

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE ASSOCIATED PRESS,

Plaintiff,

v.

TAYLOR BUDOWICH,
White House Deputy Chief of Staff, et al.,

Defendants.

Civil Action No. 25-0532 (TNM)

SUPPLEMENTAL DECLARATION OF TAYLOR BUDOWICH

I, Taylor Budowich, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct to the best of my recollection and belief.

1. I am Deputy Chief of Staff and Cabinet Secretary at the White House.
2. I offer the following supplemental declaration based on my personal knowledge and information that I have learned in the scope of my job responsibilities.

White House Press Pool Approach

3. Under the new process for press pool selection, the White House press team selects the journalists that will have special access to the President's most intimate settings on a day-by-day basis (or for out-of-town ventures, on a trip-by-trip basis). Outlets that were among the members of the pool under the old system continue to be eligible for pool selection in the new system, including the Associated Press. That said, the new system affords well-deserving outlets, including new media outlets that were historically excluded from certain pool rotations by the White House Correspondents' Association, to share in the privilege and responsibility of being afforded special access to the President in his intimate work, travel, and home environments.

4. The White House believes that affording special access to the President under these terms allows both new voices to be heard, while producing an environment that serves to better inform the public on the actions being taken by the administration. For example, on March 24th, the press pool was allowed access to the Roosevelt Room for a steel manufacturing investment announcement with President Trump and executives with Hyundai. Due to the flexibility and control provided by the new process, the press team was able to include CNBC and Bloomberg, whose reporters and audiences have heightened interest on the topic.

5. Since the inception of the new press pool system, the press teams have been empowered to better perform their jobs by creating a pool that best serves the public by pairing the topics of each event with the reporters and audience who are most curious about them.

6. It is indisputable that coverage of and access to the White House has only increased since the newly instituted White House Press Pool, and a vast majority of the White House press corps is celebrating these long overdue changes, which put journalists, networks and the American people above the self-important “board” of journalists from WHCA.

Private Spaces

7. In private spaces such as the Oval Office or Air Force One, it is up to the President’s discretion whether or not he accepts questions from press pool members.

East Room Events

8. In my earlier declaration, I described the RSVP request process that journalists use to seek access to limited access press events in the East Room of the White House. Herein, I provide additional information on that process.

9. When the White House is unable to accommodate all journalists that seek access to these limited access press events at the White House, the White House provides credentials to non-

pool, hard pass holders based on a similar approach as the approach taken with the limited press pool by prioritizing the journalists, outlets and audiences best suited for each individual event.

10. For events, there is no existing written policy for press admission. The White House exercises its expertise in understanding journalists, their outlets, and the audiences to ensure the widest and most robust coverage and distribution of these events. Due to space limitations, the press team may select news media that is more relevant to an event. For example, foreign press may be given admission preference for foreign-related events, and business or economic-focused media may be prioritized for announcements most relevant to their reporters and audiences, as noted above.

11. In exercising that discretion, the White House has not systematically or otherwise excluded any members of the credentialed media, including since my last declaration.

12. On March 12, 2025, the President held a limited access East Room press event with Prime Minister Micheál Martin of Ireland. For that limited access event, 188 journalists requested access to the East Room for the event and 81 were permitted access. Based on my understanding, among those provided access were a domestic-based photojournalist from the Associated Press.

13. On March 20, 2025, the President held a limited access East Room press event for the signing of an Executive Order regarding education. For that limited access event, 230 journalists requested access to the East Room for the event and 108 were permitted access. Based on my understanding, among those provided access were two domestic-based photojournalists from the Associated Press.

14. On March 24, 2025, the President held a limited access East Room press event as part of a Greek Independence Day celebration. For that limited access event, 159 journalists

requested access to the East Room for the event and 93 were permitted access. Based on my understanding, among those provided access were two photojournalists from the Associated Press.

15. As these events and those described in my prior declaration demonstrate, the Associated Press remains completely eligible for selection, as all hard pass holders are, for a wide range of White House coordinated press events.

16. I can confirm that the Associated Press is eligible to access future, limited access East Room press conferences and similar media events.

17. While the Associated Press' sustained commitment to misinformation and scandalous reporting standards will indeed further erode what limited credibility they maintain, it does not interfere with their eligibility to access events.

West Palm Beach Tarmac

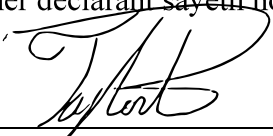
18. In my prior declaration, I noted that press access to the February 28, 2025, landing of Air Force One at Palm Beach International Airport was not a limited access event similar to the East Room events I described in that declaration. Instead, for that specific event, I noted that a small collection of journalists beyond the press pool was provided special access by the President's advance team to the otherwise non-public tarmac.

19. Non-pool access to the February 28 landing was provided by the advance team, not the White House's press team and was done so on an ad hoc, one-off (or special) basis. The Associated Press has been permitted to attend these ad hoc events.

20. For example, on March 7, 2025, at the landing of Air Force One at Palm Beach International Airport, a journalist and photojournalist from the Associated Press were permitted access.

21. As another example, on March 14, 2025, at the landing of Air Force One at Palm Beach International Airport, a domestic-based journalist and photojournalist from the Associated Press were permitted access.

Further declarant sayeth not,

A handwritten signature in black ink, appearing to read 'TB', is written over a horizontal line.

TAYLOR BUDOWICH

Deputy Chief of Staff for
Communications and Public Liaison,
and Cabinet Secretary