EXHIBIT A

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 MYDELLE WRIGHT

DONALD J. TRUMP, et al.,

Defendants.

SUPPLEMENTAL DECLARATION OF MYDELLE WRIGHT

- I, Mydelle Wright, under 28 U.S.C. § 1746 hereby declare:
 - My name is Mydelle Wright. I am over the age of 18 and competent to testify. I have personal knowledge of the matters stated herein and could and would testify competently thereto if called as a witness. I previously submitted a declaration dated December 2, 2025, in support of Plaintiffs' Reply. I respectfully submit this supplemental declaration to provide new information of which I became aware only Friday afternoon, December 5, 2025, three days after Plaintiff's Reply and with no business days prior to the court's Monday, December 8, 10:00 AM hearing on Plaintiff's motion.
 - 2. Upon information and belief, the White House, acting on its own and not through GSA, has solicited bids and/or is finalizing a bid package (the last step prior to solicitation) to analyze and recommend for demolition four historic federal buildings in DC, which include buildings eligible for and listed on the National Register of Historic Places and a National Historic Landmark.

DECLARATION OF MYDELLE WRIGHT

- 3. GSA has sole authority over this process and would exercise that authority, including ensuring NHPA and NEPA compliance, long before the stage of soliciting bids related to potential demolition, and yet, upon information and belief, key GSA personnel have only just learned of the White House's activities.
- 4. The buildings include the Robert C. Weaver Federal Building, the Wilbur J. Cohen Federal Building, the GSA Regional Office Building, and the Liberty Loan Building.
- 5. Disposal of federal buildings, including sale and demolition, is a federal undertaking subject to the National Historic Preservation Act ("NHPA") and a major federal action subject to the National Environmental Policy Act ("NEPA").
- 6. As far as I am aware, GSA has not conducted processes to comply with NHPA Section 106 or 110(f) or with NEPA for this undertaking for any of the four buildings.
- 7. If contracting is being conducted outside of GSA's required processes, and GSA has failed to implement or complete NHPA's and NEPA's requirements for meaningful public and expert input, as with the EEOB, the public's rights as set forth by Congress become meaningless.
- 8. I have read the narrow Heller declarations with some sympathy as they reflect, in my 20 years of experience with GSA, leadership struggling with an untenable situation. For the first time of which I am aware, a President is personally involved in facilitating end-runs around the agency's obligations to the buildings that are our national heritage, and who in the agency is going to tell him "no?"

I declare under penalty of perjury that the foregoing is true and correct. Executed on 7 December 2025 in Fort Collins, Colorado.

What

Mydelle Wright