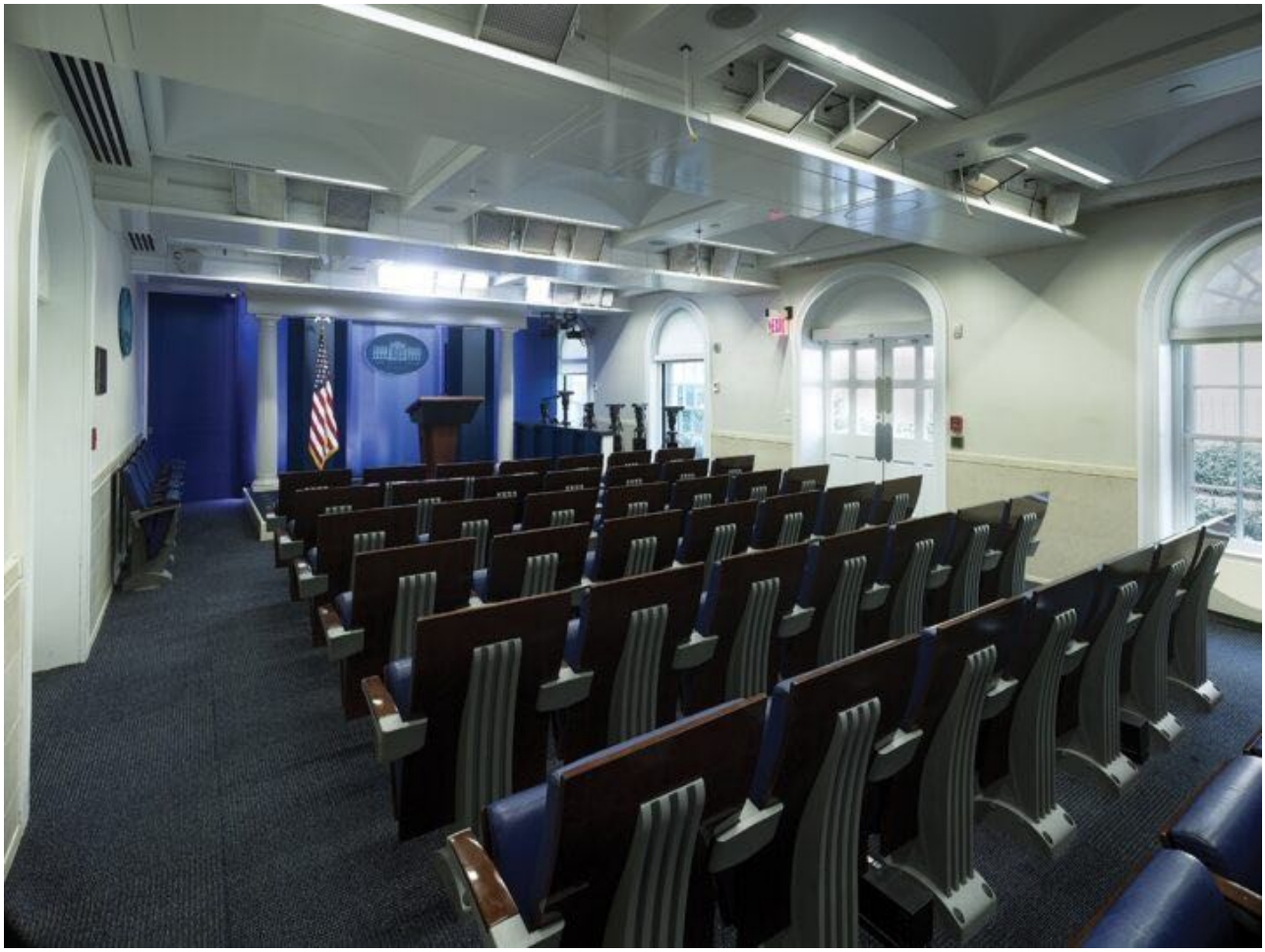


This contact sheet shows a collection of photographs taken in 1970 of the newly finished multiple room space that included desks for reporters, telephones, broadcast booths, and two comfortable lounges with ashtrays, and vending machines.

THE WHITE HOUSE COLLECTION

Although reporters were certainly impressed with their new quarters, it seems that the facility neither improved access nor increased communication to a point that satisfied members of the press. Only months after its opening, Nixon was advised by the White House Correspondents Association that the best way to "improve his press conferences" was to schedule more of them, advice that ultimately went unheeded. [74] In the end, the Briefing Room came to be used primarily for the purpose indicated by its name—daily news briefings by the press secretary, with occasional visits by the president and other members of his staff for more formal, televised conferences. The less casual nature of the Briefing Room space as it came to be used over the course of its first decade was physically codified during the Reagan administration, when couches and movable lounge furniture and a retractable dais were replaced with a permanent stage and podium and fixed auditorium seating. Electrical and communications wiring to support changes in broadcast technology and computing also had to be, sometimes inelegantly,

run throughout the facility. These changes and the wear and tear of intensive daily use took its toll by the 1990s. In 1997, the *Washington Post* referred to the White House Press Center as being "among the dingiest dumps in Washington," a far fall for a facility once heralded as "probably the fanciest governmental press room anywhere." [75] The James S. Brady Press Briefing Room, renamed by Bill Clinton in 2000 to honor Ronald Reagan's press secretary who had been shot and paralyzed during an attempt on Reagan's life in 1981, was entirely gutted and reconstructed in 2006–7. The reconstructed spaces maintain the basic spacial character and functions of the original Press Center.



James S. Brady Press Briefing Room in 2009.

THE WHITE HOUSE HISTORICAL ASSOCIATION

The construction of a spacious and modern Press Center in the West Terrace was the clearest indication of the centrality that the news media had attained by the mid-twentieth century in reporting on national issues as put forth by the executive branch of the United States government. The ability of the press to shape public opinion about these activities had long

been acknowledged by the White House. Yet the growth of the press corps assigned there and the explosion of print, television, and radio news coverage (and consumption) in the decades following World War II made the necessity of an expanded and equipped facility all the more urgent for everyone with a stake in the news. The Press Center has ably served its functions for nearly half a century with no major alterations to Nixon's essential layout, and, likewise, it remains an essential tool of the modern presidency.

This was originally published in *White House History Number 37* on March 01, 2015

See Footnotes & Resources

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Grid view *List view*



PODCAST

Inside the White House on Sept 11



COLLECTION

The Working White House



PODCAST

History, Foyt Racing and America's 250th

EXHIBIT 3

(Declaration of Katherine Fallow)



COVERING THE WHITE HOUSE

White House Correspondents' Association

Updated May 2025

Congratulations, you cover the White House.

This is unlike any other beat. We work in tight quarters in a competitive environment, under intense scrutiny. Your coverage will range from baby formula shortages one day to matters of war and peace the next.

No matter the administration,their goal is to curate information. Yours is to get past the spin.

Generations of White House correspondents have found that it takes persistence, patience, beat building, triangulation and more persistence.

The daily briefings are a focal point. But plenty of real journalism happens elsewhere, too. Introduce yourself to the people who staff the press office. Then do it again, and a few more times.

Since 1914, the White House Correspondents' Association has been championing the causes of access and transparency for the presidential press corps. We're here to help everyone do their jobs. This primer is part of that mission.

Decorum at briefings

White House briefings are a key opportunity to elicit information, quotes and footage. They're a central element of daily coverage for many. They can be intense and spirited.

It's in everyone's interest for briefings to work effectively. That requires professionalism, cooperation and **self-restraint** – from those frustrated at being overlooked, and from those who routinely get called on.

Bottom line, **please be polite**.

- Shouting over colleagues is counterproductive and unacceptable. It wastes time and risks having the briefing cut short, which helps no one.

- Once someone is called on, let them ask their question.

- It's a time-honored technique for press secretaries to change the subject by calling on a new person. Nothing we can do about it. That said, if they're trying to squirm out of a legitimate follow-up, it's OK to let a colleague press for an answer even if you've been called on. Teamwork pays off.

- Thou shalt not filibuster. Be judicious about multiple questions on multiple topics. This isn't a one-on-one interview.

- Be mindful that each redundant question means one less colleague who'll get called on. Maybe they had a question that would have yielded a great story for you, too. By the same token, when there's huge news of the day, it's fine to keep that hyper-local or esoteric question for another time.

- Remember: This isn't the only venue to ask questions. If info or a quote is what you're after, try talking to someone in the press office directly.

Decorum with the President

The norms for decorum apply in any group setting, including presidential pool sprays, gaggles and news conferences. It is standard practice to stand when the President enters the room.

Shouting: The President is less likely to engage when 10 people are shouting, especially if some keep shouting when he's starting to respond. Work cooperatively with others to make shouted questions effective and not just noise. In some situations, ask in sequence so that each question can be heard and understood.

Wranglers: If the President is engaging, poolers are entitled to remain and try for more questions – until he signals that he's done. Read the room. If he's keeping his mouth shut, it's time to move when the wranglers are shouting "thank you pool."

South Lawn departure and arrival

Marine One is loud. It's hard for the President to hear questions, and impossible for everyone in a throng of journalists to hear him.

