

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

DC PRESERVATION LEAGUE, et al.,

Plaintiffs,

v.

**BOARD OF TRUSTEES OF THE JOHN
F. KENNEDY CENTER FOR THE
PERFORMING ARTS, et al.,**

Defendants.

Civil Action No.1:26-cv-00981

**DECLARATION OF DIANE RHYU
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

I, Diane Rhyu, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct and based on my personal knowledge:

1. My name is Diane Rhyu. I am over the age of eighteen and competent to make this declaration. I reside in Washington, D.C.

2. I am a current member of the Society of Architectural Historians (“SAH”). I have been a member since 2025. I currently serve on the Exhibition Catalogue Award Committee for SAH. In that capacity, I review and select exhibition catalogues that make significant contributions to the field of architectural history, urban history, or landscape history. I have a longstanding personal connection to the John F. Kennedy Center for the Performing Arts (the “Kennedy Center”) in Washington, D.C.

3. I have attended performances and events at the Kennedy Center regularly for approximately three years. Over the past three years, I have visited the Kennedy Center approximately five times per year to attend performances by the Washington National Opera, children’s musicals, educational programs, as well as ballet and dance productions. I also visit the

Kennedy Center's public spaces, including the Grand Foyer, the terrace overlooking the Potomac River, the Hall of States, the Hall of Nations, the rooftop terrace, the REACH Expansion grounds, to spend time with family and friends and for personal enjoyment and reflection.

4. My professional work in public education brings me to the Kennedy Center on a regular basis. Over the past three years, I have consulted on matters relating to the building's programming. I visit the Kennedy Center approximately two times per year in connection with this work.

5. The Kennedy Center holds deep cultural significance to me and my community. I have attended operas, ballets, modern dance, musicals, summer movie nights and festival events over the past three years. I view the Kennedy Center not only as a performance venue but as a public landmark that belongs to and serves the people of this region and the nation.

6. The Kennedy Center holds particular personal significance to me because the building's mid-century Modernist architecture, designed by Edward Durell Stone and completed in 1971, is integral to my experience of the site. I value the building's distinctive white marble facade, its 200 exterior columns (originally finished in gold), the sweeping proportions of the Grand Foyer, the iconic crystal chandeliers, the "box within a box" acoustical design by Cyril M. Harris, and the relationship between the building and its setting along the Potomac River. These design features are central to why I visit the Kennedy Center and are part of what makes the experience meaningful to me.

7. Additionally, the Kennedy Center is a living memorial to President John F. Kennedy, established by Congress as the sole national memorial to the late President in the city of Washington. I am aware that the D.C. State Historic Preservation Officer determined in 2012 that the Kennedy Center is eligible for the National Register of Historic Places. The building's historic character, including its original design, materials, and setting within the monumental core, is

inseparable from the experience of visiting the site. Alterations that compromise the building's historic integrity would diminish the very qualities that make the Kennedy Center significant to me. The building is embedded with words by President John F. Kennedy that refer to a historical moment in time and connect generations in dialogue. The building serves as a place of memory for the public.

8. Attending events at the Kennedy Center is a meaningful personal and family tradition for me. My attachment to the building extends beyond the performances I attend. The physical environment of the Kennedy Center, including the Grand Foyer, the Hall of Nations and the REACH Expansion, is part of what makes each visit significant to me.

9. I have concrete plans to continue visiting and using the Kennedy Center in the future. I have attended operas and dance programs at the Kennedy Center for three consecutive years and intend to continue doing so. I was looking forward to taking my daughter to see the Nutcracker ballet in the winter, and taking photos of her to remember her childhood in Washington, D.C.

a. I visit the Kennedy Center approximately six times per year and intend to continue visiting at that frequency. I regularly walk the grounds, use the public terrace, attend family programs on the REACH grounds, bring visiting friends and family from out of town, enjoy the roof terrace, enjoy the river, go to read Kennedy's words on the wall and reflect on the shadows of the trees. I have no plans to discontinue these visits.

10. I have already been personally and concretely harmed by alterations that the Defendants have made at the Kennedy Center without following legally required review procedures.

11. In or around September 2025, the Kennedy Center's 200 exterior columns were painted from their original gold color to white. These columns are an original and character-defining

feature of the building's Modernist design, integral to the historic character that formed the basis for the D.C. State Historic Preservation Officer's 2012 determination that the Kennedy Center is eligible for the National Register of Historic Places. This change has diminished my aesthetic enjoyment of the building. The gold columns represented a lightness of structure, a progress in construction, engineering, and architecture. They were a defining visual element of my experience of approaching and entering the Kennedy Center. The change altered the building's appearance in a way that diminishes the historic architectural advancement, making it less legible to understand its intentions.

