

Nos. 25-5144, 25-5145, 25-5150, 25-5151

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

PATSY WIDAKUSWARA, ET AL.,
Plaintiffs-Appellees, v.
KARI LAKE, IN HER OFFICIAL CAPACITY AS SENIOR ADVISOR TO THE ACTING CEO OF
THE U.S. AGENCY FOR GLOBAL MEDIA, ET AL.,
Defendants-Appellants,

MICHAEL ABRAMOWITZ, IN HIS OFFICIAL CAPACITY AS DIRECTOR OF VOICE OF
AMERICA, ET AL.,
Plaintiffs-Appellees, v.
KARI LAKE, IN HER OFFICIAL CAPACITY AS SENIOR ADVISOR TO THE ACTING CEO OF
THE U.S. AGENCY FOR GLOBAL MEDIA, ET AL.,
Defendants-Appellants,

MIDDLE EAST BROADCASTING NETWORKS, INC.,
Plaintiff-Appellee, v.
UNITED STATES OF AMERICA, ET AL.,
Defendants-Appellants,

RADIO FREE ASIA,
Plaintiff-Appellee, v.
UNITED STATES OF AMERICA, ET AL.,
Defendants-Appellants,

On Appeals from the United States District Court for the District of Columbia Nos. 25-
cv-1015, 25-cv-887, 25-cv-966, 25-cv-907 (Hon. Royce C. Lamberth)

**BRIEF OF FORMER U.S. FOREIGN POLICY AND
NATIONAL SECURITY OFFICIALS AND OTHER
EXPERTS ON PUBLIC DIPLOMACY AS AMICI CURIAE
IN SUPPORT OF APPELLEES**

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INTERESTS OF AMICI¹

Amici are experts on national security and public diplomacy, many of whom served as foreign policy and national security officials in Republican and Democratic Administrations. They disagree about many aspects of U.S. foreign policy. Some believe Voice of America needs to be reformed to be more effective in addressing current challenges in the world. But they are united in their belief, based on their varied experiences in international affairs inside and outside government, that Voice of America plays an important role in advancing U.S. national security and should be allowed to continue to support America's position in the world.

INTRODUCTION

For more than 80 years, under administrations of both parties, Voice of America (VOA) has steadfastly advanced core U.S. foreign policy goals. Those goals include: aiding citizens of U.S. adversaries who seek the right to self-government; strengthening U.S. alliances and building popular support for the United States as the leader of the Free World; promoting respect for human rights, freedom of the press, and individual freedoms, including freedom of religious conscience and freedom of speech; and advancing recognition of U.S. leadership in scientific, technological, and cultural innovation.

The U.S. government created VOA in 1942 as a tool to achieve America's national security imperative of the day: defeating fascism in Europe and Asia. VOA quickly demonstrated its effectiveness. Part I below briefly recounts the story of VOA's origins and World War II contributions.

¹ Pursuant to D.C. Cir. Rule 29(b), counsel for amici represent that all parties have consented to the filing of this brief. Pursuant to Fed. R. App. P. 29, counsel for amici state that no party's counsel authored the brief in whole or in part, nor did a party or a party's counsel contribute money that was intended to fund preparing or submitting the brief, nor did any person—other than the amici curiae and their counsel contribute money that was intended to fund preparing or submitting the brief.

Later, as the Cold War unfolded, VOA's role in advancing U.S. national security became all the more important. America's Communist enemies relied on anti-Western propaganda at home and abroad. In the struggle against that propaganda, VOA wielded two powerful weapons: truthful news reporting and accurate accounts of America's contributions to fields that benefit humanity—science, technology, sports, and the arts, among others. Recognizing the value of VOA's contributions during the half-century fight against Communism, each successive President and Congress expanded VOA's budget and broadened its reach. There is no greater testament to VOA's important role during the Cold War than the lengths to which the Soviet Union went to prevent VOA's programming from reaching their citizens. We offer two examples of those efforts in Part II, in our account of VOA's Cold War work.

Since the end of the Cold War, two transformations in global affairs have further increased VOA's importance to U.S. national security.

The first transformation is the reordering of the geopolitical map. The relatively fixed battle lines of the Cold War have been replaced by a more chaotic array of international arrangements and a greater variety of threats to U.S. national security. While the Cold War saw battles in many places, nearly all of them pitted Soviet Communism against liberal democracy. Today, the United States and its allies face hostile governments and movements animated by many ideologies, including the People's Republic of China's combination of a market-aided one-party state with a long tradition of anti-Western nationalism; various forms of Islamic radicalism, exemplified by Iran and its proxies; reactionary nationalism in Putin's Russia, Lukashenko's Belarus, and the military junta in Myanmar; and various kinds of post-Communist anti-Western leftism, exemplified by the governments of Venezuela and Nicaragua.

The second transformation is the result of one of America's greatest inventions—the Internet. Within a few years of the Berlin Wall's collapse in 1989, the Internet had been converted from a government-funded computer-science experiment into an unprecedented globe-spanning information-distribution system. Initially, the Internet seemed to give a decisive advantage to advocates of freedom. But authoritarian governments quickly recognized that threat and developed sophisticated methods to use the Internet for their own purposes. They devised means of restricting their citizens' access to uncensored online content,² and they began to use social media as a medium for their own propaganda, both at home and abroad.³ Rightly dubbed “computational propaganda,”⁴ these “disinformation” efforts have their roots in the strategies invented by the Soviet secret services in the 1920s to dishonestly sway public opinion.⁵ U.S. adversaries—above all, the members of the so-called Axis of Autocracies, China, Russia, Iran, and North Korea—have poured resources into updating their disinformation methods for the Internet age, combining those methods with their longer-standing strangleholds over radio and television inside their borders. In the face of these efforts, VOA's honest and compelling reporting has become integral to telling America's story to the world.

