

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 KATHRYN CRAMER BROWNELL

1. I, Kathryn Cramer Brownell, am a professor of history at Purdue University, and I provide this declaration in my capacity as an individual scholar and not on behalf of the university.

2. I began my membership in the American Historical Association (AHA) as a graduate student in 2010 and I remain an active member today.

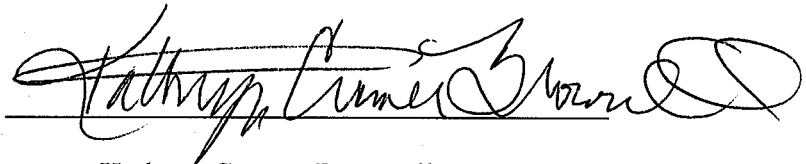
3. I am a historian of modern America, with a particular research expertise in the intersection of media and presidential politics. I am the author of three books, all of which extensively and expansively use presidential records. My first book *Showbiz Politics: Hollywood in American Political Life* (University of North Carolina Press, 2014), explores the rise of the celebrity presidency and the process by which Hollywood styles, structures, and personalities emerged as a defining feature of politics. In this book, I use records from six presidential libraries—Herbert Hoover, Franklin Roosevelt, Harry Truman, Dwight Eisenhower, John Kennedy, and Richard Nixon—to study shifts in campaign strategies and political party

operations as well as relationships between individuals in Hollywood and members of presidential administrations. This archival work has allowed me to uncover and assess how film industry leaders transformed the organization and style of national campaigns in both parties, thus influencing policymaking and awakening politicians and voters to a new type of political communication grounded in the entertainment industry. My second book, *24/7 Politics: Cable Television and the Fragmenting of America from Watergate to Fox News*, (Princeton University Press, 2023) extends my inquiry into the intersection of media and presidential politics by asking how ideas about television's growing power influenced governance. The book uses records from five presidential libraries—Lyndon Johnson, Richard Nixon, Gerald Ford, Jimmy Carter, and Ronald Reagan—to examine regulatory debates over the structure and use of cable television from the 1960s through the 1980s.

4. Most recently, my forthcoming textbook from Routledge Press, *A History of the Modern American Presidency*, compiles not just my own primary research from presidential archives but also a range of scholarship from other historians and political scientists who have also used presidential records. This textbook encourages students to study how the presidency intersects with local politics, economic developments, interest groups, technological changes, bureaucrats, members of Congress, and the foreign policy establishment. In developing this textbook and a “Recasting American Presidential History in the Classroom” teaching guide published online through the Miller Center for Public Affairs at the University of Virginia, I use a range of presidential records—including written materials, audio recordings, and photographs—to help students explore the varied operations of the American presidency and the functioning of democratic institutions more broadly.

5. As a scholar and teacher, I will continue to rely on presidential records for my work in the future. For my fourth book project, I have already begun to compile archival research at the Ronald Reagan Presidential Library and I plan to expand my research for this project into records at the George H.W. Bush, William Clinton, and George W. Bush presidential libraries in the near future. Loss of access to presidential records would significantly harm my ability to provide the most nuanced, expansive, and accurate historical assessment of modern American political history in my publications and in my teaching.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 13, 2026 in West Lafayette, Indiana.

A handwritten signature in cursive script, reading "Kathryn Cramer Brownell", written over a horizontal line.

Kathryn Cramer Brownell