

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

PATSY WIDAKUSWARA, JESSICA JERREAT,  
KATHRYN NEEPER, JOHN DOES 1-4,  
REPORTERS SANS FRONTIÈRES,  
REPORTERS WITHOUT BORDERS, INC.,  
AMERICAN FEDERATION OF STATE,  
COUNTY AND MUNICIPAL EMPLOYEES  
(AFSCME), AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES (AFGE),  
AMERICAN FOREIGN SERVICE  
ASSOCIATION (AFSA), and THE  
NEWSGUILD-CWA,  
Plaintiffs,

Case No. 1:25-cv-01015-RCL

-against-

KARI LAKE, in her official capacity as Senior  
Advisor to the Acting CEO of the U.S. Agency for  
Global Media; VICTOR MORALES, in his  
official capacity as Acting CEO of the U.S.  
Agency for Global Media; and U.S. AGENCY  
FOR GLOBAL MEDIA,  
Defendants.

**DECLARATION OF KATHRYN NEEPER**

**KATHRYN NEEPER**, declares under penalty of perjury, pursuant to 28 U.S.C. §  
1746, that the following is true and correct:

1. I am a named plaintiff in this action and a full-time employee at USAGM, currently on administrative leave. My title is Director of Strategy and Performance Assessment. As Director, my duties include managing the Offices of Policy and Research, Editorials, and Internet Freedom, and overseeing USAGM's strategic planning, performance reporting, research, data analytics, and interagency outreach. However, since USAGM placed me on administrative leave on March 15, 2025, the day after President Trump issued Executive Order 14328, I have not

performed any work to aid USAGM's operations and broadcasts. I have remained on indefinite leave since March 15, 2025.

2. Prior to the E.O. 14328, USAGM reached a massive worldwide audience. According to research published by the agency in 2024,<sup>1</sup> the USAGM reached a weekly audience of 427 million across all networks: Voice of America (VOA), Office of Cuba Broadcasting (OCB), Radio Free Europe/Radio Liberty (RFE/RL), Radio Free Asia (RFA), and Middle East Broadcasting Networks (MBN). The top five adult audiences who listened/viewed/used programming weekly were: Indonesia (64.8 million); Nigeria (37.4 million); Mexico (37.1 million); India (29.1 million); and Iran (12.2 million).<sup>2</sup>

3. The audience for VOA alone was approximately 361 million, transmitted in 49 languages to more than 100 countries.

4. VOA's pre-E.O. 14328 worldwide broadcast content was enormous. According to USAGM,<sup>3</sup> for Fiscal Year (FY) 2024 *each week*, VOA broadcast 2,391.26 hours of content, of which radio comprised 1,432.45 hours and video 958.81 hours.

5. I believe the defendants assert that VOA is meeting its minimum statutory requirements because it is broadcasting in four (out of 49) languages: Farsi, Mandarin, Dari and Pashto. Those four language services accounted for a total of 454.67 weekly hours in FY 2024, as follow: Farsi, 168 hours; Mandarin 169 hours, Dari 53.8 hours and Pashto 64.38 hours.<sup>4</sup>

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<sup>1</sup> USAGM, *FY 2024 Audience Report*, at 8, available at [https://www.usagm.gov/wp-content/uploads/2025/02/USAGM-FY-2024-Agency-Performance-Report\\_2-13-25\\_WebVersion.pdf](https://www.usagm.gov/wp-content/uploads/2025/02/USAGM-FY-2024-Agency-Performance-Report_2-13-25_WebVersion.pdf).

<sup>2</sup> USAGM, *Audience and Impact* (Feb. 2025), available at [https://www.usagm.gov/wp-content/uploads/2025/02/USAGM\\_Audience\\_and\\_Impact\\_Report\\_2025\\_11x17version\\_2-24-25.pdf](https://www.usagm.gov/wp-content/uploads/2025/02/USAGM_Audience_and_Impact_Report_2025_11x17version_2-24-25.pdf)

<sup>3</sup> USAGM, *FY 2025 Congressional Budget Justification*, at Appendix B, available at [https://www.usagm.gov/wp-content/uploads/2024/03/USAGMBudget\\_FY25\\_CBJ\\_03-08-24-1.pdf](https://www.usagm.gov/wp-content/uploads/2024/03/USAGMBudget_FY25_CBJ_03-08-24-1.pdf).