The world now turns to online sources to make sense of complex geopolitical situations. In this environment, America's authoritarian adversaries recognize that controlling the narrative is vital both to staying in power and to challenging the United States. To advance its strategic

² See, e.g., Andrei Soldatov and Irina Borogan, *The Red Web: The Struggle Between Russia's Digital Dictators and the New Online Revolutionaries* (2015) (documenting the Russian government's efforts to control its citizens' Internet access); Freedom House, Freedom on the Net 2024: China, <https://freedomhouse.org/country/china/freedom-net/2024> (similar for China); Cathryn Grothe, *Countering Iran's Brand of Digital Authoritarianism*, Just Security (Oct. 21, 2022), <https://www.justsecurity.org/83633/countering-irans-brand-of-digital-authoritarianism/> (similar for Iran).

³ See, e.g., Council on Foreign Relations, *Confronting Reality in Cyberspace: Foreign Policy for a Fragmented Internet* 15-22 (2022), <https://www.cfr.org/task-force-report/confronting-reality-in-cyberspace>.

⁴ Samuel Wooley and Philip N. Howard, *Computational Propaganda: Political Parties, Politicians, and Political Manipulation on Social Media* (2018).

⁵ See generally Thomas Rid, *Active Measures: The Secret History of Disinformation and Political Warfare* (2016).

interests, therefore, the United States must counter these new forms of information warfare.⁶

VOA's journalists and broadcasters serve on the U.S. front lines in this war. VOA reaches hundreds of millions of people around the world, offering them accurate and compelling reporting in their own languages. Nothing can compare in sharing America's side of the story—the side of truth and of individual freedoms. In part III below, we describe how VOA's work directly strengthens U.S. national security.

In light of VOA's continuing importance in sharing the promise of America and the values of individual freedom and democratic self-government with audiences around the world, the undersigned Amici support Appellees' request for affirmance of the district court's injunction.

ARGUMENT

I. VOA Was Created During World War II To Support America's Fight Against Fascism

Created under the auspices of the Foreign Information Service in early 1942, VOA began its life with a tiny staff, broadcasting from above a Chrysler dealership in Manhattan. But within a few months, VOA was on the air 24 hours a day in English, French, German, and Italian. By the middle of 1944, operating under the auspices of the Office of War Information, VOA was reaching audiences in more than 40 languages.⁷

VOA's musical signature was a "spritely small band rendition of 'Yankee Doodle.'"⁸ That signature fit with VOA's animating purpose: helping the United States and its allies win the

⁶ See generally Richard Stengel, *Information Wars: How We Lost the Global Battle Against Disinformation and What We Can Do About It* (2019); Peter Pomerantsev, *This Is Not Propaganda: Adventures in the War Against Reality* (2019); Billyana Lilly, *Russian Information Warfare: Assault on Democracies in the Cyber Wild West* (2022).

⁷ This account of VOA's work during World War II is drawn principally from two sources: Alan Heil, *Voice of America: A History*, ch. 2 (2003) (hereafter "Heil"), and Holly Cowan Shulman, *The Voice of America: Propaganda and Democracy, 1941-1945* (1990).

⁸ Heil 38.

war. As the VOA News Branch stylebook, *This Is Your Job*, explained, VOA was not in the news business “because news is an end in itself. The United States is in the midst of a serious struggle for the mind of mankind and the only purpose of the News Branch as well as the entire Voice of America is to contribute to winning that struggle.”⁹ In order to achieve that goal of advancing the war effort, VOA had to win the trust of its listeners, and that required honest news reporting. As the host of VOA’s first broadcast told his listeners, “We bring you Voices from America. Today, and daily from now on, we shall speak to you about America and the war. The news may be good for us. The news may be bad for us. But we shall tell you the truth.”¹⁰

Audiences responded enthusiastically. From occupied Cannes, France one listener wrote in 1942: “You in America cannot imagine how even a few minutes of news from America, heard by a Frenchman, is spread around. An hour after it is heard, hundreds, thousands, know the truth.”¹¹

II. During the Cold War, VOA Made Important Contributions to the West’s Struggle Against Communism Around the Globe

With World War II won, it was not immediately clear whether VOA would continue to broadcast. But the United States soon faced a more extended struggle for freedom: the Cold War against the Soviet Union and against the spread of Soviet-style Communism elsewhere around the world. In that decades-long struggle, under administrations of both parties, VOA played a powerful role in countering Communist propaganda with accurate reporting and engaging cultural programming.

By 1950, it was clear to President Truman that the United States needed a forceful response to Soviet propaganda and effective means for penetrating the “static curtain” that Soviet

⁹ Heil 32.

¹⁰ *Id.*

¹¹ Heil 39

jamming had thrown up to block accurate information from reaching citizens in the Soviet bloc. In March 1950, Undersecretary of State James Webb urged the President “to step up every means of getting understanding of our peaceful purposes through the Iron Curtain.” The next month, speaking at the annual meeting of the American Society of Newspaper Editors, President Truman announced what he called a “Campaign of Truth” to make good on Webb’s recommendation. VOA took a leading role in that campaign, receiving expanded appropriations for both broadcasting and developing counter-jamming equipment.¹²

Nearly 20 years later, with President Nixon in the White House and Henry Kissinger serving as National Security Advisor, the United States remained committed to ensuring that VOA could evade Soviet jamming and bring accurate information to the millions living under Communism. Responding to a request from President Nixon in June 1969, for example, Kissinger laid out a menu of possible strategies for ensuring VOA’s voice could still be heard.¹³

And in the 1980s, President Reagan, himself a former broadcaster, spoke frequently and forcefully about the importance of VOA’s work. In 1984, promoting additional investments in VOA, he stated that “[t]he Voice of America has been a strong voice for truth.” To ensure that VOA “could be heard more clearly by many more people around the globe,” he explained, his administration had “made the same commitment to modernizing the Voice of America that President Kennedy brought to the space program.”¹⁴

III. VOA’s Contributions to U.S. Global Interests Have Become Even More Important in the Post-Cold War World

¹² This account draws on David F. Krugler, *The Voice of America and the Domestic Propaganda Battles, 1945-1953*, ch. 4 (2000).

¹³ Memorandum From the President’s Assistant for National Security Affairs (Kissinger) to President Nixon, June 30, 1969, Re: Soviet Jamming of the Voice of America and our Response, <https://history.state.gov/historicaldocuments/frus1917-72PubDipv08/d26>; see Michael Nelson, *War of the Black Heavens: The Battles of Western Broadcasting in the Cold War* (1997).