Please check out this memo for details about how our "boarding group" system works. It's designed to ensure that poolers can see and hear, photographers get a clear shot, and no one gets hurt.

Procedures are regularly refined. PLEASE work with us and the wranglers to make these gaggles useful and safe.

No livestream social media posting is permitted for departure and arrivals. No live TV coverage is permitted as a security measure.

Oval Office and other tight spaces

TV crews and still photographers go in first, followed by correspondents.

Etiquette at briefings

- Disruptive behavior is unacceptable.
- Those without an assigned seat can take a vacant one. But if the outlet assigned to the seat shows up, you're expected to move, even after the briefing starts.
- Standing is allowed, but make sure photographers can move around as needed.
- Leaving your seat mid-briefing should be avoided, except for members of the pool when the pool has been called. (Arriving late also should be avoided.)
- Once the briefing starts, enter and exit at the back.

- No phone calls.
- Silence your phone and your laptop, to avoid interruptions by ring tone or a video that suddenly starts to play.

OFF THE RECORD (OTR), FOR PLANNING PURPOSES ONLY (FPPO)

The WHCA regularly shares information that is not reportable, on upcoming travel and other logistics. Such information must **NOT** be published and **CANNOT** be used as the basis for reporting (i.e. seeking confirmation elsewhere).

Ongoing receipt of such information is contingent on abiding by these rules.

The WHCA board works hard to maximize the flow of planning information. That spigot closes if we can't keep it to ourselves.

About the Pool

We can't all cram into the Oval Office. So, a pool serves as the eyes and ears of the full press corps — at White House events and when the President leaves campus.

It's a time-tested system that balances reporting needs with logistical realities.

Print poolers serve the entire press corps with near real-time pool reports on the President's comments and activities. Radio and TV poolers share info only among themselves, though all poolers are obliged to pitch in — for instance, spotting VIPs or helping with key quotes when acoustics are bad.

Pool reports: These should be timely and factual, with quotes and color. They should reflect fairness, objectivity and good taste.

Pool reports are part of the historical record and are used instantly by a myriad of news outlets. That's the main audience. But the White House sends these to at least 10,000 congressional aides, administration officials and political allies – worth keeping in mind.

Poolers are expected to share info and quotes by pool report before publishing unilaterally, even on social media. Poolers are acting on behalf of the collective in this role and not as individual journalists.

Pool reports may be quoted or published verbatim, and without attribution, though a shout-out for especially valiant pooling is always appreciated.

You can receive pool reports three ways:

- Join the WHCA. Pool reports go instantly to this list.
- Request access to the WHCA list without joining. Those who regularly cover the beat can apply here.
- Sign up through the press office. You can self-register here. Sometimes there's a lag before wranglers send out emails.

Types of pools

The pool includes wire and print reporters, TV, radio and photojournalists. The size depends on where the President is.

In-town travel pool – Covers the President off-campus within driving distance, for instance when he goes to the Capitol or Walter Reed, or delivers a speech. The pool includes writers from the Print Pool, AP, Reuters and Bloomberg; five photographers (AP, Reuters, AFP, newspaper, photo agency); radio; and a network TV crew and correspondent.

Expanded in-house pool – In-town plus foreign press, AFP and Dow Jones. Used when the President meets with a foreign leader and ideally, for most on-campus pool sprays.

Domestic Travel Pool – The 13-person group that travels with the President outside the capital region. Sometimes referred to as the **protective pool.**

Air Force One has 13 press seats. This includes three wire reporters (AP, Reuters and Bloomberg), four photographers (AP, Reuters, AFP and New York Times), three from network TV, a radio correspondent, and two print reporters (in the Print and WHCA seats). Each outlet pays the full cost of travel, except for the Print seat, where costs for each trip are shared 14 ways by members of that rotation.

Eight print outlets share the WHCA seat (formerly the "Magazine seat).

Foreign Travel Pool – Same as the Domestic Travel Pool except that only eight Print outlets participate, and costs are not split.

Print Pool – 32 outlets as of March 2023. Open to US print outlets that regularly cover the White House, have the proper credentials, and demonstrate a commitment to the beat and to journalistic standards. Poolers are responsible for filling **every assigned shift**, even on holidays, and agree to abide by WHCA guidelines.

Supplemental Pool – Eligible to volunteer when poolers are needed to cover the Vice President or First Lady, including when they travel, and whenever extra poolers are needed. Outlets in any print pool are always eligible to volunteer. Other outlets, print and non-print, may join this pool, on approval by the WHCA board. A year of supplemental pooling is required

before consideration for membership in the Print Pool. Reach out to director@whca.press to apply for the Supplemental Pool.

Supplemental poolers may request Air Force One seats in the rare event those go unclaimed.

Print rotations are tracked at poolrotations.com.

How to join a pool

TV, Radio, and photographers oversee their elements of the pools. The WHCA board controls membership in all Print pools. Talk to a board member for more information.

Where can I go without being tackled?

A hard pass or a daily pass gets you through the Northwest Gate, on Pennsylvania Avenue across from Lafayette Park.

From there you have free access to:

- Pebble Beach (TV standup area)
- The driveway from the security gate to the West Wing, past the briefing room, to the Palm Room doors
- Briefing room and press workspace (including basement)
- Lower Press (through sliding door to the left of the podium), where press assistants ("wranglers") and assistant/deputy press secretaries work
- Upper Press (through door to left in Lower Press), where the press secretary and others work

Escort is needed beyond Upper Press, anywhere else in the White House, and to the EEOB.

You'll get yelled at, or worse, if you cross any of these invisible lines:

- North Lawn, the sidewalk that crosses it, and the circular driveway toward the White House front door
- Too close to the stairs to West Executive Dr. and the EEOB
- Too close to the West Wing portico where the Marine stands guard

How do I get into the White House without a hard pass?

You'll need to be cleared in for specific events, or for one day at a time.

Email whopress@who.eop.gov or presswaves@who.eop.gov or call the Press Office at (202) 456-9570. They'll provide a link to submit full name, date of birth, Social Security number and citizenship.

The WHCA also sends out weekly notices with access request links for the upcoming week.

- **Leave extra time when trying to enter the complex for major news events.**

How do I get a hard pass?

Journalists who cover the White House regularly are eligible for a hard pass. The process is managed by the White House Press Office, not the WHCA.

Applications require approval by the press secretary, then a background check by the Secret Service. The process can take months. Talk to Lower Press or send requests to: presswaves@who.eop.gov.

Hard passes are usually valid for two years, and should be updated with any change of employer.

Passes are issued by The Presidential Protective Division, U.S. Secret Service, EEOB, Room 18. You'll get an appointment when you're approved. **Contact them immediately if your pass is lost or stolen** at (202) 757-3948.

Briefing room and workspace

The WHCA assigns the 49 permanent seats in the Brady Briefing Room, and all booths and desks in the upper and lower workspace. Assignments are reviewed periodically.

Journalists without an assigned seat or desk may use them while unclaimed, but must relinquish them without fuss to the assigned outlet.

Wi-Fi: The password changes every three months and is posted around the workspace. Avoid using hotspots. They don't work well, and they interfere with the White House-provided Wi-Fi. There is usually connectivity for press events in the East Wing and Rose Garden.

Audio: Briefings are piped into the workspace. You'll also hear 2-minute warnings for briefings, and announcements to gather for a pool event or Marine One departure, etc.

WHCA contact info: Posted on the bulletin board.

Nursing mothers: CBN and CBC generously share their basement booth with the nursing mothers of the press corps. The booth is in the basement near the back stairs. Details on how to use it here.

Leaks, repairs, mice and other issues: Contact the WHCA facilities committee, or any board member. Or ping director@whca.press and CC: whc.service.helpdesk@gsa.gov.

Motorcades

In-town motorcades typically include two press vans. Like many things on this beat, there are unwritten rules.

Press van 1 is for the wires and TV crew.

Press van 2 is for print, radio and non-wire photographers. Photographers get the front row so they can get out fast. Let them. Print pooler is closest to the door in row two. The wrangler usually rides shotgun in this van.

The master drivers are part of the White House Transportation Agency, referred to as "Carpet" since the 1930s, when the executive fleet began using vehicles more plush than Army staff cars.

Out of town, press vans usually are driven by volunteers far less skilled at going high speed with 10 feet between vehicles. Buckle up.

Wranglers

Herding cats is nothing compared to wrangling the press corps. We NEVER NEVER quote them, even indirectly. But you'll soon discover that's worth the tradeoff with these junior press assistants.

Wranglers know things. They can point you in the right direction, literally and figuratively. They handle credentials and access requests and track pool rotations. They have invaluable information on timing and logistics. They make sure no one gets left behind, including overseas. They help us avoid stampedes on the South Lawn.

Please be respectful and polite, even when someone half your age is shooing you out of the Oval Office. They're under enormous pressure and doing as they're told. If there's an issue, find a WHCA board member.

And keep in mind they won't always be wranglers. None got that job by chance. You'll see some of them in more senior roles in a few years.

