

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

AMERICAN HISTORICAL
ASSOCIATION, *et al.*,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity
as President of the United States and in his
personal capacity, *et al.*,

Defendants.

Case No. 25-cv-03657

DECLARATION OF TIMOTHY J. NAFTALI

1. I, Timothy J. Naftali, am a Senior Research Scholar at Columbia University's School of International and Public Affairs
2. I have been a member of the American Historical Association (AHA) since 2020.
3. Much of my professional career would not have been possible without presidential records. They have fueled a lot of my scholarship, informed my teaching and been a focal point of my work in government. Early in my career I co-authored an international history of the Cuban Missile Crisis, which would not have been the same without materials from the John F. Kennedy library, especially the Kennedy tapes. My later works drew even more heavily upon presidential materials: a history of US counterterrorism policy; a biography of George H. W. Bush and two books of annotated transcripts of the Kennedy tapes. Between 2006 and 2011, I had the privilege and honor of serving as, initially, the director of the Nixon Presidential Materials Project and, then, as the first director of the Richard Nixon Presidential Library and Museum. My time at the National Archives informed my understanding of the importance of

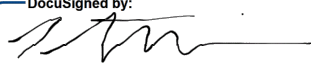
how we preserve presidential records and how much our approach to them since the Watergate era has served the goal of civic literacy. Now, at Columbia, I teach courses on the evolution of the modern presidency and on policymakers and the intelligence community. The complexities, the tradeoffs, and the internal politics of presidential decisions could not be understood relying solely on public statements and tweets.

4. I am currently completing a presidential biography of John F. Kennedy that will draw not only upon the records of the Kennedy Library but also from presidential materials in the Dwight D. Eisenhower and Gerald R. Ford Libraries, the latter because of its holdings of the Commission on CIA Activities within the United States (Rockefeller Commission). In the course of researching the Kennedy presidency I have encountered gaps in the record—either missing tape recordings of meetings from the critical summer of 1963 or of documents—likely the result of the fact that the Kennedy presidential collection is a legacy of the Deed of Gift era where presidents or their legatees could legally remove or destroy presidential records at will [I have no reason to believe the National Archives is responsible for these gaps]. I have written articles about the first and second Trump administrations as well as the Obama and Biden administrations and intend to keep writing about past, current and future presidents for as long as possible.

5. Should the Courts annul the Presidential Records Act, the ripple effects will hurt not only the understanding of one President. Until April 30, 2025, I served on the Department of State's Advisory Committee on Historical Diplomatic Documentation. As described in our public meetings, State Department Historians are currently working on or about to begin volumes of the authoritative *Foreign Relations of the United States* [FRUS] series for four presidencies, Ronald Reagan, George H. W. Bush, and William J. Clinton, and George W. Bush.

These presidencies all have Presidential Records Act collections. My ability—and more importantly that of thousands of scholars and countless members of the interested public—to make sense of the foreign policy decision-making of our government since 1981 in books, articles, online and in the classroom, would be immediately affected if the public ownership, and by definition, the accessibility of those records were suddenly called into question, let alone revoked. I intend to continue to write articles and books on recent presidents, including the current occupant of the White House, using Presidential Records. Once the current President’s term ends and the National Archives assumes legal custody of his records, I intend to make use those records as permitted under the Presidential Records Act. If those records are not preserved now, however, they may be irretrievably lost to research scholars such as myself. The Presidential Records Act inspires confidence in official transparency by establishing a legal chain of preservation and custody for presidential records. Recent presidential records may continue to remain classified for several decades, but the public can rest assured that they won’t be destroyed. It may take time, but having confidence in being able to reconstruct some of the most difficult decisions faced by a White House is essential to fostering faith in democratic institutions and in ensuring public understanding of what our elected leaders do on our behalf.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 13, 2026 in Budapest, Hungary

DocuSigned by:

8040872BD88C46B...

Timothy J. Naftali