¹⁴ Heil 116.

Today's VOA would be unrecognizable to someone familiar with the shortwave radio version founded in 1942. VOA now shares accurate and thought-provoking stories in every communications format, from television to social media; in over 100 countries; and in 49 languages, from Afan Oromo (Northeast Africa) to Vietnamese.¹⁵ On a weekly basis, these broadcasts reach at least 361 million adults outside the U.S. and China (for which reliable audience estimates are unavailable).¹⁶ By reporting in so many languages, VOA offers an accessible local alternative to government-controlled media and foreign propaganda.

VOA's broad reach and reliable content were critical during the Cold War, but they are even more important today. Now, threats to U.S. national security come not only from Russia and its satellites but also from Chinese imperialism, Iran's terrorist theocracy, anti-Western posturing in authoritarian countries such as North Korea and Venezuela, the spread of disinformation around the globe, and many other sources. The news and information shared by VOA help push back on these countries' narratives and promote an informed global public—"expand[ing] freedom of information and expression; and [s]har[ing] America's democratic experience and values"¹⁷ with audiences that might otherwise hear only propaganda from whichever domestic or foreign authority controls their local airwaves and Internet feeds.

A. VOA's Current Footprint

In these challenging times, the world's appetite for accurate news and information is at an all-time high, and VOA has continued to meet the moment by expanding its reach. Over FY

¹⁵ See U.S. Agency for Global Media (USAGM), FY 2024 Agency Performance Report at 2, https://www.usagm.gov/wp-content/uploads/2025/01/USAGM-FY-2024-Agency-Performance-Report_Final_1-17-25_WebVersion.pdf (hereafter "FY 2024 Report"); U.S. Agency for Global Media, FY 2024 Congressional Budget Justification at 1, https://www.usagm.gov/wp-content/uploads/2024/03/USAGMBudget_FY25_CBJ_03-08-24-1.pdf (hereinafter "FY 2024 Budget Justification"); VOA, VOA Languages, <https://docs.voanews.eu/en-US-INSIDE/2019/08/01/5b24dbec-c11e-450e-b795-2a7d85cbb75e.pdf> (last visited July 15, 2025).

¹⁶ FY 2024 Report at 2, 8, 9.

¹⁷ *Id.* at 4.

2024, VOA's weekly audience grew by eight million users, to 361 million. Average weekly website visits rose by approximately 900,000, to 16.4 million. Demand for censorship circumvention tools—which allow audiences in repressive media environments to access online content from VOA—surged over the same period.¹⁸

Importantly, VOA has maintained its credibility worldwide even as it has grown its reading, viewing, and listening audiences. In FY 2024, 90% of weekly users in countries as varied as Bangladesh, Guatemala, Kosovo, and Niger reported that they trust VOA content. And the self-reported trust levels in target countries such as Ukraine are even higher.¹⁹ VOA is also winning the trust contest in key markets like Afghanistan, where VOA is the most-trusted news brand.²⁰

VOA does not work alone, instead partnering with local affiliates to extend its influence. Across Africa, for instance, VOA works with over 1500 affiliates; in East Asia and the Pacific, 1254; in Eurasia, nearly 1000; in Latin America, 744; and in South and Central Asia, 99.²¹

B. VOA and the Fight against Chinese Repression and Expansionism

Unlike during the Cold War, Russia is no longer the sole nation whose global ambitions threaten the continued vitality of liberal democracies and of press and religious freedoms. China, too, ruthlessly controls the press at home while spreading propaganda and expanding its influence outside its borders, notably in the global South. The reliable news and information provided by VOA serves at least five important functions in opposing Beijing's efforts: debunking and providing a counternarrative to misinformation within China; exposing China's

¹⁸ *Id.* at 13, 46, 44.

¹⁹ *Id.* at 18.

²⁰ Testimony of Michael Abramowitz, Director, Voice of America, House Foreign Affairs Committee, Subcommittee on Oversight and Accountability (July 9, 2024), <https://docs.house.gov/meetings/FA/FA17/20240709/117493/HHRG-118-FA17-Wstate-AbramowitzM-20240709.pdf>.

²¹ *Id.*

disinformation techniques; documenting Chinese expansionism; countering Chinese influence abroad by sharing U.S. culture and values with the same audiences; and finally, amplifying the voices of Chinese dissidents.

On the first point, VOA content reaches citizens within China despite heavy censorship, providing them with accurate reporting that helps shape their worldview and instills the values of “freedom and human dignity.” Perhaps just as important, millions in China have “learned English through Voice of America,” all while listening to reports that “contradict[] the Chinese Communist Party’s narratives” and “imagin[ing] a world where life, liberty and the pursuit of happiness [are] held as ideals.”²²

VOA’s reporting about the COVID pandemic in China, and Beijing’s responsive crackdown, offers a compelling example of VOA’s work to counter Chinese misinformation. From 2019 to 2020, VOA articles in English and Mandarin questioned China’s official COVID infection numbers and its timeline of the pandemic. During this period, VOA’s viewership within China soared, with over 68 million visits to VOA Mandarin’s website from April 2019 to April 2020, including 4.5 million views of articles related to COVID.

Later in the pandemic, VOA added reporting on the virus’s political repercussions for the Chinese government. VOA China’s award-winning 2024 podcast, *My Voice, Our Story: The Young Generation with White Paper in Hand*, for example, covered the White Paper Movement, a series of spontaneous street protests against China’s strict COVID controls.²³ But for the VOA’s reporting, the world might have remained largely ignorant of this movement—“thought to be the largest [protest in China] since the 1989 pro-democracy Tiananmen Square

²² Li Yuan, *Trump Could Hand China a ‘Strategic Victory’ by Silencing Voice of America*, N.Y. Times (Mar. 28, 2025), <https://www.nytimes.com/2025/03/28/business/media/china-voice-of-america-radio-free-asia.html>.

