

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

**CHARLES K. VOORHEES AND
JUDITH A. VOORHEES**

Plaintiffs,

v.

**DONALD J. TRUMP, in his official
capacity as President of the United
States; and JESSICA BROWN, in
her official capacity as the Director
of the National Park Service,**

Defendants.

Civil Action No.: _____

**PLAINTIFFS' APPLICATION FOR TEMPORARY RESTRAINING
ORDER WITH EQUITABLE RELIEF**

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Rule 65.1(a), Plaintiffs Charles K. Voorhees and Judith A. Voorhees hereby apply to this Court for a temporary restraining order ("TRO") with other equitable relief.

In support of the motion, Plaintiffs state as follows:

1. Plaintiffs bring this action to halt Defendants' destruction of the East Wing of the White House located at 1600 Pennsylvania Avenue, NW, Washington DC 20500, also known as the "People's House."
2. Defendants are engaged in demolition of the East Wing of the White House and construction of a new ballroom without legally required approvals or reviews.
3. Defendants are violating the National Capital Planning Act of 1952 by moving forward with the demolition of the East Wing of the White House before submitting the final

plans for the construction of a new ballroom to the National Capital Planning Commission (“NCPC”).

4. Defendants are violating the National Historic Preservation Act (“NHPA”) of 1966 by not: (a) identifying and evaluating the historic property; (b) assessing the project’s affects on that property; and (c) consulting with the Advisory Council on Historic Preservation (“ACHP”) and the D.C. State Historic Preservation Office (“SHPO”) to mitigate any adverse effects before the project proceeds.

5. Defendants are bypassing legally required oversight by the Commission of Fine Arts (“CFA”), which reviews and advises on the design and aesthetics of the exterior modifications to the White House and its grounds.

6. Defendants are unilaterally decoupling the demolition of the East Wing of the White House from the construction approval process to expedite the project, effectively bypassing the historic preservation and planning reviews required under federal law for a project of this magnitude on a protected national landmark.

7. Plaintiffs therefore seek a TRO:

a. Temporarily restraining and enjoining Defendants and any third parties from further destroying any portion of the White House until: (1) demolition and construction plans can be reviewed by NCPC, ACHP, SHPO, and CFA; and (2) the public review process is completed by the National Trust for Historic Preservation (“NTHP”).

b. Requiring Defendants to show cause why this Court should not issue a preliminary injunction extending such temporary relief pending an adjudication on the merits; and

c. Providing for other equitable relief.

8. Pursuant to Fed. R. Civ. P. 65(b) and Local Civil Rule 65.1(a)(1), Plaintiffs will provide actual notice to Defendants as of making this application, and has provided copies of all pleadings and papers filed in this action to date. A certificate of counsel pursuant to Local Civil Rule 65.1(a)(1) accompanies this motion.

9. A memorandum in support of TRO will be subsequently filed.

WHEREFORE, Plaintiffs respectfully request that this Court grant this motion by entering the proposed TRO.

Respectfully submitted,

CYNERGY CONSULTING GROUP, PLLC

/s/ Mark R. Denicore

Mark R. Denicore, Esq., P.E.

D.C. Bar #460573

PO Box 34, 15591 Second Street

Waterford, VA 20197

Phone: (703) 819-3688

E-mail: denicorem@contactcynergy.com

*Counsel for Plaintiffs Charles K. Voorhees and
Judith A. Voorhees*

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