About the WHCA

The White House Correspondents' Association (whca.press) represents the interests of the entire press corps, **regardless of membership status.** Feel free to raise concerns with any of the 9 elected board members or WHCA executive director Steven Thomma. **We can't solve problems we don't know about.**

Among the WHCA's roles:

Manage pools: We fill the slots for daily in-town pools, Air Force One trips, and coverage of the Vice President and First Lady.

Work with press staff: The board communicates constantly with White House aides to advocate on access, seek shareable info on upcoming events, coordinate logistics and address any grievances on either side.

Briefing room/workspace: WHCA assigns seats and workspace. During the Covid-19 pandemic, emergency restrictions kept the press on campus, ensured uninterrupted operation of the pool, and avoided any instance of press-to-press transmission.

Presidential travel: The WHCA works with the White House Travel Office and advance staff to optimize logistics and access, and hold down costs.

Press advocacy: WHCA uses its unique role to promote press freedom and public understanding of the media's role in a democracy, and encourage journalistic excellence and training through awards, scholarships and mentoring.

White House glossary:

Lower Press: The deputies, assistants and press wranglers behind the door to the left of the briefing room lectern.

Upper Press: Where the press secretary's office is located.

Palm Room: The breezeway between the Rose Garden and the back of the press workspace. The "Palm Room doors" are a gathering spot for the pool, and for South Lawn events.

Pebble Beach: The TV standup locations on the North Lawn.

"Stakeout": Driveway spot at the West Wing portico where notables speak to press at the "sticks" (microphones).

Lid: Generically, when the pool is dismissed for the day with an assurance the President isn't going anywhere or doing anything in public.

Full lid: The President isn’t going anywhere for the rest of the day or appearing in public, and there will be no further announcements, even by email. The pool is dismissed.

Travel/photo lid: The President isn’t going anywhere for the rest of the day. There won’t even be any photo ops. But there may be announcements via email. The pool is dismissed.

Lunch/dinner lid: An assurance that the pool is free to leave the White House grounds temporarily and won’t miss anything.

Call time: When poolers are obliged to be on site for pool duty.

Open press: Events that anyone could attend and cover. Don't expect pool reports, other than start/stop times and maybe some color or tidbits that only the pool likely saw and heard. One exception: Marine One departures and arrivals are open press, but are pooled because it's so hard to hear.

Bad weather call: When it's raining too hard to safely take Marine One, the President will motorcade to or from Joint Base Andrews etc. Sometimes a bad weather call is made on short notice, so the in-town pool needs to be alert.

“The Beast”: This refers only to the black Cadillac presidential limousine used for official events. It got the nickname for its considerable weight due to security enhancements. The president also travels in SUVs, often on weekends and personal trips. The SUVs should not be be confused with The Beast.

EXHIBIT 4

(Declaration of Katherine Fallow)

The East Room

★ ★ ★

THE WHITE HOUSE HISTORICAL ASSOCIATION

Ascending from the Ground Floor Corridor, a marble stairway leads the White House visitor to the State Floor level. Off the landing to the right is the East Room. The largest of the State Rooms, it was designed by James Hoban and George Washington to be a "Public Audience Room." Second President John Adams and his wife First Lady Abigail Adams, the first couple to live in the Executive Mansion, used the huge, unfinished room for hanging out wash.



Abigail Adams Supervising the Hanging of the Wash in the East Room.

WHITE HOUSE HISTORICAL ASSOCIATION

When President James Madison and First Lady Dolley Madison moved into the house in 1809, they assigned architect Benjamin Henry Latrobe to decorate the State Rooms, but an impending war with Great Britain halted interior design plans before the East Room could be addressed. In August 1814, invading British troops set the house ablaze, destroying the interiors and leaving only a burned-out shell.

In March 1815, architect James Hoban returned to rebuild the President's House. The East Room remained unfinished when James Monroe moved back into the house in 1817. The walls were bare plaster and windows were unadorned, the mantles were simple painted wood, and the floor was raw boards. An ornamental anthemion frieze, highlighted with gold leaf on a black flocked background, was the room's only ornamentation for eleven years. Yet, in 1824, President Monroe entertained the Marquis de Lafayette in this unfinished room.

Elected president in 1829, Andrew Jackson arrived at the White House as a hero of the American people. During his first term, Jackson papered the East Room walls lemon yellow and added splendid gold stars. Predominantly blue Brussels carpeting covered the floor. Spittoons, centered on protective squares of oilcloth, lined the east and west walls. He installed the East

Room's first great glass chandeliers, eventually replacing the candles with small lard-oil lamps. Twenty-four Empire style chairs purchased by James Monroe in 1817 were repaired so the throngs of visitors would not be kept "standing upon their legs as they do before kings and emperors."



President James Buchanan and Harriet Lane appear in the East Room as the last phase of a great public reception, 1858.

WHITE HOUSE COLLECTION/WHITE HOUSE HISTORICAL ASSOCIATION

Large scale entertaining placed heavy demands on the house and necessitated regular refurbishing of the State Rooms. By 1841, the Monroe chairs were in such poor condition that a journalist complained they would "disgrace a house of shame." That same year, the White House was draped in mourning black for William Henry Harrison, the first president to die in office. Funeral services were held in the East Room. In 1848, James K. Polk piped gas into the chandeliers in the East Room. It was by the glow of these lights that the second president to die in office, Zachary Taylor, lay in state in 1850. The gaslights still glowed in the East Room ten years later when President Abraham Lincoln came to the White House. Guests at receptions hosted by the Lincolns waltzed here during the Civil War. Beneath the dancing feet, heavy support logs in the basement shored up a sagging floor.

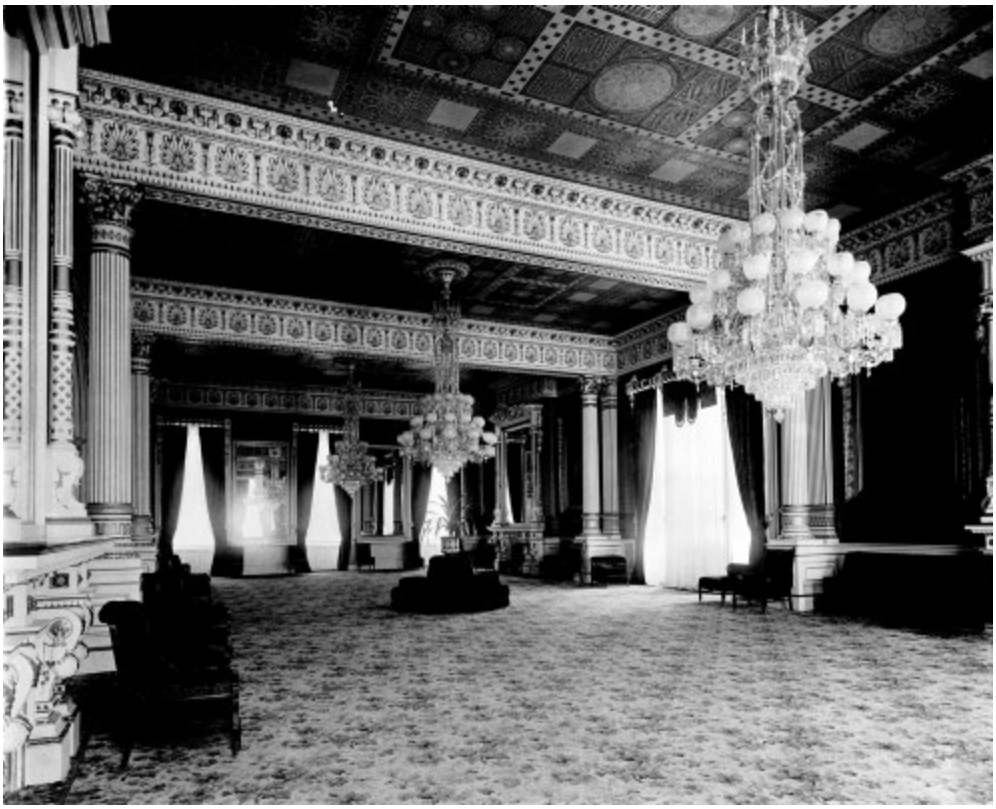


The East Room, c. 1861, lithograph.

WHITE HOUSE COLLECTION/WHITE HOUSE HISTORICAL ASSOCIATION

During the early days of the Civil War, Union soldiers from Kansas used the room as a bivouac. Young Tad Lincoln gave his father some much-needed amusement when he rode a chair pulled by a goat named Nanko into the East Room during a social visit. After his assassination in April 1865, President Abraham Lincoln was the third president to be mourned in the East Room.

President Ulysses S. Grant renovated the East Room in 1873-74 prior to the wedding of his daughter, Nellie. Immense mirrors topped new wooden mantles, two ceiling beams were added continuing Hoban's anthemia, and Andrew Jackson's chandeliers were replaced by ornate new gas chandeliers that featured clusters of globe lights. Louis Comfort Tiffany embellished the room even further for Chester Arthur in 1882, adding delicate ceiling wallpaper that resembled Pompeiian mosaics. Theodore Roosevelt gave a state dinner in the East Room for Prussia's Prince Henry in 1901. A photographer recalled it was like eating "in a Christmas tree."



The East Room, 1889.