²³ FY 2024 Report at 15.

demonstrations”—because Chinese authorities censored all online reporting about it and “silenced those who dared to document or commemorate it.”²⁴

Anyone questioning the significance of the news and counternarrative that VOA provides to Chinese audiences need look no further than the Chinese state-run media’s response to the effort to shutter VOA. As numerous independent journalists have reported, Chinese state media and pro-China commentators are “revel[ing]” in the possible demise of VOA.²⁵

But VOA’s work is not limited to correcting misinformation within China; VOA content also exposes the insidious mechanisms by which China (and similar regimes) spread their disinformation around the world. In June 2023, for example, VOA China reported that certain Mandarin-language responses by Google’s AI assistant, Gemini, “were indistinguishable from Beijing’s official propaganda.” Citing cybersecurity analysts, this report suggested the data used to train Gemini likely came from Chinese social media, which is “flooded with [the Chinese government’s] preferred narratives.” A VOA source characterized the findings as a “reminder that generative AI tools influenced by state-controlled information sources could serve as force multipliers for censorship.”²⁶

VOA’s third important role in addressing the threat from China is to document Beijing’s growing ambitions in the global South. For example, numerous recent VOA reports document

²⁴ Jessie Lau, *China erases memory of ‘white paper’ protests in further threat to journalism*, The Guardian (May 1, 2024), <https://www.theguardian.com/global-development/2024/may/01/chinas-authorities-erase-memory-white-paper-protests-in-tightening-of-censorship-press-freedom>.

²⁵ Erin Hale, *Chinese state media revel in demise of Voice of America*, Radio Free Asia, Aljazeera (Mar. 19, 2025), <https://www.aljazeera.com/news/2025/3/19/chinese-state-media-revel-in-demise-of-voice-of-america-radio-free-asia>; see also, e.g., Kate Lamb, *Chinese state media celebrates Trump’s cuts to Voice of America and Radio Free Asia*, The Guardian (Mar. 18, 2025), <https://www.theguardian.com/media/2025/mar/18/chinese-state-media-celebrates-trumps-cuts-to-voice-of-america-and-radio-free-asia>; Nectar Gan, *‘How gratifying’: Cheers in China as Trump dismantles Voice of America*, CNN (Mar. 17, 2025), <https://www.cnn.com/2025/03/17/china/china-cheers-trump-cut-voice-of-america-intl-hnk>.

²⁶ Wenhao Ma, *Google AI Gemini parrots China’s propaganda*, VOA (Jun. 13, 2024), <https://www.voanews.com/a/google-ai-gemini-parrots-china-s-propaganda/7654874.html>.

Chinese infrastructure investment across Africa.²⁷ As VOA has also noted, China's ambitions extend not only to dominating infrastructure development but also to shaping African popular culture: China aspires to capture hearts and minds, with recent investments aimed at "restructuring African music, film and digital content creation."²⁸

Fourth, VOA's reporting combats China's influence outside its borders. VOA's English to Africa service, for example, reaches all 54 countries on the continent, via radio, television, web, and social media. The service's broadcasts and posts cover a wide range of topics, from science and technology to health, arts, entertainment, and sports.²⁹

Finally, fifth, VOA amplifies the voices of dissidents from the Chinese diaspora and reveals threats to their security. In 2024, for example, VOA publicized the work of activist Liu Dongling, a Chinese citizen then seeking asylum in Denmark, to lead the "Ban the Great Firewall" campaign against China's censorship of online content, and to document human rights violations in China.³⁰ Earlier VOA reporting chronicled the Dutch Chinese community's requests that the Dutch government shut down Chinese "police stations" in the Netherlands, which were used to "harass dissidents."³¹ And in 2017, VOA publicized the documentary

²⁷ See, e.g., Agence France-Presse, *5 key Chinese 'Belt and Road' projects underway in Africa*, VOA (Sept. 1, 2024), <https://www.voanews.com/a/key-chinese-belt-and-road-projects-underway-in-africa/7767507.html> (noting Chinese companies signed contracts in Africa worth more than \$700 billion between 2013 and 2023); Carol Van Dam Falk, *US Invests in Africa in Effort to Counter Chinese Influence*, VOA (Dec. 14, 2023), <https://www.voanews.com/a/us-invests-in-africa-in-effort-to-counter-chinese-influence-/7399128.html>.

²⁸ VOA Africa, *Exploring the impact of Chinese investments on African entertainment*, Youtube (May 18, 2024), <https://www.youtube.com/watch?v=IX8yVFPLA4I>.

²⁹ VOA, *VOA Broadcasting in English to Africa*, <https://www.insidevoa.com/p/6580.html> (last visited July 15, 2025).

³⁰ William Yang, *Chinese activist risks deportation after Denmark rejects asylum bid*, VOA (Sept. 7, 2024), <https://www.voanews.com/a/chinese-activist-risks-deportation-after-denmark-rejects-asylum-bid/7775272.html>.

³¹ Agence France-Presse, *Netherlands Tells China to Close 'Police Stations'*, VOA (Nov. 1, 2022), <https://www.voanews.com/a/netherlands-tells-china-to-close-police-stations-/6815747.html>.

“Human Flow” by Chinese dissident Ai Weiwei, which highlights the plight of refugees from around the world.³²

C. VOA and the Struggle against Teheran’s Terrorist Theocracy

The risk to peace and stability posed by Iran’s efforts to spread negative narratives and misinformation about America’s goals and policies in the Middle East adds considerable complexity to the national security landscape. On this front, too, VOA plays critical roles: explaining the benefits of U.S. initiatives, such as the Abraham Accords; documenting Iran’s atrocities; exposing differences of opinion within Iran; and amplifying the voices of opponents of the regime.

On the first point, in exclusive interviews with VOA Persian, several prominent U.S. foreign policy experts recently discussed major regional developments, with a particular focus on the Abraham Accords and broader Middle East security. Ellie Cohan, currently a senior fellow at the Independent Women’s Forum and a former U.S. State Department official under President Trump, emphasized the importance of maintaining maximum pressure on the Islamic Republic while fully supporting the Iranian people. She contributed a chapter on the Middle East, Israeli security, and the Iranian threat in a recently published policy guide by the America First Policy Institute. Patrick Clawson, director for research at the Washington Institute for Near East Policy, and Ilan Berman, vice president of the American Foreign Policy Council, also shared insights in their interviews. Berman critically analyzed the Biden administration’s foreign policy approach, particularly regarding Iran’s role in regional destabilization.

