EXHIBIT A

Declaration of Cameron Stanley,
Department of War (June 15, 2026)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, ET AL., Plaintiffs, v. X.AI CORP, ET AL., Defendants.	26 Civ. 74 (DMB)

DECLARATION OF CAMERON STANLEY

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

1. I am the Chief Digital and Artificial Intelligence Officer (CDAO) for the U.S. Department of War (DoW). I have held this position since January 7, 2026. I am responsible for leading the acceleration of DoW's adoption of data, analytics, and artificial intelligence (AI) to generate decision advantage for the Warfighter. As such, I oversee the Department-wide integration of digital capabilities and shifting the organization to rapid, disciplined operational delivery. Prior to this role, I served as National Security Transformation Lead for Amazon Web Services; Chief Data Officer of the Undersecretary of Defense for Intelligence and Security; as well as Chief of the Department's Algorithmic Warfare Cross Functional Team, also known as "Project Maven."

2. I submit this declaration in support of the United States' motion to intervene in this civil action. Its purpose is to explain DoW's and the United States' cognizable interests relating to the subject matter of this case, along with how its disposition will likely harm those interests, especially if intervention is denied. The statements that follow are based on my personal knowledge, as well as information provided to me in the course of my official duties.

3. The plaintiffs in this civil action seek to enjoin xAI's use of temporary gas-fired turbines at its Stanton Road site that powers the nearby "Colossus 2" data center or supercomputer—xAI uses the Colossus 2 supercomputer to train and upgrade its Grok models, including ones used by DoW. For the reasons described below, this action directly threatens our ongoing national security interests.

4. xAI's Grok represents one of only four proprietary state-of-the-art ("frontier") AI models currently capable of supporting national security applications. Furthermore, xAI remains one of just three enterprise providers equipped to sustain mission-critical operations across Secret and Top-Secret classified networks for the foreseeable future due to the enormous resources required for initial certification.

5. DoW currently relies on derivatives of xAI's commercial offerings known as the Grok Gov Model. This model is tuned specifically for United States government specifications and provides critical support to both business enterprise activities and military operations. For example, it is deployed in Maven Smart Systems ("MSS") to support vital national security missions, including targeting, intelligence, readiness, and recruitment. Furthermore, it has tailored functionality to support military planning workflows, report synthesis and generation, predictive analytics for logistics and sustainment, red-teaming analysis of adversary positioning, personnel management, and medical supply lines. The Grok Gov Model offers features unique to xAI that are found in no other frontier AI model.

6. To further illustrate the uses of the Grok Gov Model within DoW, MSS frontier workflows enabled U.S. forces to deploy over 2,000 munitions to 2,000 distinct targets within 96 hours during Operation Epic Fury, a testament to the greatly increased operational efficiency made possible by the Grok Gov Model. More generally, MSS users consume almost 2 billion

tokens, the units used to purchase usage of a frontier AI model, on DoW's Top-Secret network every day, which is a critical national security capability for intelligence and operational workflows across the globe. This immense amount of AI usage is roughly equivalent to 1.5 billion words or up to 6 million pages of text being processed by the technology.

7. The Grok Gov Model is foundationally based on commercial Grok architecture. Consequently, the essential language training processes required to build and perfect the models for DoW use require robust commercial infrastructure, as well as a stable energy supply for that infrastructure. If there is a reduction in the infrastructure available to xAI, such as requested by Plaintiffs in this action, then the Grok Gov Model would be impacted to a similar extent as the commercially available Grok models. In particular, if Colossus 2 is shut down because it cannot rely on power from the Stanton Road site, xAI would lose capacity to train and develop future, improved versions of Grok. And if xAI is hindered from continuing to improve and upgrade Grok, including the Grok Gov Model, DoW's ability to meet its national security mission and keep pace with adversaries will be impaired.

8. In the event of armed conflict or other exigent circumstances affecting national security, DoW projects there is a significant likelihood of an immediate and substantial escalation in AI inference demands for Grok Gov Models. The commercial data centers such as Colossus 2 operated by xAI are well-positioned to provide this critical surge capacity needed to sustain wide-ranging national security operations under rigorous conditions because they have the requisite size and capabilities that few other enterprise providers possess. Therefore, preserving xAI's current data center capacity is a matter of paramount national security.

9. Moreover, the Department relies on xAI as a primary classified compute infrastructure provider. The critical ability to field its data facilities at massive scale is as

foundational to our modern defense posture as traditional munitions production. Any impediment to commercial data center operations severely diminishes xAI's innate capacity to adequately support current operations, as well as any potential future operations, thereby compromising DoW's strategic computing reserves. In the modern theater of operations, data center inference capacity must be recognized not merely as commercial infrastructure, but as a long-term strategic tool vital to maintaining our technological advantage against adversaries. In addition, the limited competition between frontier model vendors would likely lead to an unsustainable increase in cost to DoW and thus the American taxpayers if DoW were forced to seek alternative vendors.

10. If Grok Gov Model cannot be deployed, refined, and upgraded across the DoW due to either limitations in energy supply or limited reserve compute capability, such as those requested by Plaintiffs in this matter, the many tools deployed by military and civilian personnel alike which rely on Grok Gov Models would be severely impacted.

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

EXECUTED this 15th day of June, 2026 in Arlington, VA.

Cameron Stanley
Chief Digital and Artificial Intelligence Officer
U.S. Department of War