UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

COALITION FOR INDEPENDENT TECHNOLOGY RESEARCH,

Plaintiff,

v.

MARCO RUBIO, in his official capacity as Secretary of State; KRISTI NOEM, in her official capacity as Secretary of Homeland Security; and PAMELA BONDI, in her official capacity as Attorney General of the United States,

Defendants.

Civil Action No. 1:26-cv-00815 (JEB)

DECLARATION OF CARRIE DECELL

I, Carrie DeCell, declare as follows:

1. I am a licensed attorney in good standing in the District of Columbia. I appear on behalf of Plaintiff Coalition for Independent Technology Research ("CITR") in the above-captioned case.

2. I submit this declaration in support of Plaintiff's motion for a Section 705 stay and preliminary injunction pursuant to Federal Rule of Civil Procedure 65.

3. An anonymous member of CITR, identified as "CITR Member A," is submitting a declaration in support of Plaintiff's motion. *See* CITR Member A Decl. They have informed me that they are willing to participate in this matter only pseudonymously because they fear that being identified in connection with this lawsuit could lead to their detention and deportation, or the targeting of their noncitizen family members or colleagues, under the Censorship Policy or in retaliation for their participation in this lawsuit. I know CITR Member A's identity, and I have

confirmed that CITR Member A is a member of CITR and works for a research group that is an organizational member of CITR. I have the signed version of their declaration in my possession.

4. Attached hereto as **Exhibit 1** is a true and correct copy of a webpage on Instagram titled "Instagram Community Guidelines FAQs," published on April 19, 2018. This page is also available at https://perma.cc/P6R5-J4FD.

5. Attached hereto as **Exhibit 2** is a true and correct copy of a webpage on YouTube titled "YouTube's Community Guidelines." This page is also available at https://perma.cc/EBL8-TSAD.

6. Attached hereto as **Exhibit 3** is a true and correct copy of a webpage on X titled "The X Rules." This page is also available at https://perma.cc/L5ZE-PFUD.

7. Attached hereto as **Exhibit 4** is a true and correct copy of a webpage on Truth Social titled "The Moderation FAQ." This page is also available at https://perma.cc/L82V-CW9Y.

8. Attached hereto as **Exhibit 5** is a true and correct copy of a webpage on Truth Social titled "Truth Social Terms of Service." This page is also available at https://perma.cc/ZV3M-RFVC.

9. Attached hereto as **Exhibit 6** is a true and correct copy of an *NPR* article by Shannon Bond titled "State Department to deny visas to fact checkers and others, citing 'censorship,'" published on December 4, 2025. This article is also available at https://perma.cc/JX4C-4XDT.

10. Attached hereto as **Exhibit 7** is a true and correct copy of a *Reuters* article by Humeyra Pamuk titled "Exclusive: Trump administration orders enhanced vetting for applicants of H-1B visa," published on December 4, 2025. This article is also available at https://perma.cc/FJF4-VMZD.

11. Attached hereto as **Exhibit 8** is a true and correct copy of a *Washington Post* article by Naomi Nix and Ian Duncan titled "Inside the Trump administration's campaign to counter content bans in Europe," published on March 20, 2026. This article is also available at https://perma.cc/XH6G-QALE.

12. Attached hereto as **Exhibit 9** is a true and correct copy of a post published on X by Defendant Marco Rubio on May 28, 2025. This post is also available at https://perma.cc/HE95-7VBG.

13. Attached hereto as **Exhibit 10** is a true and correct copy of a press release from the Department of State titled, "Announcement of Visa Restrictions on Brazilian Judicial Officials and their Immediate Family Members," dated July 18, 2025. This press release is also available at https://perma.cc/NX4L-DADG.

14. Attached hereto as **Exhibit 11** is a true and correct copy of a *CBS News* article titled "Judge suspends X platform in Brazil amid feud with Elon Musk," published on August 30, 2024. This article is also available at https://perma.cc/8U94-PXSE.

15. Attached hereto as **Exhibit 12** is a true and correct copy of a press release from the European Commission titled, "Commission fines X €120 million under the Digital Services Act," dated December 5, 2025. This press release is also available at https://perma.cc/C86A-B8DY.

16. Attached hereto as **Exhibit 13** is a true and correct copy of a post published on X by Defendant Rubio on December 5, 2025. This post is also available at https://perma.cc/X556-5FAG.

17. Attached hereto as **Exhibit 14** is a true and correct copy of the administrative record filed by Defendants in *Ahmed v. Rubio*, No. 1:25-cv-10705-LAP (S.D.N.Y. Feb. 6, 2025), ECF No. 42. The administrative record is also available at https://perma.cc/2E3G-79HH. The

administrative record includes: a memorandum by Under Secretary of State for Public Diplomacy and Public Affairs Sarah B. Rogers titled "Approved Action Memo for the Secretary re Response Options to the European Commission's Fine of X Corp. Under the Digital Services Act (DSA)," dated December 16, 2025; as an attachment to the "Action Memo," a document titled "INA Section 237(a)(4)(C) ('4C') and Subjects Recommended for Deportability Determinations," which is undated; and a memorandum by Defendant Rubio titled "Determination of Deportability under Section 237(a)(4)(C) of the INA," dated December 19, 2025.

18. Attached hereto as **Exhibit 15** is a true and correct copy of a press release from the Department of State titled, "Announcement of Actions to Combat the Global Censorship-Industrial Complex," dated December 23, 2025. This press release is also available at https://perma.cc/2FGJ-R2QB.

19. Attached hereto as **Exhibit 16** is a true and correct copy of a post published on X by Defendant Rubio on December 23, 2025. This post is also available at https://perma.cc/C5DV-4RSG.

20. Attached hereto as **Exhibit 17** is a true and correct copy of a post published on X by Under Secretary Rogers on December 23, 2025. This post is also available at https://perma.cc/35S6-S7KJ.

21. Attached hereto as **Exhibit 18** is a true and correct copy of a post published on X by Under Secretary Rogers on December 23, 2025. This post is also available at https://perma.cc/7YE8-KHJ9.

22. Attached hereto as **Exhibit 19** is a true and correct copy of a post published on X by Under Secretary Rogers on December 23, 2025. This post is also available at https://perma.cc/7AT6-53AB.

23. Attached hereto as **Exhibit 20** is a true and correct copy of a post published on X by Under Secretary Rogers on December 23, 2025. This post is also available at https://perma.cc/8PAE-ZBBZ.

24. Attached hereto as **Exhibit 21** is a true and correct copy of a post published on X by Under Secretary Rogers on December 23, 2025. This post is also available at https://perma.cc/29F8-LFUU.

25. Attached hereto as **Exhibit 22** is a true and correct copy of the report published by the Department of State titled "Agency Strategic Plan Fiscal Years 2026–2030." This report is also available at https://perma.cc/VX2H-SJXP.

26. Attached hereto as **Exhibit 23** is a true and correct copy of a post published on X by Under Secretary Rogers on December 23, 2025. This post is also available at https://perma.cc/8RRC-LJ6E.

27. Pursuant to Local Civil Rule 7(m), I attempted to confer with Defendants' counsel regarding this motion, including by contacting attorneys within the U.S. Attorney's Office for the District of Columbia and the U.S. Department of Justice Civil Division's Federal Programs Branch and Office of Immigration Litigation, but I was informed that an attorney has not yet been assigned to this matter.

28. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on: March 26, 2026

/s/ *Carrie DeCell*
Carrie DeCell

Counsel for Plaintiff