<sup>4</sup> See *id.*

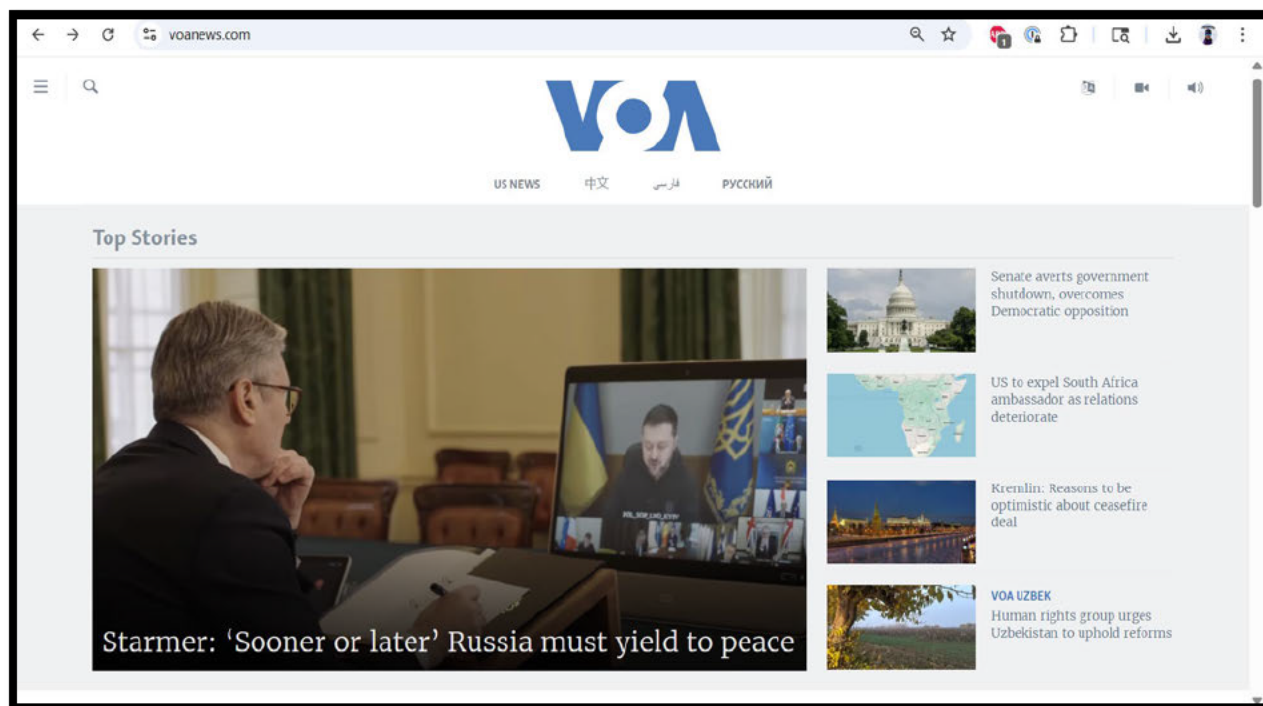
6. VOA's broadcasting has nearly completely ceased since mid-March when all full-time VOA employees were placed on administrative leave. There are approximately 30 VOA employees who are not on administrative leave. That skeleton crew has produced almost no content: a few articles and a handful of social media posts per day, plus a daily five minute newscast in Dari and Pashto for Afghanistan.

7. For almost all of the world VOA has gone silent. VOA is not broadcasting in its: Africa Division where, according to USAGM data,<sup>5</sup> it broadcast 625.17 weekly hours in FY 2024; East Asia and Pacific Division, 625.17 FY 2024 weekly hours; Eurasia Division 29.05 FY 2024 weekly hours; Latin America Division, 63.99 FY 2024 weekly hours; and English/News Center Division, 415.33 FY 2024 weekly hours. Prior to March 15, VOA's Africa Division alone broadcast to a weekly audience of approximately 93.6 million.

8. There has been no radio broadcast activity since mid-March with the exception of a single 5-minute radio segment to broadcast to only Afghanistan earlier this week. VOA's English-language website (voanews.com) now lists five "top stories." Each has a date of March 14 or March 15, 2025.

