

EXHIBIT 4

**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 MARION
WERKHEISER**

DONALD J. TRUMP, et al.,

Defendants.

**DECLARATION OF MARION WERKHEISER IN SUPPORT OF PLAINTIFFS’
RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS**

I, Marion Forsyth Werkheiser, under 28 U.S.C. § 1746, hereby declare on my own behalf and on behalf of Cultural Heritage Partners, PLLC (“CHP”):

1. My name is Marion Forsyth Werkheiser. I have personal knowledge of the matters stated herein. I am authorized to make this declaration on behalf of Plaintiff Cultural Heritage Partners, PLLC. I previously submitted a declaration dated November 17, 2025, and a supplemental declaration dated December 2, 2025, in this action. I submit this declaration to update the Court regarding my continued use and enjoyment of the Eisenhower Executive Office Building (“EEOB”) and the Lafayette Square National Historic Landmark District (“Lafayette Square NHLD”), and to address developments since my prior declarations.

2. I incorporate by reference my prior declarations filed in this action as if fully set forth herein.

3. Since my supplemental declaration of December 2, 2025, I have continued my pattern of frequent visits to Washington, D.C., and continued enjoyment of the EEOB and

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surrounding areas. I have traveled to Washington, D.C., multiple times in 2026 for professional meetings, client work, court-related activity, and other purposes. On each of these visits, I have walked through Lafayette Square and the area around the EEOB. The EEOB's unpainted gray granite façade, its mansard roofs, and its visual relationship to the White House complex continue to be central to my experience of this historic setting. I have additional trips to Washington, D.C., planned in the coming weeks and months, during which I will again visit Lafayette Square NHLD and the area around the EEOB.

4. I am aware that on March 13, 2026, Defendants filed the Second Declaration of Heather Martin, which sets forth a detailed timeline for advancing the Project through review by the Commission of Fine Arts ("CFA"), the National Capital Planning Commission ("NCPC"), and other bodies. That declaration confirms that the Office of Administration ("OA") intends to submit its initial CFA application on April 2, 2026, its initial NCPC application on April 3, 2026, and anticipates completing an environmental assessment no earlier than June 24, 2026. The CFA and NCPC final review meetings are scheduled for June 18, 2026, and July 9, 2026, respectively. These concrete dates and defined milestones confirm that the Project continues to advance and that the threat to the EEOB's historic exterior remains real and imminent.

5. The injuries I described in my prior declarations remain ongoing and will intensify as the Project progresses. Neither I nor CHP has received any notice of a completed National Environmental Policy Act ("NEPA") review, a Section 106 consultation under the National Historic Preservation Act ("NHPA"), or a Section 110(f) process for the Project. To my knowledge, the public has not received any such notice. I continue to be denied the opportunity to participate in the review processes that federal law requires before a project of this magnitude may proceed.

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

Executed this 27th day of March, 2026, in Richmond, VA.

Marion F. Werkheiser

Marion Forsyth Werkheiser

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