

EXHIBIT

A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MAX BLUMENTHAL,

Plaintiff,

v.

MARKWAYNE MULLIN, SECRETARY,
U.S. DEPARTMENT OF HOMELAND
SECURITY,

Defendant.

Case No. 1:26-MC-00016

Declaration of Harmanpreet Singh

I, Harmanpreet Singh, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. U.S. Customs and Border Protection (CBP), a component agency of the U.S. Department of Homeland Security (DHS), is charged with securing our international borders and enhancing our economic prosperity. To achieve this mission, CBP works to combat transnational crime and the flow of contraband, to detect and disrupt terrorism and cybersecurity threats, to interdict unlawful border crossings and migration, and to seize and penalize counterfeit or misclassified commercial goods, all while facilitating lawful trade and travel.

2. The Port of Washington, D.C. is a port of entry and functions as part of the United States' international border with CBP operations at Andrews Air Force Base, Maryland, Ronald Reagan National Airport in Arlington, Virginia, and Washington Dulles International Airport (IAD) in Sterling, Virginia. *See* Treasury Decision 68-67 (Feb. 23, 1968). Upon arrival at a port in the customs territory of the United States, passengers disembarking from an

international flight must declare and make entry. CBP Officers will conduct a border inspection on all arriving individuals seeking to make entry into the United States. A border inspection may include an examination of traveler's documentation, questioning relating to their travel, and a search of their personal effects or property.

3. On July 10, 2026, Mr. Max Blumenthal, a United States citizen, arrived at IAD on a Turkish Airlines flight from Istanbul, Türkiye. Mr. Blumenthal presented a valid, un-expired United States passport to CBP Officers in the primary inspection area and was referred for secondary inspection. During his secondary inspection, Mr. Blumenthal stated he traveled travel to the Islamic Republic of Iran for the purpose of providing press coverage of the funeral of former Supreme Leader Ali Khamenei. CBP Officers asked Mr. Blumenthal if he would voluntarily provide his phones' passcodes, or would otherwise open the phones, so that the CBP Officers could conduct a search of his phones. Mr. Blumenthal declined.

4. As defined by CBP policy, a basic search is "[a]ny border search of an electronic device that does not qualify as an advanced search . . . in which an officer conducts a review or analysis of information residing in electronic or digital form on the device." *See* CBP Directive 3340-049B, Border Search of Electronic Devices § 3.3 (Jan. 1, 2026). An advanced search is "[a]ny search in which an officer connects equipment, wired or wireless, to copy and/or analyze the contents of an electronic device." *Id.* at § 3.4.

5. Because of Mr. Blumenthal's declination for CBP to conduct a border search of his electronic devices, CBP informed Mr. Blumenthal his phones would be detained pending further investigation. The detention of the electronic devices was approved by Assistant Port Director Matthew Brothers. Mr. Blumenthal was presented with a custody receipt (CBP Form 6051D). Upon receiving his phones, because he is a journalist, CBP Officers asked Mr.

Blumenthal whether there was any privileged material on his devices of which CBP should be aware. Mr. Blumenthal declined to answer this question. Mr. Blumenthal was subsequently admitted to the United States without further incident.

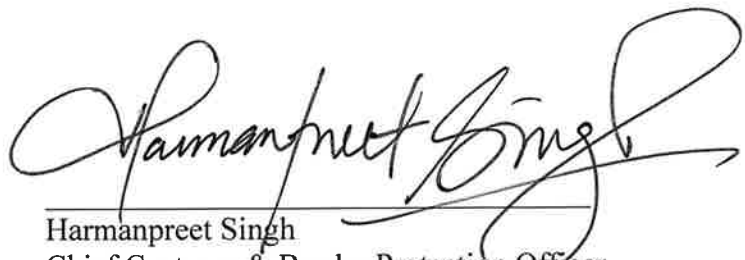
6. After Mr. Blumenthal's admission and departure from IAD, his two phones were referred for further inspection. However, federal officials were still unable to gain any access to Mr. Blumenthal's devices.

7. Given CBP's inability to access Mr. Blumenthal's devices, Mr. Blumenthal was notified that he could retrieve his devices, which he did on July 17, 2026.

8. No search was conducted on Mr. Blumenthal's devices, and consequently, CBP never possessed or retained any information from Mr. Blumenthal's devices.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed this 24 day of July 2026.

A handwritten signature in black ink, appearing to read "Harmanpreet Singh", written over a horizontal line.

Harmanpreet Singh
Chief Customs & Border Protection Officer
Port of Washington, D.C.
U.S. Customs and Border Protection