³² Penelope Poulou, *Ai Weiwei’s ‘Human Flow’ Highlights Refugee Plight Around the World*, VOA (Oct. 18, 2017), <https://www.voanews.com/a/ai-weiwei-on-human-flow-documentary/4076059.html>.

Collectively, these experts stressed that expanding the Accords and confronting the Islamic Republic's influence should be cornerstones of future U.S. and Israeli policy in the region.³³

Examples of VOA's coverage of Iranian atrocities include its stories on a series of mysterious mass poisonings in 2022-2023, in which thousands of Iranian school girls were reportedly deliberately poisoned by unidentified toxic gas, possibly in an effort to discourage girls' education,³⁴ and VOA's 2022-2023 reporting on Iran's practice of "hostage diplomacy"—i.e., taking hostages to coerce payments or prisoner swaps from the United States or U.S. allies.³⁵ VOA also exposed Iran's efforts to shift global opinion after Hamas's October 7, 2023, murderous attack on towns and kibbutzim in southern Israel by allegedly coercing Iranian Jews to stage anti-Israel rallies in five large Iranian cities.³⁶ VOA has also been an important source of unbiased information on the Gaza war and Israel-Palestine conflict, including presenting in local languages a broader range of perspectives than is generally heard in Muslim-majority countries such as Iran and Indonesia.

VOA reports also expose divisions of opinion within repressive regimes like that in Tehran—divisions that could be critical to U.S. policy development. For example, VOA's coverage of the Hamas attacks "captured rare perspectives from Iranian citizens who criticized Hamas—a sentiment repressed within Iran."³⁷ VOA Persian had an exclusive featurette focused

³³ VOA, *A Glance - An Interview with Ilan Berman* (Feb. 5, 2024), <https://ir.voanews.com/a/7471604.html> (in translation); VOA, *A Conversation with Patrick Clawson* (Jan. 29, 2024) <https://ir.voanews.com/a/7461472.html> (in translation); VOA, *A Glance - Interview with Ellie Cohan* (July 16, 2024) <https://ir.voanews.com/a/7698885.html> (in translation).

³⁴ E.g., Agence France-Presse, *20 Iranian Schoolgirls Hospitalized After Suspected Poisoning*, VOA (Apr. 4, 2023), <https://www.voanews.com/a/iranian-schoolgirls-hospitalized-after-suspected-poisoning-/7036243.html>.

³⁵ Henry Ridgwell, *Amid British-Iranian Prisoners' Homecoming, West Grapples With Tehran's 'Hostage Diplomacy'*, VOA (Mar. 17, 2022), <https://www.voanews.com/a/amid-british-iranian-prisoners-homecoming-west-grapples-with-tehran-s-hostage-diplomacy-/6489945.html>.

³⁶ E.g., Michael Lipin, *EXCLUSIVE: US Calls Iran's Apparent Coercion of Minority Jews into Staging Anti-Israel Rallies 'Abhorrent,'* VOA (Nov. 5, 2023), <https://www.voanews.com/a/exclusive-us-calls-iran-s-apparent-coercion-of-minority-jews-into-staging-anti-israel-rallies-abhorrent-/7342220.html>.

³⁷ FY 2024 Report at 25.

on the sentiments of ordinary Iranian citizens interviewed by undercover reporters. Contrary to the Islamic Republic's decades-long disinformation campaign, which claims nationwide support for Palestinian militant groups, the Iranians who spoke to VOA considered Hamas to be the wrongdoer and opposed the Iranian regime's costly support of the group.³⁸

Finally, VOA has worked to expand the audience for Iranian dissidents. Recent reporting, for instance, covers Iran's Woman, Life, Freedom movement, a peaceful protest movement launched in September 2022 after the murder by Iranian religious police of a young Iranian woman, Mahsa (Jina) Amini, who had been arrested for allegedly wearing the hijab improperly.³⁹ Afsoon Najafi, whose sister Hadis Najafi was also killed during that movement, thanked VOA for its coverage of associated events:

“[VOA] has been essential in amplifying my cry for justice. We have followed [VOA] for many years through satellite broadcasts. VOA has been a crucial source of information for us Iranians, allowing us to see and hear about issues that were either censored or entirely ignored by state-controlled media under the Islamic Republic's laws. I can confidently say that [VOA] is one of the few media outlets that presents the truth without censorship or bias. My personal experience with them began when VOA Persian covered the news of my sister's killing. ... VOA journalists have been by our side every moment, ensuring our stories are heard.

VOA Persian late-night coverage of the kidnapping of my brother was vital in keeping him safe and reuniting [him] with our family in Iran. The Islamic Republic is vehemently opposed to [VOA] and has done everything in its power to block access to it. ... Without [VOA], many voices, cries for justice, and reports of atrocities would be silenced.”⁴⁰

³⁸ VOA, *Special Coverage, Iranian's opinion: Islamic Republic's role in the conflict between Israel and Hamas* (Nov. 21, 2023), <https://ir.voanews.com/a/7364368.html> (in translation).

³⁹ E.g., Agence France-Presse, *Freed Researcher Says Anti-Hijab Protests Changed Iran, Its Prisons*, VOA (Nov. 4, 2023), <https://www.voanews.com/a/freed-researcher-says-anti-hijab-protests-changed-iran-its-prisons-/7341858.html>.

⁴⁰ Declaration of Afsoon Najafi, attached in Appendix B.

