UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KENNETH ROTH; DANIEL FROOMKIN; BEVERLY GAGE; PETER SCHMIDT-NOWARA; BENJAMIN WITTES; and ETHAN YOUNG, Plaintiffs, v. DONALD J. TRUMP, in his official capacity as President of the United States; STEVEN CHEUNG, in his official capacity as Assistant to the President for Communications; SEAN M. CURRAN, in his official capacity as Director of the Secret Service; and SUSAN WILES, in her official capacity as White House Chief of Staff, Defendants.	Civil Action No.

DECLARATION OF BEVERLY GAGE

I, Beverly Gage, declare and state as follows:

1. I am a plaintiff in this matter and am submitting this declaration in support of a motion for a preliminary injunction.

2. I am over the age of eighteen. I have personal knowledge of the facts stated in this declaration, and, if called to testify, I could and would competently do so under oath.

3. I am a resident of Cheshire, C.T., and a citizen of the United States.

4. I received a B.A. in American Studies from Yale University and a Ph.D. in History from Columbia University.

5. I am a historian of U.S. political history and currently the John Lewis Gaddis Professor of History at Yale University. I teach a number of courses, including "The American Century," a course on U.S. politics, political thought, and social movements in the 20th century; "The Un-American Century," which explores the political history of the United States in the 20th century through the national contest over communism and anticommunism; "Reagan's America," an upper-level course that examines 20th century U.S. politics through the life of Ronald Reagan; "Liberalism and Conservatism in the Modern United States," a survey of American political thought since the New Deal; and several graduate-level courses on modern U.S. history. To mark the nation's semiquincentennial, I also co-taught a one-time course called "America at 250," a broad history of the United States and American national identity.

6. In addition to my teaching, I publish widely. I have written three books: *The Day Wall Street Exploded: A Story of America in its First Age of Terror* (2009), which examines the history of terrorism in the 19th and early 20th centuries through the lens of the 1920 Wall Street bombing; *G-Man: J. Edgar Hoover and the Making of the American Century* (2022), a biography of the former FBI director, which received the 2023 Pulitzer Prize for Biography; and *This Land is Your Land: A Road Trip Through U.S. History* (2026), a New York Times–bestselling behind-the-wheel retelling of the 250 years of U.S. history. I am currently writing a biography of Ronald Reagan. I also publish articles in academic and popular publications, including Foreign Affairs, the New York Times, the New Yorker, and more, and I appear on television, radio, and podcasts to discuss my work and U.S. political history.

7. To inform my work and educate myself about current events and politics, I read White House reporting from a wide range of news organizations. I personally subscribe to the New York Times, the Atlantic, the New Yorker, the New York Review of Books, New Republic, the

Nation, Texas Monthly, and others. Through Yale, I access additional publications, including the Wall Street Journal and the Washington Post. I also watch cable news, including Fox, CNN, and MS NOW, listen to NPR, and subscribe to news podcasts including the New York Times' "The Daily" and NPR's "Up First." I receive newsletters from many of the publications to which I subscribe, as well as from the Bulwark, Free Press, and more.

8. I rely on White House reporting to inform myself about a variety of issues, and am particularly interested in U.S. domestic policy, electoral politics, and intellectual frameworks through which people process and understand politics. I depend on the analysis, judgment, and expertise of reporters who have access to the White House to serve as meaningful filters of information, guiding me to the most important news related to the president and his administration. If I am writing about an executive order, for example, I will ultimately spend time studying the text of the order itself, but I depend on reporters to inform me about the publication of the order in the first place and to contextualize its issuance within the current political reality.

9. As a historian of American politics, White House reporting—both historical and contemporary—is essential to my work. My historical research often draws on presidential and media records. In my book *G-Man: J. Edgar Hoover and the Making of the American Century*, for example, I made widespread use of contemporaneous newspaper reporting, including reporting by members of the White House press corps. This reporting was crucial for gaining a moment-to-moment sense of presidential administrations from FDR through Nixon. My account of the 1953 showdown over espionage accusations against former Treasury Department official Harry Dexter White relied largely on contemporaneous press coverage, including the essential reporting of John O'Donnell, head of the Washington bureau of the New York Daily News and a member of the White House press corps. **Exhibit 1** (*G-Man* chapter 35 excerpt and endnotes) For my renderings

of American politics in the 1960s and 1970s, I looked to the writings of many White House reporters, including Drew Pearson, who was a Washington columnist and a member of the White House press corps at various points in his career. To develop my account of the relationship between Hoover and Nixon, I looked to White House reporting, including the work of Terence Smith, an influential White House reporter for the New York Times from the 1960s through the 1980s. **Exhibit 2** (*G-Man* chapter 55 excerpt and endnotes); **Exhibit 3** (Smith New York Times article) (available at https://perma.cc/8EH2-2MPG). Another frequent source of commentary was Jeremiah O'Leary, a member of the White House press corps and eventually the president of the White House Correspondents' Association. **Exhibit 4** (*G-Man* chapter 58 excerpt and endnotes).

