

**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 MATTHEW CONNELLY**

1. I, Matthew Connelly, am a professor of history at Columbia University.
2. I first became a member of the American Historical Association (AHA) in the 1990s, and became a lifetime member in 2019.
3. My scholarship focuses on diplomatic and military history, government secrecy, and the exercise of executive power. I have authored three books that rely substantially on Presidential records. *A Diplomatic Revolution: Algeria's Fight for Independence and the Origins of the Cold War* (Oxford University Press, 2002), drew extensively on records held at the Dwight D. Eisenhower Presidential Library in Abilene, Kansas, and the John F. Kennedy Presidential Library in Boston, Massachusetts. My second book, *Fatal Misconception: The Struggle to Control World Population* (Harvard University Press, 2008), required research across multiple Presidential Libraries, including the Johnson, Nixon, Ford, Carter, and Reagan Presidential Libraries. My third book, *The Declassification Engine: What History Reveals About America's Top Secrets* (Pantheon, 2023), examined the system by

which the executive branch creates and classifies records, and uses national security information to justify and expand presidential power. That project required intensive use of materials from the Kennedy, Johnson, Ford, Carter, and Reagan Presidential Libraries. I have also published articles in peer-reviewed journals that rely on Presidential records. Over more than thirty years of research, Presidential and other executive branch records have been foundational to virtually every major project I have undertaken. As the National Archives takes custody of additional Presidential records, including records of the current administration, I plan to use them in my scholarship, as I have throughout my career.

4. I am currently making extensive use of the records of former Presidents in new research on the history of expert predictions of catastrophic global risk. It requires access to records documenting how American administrations since the mid-twentieth century received, evaluated, and acted upon warnings about threats ranging from nuclear war to pandemic disease to environmental collapse. This research depends on my continued ability to access materials held at Presidential Libraries, and use FOIA and MDRs to obtain currently classified records. Any curtailment of access to Presidential records would directly and materially harm my ability to complete this book, which is under contract with Random House.

5. For more than a decade, I have also conducted data science research on classification and declassification of national security information. I direct the History Lab at Columbia University, which I founded as a research center dedicated to developing computational tools and methods for processing and analyzing large volumes of sensitive materials. This work has been supported by more than \$5.5 million in competitive federal and foundation grants, including awards from the National Science Foundation, the National

Endowment for the Humanities, the Intelligence Advanced Research Projects Agency, the National Historical Publications and Records Commission, the American Council of Learned Societies, the MacArthur Foundation, and the Arcadia Fund. A central focus of this research has been developing machine learning and large language model tools capable of identifying sensitive information within government records in order to expedite the declassification and public release of information that no longer imperils national security. More specifically, my current research with colleagues in computer science and statistics depends on the use of a large collection of digitized records from the Carter Presidential Library.

6. I have drawn on this work in public advocacy to support continued access to Presidential and executive branch records. I have served on the AHA's National Archives Review Committee since 2020, chaired the Society for Historians of American Foreign Relations Task Force on Advocacy from 2019 to 2023, and was also board secretary of the National Coalition for History. I have therefore learned from many colleagues not only in the historical profession but also adjacent fields like political science and national security law about the critical need to protect and expand public access to executive branch records. I have written on these issues in the *New York Times*, the *Los Angeles Times*, and *Time*, and have also consulted with members of Congress and the Public Interest Declassification Board. All of this work has required showing how the responsible management of sensitive government information and the timely release of historical records are complementary rather than competing goals. And all of that is now directly threatened by the administration's actions at issue in this case.

7. Finally, as director of History Lab, I have also organized training workshops to teach scholars and archivists how to deploy data science tools to better process and access

digital and digitized records. I frequently use Presidential and other executive branch records to demonstrate both the challenges and opportunities. These records are not just uniquely important. The long history of presidential records management since the Franklin Delano Roosevelt administration also serves to demonstrate best practices in the collection, preservation, and dissemination of historical materials. People who have benefitted from this training include archivists and records managers responsible for sensitive and vitally important collections, such as at the National Archives in College Park, and the Special Operations Command at MacDill Air Force Base, Florida. Restrictions on access could therefore harm not only my own research, and the possibility of having an informed public discussion of policy on balancing democratic accountability and national security, but the development of the next generation of historians and archivists.

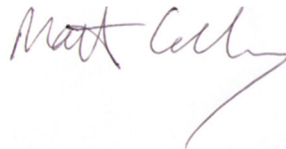
8. My long study of Presidential records makes clear that they cannot be the property of the officials who created them. They belong to the public, because citizens cannot otherwise hold their leaders to account. When Presidential records are withheld indefinitely, or made inaccessible, it becomes impossible to reconstruct what officials did in the name of the people who elected them. And if our government is not accountable even in the court of history, it is accountable to no one. The costs of that loss — diminished public confidence in political institutions, the proliferation of conspiracy theories, and the deepening inability of citizens to evaluate or even understand critical policy choices — are incalculable.

9. The historical record also shows, repeatedly, that when officials shield themselves from scrutiny, systemic vulnerabilities multiply. Those officials who are most intent on monopolizing the power to decide what to reveal to the public are very often concealing the rot of incompetence. With no prospect of ever analyzing their actions, they can continue

deceiving citizens while failing to defend us from our foes. Researchers who study Presidential records perform an essential function in our republic: they identify the patterns of institutional failure, concealed from contemporaries, and make an example of those who have betrayed their constitutional responsibilities.

10. Finally, withholding records from the public makes it easier to destroy them. Destroying historical records is the worst form of evasion, rendering information unknown and unknowable by any living being. As the Czech novelist Milan Kundera wrote, “The struggle of man against power is the struggle of memory against forgetting.” That struggle is an unequal one. When the most powerful people make it impossible even to ask for an account of their decisionmaking, this truly is the end of history.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 12, 2026 in Brightwaters New York.

A handwritten signature in black ink that reads "Matt Connelly". The signature is written in a cursive style with a long, sweeping underline.

Matthew Connelly  
Professor of History