Likewise, soon after the inauguration of President Trump, VOA reported on a Paris rally by Iranian dissidents who hoped the new U.S. Administration's "maximum pressure" campaign would catalyze "a better future" in Iran.⁴¹

VOA has also exposed the threat to the United States and our allies posed by Iranian proxies such as Hamas. As noted, for example, VOA documented Hamas' October 7, 2023, attack in southern Israel, providing then-current estimates of the death toll and the number of kidnapped Israelis.⁴² Over the next year and a half VOA's reporting on Gaza continued apace.⁴³

D. VOA's Coverage of Anti-Western Moves in North Korea and Venezuela

VOA also works to expose the anti-Western activities of authoritarian regimes in countries such as North Korea and Venezuela. Just after the Hamas's October 7, 2023 attack, for example, VOA documented that North Korea had supplied some of the weapons used by Hamas terrorists. The report explained that Hamas made its anti-tank rockets "us[ing] the rocket propellant engines of the North Korean-made rocket-propelled grenade launcher, the F-7."⁴⁴ The Associated Press and other media organizations picked up VOA's report, and the South Korean Joint Chiefs of Staff later confirmed the claim.⁴⁵ VOA has also documented North Korea's efforts to evade sanctions by funding infrastructure projects in countries such as Senegal and pocketing the proceeds,⁴⁶ as well as the regime's brutal mistreatment of University of Virginia

⁴¹ Reuters, *Emboldened by Trump, Iranian dissidents demand overthrow of rulers*, VOA (Feb. 8, 2025) (internal quotation marks and citations omitted), <https://www.voanews.com/a/emboldened-by-trump-iranian-dissidents-demand-overthrow-of-rulers-/7968042.html>.

⁴² VOA, *Hamas Attacks Israel, Killing Hundreds; Dozens Kidnapped* (Oct. 7, 2023), <https://www.voanews.com/a/hamas-attacks-israel-killing-hundreds-dozens-kidnapped/7301265.html>.

⁴³ E.g., VOA News, *Trump envoy describes recent meeting with Hamas as 'very helpful'* (Mar. 9, 2025), <https://www.voanews.com/a/israel-says-it-is-cutting-off-its-electricity-supply-to-gaza/8004498.html>.

⁴⁴ Ham Ji-ha, *Hamas to make new weapons out of North Korea F-7 parts: Israeli military "tens of tens of thousands of North Korean weapons,"* VOA (Dec. 29, 2023), <https://www.voakorea.com/a/7416498.html> (in translation).

⁴⁵ *Id.*

⁴⁶ Ham Ji-ha and Kim Seon-myung, *Despite UN Sanctions, North Koreans at Work in Senegal*, VOA (Sept. 24, 2019), <https://www.voanews.com/a/africa-despite-un-sanctions-north-koreans-work-senegal/6176412.html>.

student Otto F. Warmbier, who died in 2017 after the first Trump administration secured his return to the U.S. from 17 months of captivity in Pyongyang.⁴⁷

With respect to Venezuela, where VOA provides a counterweight to propaganda by President Maduro and his allies in China, Russia, and Iran, VOA's coverage has been similarly unsparing. Most notably, after the 2024 Venezuelan election, VOA documented the large number of nations (including the United States) that recognized opposition leader Edmundo Gonzalez as the true victor despite the election authority's ratification of Maduro's win.⁴⁸ At the same time, VOA also explored China's very different response: full support for Maduro. As VOA explained, Beijing took that position to safeguard its own relationship with Venezuela, where China has "financed more than \$60 billion worth of projects" in return for "essential resources ... including crude oil and minerals, through an oil-for-loan model."⁴⁹

VOA has also covered Iran's growing influence in Venezuela. In 2023, for example, VOA reported on a fair in Caracas hosted by the Center for Intercultural Exchange in Latin America—which, per VOA and its source, "is a Latin American branch of Iran's al-Mustafa International University, ... Tehran's principal institution for recruiting, indoctrinating and training foreign converts to Shi'ite Islam." The same report also explored Iran's role in funding—at a cost of close to half a billion dollars, and despite the sanctions on both countries—Venezuela's refurbishment of its largest refining complex, the Paraguana Refining Center.⁵⁰

E. VOA and the Fight against Russian Aggression

⁴⁷ Ham Ji-ha, *Court Papers Hint at Warmbier's Treatment in North Korea*, VOA (Oct. 27, 2018), <https://www.voanews.com/a/court-papers-hint-at-otto-warmbiers-treatment-in-north-korea/4631497.html>.

⁴⁸ Agence France-Presse, *Venezuela ratifies Maduro win as more nations recognize rival as true victor*, VOA (Aug. 2, 2024), <https://www.voanews.com/a/venezuela-ratifies-maduro-win-as-more-nations-recognize-rival-as-true-victor/7728468.html>.

⁴⁹ Lin Yang, *China stands by Maduro in Venezuela to safeguard its investments*, VOA (Aug. 3, 2024), <https://www.voanews.com/a/china-stands-by-maduro-in-venezuela-to-safeguard-its-investments/7729148.html>.

⁵⁰ Michael Lipin, *Why Iran's Growing Influence in Venezuela Challenges the West*, VOA (Mar. 11, 2023), <https://www.voanews.com/a/why-iran-s-growing-influence-in-venezuela-challenges-the-west-/7000632.html>.

VOA also remains essential to combatting the Kremlin's global ambitions. Two examples prove the point. First, VOA's reports on anti-Ukrainian propaganda within Russia, and on the ongoing political, cultural, and personal impacts within Ukraine of Russia's full-scale invasion, offer Ukrainians a well-trusted source for accurate information about the war, while also providing the world a clear and reliable counternarrative to Moscow's self-serving claims. For instance, while Russian President Vladimir Putin compares "the regime in Kyiv" to "Hitler's accomplices, the SS men," VOA's report notes that Ukrainian President Volodymyr Zelensky was democratically elected, and also that he lost relatives in the Holocaust.⁵¹ Similarly, VOA reporting helped to disprove Kremlin claims of Ukrainian involvement in the March 2024 terrorist attack at Moscow's Crocus City Hall—an attack that VOA, relying on U.S. government sources, instead tied to ISIS.⁵²

VOA's reporting also provides Ukrainians with information to protect their interests, and amplifies the voices of Ukrainian activists. In 2023, for instance, VOA exposed Russia's use of online phishing sites to obtain personal information from Ukrainian soldiers, in what U.S. officials suggested may have been an effort to locate, detain, and deport soldiers' family members from occupied Ukraine.⁵³ In the same year, VOA shared the important backstory of Ukraine's struggle to align itself with Europe rather than Russia, as well as the present-day efforts of longtime pro-European activists in the country.⁵⁴ And in 2024, VOA won an award at

⁵¹ VOA, *Putin Falsely Claims 'De-Nazification' of Ukraine as Pretext for War* (Jan. 27, 2024), <https://www.voanews.com/a/ukraine-russia-trade-blame-over-downing-of-russia-plane-carrying-pows/7458993.html>.