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<sup>5</sup> See *id.*

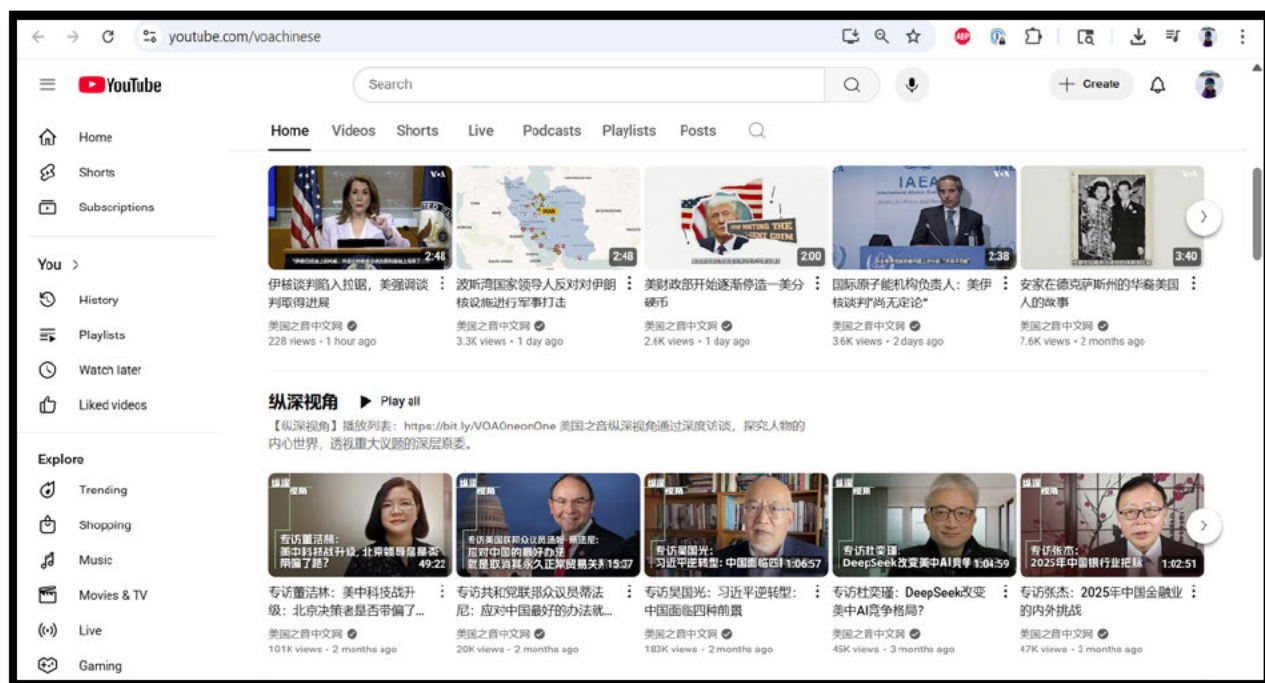
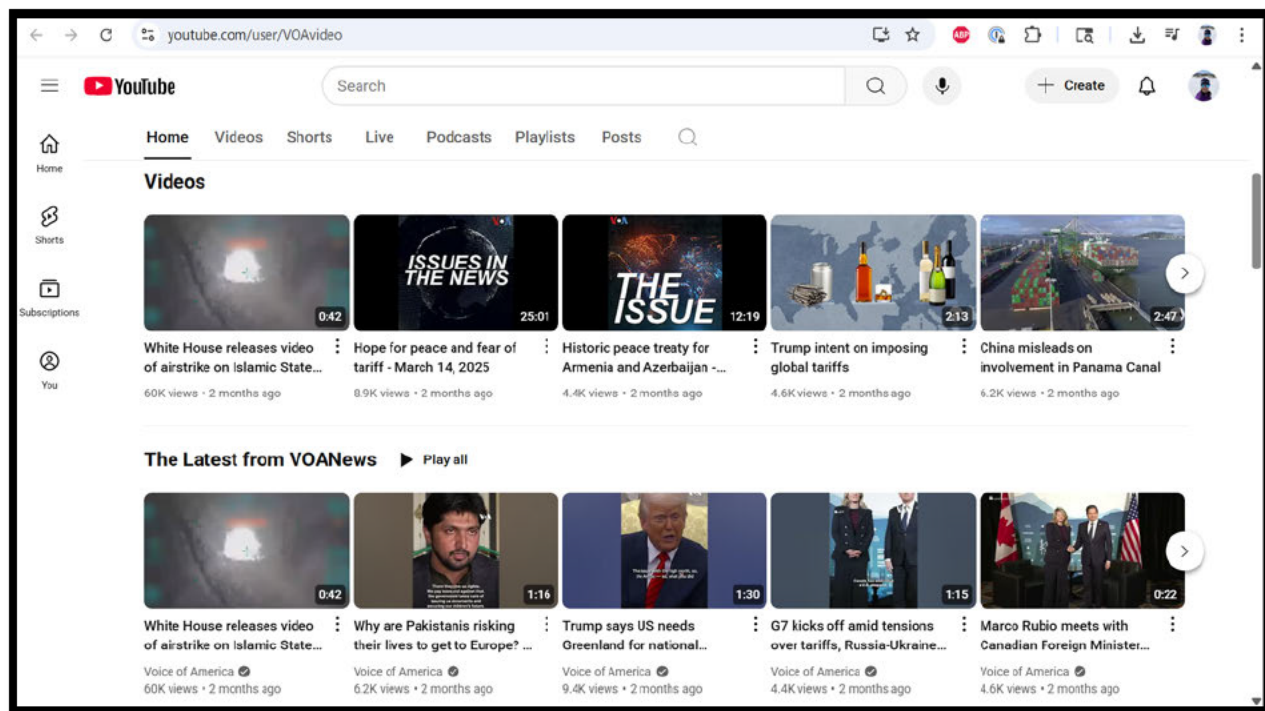


