IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CABLE NEWS NETWORK, INC., et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States, et al.,

Defendants.

Civil Action No. 1:26-cv-3287

DECLARATION OF KINGSLEY WILSON

I, KINGSLEY WILSON, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

BACKGROUND

1. I am the Press Secretary for the Department of War. I have served in this position since May 2025. In this role, I am responsible for managing press interactions with the Department of War ("DoW"), overseeing the Pentagon Press Operations office ("PPO"), and serving as the Department's principal liaison with credentialed journalists. I report directly to the Assistant to the Secretary of War for Public Affairs.

2. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto. In particular, I have personal knowledge of the frequency and nature of press inquiries involving sensitive or classified information because such inquiries are directed to my office or are reported to me by my staff, as well as the press access procedures implemented by the Department of War.

3. I submit this declaration in support of Defendants' opposition to the Motion for a Temporary Restraining Order.

THE IMPACT ON NATIONAL SECURITY

4. The regular receipt and publication of classified information by journalists poses serious risks to national security. The unauthorized disclosure of security information or procedures, operational plans, intelligence assessments, force posture decisions, or sensitive internal deliberations regarding domestic or foreign policy has the potential to put American lives in danger, to compromise ongoing military and intelligence operations, and to undermine the economic and national security of the United States. When classified or sensitive information is published, adversaries can adjust their tactics, techniques, and procedures in response—potentially endangering the servicemembers conducting those operations or undermining American strategic objectives both at home and abroad. Indeed, even unclassified but sensitive information, including security information, can reveal to an adversary critical information about national security that may undermine carefully orchestrated long-term strategic planning.

5. The current national security environment makes the protection of classified information particularly critical. United States military personnel are currently deployed and conducting military operations in Iran. The unauthorized disclosure of classified information relating to these operations could have immediate and irreversible consequences for the safety of American servicemembers and the success of military objectives. In addition, many adversaries for the United States operate below the level of outright military action and seek to utilize any available information about the United States domestic policy, strength, operations, supply chain, or plans to undermine the United States national security strategy in the long term.

6. Classified information is classified for a purpose. The release of any classified

information can be expected to have an irreparable harm to the United States national security. Even confidential information, the lowest level of classification, is so classified because its unauthorized disclosure could be expected to result in damage to the national security. Sensitive information that is unclassified, especially information discussed at the White House, among the highest level of direct advisors to the President, can reasonably be expected to result in harm to the national security when it is leaked, published, or misrepresented.

7. When sensitive or classified information is released, it requires a realignment of resources and a number of sensitive decisions to be made. First, the decision must be made whether to acknowledge the information and draw more attention to it. Second, the decision must be made whether the information can be withdrawn, modified, or corrected, if it is incorrect. Even the release of incorrect sensitive information can cause significant interference with the typical functioning of the Government.

8. Such decisions are not made by the press office alone. Instead, when my office receives an inquiry containing sensitive or classified information, it begins a chain reaction that results in a number of personnel being pulled from their typical work and engaging in other duties. This impairs the typical functioning of the United States government.

THE FREQUENCY OF SENSITIVE INFORMATION REACHING JOURNALISTS BEFORE THE POLICY

9. Before the Department implemented the PFAC Policy in October 2025, my office was contacted by journalists on a regular basis—often monthly, and sometimes multiple times per month—regarding information they had obtained that was sensitive or classified, including information relating to operational plans, intelligence assessments, diplomatic communications, and force posture decisions. These contacts came from

journalists at multiple news outlets, including the CNN, MS NOW (formerly MSNBC), and Politico. Many of these journalists that called were PFAC holders.

10. Controlled unclassified information, classified information, and other sensitive information was reaching journalists with a frequency that raised serious concerns about the security of information within the Pentagon.

11. To be clear, the Department encourages journalists who come into possession of controlled or classified information to contact the press office before publishing, and these contacts are not themselves improper. Nor does the Department know or opine on whether each instance involved information that was solicited by the journalist, because the Department does not know the source in each case. The concern is the frequency with which journalists were coming into possession of sensitive, controlled or classified information.

12. Based upon the similarities between the Pentagon and the White House complex and the types of sensitive information that flow through both buildings, it is reasonable to expect that they have encountered similar issues. Indeed, my conversations with their team have confirmed this to be the case.