LIBRARY OF CONGRESS

In 1902, architect Charles McKim obliterated the room's exuberant Victorian décor in a White House renovation for Theodore Roosevelt. Highly carved French-inspired neoclassical paneling, painted a brilliant cream white, replaced what critics had called a "Steamboat Gothic" interior design. The room's bright finishes were brought to life by three new massive Bohemian glass chandeliers that remain in the room today. Almost immediately, President Roosevelt held a Japanese jujitsu exhibition in his new stately East Room. His children roller-skated on the fine oak floor. Eldest daughter Alice remembered hiding inside ottomans crowned by potted palms. In 1906, the East Room became the setting for Alice Roosevelt's famous wedding to Nicholas

Longworth.



The East Room following the 1902 renovation.
WHITE HOUSE COLLECTION

Although the White House staged its first formal East Room concert during Chester Arthur's administration, the space emerged as one of the world's great musical stages after Steinway & Sons presented a grand piano to the White House in 1903. World renowned pianists came to the perform at the mansion such as Feruccio Busoni, Ignacy Paderewski, Josef Hofmann, Olga Samanoff, Sergei Rachmaninoff, and a host of others. This piano was replaced in 1938 by another Steinway concert grand, which remains in the White House today.

During President Harry Truman's 1948-1952 interior reconstruction of the White House, the East Room's "bold, high-relief ornament" was given "a certain gentle simplification" based on McKim's 1902 design. President Truman showed off the new East Room on international television. He played the 1938 Steinway piano and told the story of how Dolley Madison saved Gilbert Stuart's full-length portrait of George Washington from the fire set by British troops in 1814. Dolley Madison ordered the painting removed from its frame in the State Dining Room and fled just before the British arrived at the President's House. Currently hanging in the East

Room, the Washington portrait has been in the White House collection longer than any other item.

During the administration of John F. Kennedy in the early 1960s, the White House became a prominent center for America's artistic achievements. Opera, ballet, chamber music and jazz, although they had appeared at the mansion before 1960, were given a new focus and showcased in renowned East Room performances. Tragically, in November 1963, John F. Kennedy became the eighth president to die while in office; his casket laid in state in this room. The following year, President Lyndon B. Johnson signed the 1964 Civil Rights Act in the East Room on live television. Today, this room continues to be a grand stage for bill-signing ceremonies, press conferences, and music and dance performances.



The East Room, 1990s.

WHITE HOUSE HISTORICAL ASSOCIATION

EXHIBIT 5

(Declaration of Katherine Fallow)

The intricacies of press credentials, at the White House and beyond

Harmeet Kaur

What makes a journalist a journalist? In the United States, by foundational principle, anyone who wants to report and publish the news can do it without official permission.

On the White House beat, however, a reporter needs to show an ID badge, linked to a security code, for consistent, streamlined access to the grounds. Saturday morning, as CNN reporter Betsy Klein tried to enter the White House through the usual security checkpoint at the Northwest Gate, the system told her there was an error. A Secret Service member asked to see her badge and confiscated it, returning only the lanyard and clear plastic case.

Her press credentials, she was told, were deactivated.

The day before, President Donald Trump had announced that he was banning CNN, MS NOW and Politico from the White House. His way of making that happen, it turned out, was by shutting off their credentials.

CNN, MS NOW and Politico are suing the Trump administration, alleging that the ban on their journalists violates the First Amendment and the Constitution's due process protections. The position of being a credentialed journalist is not something that can be summarily and unilaterally revoked, according to binding legal precedent.

Early Thursday morning, a federal judge ordered that the Trump administration temporarily reinstate the reporters' White House access while each side continues to make its case. CNN, MS NOW and Politico were eventually allowed back in after being denied earlier in the day.

EDITOR'S NOTE: CNN's "Word of the Week" brings you the meaning behind the words in the news.

A journalistic credential, in the US, does not inherently make a person a journalist. Where doctors or lawyers need to be properly educated and authorized by overseeing bodies, journalists operate with no formally required qualifications.

But journalists do need to go places and see things, including getting access to spaces and events that aren't open to the general public. So governments, law enforcement agencies and private entities have systems to provide credentials to identify people who are gathering the news.

This means the independent press and the authorities coming to an agreement about who is engaged in newsgathering. Who gives out a press pass? Who gets one? And on what grounds can they be denied or revoked?

These questions can produce fundamental conflicts around reporting. "The same public offices responsible for managing public perception are also empowered to decide which journalists are granted access, often without external review or oversight," Nicole Ligon, an assistant professor of law at Campbell University, wrote in a law review article on press credentialing published earlier this year.

"Credential," derived from the Latin root "credere" meaning to believe, was first recorded in 1433 as part of the term "letter credential," a document that served as a diplomatic recommendation or introduction. By the 19th century, it had also evolved into a verb to describe the act of providing proof of one's identity or qualifications.

At the White House, that proof comes in the form of plastic ID badges also known as "hard passes." Beginning in the early 20th century, the White House Press Office has administered these credentials to journalists who

regularly cover the White House, allowing them ready and regular access to the grounds. Criteria for obtaining credentials have varied over the years. President Joe Biden's administration tightened the rules around hard passes in 2023, and media reporter Justin Baragona wrote at the time that the move would likely curb access for fringe journalists.

The White House passes occupy an upper tier in a hierarchy of access to official Washington, DC. Journalists applying for one have to undergo a background check, provide a residential or professional address in the Washington, DC, area and demonstrate that they regularly cover the White House; a 2023 DC district court ruling indicated that they must also be accredited by the Supreme Court or the congressional press galleries.

Those congressional passes are issued through the Senate Press Galleries by committees of working journalists and provide reporters who cover the House and Senate unaccompanied access to the US Capitol complex. Applicants from daily news organizations and wire services must establish that they are full-time paid employees who require regular access to the Capitol grounds; those from magazines or other non-daily publications must submit a letter on their organization's letterhead — a credential about credentialing — signed by a bureau chief or managing editor, indicating full-time employment and explaining what they need to cover.

Other governments and agencies have their own processes, with their own proofs of journalistic status. The New York City Mayor's Office issues press cards that allow local journalists to cross police barriers or other city-imposed restrictions during emergency and breaking news events. To apply for the city's standard press card, applicants must submit at least six examples of work involving in-person coverage, published in the last two years. In the city of Los Angeles, the Los Angeles Police Department is responsible for issuing media credentials to cover news behind police and fire lines.

For decades, governments have generally granted journalists access to official events and spaces, regardless of the tenor of their coverage. But during his first and second terms in office, Trump has attempted to shut out certain reporters and news organizations.

In 2025, after Associated Press said it would continue to refer to the Gulf of Mexico and not Trump's moniker Gulf of America, administration officials made changes to the daily pool rotation that prevented some AP reporters from accessing presidential events in the Oval Office and Air Force One. The AP sued over the move, and a lower court ruled that the outlet had shown the administration had improperly retaliated against it. Litigation is ongoing. Defense Secretary Pete Hegseth has also repeatedly attempted to restrict journalists' access to the Pentagon based on their reporting — in March, a judge deemed the policy unlawful.

During Trump's first term, the White House revoked the credentials of Jim Acosta, then CNN's chief White House correspondent. CNN sued, and a federal judge ordered the administration to restore his press pass.

"When the people who are deciding who get press credentials are the very people that the journalists are reporting on, that seems to me a real conflict," Ligon said.

How might journalistic access be protected against political influence or interference? Press credentials often function like professional licenses — revoking one, Ligon argued in the article, can interfere with a journalist's ability to do their job. Doctors, lawyers and taxi cab drivers facing the revocation of their licenses are entitled to due process. Journalists, she said, should be too.

In addition to licensing boards and oversight bodies, Ligon points to the model of congressional press galleries as another possible safeguard. As with the Senate Press Galleries, journalists covering Canada's parliament are credentialed independently from parliamentary leadership or the prime minister's office, by a group of working journalists.

The definition of who counts as a journalist is always evolving. In recent years, mass layoffs at established news organizations have led to more independent journalists and freelancers, while technological shifts have blurred the lines between journalists and bloggers and content creators.

In previous eras, working for an established news organization might have improved a journalist's odds of

obtaining a press credential. A 2015 survey by researchers at Harvard University found that 14% of employees at media organizations had been denied credentials at least once, while 32% of freelancers and 27% of independent journalists had been denied. But in recent years, governments and political institutions have broadened the scope of who merits a credential. During the 2024 Democratic National Convention, the DNC issued credentials to more than 200 digital content creators.

And as the Trump administration has attempted to shut out mainstream news organizations from the White House briefing room, it has welcomed nontraditional and MAGA-friendly organizations. During the first White House briefing of Trump's second term, then-press secretary Karoline Leavitt encouraged podcasters and social media influencers to apply for credentials.

"The Trump White House will speak to all media outlets and personalities, not just the legacy media who are seated in this room," she said, to the media seated in the room.

read more in this series

- When did the United States claim the name 'America'?
- Is dumping a Cuban person in Africa 'deportation'?
- To Silicon Valley, anything could be a 'psyop'
- What does it mean to put a 'watermark' on AI text?
- What does Trump mean when he says the US is 'low-keying' negotiations with Iran?

