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 PETER SCHMIDT-NOWARA

I, Peter Schmidt-Nowara, 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 Brooklyn, N.Y., and a citizen of the United States.

4. I received a B.A. in History from Princeton University and a M.A. in English and Creative Writing from the University of New Mexico.

5. I am a civics and social studies teacher at Brooklyn Technical High School, a public specialized high school in New York City. I currently teach two primary courses, Participation in

Government (fall semester) and Economics (spring semester). I have been an educator for over thirty-four years.

6. I rely on the newsgathering and reporting of members of the White House press corps to inform my teaching and educate myself about current events and politics. I read, listen to, and watch news from a variety of outlets every day, many of which provide reporting and analysis directly from the White House. I subscribe to the New York Times, the Boston Globe, the Economist, and the New Yorker, and I read them on a daily or weekly basis, including by subscribing to their email news digests and newsletters. I also read or listen to news from a range of other outlets, including the BBC, the Guardian, Al Jazeera, NPR, and PBS. I listen to several podcasts, including The Daily and The Ezra Klein Show, both of which are produced by the New York Times, and On Point, a daily news podcast distributed by American Public Media.

7. As a citizen, I rely on White House reporting to educate myself about current events and politics. I am particularly interested in local, state, and national politics, civil rights, foreign relations, and economic policy. I closely follow reporting about President Trump and his administration to inform my views.

8. As an educator, I rely on reporting about the president and the White House to teach students in both of my courses. I read reporting from members of the White House press corps in preparation for each semester and to prepare my weekly lesson plans. My civics course, Participation in Government, includes a unit on the U.S. Constitution that focuses on fundamental concepts like the checks and balances, the separation of powers, and presidential powers. I incorporate White House reporting directly into the lesson plans for this unit, sharing with students recent news articles and editorials about the president as the basis for class discussion. For example, I assign a project called “Principles of the U.S. Constitution,” in which I ask students to

identify and define a basic constitutional principle, select a New York Times article that relates to their selected principle, and then present their article to the rest of the class. **Exhibit 1**. These articles are often written by members of the White House press corps. One student presented on an article about an executive order that President Trump signed in 2025 aimed at dismantling the Department of Education. The article was reported by three journalists, including Michael C. Bender and Erica L. Green, both of whom are White House reporters. **Exhibit 2** (available at https://perma.cc/ZY23-9YBU). Another student presented on an article about Trump's tour of Asian countries in October of 2025. The article was reported by four journalists, including Katie Rogers and Erica L. Green, both of whom are White House reporters. **Exhibit 3** (available at https://perma.cc/7AVD-SURH).

9. I frequently share New York Times articles to initiate classroom discussion. These articles concern a wide variety of issues, including, for example, DOGE's activities at the beginning of President Trump's second term, the federal budget, and presidential pardons and appointments. I sometimes include these articles in a PowerPoint presentation, and other times I will print them out for students to read together before we discuss in class.

10. White House reporting is essential to my work as an educator. I use it to inform my students about current events and U.S. political history, provide them with varying perspectives on those events, and to teach them about how to responsibly access and digest political information. I feel an obligation, especially as a civics teacher, to help prepare my students to be critical, productive citizens who are equipped to consume news responsibly. As a busy high school teacher, I have little time to independently fact-check the news I consume or review a variety of sources before I discuss current events with my students. While I know that no single source of news can be perfectly accurate and unbiased, when the White House puts a thumb on the scale for or against

certain news outlets, it impairs the reliability of all the news I receive about the White House. I need to trust that what I am reading and then sharing with my students is as comprehensive, accurate, and independent as possible.

11. President Trump's ideological ban on members of the White House press corps deprives me of essential materials on which I rely to teach my students and stay informed as a citizen of the United States. President Trump's assault on reliable, independent reporting from the White House makes it difficult to fulfill my responsibilities as an educator of young people, many of whom look to me to guide them about where and how to find accurate and reliable information about the world they live in. With fewer voices in the room and with the threat of expulsion hovering over them, I fear that White House reporters will become more partisan and sycophantic to avoid retaliation.

12. If the President is allowed to continue to exclude journalists based on their perceived political orientation, I will continue to be harmed as both an educator and a private citizen, and my students will grow up in an information ecosystem that they cannot trust.

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

Executed on: October 23, 2026

Peter Schmidt-Nowara