⁵² FY 2024 Report at 32.

⁵³ Carla Babb, *Russian Scam Sites Obtain Personal Info of Thousands of Ukrainians*, VOA (Aug. 31, 2023), <https://www.voanews.com/a/russian-scam-sites-obtain-personal-info-of-thousands-of-ukrainians/7249234.html>.

⁵⁴ Lesia Bakalets, *Ten Years after Maidan, Ukraine's Activists Say Their Fight Continues*, VOA (Nov. 21, 2023), <https://www.voanews.com/a/ten-years-after-maidan-ukraine-s-activists-say-their-fight-continues-/7364808.html>.

Cannes for its online documentary “Jamala: Songs of Freedom,” which follows a Ukrainian singer-songwriter and activist in the aftermath of the Russian invasion.⁵⁵

The second example of VOA’s work to combat Russian expansionism concerns the activities of the Wagner Group, the private military force that serves as an unofficial arm of the Kremlin. The Wagner Group came to the world’s attention in 2023, when its then-leader, Yevgeny Prigozhin, first “launched an unexpected insurrection” against Russian military leaders and then, shortly thereafter, died in a suspicious plane crash.⁵⁶ VOA reporting on the origins of the group reveals “a complex organization involved in security, resource extraction and financial operations spanning the globe.”⁵⁷ Per VOA, the Wagner Group’s unofficial status has allowed Russia to maintain “plausible deniability of [the Group’s] actions,” which include assisting Russian separatists in Ukraine, backing Bashar al-Assad’s murderous government in Syria’s civil war, planting internationally-banned landmines to support General Khalifa Haftar’s troops in Libya, and supplying weapons to one of the warring parties in Sudan.⁵⁸ Reportedly, Wagner has also exchanged its military assistance for stakes in oil and gas fields in Syria and Libya, gold mines in Sudan, and diamond mines in the Central African Republic. These stakes enable Russia to evade international sanctions and develop its strategic reserves.⁵⁹

F. Recent Bipartisan Expressions of Support

Consistent with its nonpartisan mission, VOA has long enjoyed broad bipartisan support. Just last month, eight former VOA directors from both parties jointly wrote to a group of senior

⁵⁵ VOA, *Jamala: Songs of Freedom* (Feb. 24, 2024), <https://www.voanews.com/a/jamala-songs-of-freedom/7498517.html>.

⁵⁶ Matthew Kupfer, *Over a year after Wagner Group leader’s death, Russian mercenaries aren’t going away*, VOA (Nov. 29, 2024), <https://www.voanews.com/a/over-a-year-after-wagner-group-leader-s-death-russian-mercenaries-aren-t-going-away/7881045.html>.

⁵⁷ Alex Gendler, *Wagner Group Leaves Trail of Destruction from Africa to Russia*, VOA (Jul. 18, 2023), <https://www.voanews.com/a/wagner-group-leaves-trail-of-destruction-from-africa-to-russia/7186294.html>.

⁵⁸ *Id.*

⁵⁹ *Id.*

Senators to explain VOA's role as "one of the most cost-effective instruments of American soft power." The signatories included Robert Reilly, VOA Director during both the George W. Bush Administration and President Trump's first Administration, and Danforth Austin, who also led VOA during George W. Bush's presidency. The signatories cautioned:

Gutting VOA would cede an entire continent to America's adversaries and allow authoritarian regimes to control the narrative. VOA operates with extraordinary efficiency in Africa: just 200 staff produce 59 radio shows and 31 TV programs, in addition to managing 16 websites and dozens of social media accounts in 16 languages.

In sum, they explained, "VOA's mission is critical to the United States' interests, and VOA's personnel are hard-working professionals who put themselves at risk for their work."

Legislators from both parties have relied on VOA's reporting. For example, commenting on VOA's report that Google's Gemini tool could be used to amplify Chinese propaganda, Senator Mark Warner (D-VA), then chairman of the Senate Intelligence Committee, told VOA he is worried about Beijing using AI for disinformation, "whether that's by poisoning training data used by Western firms, coercing major technology companies, or utilizing AI systems in service of covert influence campaigns."⁶⁰ Likewise, then-Senator Marco Rubio expressed concern that "AI tools that uncritically repeat Beijing's talking points are doing the bidding of the Chinese Communist Party."⁶¹ Senator Jeanne Shaheen (D-NH), Ranking Member of the Senate Foreign Relations Committee, commented on VOA's role in countering AI-created disinformation, arguing that "[a]s we head into an era in which AI could radically alter

⁶⁰ Wenhao Ma, *Google AI Gemini parrots China's propaganda*, VOA (Jun. 13, 2024), <https://www.voanews.com/a/google-ai-gemini-parrots-china-s-propaganda/7654874.html>.

⁶¹ *Id.*

information warfare, Republicans and Democrats need to join together to restore and strengthen networks like VOA.”⁶²

IV. Declarations from Dissidents Show the Power of VOA’s Work Bolstering the Position of the United States Around the World

There is no more powerful evidence of VOA’s contributions to America’s global influence than testimonials about VOA from individuals who have suffered for their devotion to freedom. Attached to this brief are sworn declarations from six outstanding individuals who were punished under despotic governments because of their commitment to that cause. The declarations explain how the declarants depended on VOA not only for accurate information but also for inspiration that the United States stood with them.

Gao Yu, now 81, is a courageous independent Chinese journalist who has been imprisoned three times for exposing the brutalities of the regime in Beijing. She relied on VOA for more than four decades. As she explains, “generations of Chinese citizens have risked their lives to listen to VOA just to access truthful information.” Given the Chinese government’s extraordinary censorship and propaganda efforts, “shutting down VOA— a highly influential U.S. government media outlet that the CCP regime fears—is,” in her view, “akin to cutting off one of America’s own arms or slitting its own throat. It is ceding the information battlefield to the authoritarian regime, causing pain for the Chinese people and joy for the [Chinese Communist Party].”

