

EXHIBIT 13

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**CULTURAL HERITAGE PARTNERS,
PLLC, et al.,**

Civil Action No. 1:25-cv-03969-DLF

Plaintiffs,

v.

**DECLARATION OF GREGORY ALAN
WERKHEISER**

DONALD J. TRUMP, et al.,

Defendants.

DECLARATION OF GREGORY ALAN WERKHEISER

I, GREGORY ALAN WERKHEISER, under 28 U.S.C. § 1746, hereby declare:

1. My name is Gregory Alan Werkheiser. I have personal knowledge of the matters stated herein.
2. I am an attorney residing in Richmond, Virginia, and I am a founder and equity partner of Cultural Heritage Partners, PLLC, (“CHP”), an international law firm with an office in Washington, DC. I have practiced law for twenty-five years.
3. CHP focuses its practice on the protection of cultural heritage, including architecture, art, landscapes, sacred places, and traditional practices. We represent clients that include tribes, governments, civil society organizations, and individuals, frequently with respect to federal review of threats to historic resources arising under the National Environmental Policy Act (“NEPA”) and the National Historic Preservation Act (“NHPA”).
4. I have guest lectured at several of the nation’s foremost law schools on the importance of enforcement of NEPA and NHPA, not just to preserve the past for its own sake, but to leverage the knowledge we glean from that history and culture to build a better future.

5. Earlier in my career I worked for the U.S. government in the Eisenhower Executive Office Building (“EEOB”) and have direct, lived familiarity with the building’s historic exterior, interiors, materials, and relationship to the Lafayette Square National Historic Landmark District (“Lafayette Square NHLD”).
6. I travel to Washington, D.C. frequently for professional meetings, court appearances, and recreation. I regularly walk through and photograph the White House complex, Lafayette Square NHLD, President’s Park, and the area around the EEOB to conduct business and enjoy the historic architecture and setting. The EEOB’s gray granite façade, mansard roofs, and ornate details are among the reasons I am drawn to the area. I use these spaces for aesthetic, recreational, professional, and educational purposes, and I intend to continue doing so. Returning to the EEOB and its surroundings and sharing the building where I once worked with clients and colleagues, is an important part of how I experience and appreciate this historic setting. If the EEOB’s exterior is painted, that experience will be permanently diminished.
7. In my role at Cultural Heritage Partners, I use the EEOB and its surroundings in my work for clients as an example of federal preservation successes. The repainting project would diminish the value of this setting for my work and for CHP’s mission.
8. I saw a post by President Donald J. Trump on the social media platform Truth Social dated on or about August 7, 2025. The post included renderings of the EEOB painted white and stated: “The beautiful Executive Office Building, opposite the White House, as it would have looked in white stone but, nevertheless, is still beautiful in its original grey stone. What a great beauty it is!” A true and correct copy of that post is attached hereto as Exhibit 2.

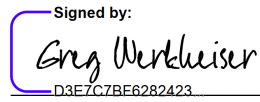
9. On a subsequent date, I watched the televised interview of President Trump on *Seen and Unseen* segment of the *The Ingraham Angle* (Fox News Channel). During the interview, the President displayed before-and-after images of the EEOB painted white, stated that people once considered the building “a really ugly building” but that he saw it as “one of the most beautiful buildings ever built,” and claimed that painting would bring out the building’s detail and highlight its features. He also said he was “getting bids right now from painters” and that the project would involve cleaning, repointing, and painting. A true and correct copy of the interview transcript is attached as Exhibit 3.
10. I am aware of a pattern of recent alterations to the White House grounds executed quickly and without public notice or preservation review. For example, I learned through news reports that President Trump ordered the removal of a historic magnolia tree associated with Rachel Jackson from the White House grounds in March 2025, and that the tree was cut down shortly thereafter, in April 2025. A true and correct copy of an article titled “A Timeline of Donald Trump’s Shocking Changes to the White House Since He Took Office in January,” *People Magazine*, November 3, 2025, is attached as Exhibit 4. The article describes the removal of the magnolia tree and other changes to the White House grounds.
11. I also learned that bulldozers began removing grass from the White House Rose Garden on June 11, 2025, in preparation for paving, as reported in a *Vogue* magazine article. A true and correct copy of that article, titled “They Paved Paradise? A Closer Look at Trump’s New White House Rose Garden,” *Vogue*, August 3, 2025, is attached as Exhibit 5.

12. During the Ingraham Angle interview, President Trump stated that he is “getting bids right now from painters” for the EEOB project. Based on my experience with federal projects involving historic buildings, a statement that bids are being solicited typically means that the responsible agency—here, the General Services Administration (“GSA”), which manages the EEOB—is taking concrete procurement steps to identify and hire contractors. On that basis, I understand and believe that preparations for the work are already underway and that the project could begin soon. I am therefore deeply concerned that surface preparation, cleaning, repointing, or painting could commence before the Court has an opportunity to rule on this motion.
13. If the EEOB’s historic unpainted granite and slate exterior is painted, I will suffer immediate and irreparable harm. The unpainted gray stone and contrast with the White House are central to the aesthetic experience I value when visiting and working in Lafayette Square NHL. Painting the EEOB will permanently diminish my enjoyment and professional use of the area. Once the granite is abraded and coated, the original finish cannot be restored. I would suffer personal and professional harm that cannot be compensated with money damages.
14. As a preservation attorney, I am aware that NEPA and NHPA require federal agencies to evaluate the environmental and historic preservation impacts of major federal actions and federal undertakings and to consult with the public before initiating projects that may affect historic properties.
15. Neither I nor CHP has received any notice of NEPA or NHPA review for the EEOB repainting project. I am not aware that the public has received any such notice. To my knowledge, no environmental assessment, environmental impact statement, Section 106

consultation, or Section 110(f) process has been initiated. Plaintiffs and the public have been denied the opportunity to comment on the proposed project and to consult on alternatives and mitigation. This denial of procedural rights is itself a harm because we cannot participate in the decision-making process before the project commences.

16. If Defendants initiated NEPA and NHPA review for the EEOB project, I would participate by reviewing historic documents, submitting written comments, and engaging in any available Section 106 and Section 110(f) consultations, including meetings or site visits. The absence of these processes deprives me of information and opportunities to influence the decision-making process before irreversible work begins.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 17, 2025, in Richmond, Virginia.

Signed by:

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Gregory Alan Werkheiser, Partner
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