10. As a biographer of political figures, including presidents, I am particularly interested in presidential personalities, self-presentation, and rhetoric. I look not only for what presidents and public officials say about a particular policy, but how they say it, whether they seem to be up to date on a particular issue, and what their attitude towards the policy appears to be. Because presidents and public officials are often more scripted in other settings, spontaneous exchanges between independent White House reporters and White House officials tend to be particularly revealing. Nixon's famous utterance, "I'm not a crook!", was elicited by journalists at a heated press conference. During the Iran-Contra crisis, the White House limited its engagement with the press, but during that time, Reagan's exchanges with members of the White House press corps provided what little insight the American public had into his relationship to that crisis.

11. Much of my work puts the past in conversation with the present. My public writing, which often aims to provide historical context for current political activities, relies on White House press coverage to inform my understanding of an administration's policies and priorities. In the process of researching my forthcoming biography of Ronald Reagan, I wanted to investigate

whether the Trump administration had proposed anything like Reagan's "Strategic Defense Initiative"; I was able to turn up relevant White House reporting from Erica L. Green of the New York Times about Trump's proposed "Golden Dome" missile defense system. **Exhibit 5** (available at https://perma.cc/M79E-MDWY). In a 2017 New York Times opinion piece that I wrote about President Trump's firing of FBI director James Comey, I relied on White House reporting by Michael D. Shear, a White House reporter. **Exhibit 6** (Gage New York Times op-ed) (available at https://perma.cc/7RBB-XHK2); **Exhibit 7** (Shear New York Times article) (available at https://perma.cc/ZMC8-77MJ). I also contributed a chapter to *The Presidency of Donald J. Trump: A First Historical Assessment* (2022), an early history of the first Trump administration, edited by Julian E. Zelizer, in which I relied heavily on White House press coverage. **Exhibit 8** (*The Presidency of Donald J. Trump* excerpts); *e.g.*, **Exhibit 9** (New York Times article) (available at https://perma.cc/AUY6-M676). To gain a deeper background on the inside workings of the Trump administration, I have especially relied on the works of Maggie Haberman, White House reporter for the New York Times, including her recent co-authored book, *Regime Change*.

12. My teaching also involves frequent references to historical and contemporary White House reporting. Many of the readings I assign my students draw on White House reporting. For example, I ask my students to read Rick Perlstein's *Before the Storm: Barry Goldwater and the Unmaking of the American Consensus* (2001), Nicole Hemmer's *Partisans: The Conservative Revolutionaries Who Remade American Politics in the 1990s* (2022), and James Mann's *The Rebellion of Ronald Reagan: A History of the End of the Cold War* (2009), all of which discuss presidential statements, press briefings, and other information that likely relied on White House reporting. I also often draw parallels between the historical events that are the subject of my

courses and current political events and trends; to do this effectively, it is important that I am well-informed about the statements, activities, and decisions of the president and his administration.

13. I depend on White House reporters to ask hard questions, to be adversarial when necessary, to serve as witnesses of the presidency, and to report about both the activities and the affect of the president and other officials. Members of the White House press corps, especially those who are present over longer periods of time and have a sustained knowledge of multiple presidential administrations—either as individual reporters or as institutions—help contextualize current events and alert the public to important presidential habits, demeanor, and policy. Without a truly independent White House press corps, the public's understanding—and my own understanding—of the president and his administration will be diminished.

14. Members of the White House press corps have access to presidential spaces that I study but cannot personally access. Without their independent journalistic presence in those spaces, I cannot be confident in the creation and preservation of a complete and accurate historical record.

15. President Trump's bans and restrictions on disfavored members of the White House press hinders my ability to access the information I require to write, research, teach, and stay informed as a citizen of the United States. Inevitably, different reporters from different outlets will observe things differently and decide that different things matter, even if they are all reporting from the same room. The diversity of the White House press corps is important to me because it gives me a degree of assurance that the picture that White House journalists paint through their collective reporting is tethered to reality, even if individual journalists have biases, as they inevitably will. Furthermore, my work as a historian and a professor necessitates that I have access to accurate, complete, and independent reporting on White House officials and the president. Because access

is such an essential component of White House reporting, I worry that even the threat of expulsion might diminish the willingness of reporters to engage in the kind of rigorous, adversarial reporting that I require as both a citizen and a historian.

16. Not only does the president's press ban policy affect my own work, but it also threatens to make the historical record unreliable for future historians. If President Trump is allowed to exclude White House reporters based on their perceived ideology, he not only controls the public's access to information in the present moment, but he also controls what information is included in the historical record. Because White House press reporters are often privy to some of the most spontaneous public expressions of the president and other White House officials, ideological exclusions will mean that information about the president's demeanor, knowledge of his own policies, and off-the-cuff answers to challenging questions may never be publicized.

17. As a historian of the United States, I know from my research that many presidents have had combative relations with the White House press corps. But the fact that this is often an adversarial relationship is all the more reason to combat censorial political impulses and to protect the independence of White House reporters.

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

Executed on: October 23, 2026

Beverly Gage