

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

---

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

KARI LAKE,  
Senior Advisor to the Acting CEO of the U.S.  
Agency for Global Media, et al.,

Defendants.

Civil Action No. 25-1015 (RCL)

---

MICHAEL ABRAMOWITZ, et al.,

Plaintiffs,

v.

KARI LAKE,  
Senior Advisor to the Acting CEO of the U.S.  
Agency for Global Media, et al.,

Defendants.

---

Civil Action No. 25-0887 (RCL)

**DEFENDANTS' RESPONSE TO THE COURT'S JULY 8, 2025, ORDER**

Defendants Kari Lake, in her official capacity as a Senior Advisor to the Chief Executive Officer (“CEO”) of United States Agency for Global Media (“Global Media”), Victor Morales, in his official capacity as Acting CEO of Global Media, and Global Media, by and through counsel, pursuant to the Court’s July 8, 2025, Order, file this supplemental response to address the questions raised in the Court’s July 8, 2025 Order pertaining to the operations of Voice of America. *See* July 8, 2025, Order (*Widakuswara*, ECF No. 126). Specifically, the Court requested that Defendants provide additional information as to Voice of America’s personnel and staffing (*id.* at 2-3), an explanation of how Defendants are utilizing the budget appropriated by Congress for Fiscal Year 2025 (*id.* at 4), further explanation regarding Global Media’s determination that Voice of America would broadcast in four statutorily required languages (Dari, Pashto, Farsi, and Mandarin) (*id.* at 4), the purpose of broadcasting from Greenville, North Carolina,<sup>1</sup> and additional explanation as to the Agency’s decision to no longer broadcast to Africa. *See generally* July 8, 2025, Order. In response to the Court’s order, Defendants provide the attached Declaration of Kari Lake, appended hereto.

For the reasons previously explained, the Court should deny Plaintiffs’ motions for an order to show cause, as Defendants have been and continue to comply in good faith with the third prong of the Court’s April 22, 2025, injunction.

---

<sup>1</sup> Frank Wuco’s June 27, 2025, declaration (ECF No. 123-1 at 6) previously identified a transmitting station in “Greenville, South Carolina,” but that was an error. It should have read Greenville, North Carolina.

Dated: July 18, 2025  
Washington, DC

Respectfully submitted,

JEANINE FERRIS PIRRO  
United States Attorney

BRIAN P. HUDAK, D.C. Bar #90034769  
Chief, Civil Division

By: /s/ Brenda González Horowitz  
BRENDA GONZÁLEZ HOROWITZ  
D.C. Bar No. 1017243  
STEPHANIE R. JOHNSON  
Assistant United States Attorneys  
601 D Street, NW  
Washington, DC 20530  
Main: (202) 252-2500

*Attorneys for the United States of America*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

KARI LAKE, Senior Advisor to the Acting  
CEO of U.S. Agency for Global Media, et al.,

Defendants.

Case No. 1:25-cv-1015-RCL

Case No. 1:25-cv-0887-RCL

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

v.

KARI LAKE, Senior Advisor to the Acting  
CEO of U.S. Agency for Global Media, et al.,

Defendants.

**DECLARATION OF KARI LAKE**

I, KARI LAKE, hereby make the following declaration pursuant to 28 U.S.C. § 1746:

1. I have been serving in the role of Senior Advisor at the U.S. Agency for Global Media (USAGM) since on or around March 3, 2025. I base this declaration on knowledge and information I have gained in the course of performing my official duties.

2. In the above-mentioned capacity, I have personal knowledge of, and direct involvement in, the current operations of the Voice of America (VOA) and the Office of Cuba Broadcasting (OCB), both of which are under the direction and supervision of USAGM.

3. The following information is provided to the Court pursuant to its July 8, 2025, Court Order (Order) requesting additional information from USAGM about the sufficiency of operations of VOA.

4. Although the number is subject to change as the Agency manages its operations, at present, VOA has 72 full-time employees who are responsible for the execution of VOA's statutorily directed functions.