9. Between January 1 and March 15, 2025, VOA services posted 37,908 articles to their websites, or an average of 512 per day. Since March 16, there have been just 353 articles posted to VOA websites – fewer articles in 2.5 months than the network previously generated in the average day. Those articles began to appear on May 7, and are provided in just four languages: Dari (78 total), Pashto (72), Mandarin (89), and Persian (85). Since articles began appearing, there have been an average of less than 16 per day.<sup>6</sup>

10. Similarly, while a small social media operation has resumed in Dari, Pashto, Mandarin, and Persian, social media sites in the remaining VOA languages – including the flagship English-language sites – remain dark. For example, the main VOA English-language YouTube page includes a playlist of “The Latest from VOA News” on which the most recent stories are dated March 15. The Mandarin-language YouTube site has resumed with a small presence: the

<sup>6</sup> Data aggregated via publicly available RSS feeds.

first four stories listed under the heading “Daily Video News” are from this week, but the fifth is from March 14. Similarly, the VOA Dari, Pashto, and Persian Facebook pages have each been updated with around 7-8 short posts per day.



11. Between May 6-15, USAGM terminated nearly all of the approximately 598 personal service contractors (PSCs) who work at USAGM and VOA. In most cases, those terminations are effective today, May 30. The PSCs' work was essential to performing and supporting VOA's required functions and without them VOA will not be able to serve its global audience.

12. PSCs are integral to VOA's work and some VOA units are predominately PSCs. I will provide examples of PSCs' work that cannot occur once they are all terminated.

- a. **Africa:** VOA had a weekly audience of 93.6 million in Africa. 38% of the Africa Division workforce was PSCs. PSCs were an essential component of the VOA team across all content production units, radio, television, and digital. Most of the radio and TV reporters in the Division are PSCs, as are more than 90% of the digital workforce. PSCs also work in production and editing roles, and translate and adapt content for various platforms.

Seven out of ten digital teams within the Africa Division are 100% staffed by PSCs. These teams manage the division's websites, create and publish multimedia content, operate social media accounts, and drive audience engagement in their respective languages. Without PSCs, VOA Africa will effectively lose its digital footprint, an essential platform for reaching young and mobile-first audiences across the continent.