EXHIBIT 6

(Declaration of Katherine Fallow)

Why a Court Order Didn't Stop Trump From Keeping Reporters Off Air Force One

A judge temporarily blocked the president from barring journalists from White House grounds, but they are being excluded in other ways.

Listen · 8:03 min



By Erik Wemple

Oct. 8, 2026

In the past few weeks, President Trump has tried to block reporters from three news outlets whose coverage he found too negative: CNN, MS NOW and Politico.

At first, journalists from those three outlets couldn't get into the White House complex at all. But after the outlets sued the administration, a federal judge forced Mr. Trump to let them back in, at least for a couple of weeks while the litigation got underway.

Then, a day after the ruling, a new twist: Mr. Trump barred CNN from traveling with him on Air Force One. He did it again the next week, then barred a Politico journalist from a scheduled trip on the plane, too.

Exactly what authority the president has when it comes to the makeup of his press detail is the subject of multiple lawsuits in federal court in Washington. On Thursday, Judge Timothy J. Kelly held a hearing to consider whether to extend his two-week order preventing the White House from barring the three outlets from its grounds.

The clashes with these outlets — and a related case involving The Associated Press — raise a number of legal and journalistic questions.

Here's what to know:

Who decides who gets to cover the president?

The White House Press Office is in charge of issuing credentials that let journalists in and out of the White House complex. Many enter on temporary press passes only for certain presidential events, but more than 1,200 journalists hold what is known as a "hard pass," a White House official said.

That credential, which requires a background check by the Secret Service, gives journalists access to "Pebble Beach," an area where TV crews do their stand-up shots; a portion of the West Wing driveway; the James S. Brady briefing room; and the "lower press" space, where White House news media assistants do their work.

What does the law say about journalists' access to the White House?

Although the White House Press Office hands out the passes, the courts have ruled that the First Amendment protects journalists from unnecessarily arduous restrictions and from being arbitrarily "excluded from sources of information," according to a 1977 court ruling. It said that after the White House set up facilities for the news media, it couldn't deny access to any particular outlet arbitrarily.

That case also established the precedent that White House hard passes can't be stripped from reporters without rigorous procedures, including proper notice of the basis for denial, an opportunity to respond and a final written statement of the reasons for denial.

These requirements have played a central role in the access disputes during Mr. Trump's presidencies: In 2018, the White House revoked the hard pass of CNN's Jim Acosta, and the next year it suspended the hard pass of Brian Karem, a Playboy magazine correspondent.

In both cases, federal judges ruled that the White House hadn't accorded the journalists due process.

And in the ruling involving CNN, MS NOW and Politico — which explicitly restored the hard passes for the journalists — the judge also criticized the White House for failing to follow due process.

His order expires Thursday, and he will weigh a longer reprieve at the hearing that day.

In court filings, the White House has claimed that the president has an interest "in enforcing minimum standards for bona fide journalists and safeguarding national security information," according to a government filing.

"President Trump will continue calling out the biased media and delivering his message directly to the American people without apology," the White House spokesman Davis Ingle said in a statement.

Why were the outlets still blocked from Air Force One?

Judge Kelly's order didn't explicitly address the outlets' so-called pool assignments.

There are different tiers when it comes to covering the president. The Oval Office is about the size of a one-bedroom apartment, far too small to accommodate all the hard-pass holders on the White House grounds. Other venues on the White House beat, including Air Force One, have space constraints as well.

The solution is the pool system, in which small groups of hard-pass-carrying journalists are allowed into tight quarters on a rotating basis. Pool reports feature notes, observations and quotes from presidential events and go out to a wide audience.

For decades, the White House Correspondents' Association and the press corps determined the rotations in the pivotal press pool, but the White House took control of those assignments in February 2025, claiming that it would provide access to outlets previously denied the opportunity to question the president.

Mr. Trump used that power to block CNN and Politico from their pool assignments. Just days after Judge Kelly's order, he stopped CNN from serving its scheduled turn as the TV pool reporter for a trip to Tennessee. The network again found itself barred from pool duty last Thursday, when Mr. Trump traveled to Texas and Oklahoma to barnstorm for Republican candidates.

Politico was excluded from its pool rotation for Mr. Trump's trip on Monday to Nebraska. An MS NOW news executive said in a court declaration that the outlet had been excluded from participation in the White House's secondary TV pool. A White House official said MS NOW's inclusion in the pool had come at the invitation of the White House in the first place.

That said, CNN was allowed to fulfill pool duties on two other occasions.

In court filings, CNN, MS NOW and Politico have asked Judge Kelly to restore the same level of White House access that they had before the September ban, a request that covers their pool rotations.

Have any other outlets been barred from those smaller spaces?

Yes. In February 2025, the White House also removed Associated Press journalists from the press pool over the wire service's decision not to refer to the Gulf of Mexico as the Gulf of America. Other outlets, including The New York Times, also use the Gulf of Mexico to refer to that body of water.

The A.P. sued, and a federal judge restored their access. But the U.S. Court of Appeals for the District of Columbia Circuit paused the heart of the judge's order while the White House appeals.

How have other news organizations responded?

When Mr. Trump barred the three outlets from the White House grounds, other news organizations banded together to blast the ban and support the ousted journalists.

The major television networks suspended their pool coverage of Mr. Trump entirely, breaking a practice that dated back decades.

The TV pool, an independent arrangement consisting of five networks (ABC News, CBS News, CNN, Fox News and NBC News), has long rotated the responsibility of providing television coverage of the president, splitting the financial costs, sharing footage with one another and affiliates and selling it to other outlets.

Once the outlets got their hard passes reinstated, the five networks decided to resume pool duties, with a caveat: Each time that CNN is removed from a pool rotation, the group of networks decides whether to provide a substitute crew. Otherwise, CNN's slot will be left unfilled, and Mr. Trump will not receive major network coverage.

A version of this article appears in print on , Section B, Page 3 of the New York edition with the headline: Why a Court Order Didn't Stop an Air Force One Ban for Reporters

EXHIBIT 7

(Declaration of Katherine Fallow)

TRUMP ADMINISTRATION

What's the White House press pool?

The TV press pool declined to participate in coverage of President Donald Trump on several days in September and October amid his attempt to ban CNN, MS NOW and Politico.

Listen to this article with a free profile

00:00 07:10 1x



President Donald Trump speaks to reporters about healthcare in the Oval Office on Sept. 18.

Chip Somodevilla / Getty Images

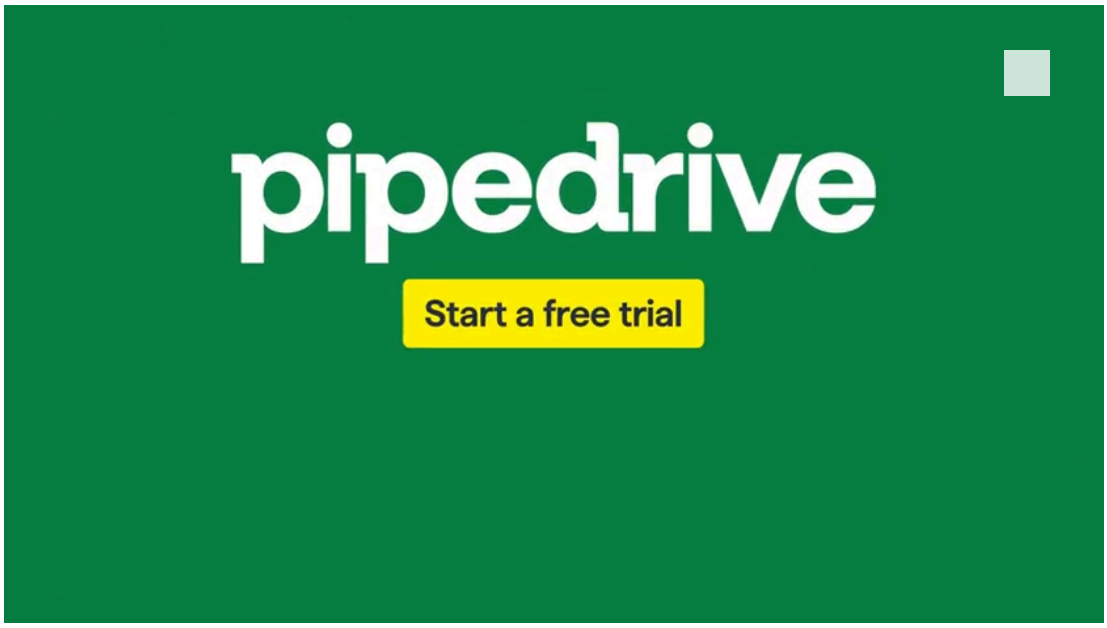
Oct. 12, 2026, 11:46 AM EDT

By Megan Brand and Kelly O'Donnell

The Justice Department's decision to investigate the five TV networks that make up the White House television pool for potentially violating antitrust laws has thrust the decades-old press pool system into the spotlight.

Trump barred CNN, MS NOW and Politico from the White House grounds last month. The TV pool members responded by declining pool coverage for four days initially and then on two subsequent occasions when CNN was blocked from performing its pool duties. That meant there was limited video coverage of Trump for six days, including his summit with Chinese President Xi Jinping and his travel to New York for the United Nations General Assembly.