5. The number of current VOA full-time employees is broken down according to the following components within VOA:

- a. VOA Staff Director - 1
- b. VOA Programming Directorate, Africa Division - 1
- c. VOA Programming Directorate, Broadcast Operations, Central Production Services Division, Traffic Branch/Traffic Services – 2
- d. VOA Programming Directorate, Broadcast Operations, Central Production Services Division, Traffic Branch/TV Operations Services – 2
- e. VOA Programming Directorate, Broadcast Operations, Central Production Services Division, Production Support Branch Video Editors Service – 1
- f. VOA Programming Directorate, Broadcast Operations, Operations Support Division – 1
- g. VOA Programming Directorate, Broadcast Operations, Operations Support Division, Radio Multimedia – 5
- h. VOA Programming Directorate, Broadcast Operations, Operations Support Division, TV Operations/TV Master Control Service – 3

- i. VOA Programming Directorate, Broadcast Operations, Operations Support Division, TV Operations/TV Studio Service – 1
- j. VOA Programming Directorate, Broadcast Operations, Technical Support Division – 1
- k. VOA Programming Directorate, Broadcast Operations, Technical Support Division, TV Maintenance Services - 1
- l. VOA Programming Directorate, Broadcast Operations, VOA Digital Management Division – 3
- m. VOA Programming Directorate, Broadcast Operations, VOA Digital Media Support – 4
- n. VOA Programming Directorate, China Division, Mandarin Service – 2
- o. VOA Programming Directorate, East Asia and Pacific Division – 1
- p. VOA Programming Directorate, East Asia and Pacific Division, China Branch, Mandarin Service – 1
- q. VOA Programming Directorate, FM Programming – 1
- r. VOA Programming Directorate, Persian News Network – 6
- s. VOA Programming Directorate, Persian News Network, Central News and Production Unit – 22
- t. VOA Programming Directorate, South and Central Asia Division – 2
- u. VOA Programming Directorate, South and Central Asia Division, Afghanistan Branch – 1
- v. VOA Programming Directorate, South and Central Asia Division, Afghanistan Branch, Dari Service – 3

- w. VOA Programming Directorate, South and Central Asia Division, Afghanistan Branch, Pashto Service – 1
  - x. VOA Programming Directorate, South and Central Asia Division, Kurdish Service – 1
  - y. VOA Programming Directorate, VOA News Center – 1
  - z. VOA Programming Directorate, VOA News Center, Coverage Desk – 1
  - aa. VOA Programming Directorate, VOA News Center, Real Time News Desk – 3
6. VOA operates and executes its statutory duties by assigning its staff to support different but essential functions for VOA's operations. For example, some of the above VOA staff are responsible for content development, which means they propose and develop video and audio content based on their judgment about the Administration's policies and other major worldwide events. This content is then translated into the languages that we have previously identified as statutorily required under current law. This translated content is then broadcast via the respective language services to the corresponding audiences.

7. As has been noted in at least one previous filing, USAGM has also begun work to ensure that statutorily required obligations that have been ignored for decades by multiple previous administrations will actually be fulfilled.

8. One such example is VOA's 50 States Initiative, which requires that VOA air content regarding all fifty (50) states that compose the United States. That content is supposed to contain information about the respective states' products, tourism, trade, and other cultural and educational features, as well as interviews and discussions with state officials about those features. VOA is presently addressing this obligation by broadcasting, via all digital language services that are currently operating, the White House's America 250 programs "*The Story of*

*America*” (5 episodes) and “*The Founders*” (30 episodes). *The Story of America Episode 1* has been versioned in Mandarin, Persian, Dari and Pashto. I would be more than happy to provide further updates to the Court regarding the ongoing implementation of this initiative which will be expanding exponentially over the coming weeks.