THE CONNECTION BETWEEN PHYSICAL ACCESS AND THE PATTERN

13. Based on my experience and the reports of my staff, I believe that unescorted access to the Pentagon was a significant contributing factor to the frequency with which sensitive, controlled, and classified information was reaching journalists. Unescorted access allowed journalists to maintain a persistent physical presence near sensitive spaces within the Pentagon. This presence enabled journalists to observe activity patterns—such as which officials were meeting, when, and in what configuration—that could be used to

identify individuals with access to specific sensitive information and to time inquiries accordingly.

14. The Correspondents' Corridor was located next to the office space for the Joint Chiefs of Staff—the military advisors to the President, National Security Council, Homeland Security Council, and Secretary of Defense. *See* 10 U.S.C. § 151. Journalists, including journalists who regularly called my office regarding controlled or classified information they had obtained, frequently used their access to closely monitor activity in and out of the Joint Staff spaces.

15. The Department assessed that the combination of unescorted access and the absence of security screening criteria contributed to the frequency with which controlled unclassified information and classified information was reaching journalists. The Department therefore instituted a new policy to reduce this frequency.

16. The White House similarly has sensitive areas that must be carefully controlled. The access policies must adapt to modern technological advances in cameras and microphones, as well as to the changing threat matrix for what information's release could cause damage to the national security.

THE CHANGE AFTER THE POLICY

17. Following the implementation of the PFAC Policy in October 2025, the frequency with which my office was contacted by journalists regarding sensitive, controlled or classified information dropped dramatically. While there have been a small number of isolated incidents, the regular pattern of contacts involving such information largely ceased.

18. I attribute this reduction primarily to the fact that many journalists were not present in the Pentagon because they surrendered their PFACs following the implementation of the

PFAC Policy, meaning they were unable to maintain a persistent, unescorted presence near sensitive spaces within the Pentagon. The PFAC Policy was not intended to exclude journalists from the Pentagon. But when journalists surrendered their PFACs and accompanying Pentagon access, the Department was able to observe a dramatic decrease in journalists obtaining sensitive, controlled or classified information that should never have been released to them. Without the ability to observe activity patterns and time their inquiries accordingly, the systematic pattern was disrupted.

19. In addition, I believe that the Department action in and of itself sent a message to journalists that the Department was taking information security more seriously. While this is not intended to chill reporters from engaging with the press office when they come into possession of classified information without soliciting any wrongful behavior, it may have beneficially reminded reporters of their obligation not to solicit such information.

20. As noted above, it is reasonable to expect that the White House implementation of such a policy would likewise result in a commensurate reduction in the frequency of such information being released.

THE WHITE HOUSE COMPLEX

21. After discussions with staff in the White House Communications Office, I believe that the President's determination to revoke credentials for news outlets and reporters that have caused such interference with government functions would be effective in reducing the amount of information that is published that undermines national security.

22. In January, CNN released information about plans to rebuild a top-secret bunker beneath

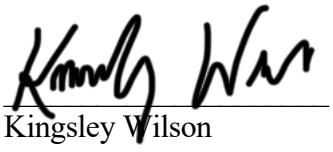
the White House East Wing.[1] The release of such information is exactly the type of release that can cause harm to the national security. CNN therefore demonstrated its willingness to publish information that undermines the security of the White House and the President.

23. In May 2026, Politico reported on internal United States Secret Service documents relating to the security of the White House complex.[2] Politico thereby expressed a willingness to publish sensitive undisclosed information relating to the security of the White House and the President.

24. In May 2026, MSNOW reported on an alleged leak investigation that the FBI was conducting focusing on a journalist.[3] Such an investigation, if it existed, would be nonpublic sensitive law enforcement information. MSNOW clearly demonstrated its willingness to publish sensitive information without regard for national security or the safety or security of senior government officials.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 22, 2026, at Washington, D.C.



Kingsley Wilson
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[1] Betsy Klein, *There's a 'Top-Secret' Project Beneath the White House East Wing*, CNN (Jan. 19, 2026), https://www.cnn.com/2026/01/19/politics/east-wing-secret-bunker-construction-details.
[2] John Sakellariadia, Secret Service Briefing Fails to Quiet GOP Ballroom Funding Concerns, *Politico* (May 12, 2026), https://www.politico.com/news/2026/05/12/secret-service-briefing-fails-to-quiet-gop-ballroom-funding-concerns-00917317.
[3] *FBI Probing Leaks to Journbalist Who Wrote Explosive Article on Kash Patel, Sources Say,* MS NOW (May 6, 2026), https://www.ms.now/news/fbi-investigating-leaks-to-journalist-who-wrote-explosive-article-on-kash-patel-sources.