ADVERTISING



While the Justice Department investigates, the three news outlets, CNN, MS NOW and Politico, are challenging the Trump policy in federal court in a case with implications for the long-standing system that journalists in the U.S. and around the world rely on to report on the presidency.

What is the press pool?

The White House press pool is a group of media outlets that share video, editorial information and costs for coverage of high-profile officials and events involving the president anywhere in the world. Under the system, the day's designated "poolers" represent the wider press corps to document newsworthy events and serve as a conduit between the president and the public.

The arrangement allows the pool to distribute video and information to its members in situations where space is limited, such as events in the Oval Office or Cabinet meetings.





The White House press corps has separate print, radio, still photography and TV pools. Press pools cover high-profile administration officials, government departments and government events.

The TV press pool declined to provide video and editorial coverage of Trump before a federal judge temporarily blocked the ban while a lawsuit filed by the three affected outlets proceeds. The TV pool also declined to provide coverage on subsequent days when the White House barred CNN from Air Force One, preventing it from carrying out its scheduled pool duties.

But TV poolers have continued to cover other administration officials, including Vice President JD Vance and Secretary of State Marco Rubio, who did not join in the ban on specific news outlets.

How does it work?

Poolers track the president, giving the public insight into his events, speeches and even his health. For example, video shot by the TV pool captured the moment Trump was shot at a 2024 rally; later, video of his bruised hand sparked questions about his health.

A press pool typically travels alongside the president any time he leaves the White House, including when he's vacationing or dining out. Before the age of social media, the president's proximity to the press pool was one of the only ways to immediately deliver a message to Americans, such as during a sudden national crisis.

Poolers have reported on scheduled and spontaneous major stories that shaped the course of history. Former White House Correspondents' Association President Steven Portnoy wrote that poolers were in the motorcade when President John F. Kennedy was shot. They witnessed the attempted assassination of President Ronald Reagan, and they covered President George W. Bush during the Sept. 11, 2001, terrorist attacks.

Who is part of the TV pool?

The network television pool consists of the five major networks: NBC, ABC, CBS, CNN and Fox. The networks take turns sending a journalist and a camera crew to both scheduled and spontaneous administration coverage.

The designated pooler distributes editorial content and video feeds widely to the other networks and pool subscribers, which can include outlets that may not have the resources to shoot and distribute coverage themselves. Pool subscribers include outlets like Newsmax, One America News Network, NewsNation and C-SPAN.

International outlets can also subscribe to the pool, allowing them to use network-shot video and editorial guidance in their coverage around the world. When world leaders like Xi visit, the pool includes a slot for foreign media. Print, radio and still images are represented by their own separate pools.

How did the pool system begin?

The pool system has been in place for decades across both Democratic and Republican administrations.

Reporters used a pool system to cover the presidency as early as the World War II era, when poolers traveled with Franklin D. Roosevelt, according to the White House Correspondents' Association.

Who controls the TV pool's content?

The journalists who make up comprise the pool determine the content of the coverage. The White House can shoot and distribute its own video, but the pool system provides content independent of the administration.

The five networks that make up the TV pool make daily coverage decisions about which network is covering an event for the pool and how it is being covered. The networks are regularly in contact with one another to coordinate pool coverage.

The Trump administration also created a "secondary TV pool" position. However, while the position allows outlets invited by the White House to participate in coverage when space is limited, the "secondary" poolers report only for their outlet, not the wider pool of journalists. They do not distribute video or editorial content to pool subscribers.

Has the White House banned specific media outlets before?

This appears to be the first time a president has moved to ban three major media outlets from White House grounds.

While the White House Correspondents' Association traditionally determined which outlets would be allowed to serve in the print pool, television networks have overseen the TV pool. The Trump administration, though, has at times moved to block outlets.

For example, the administration moved to block The Associated Press from accessing the Oval Office and Air Force One last year after it refused to change its style for the Gulf of Mexico after Trump renamed it the "Gulf of America"; the AP's legal challenge to the ban is ongoing. Separately, the administration removed The Wall Street Journal from the pool of media outlets traveling to Scotland with Trump last year in response to the newspaper's report about a birthday card Trump was alleged to have sent Jeffrey Epstein in 2003.

In 2018, during his first term, Trump temporarily withdrew credentials from then-CNN reporter Jim Acosta after a contentious interaction at a news conference – but did not move to limit CNN's access as a news outlet. A judge temporarily ordered the administration to restore Acosta's credentials, and days later, the administration permanently restored his pass.

And while the president is expected to always travel with pool reporters, Trump evaded the pool when he took a secret flight out of Turkey this summer. He entered Air Force One, where the pool and other journalists were waiting. Trump, though, slipped onto another plane via a catering truck amid security concerns related to the war in Iran.

EXHIBIT 8

(Declaration of Katherine Fallow)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE ASSOCIATED PRESS, Plaintiff, v. TAYLOR BUDOWICH, et al. Defendants.	Case No. 25-cv-532-TNM

SECOND DECLARATION OF ZEKE MILLER

Zeke Miller, pursuant to 28 U.S.C. § 1746, declares as follows:

I submit this declaration in support of the Amended Motion for Preliminary Injunction filed by Plaintiff The Associated Press ("the AP") in the above-captioned matter. I have personal knowledge of the facts set forth herein and would be competent to testify to them.

1. I am the Chief White House Correspondent for the AP. I have been employed by the AP for more than seven years, first as a White House Reporter and then White House Correspondent. I have reported on the White House and other aspects of national politics for more than 13 years.

2. From 2020 to 2021, I also served as the President of the White House Correspondents' Association ("WHCA"), a non-profit organization that exists to promote excellence in journalism as well as journalism education, and to ensure robust news coverage of the president and the presidency. Until February 25, 2025 the WHCA administered the White House press pool and coordinated and advocated for independent news coverage of presidential and vice-presidential events. Additional information about the WHCA's programs, membership, leadership, and history can be found on its website at https://whca.press/about.

The White House Press Pool Prior To February 25, 2025

3. Journalists and news organizations from across the country and around the world endeavor to keep their readers, listeners, and viewers as informed as possible about the President of the United States, the single-most powerful public official in the world.

4. Because the President is often in locations that can accommodate only a limited number of journalists, a smaller group of journalists, known as the White House press pool, has long accompanied the President almost everywhere he goes, including to the Oval Office and Air Force One. The press pool has thus served as the eyes and ears of fellow journalists and of the public in small yet critically important spaces.

5. The White House press pool is over a century old, and until the events at issue in this lawsuit, the AP had participated in the pool for that entire time. Indeed, as my colleague recently reported, "The first known instance of a so-called pool reporter inside the White House was in 1881 after President James A. Garfield was shot. As the chief executive lay in bed, AP reporter Franklin Trusdell sat outside his sick room, listening to him breathe and sharing updates with other correspondents." *See* Laurie Kellman, *The relationship between the White House and its press corps is time-tested — and can be contentious*, AP (Feb. 12, 2025), https://apnews.com/article/trump-gulf-mexico-america-ap-first-amendment-4304433d73ad496f5308c9666cbe8e11.

6. Prior to February 25, 2025, the White House press pool's membership had been determined, since the Eisenhower administration, by the WHCA and the press corps itself – not by the President or the White House.

7. Prior to February 25, 2025, while there were different permutations of the White House press pool depending on the nature of the event, it consisted of, at minimum, three wire

reporters (one each from the AP, Reuters, and Bloomberg), four photographers (one each from the AP, Reuters, AFP, and The New York Times), three network television journalists (from a rotating group of news organizations), a radio correspondent (also from a rotating group of news organizations), and at least one print reporter (also from a rotating group of news organizations).

8. When White House officials opened limited spaces such as the Oval Office or Air Force One, they generally first provided access to the entire press pool, plus additional journalists if space permits.

9. In circumstances when severe logistical constraints further restricted the number of journalists who could enter a limited space, a subset of the White House press pool – again selected by the WHCA, not the White House – accompanied the President. For example, when President Biden made a secret trip to Kyiv in 2023, two press pool journalists – including an AP photographer – accompanied him and reported on the events. A limited pool also accompanied President Trump on his secret trip from Palm Beach to Joint Base Andrews to begin a secret trip to Afghanistan in 2019.

10. When AP text journalists covered presidential events, they were able to send wire reports out instantaneously to the AP's global readership. When they did so as part of the press pool, there were no customs, expectations, or requirements that the AP's text journalists share the information they gathered with other press pool members. To the contrary, AP text journalists have vigorously competed with the other wire service pool journalists to provide the fastest and most accurate news reporting at the very moment that the event was happening.

11. Of the 13-member pool, the designated "print pooler" was the only journalist who, according to WHCA rules, was obligated to or regularly did share information with the rest of the pool and the press corps. Since the February 25, 2025 takeover by the White House, the

print pool report remains the only freely and widely disseminated pool product. The journalists in the other 12 slots, including the wire service slots that previously included the AP, only freely share information to participants in their rotations – if applicable – or as part of licensing agreements.

12. A list of the various permutations of the press pool, with descriptions of each that I have prepared based on information available on the WHCA website and my own personal knowledge, is attached as Exhibit A.