- b. **East Asia/Pacific.** VOA had a weekly audience of 80 million audience in eight languages in East Asia and the Pacific. 31% of the East Asia and Pacific workforce were PSCs. Half of VOA's Burmese staff are PSCs because they need to support programming for their 24-hour Burmese channel, the only 24-hour international Burmese broadcast in the world. VOA Indonesian's digital and TV



programming depend on the digital skills of their PSCs— VOA Indonesia’s audience alone make up 18% of the total VOA audience, despite having a budget of about 2% of the VOA total budget. VOA Korean relies on PSCs to provide the most up to date news on North Korea for their 7 hours per day of radio broadcasting. VOA Tibetan PSCs are key to penetrating the Chinese firewall through hundreds of WeChat groups to spread VOA Tibetan programs. VOA Khmer and VOA Thai PSCs bring modern day techniques and skills to engage with younger audience in Thailand and Cambodia.

- c. **Eurasia.** The services of the Eurasia Division had a measured audience of 20 million people in their broadcast region. 55% of the Eurasia Division workforce were PSCs. PSCs served as multimedia journalists in the Eurasia Division, playing a vital, multifaceted role in producing high-quality, cross-platform content. Several services were almost entirely composed of PSCs: Armenian, for example, had 1 FTE and Macedonian and Georgian had 2 FTEs, with all the remaining positions filled by PSCs. Key correspondents for VOA Russian and Ukrainian services including White House, Congressional, and Pentagon beat reporters were PSCs. VOA Russian video production relied on an all-PSC team and most social media publishing and analytics work across the division is performed by PSC.
- d. **China.** While China is a difficult market to research, an online panel survey conducted in 2023 suggests that VOA has an audience of at least 45 million people in the country. 42% of the China Division workforce were PSCs. PSCs are responsible for news writing, in-depth reporting, field coverage, live reporting

from the field, daily video and audio production, daily live show and livestream recording and production, daily graphics creation, daily digital platform management and operation. PSCs contribute to video and digital content and cover the China Division's 24-7 operations. The overnight shift, various technical production functions (including livestreaming and live translations), and many elements of digital content production and distribution would be impossible without PSCs.

- e. **South and Central Asia.** Fifty Six percent of the South and Central Asia Division workforce were PSCs, including more than half of the Afghan Service, which has been returned to very partial operations. PSCs were central to operations in all languages and on all platforms, particularly in providing specialized content for digital media. In some services, nearly all of the reporters were PSCs. Numerous TV anchors, video editors, graphic artists, and social media specialists were PSCs, and the PSC workforce allowed some services to maintain 24/7 news operations.
- f. **Latin America.** VOA's Latin America Division has an audience of 100 million. 60% of the workforce was PSCs. PSCs were responsible for more than half of the Spanish Service's broadcast production, including anchoring, reporting, and production of live shows, and coordinating with local broadcast partners who air the service's content. They were similarly vital for TV, radio, and digital production in the Creole Service. PSCs did essential work in producing content tailored for a range of broadcast and digital platforms.



- g. **English.** VOA's English-language news hub was approximately 40% PSCs. For nearly the last decade at VOA, most of the News Center evening editing shift, which handles the production of US news copy that is the core editorial product of VOA, was copy-edited and published by PSC editors on the evening shift, overseen by a single FTE duty editor. These are teams of four to six highly-competent and deeply experienced contract news editors who ensured that the English language news product met VOA's high editorial standards and was delivered in a timely fashion.
- h. **Operations.** VOA Operations, which manages technical production of VOA content, was around 40% PSCs. They performed essential operations in television production, television directing, video news gathering, video editing and training and support for the various production tools. VOA would struggle to produce television without PSCs, as some technical production teams are exclusively staffed by PSCs.

13. In addition, there are numerous technical and support functions throughout the organization that are largely or entirely staffed by PSCs. For example, 78% of the 27 video editors are PSCs. The editors support over 25 VOA shows, as well as special projects, each week. The work could not be accomplished without the PSCs. My team in the Office of Policy and Research maintains all of the agency's digital analytics systems for use in understanding the impact of content on a daily basis, and for mandatory performance reporting to the administration and Congress. These systems are implemented and maintained by PSCs and cannot function without their work.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in Washington, D.C. on May 30, 2025

Dated: May 30, 2025

*Kathryn Neeper*  
Kathryn Neeper (May 30, 2025 19:41 EDT)

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Kathryn Neeper


# Neeper Decl. - Final

Final Audit Report


2025-05-30

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