12. The Kennedy Center Defendants installed new exterior signage placing the name "Donald J. Trump" on the facade above the name of President Kennedy. This alteration to the facade changed the character of the building as a memorial to President Kennedy, which is central to my personal experience of the site, and the historical accuracy of its purpose as a building and a memorial, and it misrepresents the will and intentions of its original design and the resources that went into its construction.

13. On December 18, 2025, the Board voted to rename the Kennedy Center to "The Donald J. Trump and The John F. Kennedy Memorial Center for the Performing Arts." This alteration to the name is historically inaccurate as it misrepresents the will and intentions of its original design and the resources that went into its construction.

14. On March 16, 2026, the Board of Trustees and its Chair, Donald J. Trump, announced that in less than four months the Kennedy Center will close completely for several years. While closed, the Kennedy Center buildings and grounds will undergo major structural work, up to and including demolition and reconstruction (the "Project"). The Kennedy Center Defendants have stated that

“preliminary work has been started” and that “significant construction work” is anticipated to begin after July 7, 2026.

15. These proposed alterations would personally and concretely harm me because it would fundamentally change the historic character of the Kennedy Center in ways that would diminish my aesthetic enjoyment of the site. Specifically, the proposed changes to the building’s exterior marble façade, the interior spaces including the Grand Foyer, concert hall, and the opera house would alter the features that I have described above as central to my personal experience of the Kennedy Center. The Kennedy Center’s Modernist design, its materials, its spatial qualities, and its setting along the Potomac are what make the building meaningful to me, and the proposed Project threatens to destroy or fundamentally alter those qualities.

a. The announced multi-year closure of the Kennedy Center, beginning after July 7, 2026, would deprive me of access to a site that I visit regularly and that is central to my cultural life, professional work, and personal and family traditions. The closure would prevent me from attending operas and dance programs and would eliminate my access to the Kennedy Center’s public spaces including the Grand Foyer, the terraces, the grounds, and the Millennium Stage, and would disrupt a pattern of use I have maintained for three years. I have no adequate substitute for the experience of visiting the Kennedy Center.

b. The proposed alterations would directly interfere with my professional work. The changes would compromise the historic integrity of the site in ways that affect my ability to educate students and the public wanting to learn about modern architecture or memorials. The multi-year closure would prevent my access to the site entirely, and the proposed demolition and reconstruction would permanently alter or destroy features that are essential to my professional engagement with the Kennedy Center.

16. I am further harmed by the Defendants' failure to follow legally required procedures before proceeding with the Project and the already-completed alterations.

17. The failure to initiate and complete Section 106 consultation under the National Historic Preservation Act has deprived me and other members of the public of the opportunity to have our interests considered before irreversible changes are made to this nationally significant historic property. Had Section 106 review been initiated, I would have had the opportunity, either directly or through the Organization, to present my concerns about the impact of the proposed alterations on my concrete interests in the Kennedy Center as described above.

18. The failure to prepare an environmental assessment or environmental impact statement under the National Environmental Policy Act means that the environmental consequences of these alterations, including impacts on the monumental core, the historic parkway, and the Potomac River waterfront, have not been adequately studied or disclosed. I would have reviewed and commented on any such analysis.

19. The failure to submit the Project to the National Capital Planning Commission for review and approval, and the failure to request advice from the Commission of Fine Arts, has deprived me and other members of the public of the opportunity to participate in the public review processes that Congress established to ensure informed decision-making about development in the national capital. I follow and participate in NCPC and CFA proceedings through SAH, and I would have submitted comments or testimony regarding the proposed Project.

20. To my knowledge, no public comment period or consultation opportunity has been provided in connection with the proposed Project or the already-completed alterations, despite the Kennedy Center's eligibility for the National Register of Historic Places. Had such an opportunity

been provided, I would have participated and submitted comments describing the concerns set forth in this declaration.

21. The harm I have described is irreparable. Once the historic fabric of the Kennedy Center is altered or destroyed, it cannot be restored to its original condition. The Kennedy Center's architectural and historic character, which forms the basis of its eligibility for the National Register of Historic Places, would be permanently compromised. The opportunity for meaningful public consultation will be permanently lost if the alterations proceed before the legally required reviews are completed. Monetary damages cannot compensate for the loss of the aesthetic, cultural, and historic qualities I have described. These qualities, once destroyed, cannot be recreated.

22. The proposed alterations are already underway, as the Kennedy Center Defendants have stated that 'preliminary work has been started.' The 200 exterior columns have already been painted, new signage has been installed, and the Kennedy Center Defendants have announced that the building will close after July 7, 2026 for multi-year construction.

I declare under penalty of perjury that the foregoing is true and correct.



Diane Rhyu

03 / 30 / 2026

Executed on _____