

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

DEMOCRATIC NATIONAL COMMITTEE,

Plaintiff,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, THE WHITE
HOUSE OFFICE, OFFICE OF
MANAGEMENT AND BUDGET, and U.S.
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

Civil Action No. 1:26-cv-3506 (LLA)

SECOND STATUS REPORT

The Democratic National Committee (DNC) respectfully submits this second status report to further update the Court concerning the pending motion for a temporary restraining order (or preliminary injunction) and § 705 stay. *See* DNC Mot. (Doc. 3).

Earlier today, MAGA Inc., a super PAC effectively controlled by President Trump, began airing an ad entitled “President Trump’s Second Term: Stephen Miller.” *See, e.g.,* AdImpact Politics, X (Oct. 20, 2026, at 1:50 EST), <https://perma.cc/CG8C-V4VS>. This same ad (minus the tag-line indicating MAGA Inc. had paid for airtime) appeared on the Official White House YouTube Channel on October 12. The White House, *President Trump’s Second Term: Stephen Miller*, YouTube (Oct. 12, 2026), <https://www.youtube.com/watch?v=GgnvR9UJ-Sc>. This ad consists entirely of plaudits for the President, and MAGA Inc. paying to air this 90-second video in its entirety confirms that it is partisan content. Once again, MAGA Inc. has broadcast an ad

unlawfully developed by White House Office personnel, whose salaries are paid using Congressional appropriations, rather than paying to develop its own content.

Although the DNC did not previously identify “President Trump’s Second Term: Stephen Miller” to the Court, it falls within the scope of the relief initially requested, *see* Proposed Order 1–2 (Doc. 3-2), and should be included in any temporary restraining order or preliminary injunction against the White House Office.

Dated: October 20, 2026

Benjamin B. Klubes
(Bar No. 428852)
Adam Miller
(Bar No. 496339)
Klubes Law Group
1717 K Street NW, Suite 900
Washington, DC 20006
(202) 753-5054
blkubes@klubeslaw.com
amiller@klubeslaw.com

Counsel for Democratic National Committee

Respectfully submitted,

/s/ Daniel J. Freeman
Daniel J. Freeman
(Bar No. 90038422)
Democratic National Committee
430 South Capitol Street SE
Washington, DC 20003
(202) 863-8000
freemand@dnc.org