9. VOA’s Editorial responsibilities are another statutorily required mission that has historically been only partially and inconsistently implemented. When VOA has made efforts to fulfill the Editorial requirement in the past, it was primarily used by VOA staff to express internal VOA opinions on select issues and topics. Our view was that this approach was too insular, and we have been taking steps to begin using the Editorial process to post opinion and editorial pieces on relevant topic by subject matter experts (SME) from across USAGM, and other government, as well as outside, SME resources, as deemed to be in the national interest. Our efforts to fulfill this obligation were addressed in greater depth in a previous declaration and are ongoing along those lines. I would be more than happy to provide further updates to the Court regarding the ongoing upgrade of the Editorial process.

10. Based on presidential direction to determine and operate at the statutory minimum, USAGM leadership has determined to both focus on those statutorily required functions and not focus on non-statutorily required functions. Any previous agency leadership decisions, but especially decisions made under the political leadership of previous presidential administrations, to support non-statutorily required content and broadcast in non-statutorily required languages reflect custom and practice rather than statutory obligation, and as such, agency leadership retains the right to make different decisions.

11. The shortwave transmission facility located in Greenville, North Carolina, also known as the Edward R. Murrow Shortwave Transmitting Station (ERM), serves as an important

hub for future VOA activities, particularly in situations where VOA is called upon to surge or expand broadcasting to regions beyond current operations. For instance, ERM can broadcast southward, eastward, and westward to support any future VOA broadcasting efforts to the Americas and Eurasia. ERM has the capacity to broadcast as far east as the Middle East and North Africa and as far west as Central Mexico. In the past, ERM has successfully transmitted into Eurasia during previous natural disasters and conflicts. ERM has also provided backup shortwave services for VOA programming to different parts of the world in situations where other countries' governments sever internet access for their populations. Also, in the event of mission degradation or loss at OCB's dedicated medium-wave facility in Marathon, Florida, ERM would serve as a crucial backup transmission facility to help ensure that OCB can broadcast content into Cuba and its influence bloc within Central and South America. Presently, OCB carries live transmissions on both medium-wave (Marathon) and shortwave (ERM) into the region on a 24-hour-a-day, seven-day-a-week basis.

12. Regarding funding, USAGM received \$260.032 million in appropriated funding for Fiscal Year 2025, and has used approximately \$240.357 million of that total amount to date to fulfill VOA's above-discussed statutory missions. An approximate breakdown of VOA's fiscal year spending to date is as follows:

- a. Director's Office – \$5.430 million
- b. Associate Director's Office, Programming Directorate – \$5.926 million
- c. Studio and Production Operations – \$42.765 million
- d. Regional Broadcasting Operations – \$137.106 million
- e. Central News Functions – \$22.470 million
- f. Overseas Bureau Functions – \$5.598 million

g. Centralized Costs Planning – \$21.062 million

13. As discussed, USAGM has determined, pursuant to its discretion and presidential directive, to reduce the Agency's functions to the statutory minimum in an effort to streamline functions and make operations more efficient. Consistent with those USAGM and Administration priorities, USAGM has decided not to broadcast into Africa at this time because USAGM is not statutorily required to broadcast into Africa. USAGM made this decision after considering several factors, including its statutorily required functions; the desire to streamline operations; the statute's broadcasting principles, which state USAGM's broadcasting through VOA should not duplicate the activities of either private United States broadcasters or government-supported broadcasting entities of other democratic nations; and the fact that major news networks such as CNN International already broadcast into Africa, and have done so for some time at this point.

14. Similarly, pursuant to those same USAGM and Administration priorities, VOA is broadcasting in only the languages required by statute – specifically, Mandarin, Farsi, Dari, and Pashto. Consistent with 22 U.S.C. § 6201(4), VOA is broadcasting in Mandarin. Consistent with the National Defense Authorization Act for Fiscal Year 2010, Public Law 111-84, Div. A, Title XII, § 1262(a) (Oct. 28, 2009), VOA is broadcasting in Farsi. Consistent with 22 U.S.C. § 6215(a), VOA is broadcasting in Pashto and Dari. USAGM has decided, utilizing its discretion to manage its operations as it moves forward, not to broadcast in languages that are not required by statute.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 18, 2025  
Washington, District Columbia

  
KARI LAKE