13. The three wire services were granted permanent pool status by the WHCA because they were viewed as an essential source of news not only for other outlets at the White House, but also for a larger number of news outlets that could not afford the substantial costs to provide regular coverage of the presidency, and for those news outlets' readers and viewers.

14. The AP and other wire services maintained their high standards for speed, accuracy, and context in reporting on presidential events in large part because they relied on their own staffers in the pool. The AP's members, clients, and subscribers could therefore have high confidence in the quality of the AP's reporting in a breaking news situation and then choose whether to write their own version of a story after receiving the pool report.

The White House's Denial of Access

15. As a White House correspondent, I have a "hard pass" credential that permits me to freely enter certain areas of the White House, including the James S. Brady Press Briefing Room, and the AP's workspace located to the rear of the Briefing Room.

16. On the morning of February 11, 2025, shortly after I entered the White House to begin my work there for the day, White House Press Secretary Karoline Leavitt summoned me to her office.

17. Leavitt told me that AP journalists would not be permitted in the Oval Office as press pool members until and unless the AP revised its Stylebook to refer to the body of water known for hundreds of years as the Gulf of Mexico as the Gulf of America.

18. The only reason that Leavitt provided to me for this decision was to compel the AP to change the language of its reporting, which she said was at President Trump's direction.

19. Leavitt did not object to any other conduct by AP journalists.

20. The AP declined to reverse this editorial decision in response to Leavitt's February 11 demand.

21. White House staff subsequently barred one of my colleagues, an AP print journalist, from attending the signing of a presidential executive order and press conference with Elon Musk in the Oval Office, which was open to the press pool. Another of my colleagues, an AP photographer, was allowed to attend the event, which was otherwise open to the press pool.

22. That night, another AP reporter was barred from an event in the Diplomatic Reception Room, open to the press pool, as the President welcomed home an American freed in a prisoner exchange with Russia. The AP's photographer was not banned.

23. The access denials continued when, on February 13, 2025, I was barred from an Oval Office event with President Trump and Indian Prime Minister Narendra Modi, which was open to the White House pool and the Indian delegation press pool. I subsequently was barred from a White House East Room press conference held by the two leaders, which was open to other pool members and journalists with White House press credentials.

24. I had the night before received an invitation sent to White House-credentialed journalists to sign up to attend that February 13 East Room event, and I promptly signed up to

indicate that I would attend. On the day of the event, however, I was barred from entering the East Room. The East Room is one of the largest event spaces in the White House complex.

25. I understand at least one other journalist from another news organization who did not sign up in advance was admitted to the East Room.

26. After the White House's February 14 public statement banning AP reporters and photographers from "limited spaces," my colleagues and I have been and continue to be barred from participating in the White House press pool and from covering events that are open to all White House credentialed journalists. The spaces from which AP has been banned include not only physically small locations, such as the Oval Office and Air Force One, but also some of the largest rooms in the White House, such as the East Room.

27. The White House even banned an AP photographer from covering the arrival of Air Force One at Palm Beach International Airport, even though the event was open to other credentialed media, and despite there being no space constraints whatsoever on the airport tarmac.

28. A list of the events that AP White House journalists have been barred from covering since February 11, 2025, is attached as Exhibit B.

29. At each published "call time" or "gather time" for the White House press pool, AP journalists have presented themselves to join their colleagues from other outlets in coverage of the President, only to be excluded by White House Press Office staff members.

30. Being unable to attend and observe presidential events firsthand has meant that AP text reporters cannot report on key in-the-room context, such as the President's demeanor, appearance, tone, or expressions, and publish breaking news with that additional context in real time. Instead, the AP's text reporters – and by extension hundreds of other news outlets and

billions of readers around the world – must often wait for the print pool reports or the network television transmission to get out the news, and the AP's reporters are limited in their reporting based on the aperture of the camera's lens or a third party's sometimes limited perception.

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

Executed on 3/3/2025

Signed by:
Zeke Miller
5397895AE85141C...

Zeke Miller

Exhibit A

Types of Pools

The WHCA-run pool includes wire and print reporters, TV, radio and photojournalists. The size and composition depend on where the President is.

In-town travel pool – 14 members – Covers the President off-campus within driving distance, for instance when he goes to the Capitol or Walter Reed, or goes out to dinner. The pool includes writers from the Print Pool, AP, Reuters and Bloomberg; six photographers (AP, Reuters, AFP, NYT, Getty, photo agency); radio; and a network TV crew and correspondent. (Getty added to photo contingent in January, 2025, raising the total to 14.)

In-house pool – ~21 members – (Often referred to as "Expanded in-house pool") – In-town pool plus reporters from foreign press, AFP and Dow Jones, as well as a second network television crew for the "cuts" angle, and potentially additional photographers. Used for most on-campus pool events.

In-Town Print Pool Rotation – 32 outlets as of February 2025. Open to US print outlets that regularly cover the White House, have the proper credentials, and demonstrate a commitment to the beat and to journalistic standards. Poolers are responsible for filling every assigned shift, even on holidays, and agree to abide by WHCA guidelines.

Domestic Travel Pool (Often referred to as "Out-of-Town Pool" or "Out -of-Town Travel Pool") – The 13-person group that travels with the President outside the capital region. Sometimes referred to as the "protective pool," because

Air Force One has 13 seats allocated to the press. The WHCA has allocated them to three wire reporters (AP, Reuters and Bloomberg), four photographers (AP, Reuters, AFP and New York Times), three from network TV, a radio correspondent, and two print reporters (in the Print and WHCA seats). Each outlet pays the full cost of travel, except for the Print seat, where costs for each trip are shared 15 ways by the 16 members of that rotation (two outlets share one slot).

Six larger print pool outlets share the WHCA seat (formerly the "Magazine" seat), providing additional opportunities to be in the pool.

Foreign Travel Pool – The 13-person group that travels with the President outside the country. Also sometimes referred to as the "protective pool**."** Same composition as the Domestic Travel Pool except that only seven Print outlets participate, and costs are not split.

Supplemental Pool – Eligible to volunteer when poolers are needed to cover the Vice President or First Lady, including when they travel, and whenever extra poolers are needed. Outlets in any print pool are always eligible to volunteer. Other outlets, print and non-print, may join this pool, on approval by the WHCA board. A year of supplemental pooling is required before consideration for membership in the Print Pool.

EXHIBIT 9

(Declaration of Katherine Fallow)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

* * * * * * * * * * * * * * * * * *	)	
ASSOCIATED PRESS,	)	Civil Action
	)	No. 25-00532
Plaintiff,	)	
	)	
vs.	)	
	)	
TAYLOR BUDOWICH, et al.,	)	Washington, D.C.
	)	March 27, 2025
Defendants.	)	9:38 a.m.
	)	
* * * * * * * * * * * * * * * * * *	)	

TRANSCRIPT OF PRELIMINARY INJUNCTION HEARING
BEFORE THE HONORABLE TREVOR N. McFADDEN
UNITED STATES DISTRICT JUDGE

APPEARANCES:

FOR THE PLAINTIFF:
CHARLES D. TOBIN, ESQ.
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REPORTED BY: LISA EDWARDS, RDR, CRR
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United States District Court for the District of Columbia
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I'm always looking for. And I rely on Zeke and those guys to help me out because, you know, I'm pretty focused on what's going on in front of me and I'm pretty good about my news judgment but, you know, those guys are far superior than I am.

BY MR. TOBIN:

Q. And how many photographs might you take at a given event?

A. I always joke. I say, if it's a good event, you know, hundreds. If it's a bad event, thousands. It's just to try to get the right ones.

Q. Understood.

Do the photographs that you take only have value that day?

A. Absolutely not, sir. It's important that I'm gathering a historical record. The AP has a wide global reach. So if I am a photo editor in Des Moines or if I'm a photo editor in Los Angeles or if I'm a photo editor, you know, in Europe somewhere, I would expect that the Associated Press provides a broad edit of things that are happening that day.

So it's not just like -- you know, their news needs are very different. Right? So I'm expected to give you a wide variety of photographs, and those photographs are not only good for the news of the day, but those photographs are good down the line in future stories you might be

working on.

So today, I might take a picture of some guy in the corner and, you know, a week or two later, I find out that that's very important, who that person is and why that person was in the Oval. But at the time, I might not know who they are or what they're doing. But like I said, sometimes it just goes off in my head: Hey, I need a picture of that guy.

Q. And when you're taking pictures at an event, what's happening with those photos after you take them?

A. Yes, sir. So the name of the game in photojournalism now is speed. It's all about speed. So if I'm late, a minute or two or three minutes, on a big story, I'm dead in the water. It's pointless actually, sir.

So if my competitors can get an image out a minute before me or three minutes before me on a major story, then I might as well delete my entire take because it's worthless.

So with that said, what I'm doing is I'm hard-wired directly into a transmission device, a MiFi. It's like, you know, a portable internet, a MiFi device.

So I'm hard-wired directly into the MiFi device. And then I will take an image and I'll look through my camera and I'll pick the image that I really like and I'll send it to my editor. So by the time -- when I take an

image, by the time I take it, it goes to my editor and is on the wire, the AP wire, it could be, you know, a minute or two. It's basically realtime.

So -- and that speed is vitally important for our clients and, like -- speed is so important, sir, that I carry three devices with me for transmission purposes. And the reason I do is one is on the T-Mobile network, one is on a Verizon network and one is on an AT&T network. It's not that I like carrying all this crap. It's that, you know, I have to send these photos out or -- sorry, sir. You know, I have to send those photos out quickly. So the biggest stress of my entire job is getting pictures out quickly to my editors.

Q. Do you carry a cellphone into the Oval Office?

A. Of course. Yes, sir.

Q. Do you monitor your cellphone?

A. Absolutely, yeah, because I'll get text messages from an editor or a reporter or someone telling me, Hey, I need a photo of this. Can you give me this? I need -- you know, or they'll be like, What are you doing, man? Like, get it together; take better pictures.

Q. Do you ever see the photos that you have just taken posted on your phone?

A. Sure. Yeah. Yeah. Of course.

Q. So it's that instantaneous --

A. Yeah. Yeah.
Q. -- while the event is still going on, you're posting photos and you're seeing them in realtime?
A. Yeah. Yeah, of course. And not only that; if it's a big event and -- I know pretty instantly whether or not I'm going to have a good day or a bad day, because if I see a website -- a news website that has someone else's photo, I'll be, like, Oh, man.

But it's that fast. Yes, sir.

Q. And --

THE COURT: So I've got a question.

You're describing sending photos that are going online simultaneously. My guess is your print journalist colleague is not also sending stories simultaneously.

THE WITNESS: So I can't speak to that, because I don't know, like, what they do, or I couldn't do what they do.

But that's not entirely true, sir. If there's huge news, they'll send, like, an alert. And they also will send a text message to an editor that they're working with so they can send out alerts in realtime. So -- and it's really, really important that it's quick.

So if we hear something about, like, tariff news or something else that the president says that's, you know, big news, you know, those guys have to get that out

immediately. And they have to be in the room to -- to do that. They can't rely on, like, someone else.

So -- I think Zeke will speak to this, but since you asked the question, I'll give you my little take. If our journalist isn't in the room and the president says something about tariffs or some major news, well, then, our reporters are going to have to wait until the meeting in the Oval Office ends. Then it goes to get played out on a television monitor for everyone to see. So by the time he says it and, you know, when we can report that news, it could be, you know, 30, 40 minutes. So we're that far behind our competitors.

Does that make sense, sir?

THE COURT: I guess I was saying just -- kind of a year ago, you and your colleague are both wherever; you can send things out almost immediately.

THE WITNESS: Yes, sir.

THE COURT: I wouldn't think the story is going out that quickly.

THE WITNESS: Yeah. But there's quotes that go out that quickly that can be added to a story.

THE COURT: Okay.

THE WITNESS: But, sir, I'm, like, the wrong person to ask about that. Zeke will be able to answer those questions for you.

MR. TOBIN: Mr. Miller will be the next witness, your Honor.

THE COURT: Okay.

BY MR. TOBIN:

Q. So, Mr. Vucci, you touched on this a little bit. To put a fine point on it, if there are two or three other photographers in the room at the Oval Office, why does it matter whether the AP is there?

A. Well, so --

Q. Or does it matter?

A. It matters greatly, because -- speed, number one. We don't want to rely on someone else that -- where speed isn't their main, you know, issue. So speed.

The -- communication. They might not be looking for what we need for the day. They might not be giving a broad edit of everything that we need or our clients need. We're not only serving, like I said -- we are serving, like -- I think 4 billion people or something like that see our news. So it's vitally important than an AP photographer is in that room.

And, you know, here's the other thing I'd say: You know, there's a reason that you're an AP photographer. There's a reason that you're selected. There's a reason that you got that job. We are -- I mean, I will say, because I'm a company guy, but it's the gold standard of

EXHIBIT 10

(Declaration of Katherine Fallow)

The New York Times https://www.nytimes.com/2017/07/17/insider/presidential-travel-protective-press-pool.html

When the President Travels, Who's Allowed to Join Him?

By Alexandria Symonds

July 17, 2017

When the president goes on a trip, he takes a varied entourage. A group of his senior aides accompanies him, usually including national security, domestic or economic advisers, speechwriters and others, depending on the length of the trip and its purpose. But 13 members of the news media, known as the protective press pool, also take seats on Air Force One, representing the worlds of wire services, print newspapers, news sites, broadcast television and radio, as well as photographers.

In the Washington news media's often contentious battle for scoops, the press pool represents a kind of sportsmanship by necessity. Only a few seats can be spared on the plane, so the print and television poolers must represent the entirety of their disciplines and send out a series of short, to-the-point reports throughout the trip to those not on it. The White House Correspondents' Association manages a rotation of news organizations that travel at their own cost, and it is explicitly understood that the poolers must share all the material they gather, without keeping anything they've seen or heard for an exclusive story.

"Pool duty is kind of the ultimate mixed blessing," said Mark Landler, who has been a White House correspondent for The Times since 2011. It offers close access to the president, but it can be stressful: Poolers are expected to quickly send their reports to 10,000 people or more, usually via iPhone, and the accuracy of quotations and descriptions in those reports is paramount.

"And you're often doing it in very difficult circumstances," Mr. Landler said. "Getting in and out of motorcades, sometimes climbing in and out of helicopters, rushing to finish the pool report before you get on Air Force One."

The term "protective press pool" is literal. "You need a record of the president's travels, for a couple of reasons. One is the basic question of making sure he arrived safely wherever he was going," Mr. Landler said. "You always want to have reporters and camera people close to him, because it's history."

And there is further value to the White House in allowing reporters along. Since the pool was established, during the Dwight D. Eisenhower administration, its presence has also allowed the president to react quickly to events while traveling. Plus, "on every trip the president makes, he has certain messages he's trying to broadcast, and the pool reporters are the first people and the closest people to him that can help the White House get those messages out," Mr. Landler said.

On President Trump's trip to Paris last week, Maggie Haberman, a White House correspondent for The Times, acted as the print pooler, sending 20 emails to the rest of the print news media over the course of the day and a half she spent with the president in the air and on the ground in France.

As often happens with this administration, the trip did not go entirely according to plan.

During a flight, the president occasionally goes to the press cabin in the back of the plane to chitchat with reporters. As a matter of custom, these interactions are usually off the record and stick mainly to pleasantries, wrapping up in less than half an hour. Indeed, Sarah Huckabee Sanders, the principal deputy White House press secretary, specified that the conversation was off the record before the president's visit to the pool area last week.

But on the way to Paris last Wednesday night, Mr. Trump stuck around much longer than expected, spending more than an hour talking with reporters before returning to his private area, which led to some confusion over which of his comments had been suitable for dissemination.

The next day, at his first "bilat" (an abbreviation of "bilateral talk") with the French president, Emmanuel Macron, Ms. Haberman tried to ask a question. In response, "Trump called out to me, asking why I didn't use what he had said the night before," Ms. Haberman said by email. "I explained it was off the record; he said, 'No, you can use it.' It was clear later he had thought he was on record for most of it, and his press aides wanted it off."

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Thinking it was off the record, Ms. Haberman and her colleagues in the pool had not prepared stories about what Mr. Trump had said. "Then ensued a medium-sized fight

with the press staff about how much would be released," she said. "The parts where he specified at the time 'off-the-record' were kept off, and we agreed to that."

The White House, which had a stenographer on the plane, gave the pool a transcript, but omitted two crucial quotations — one about the Deferred Action for Childhood Arrivals immigration program, the other about his son Donald Trump Jr.'s recently revealed meeting with a Russian lawyer last summer. After asking the White House to amend the transcript to include the comments, Ms. Haberman supplemented it with her own notes.

The trajectory of the relationship between the Trump White House and the press has never been clear-cut. "It was an open question at the beginning how a lot of this would operate, because the Trump campaign had had such antagonistic relations with the press," Mr. Landler said. "The press corps worried, early on, about everything: the weekly briefing, the setup of the briefing room, the workspace that we have at the White House and the rotating pool system. All of those things were initially up in the air."

Although the press pool tradition has continued under the current administration, it has been accompanied by more restrictive conditions than under Mr. Trump's predecessors. Mr. Landler noted, for instance, that the president's frequent weekend golf trips have become an issue. "The White House almost never tells the pool what he's doing when you're sitting for four and a half hours at his own golf club, and they never put out the list of people that he's playing golf with," Mr. Landler said. The Obama administration, by contrast, "used to confirm he was playing golf, and usually give you a list of his partners."

When the president's press office does offer information from a trip directly, it falls to the press pool to keep its veracity in check. On last week's trip to Paris, after the White House released a transcript of Mr. Trump's comments aboard Air Force One, Ms. Haberman fielded multiple questions about a particular word included in it. Eventually, enough people asked about the word that Ms. Haberman wrote a separate pool report to clarify the White House stenographer's mistake.

"A number of you have asked me about whether POTUS said 'cray' or if it was a typo and was actually 'crazy.' It was a typo. He did not say 'cray,'" Ms. Haberman wrote. "Have a good night."

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A version of this article appears in print on , Section A, Page 2 of the New York edition with the headline: What Is the Protective Press Pool?