Tennis legend Martina Navratilova grew up listening to VOA behind the Iron Curtain in Communist Czechoslovakia. She explains that in the 1960s and early 1970s, before her

⁶² Jeanne Shaheen, *We Need the Voice of America Now More Than Ever*, Foreign Policy (Mar. 26, 2025), https://foreignpolicy.com/2025/03/26/trump-voa-rfa-cuts-truth-russia-propaganda/?utm_content=gifting&tpcc=gifting_article&gifting_article=dHJ1bXAtdm9hLXJmYS1jdXRzLXRydXRoLXJlc3NpYS1wcm9wYWdhbmRh&pid=OC22371069.

defection to the United States, “[VOA] broke through [the] wall of oppression and hopelessness for us. As hard as the regime tried, it could not censor or block VOA’s transmissions that came crackling through our radio. Those broadcasts were like oxygen to us.” Looking back, she explains, “[VOA] showed me the kind of life that was possible if you were free to express yourself, use your mind and imagination, your talents and skills, and pursue your dreams. It gave me and so many others hope that one day we, too, might have those possibilities. And it gave us the will and the courage to fight for that chance. I can’t imagine what my life would have become without those hopes and dreams, without that VOA lifeline.”

Former Somali Minister of Foreign Affairs and International Cooperation Mohamed Abdirizak states that “VOA serves as a trusted news source for countless individuals in Somalia and the [Horn of Africa], where misinformation exacerbates conflict. Its reporting provides a critical counterbalance to unreliable narratives.”

Vladimir Kara-Murza, a Russian democracy activist and Pulitzer Prize-winning journalist who spent more than two years in a Siberian prison colony for speaking out against the Putin regime and its invasion of Ukraine, was just released last year in a prisoner exchange. Kara-Murza first listened to VOA as a child. In those days, “VOA was like a breath of fresh air and in a totalitarian regime like the Soviet Union these broadcasts were the only way people ... behind the Iron Curtain could actually find out truthful information about their own countries and about the world at large.” Since the rise of the Putin regime, he notes, “many, many people inside Russia either listen to these programs or watch them or read them, and the programs have a big reach and a big impact, one that is frankly irreplaceable.”

Afsoon Najafi, mentioned above, whose sister was murdered by Iranian police, describes VOA as “a crucial source of information for ... Iranians, allowing us to see and hear about issues

that were either censored or entirely ignored by state-controlled media under the Islamic Republic's laws." From her experience, she reports that "[t]he Islamic Republic is vehemently opposed to [VOA] and has done everything in its power to block access to it." It is thus "more important than ever to support independent, uncensored, and truthful media like [VOA]. Without it, many voices, cries for justice, and reports of atrocities would be silenced."

Finally, Nicaraguan-American democracy campaigner Damris Rostran explains that in the "context of darkness and fear" created by the Sandinista dictatorship, VOA "remains an essential lifeline—reminding us that the world is watching, and that the voice of truth will not be silenced."

CONCLUSION

For the foregoing reasons, Amici urge the Court to affirm the district court's injunctions in cases Nos. 25-5145 and 25-5144.

Respectfully submitted,

/s/ Jonathan G. Cedarbaum

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APPENDIX A

LIST OF AMICI

Ambassador Derek Mitchell is senior adviser to the President and Asia Program at the Center for Strategic and International Studies. He has served as president of the National Democratic Institute and U.S. ambassador to Burma (Myanmar), and he oversaw the Defense Department's Asia policy as the Principal Deputy Assistant Secretary of Defense for Asian and Pacific Security Affairs and acting Assistant Secretary.

Elliott Abrams is a senior fellow for Middle Eastern studies at the Council on Foreign Relations. He served as Special Representative for Iran and Venezuela in the first Trump Administration. In the George W. Bush Administration, Mr. Abrams oversaw U.S. policy in the Middle East as Deputy Assistant to the President and Deputy National Security Advisor.

Ilan Berman is Senior Vice President of the American Foreign Policy Council in Washington, DC. An expert on regional security in the Middle East, Central Asia, and the Russian Federation, he has consulted for the U.S. Central Intelligence Agency as well as the U.S. Departments of State and Defense, and provided assistance on foreign policy and national security issues to a range of governmental agencies and congressional offices. He has been called one of America's "leading experts on the Middle East and Iran" by CNN.

Stephen Biegun is a former Deputy Secretary of State. Over his lengthy career in national security and foreign policy, he also served as a senior congressional staff member, serving in both the Senate and House of Representatives with a focus on Russia, the former Soviet Union, and Europe. In addition, he served two years as the Executive Secretary of the White House National Security Council.

Admiral Dennis Blair is the Knott Distinguished Visiting Professor of the Practice at the University of North Carolina Chapel Hill. In 2009-2010 he served as the Director of National Intelligence. Admiral Blair's 34-year career in the Navy culminated in his service as Commander in Chief of U.S. Pacific Command.

Johnnie Carson is a former Foreign Service officer. He served as Assistant Secretary of State for African Affairs, 2009 to 2013, and has held ambassadorial posts in Kenya, 1999 to 2003; Zimbabwe, 1995 to 1997; and Uganda, 1991 to 1994. He served on the National Intelligence Council (NIC) from 2006 to 2009.

Lisa Curtis is a foreign policy and national security expert with over 20 years of U.S. government service at the CIA, State Department, National Security Council, and Senate. From 2006 to 2017, Ms. Curtis was senior fellow on South Asia at the Heritage Foundation. During the first Trump Administration, Ms. Curtis served as deputy assistant to the President and National Security Council senior director for South and Central Asia.

Richard J. Danzig served as a Deputy Assistant Secretary of Defense and then as Principal Deputy Assistant Secretary for Manpower, Reserve Affairs, and Logistics between 1977 and 1981. During the Clinton Administration he served as Secretary of the Navy.

Eric S. Edelman is Counselor at the Center for Strategic and Budgetary Assessments. He retired as a career minister from the U.S. Foreign Service on May 1, 2009, having served, among many other positions, as U.S. ambassador to Turkey and Finland and as Undersecretary of Defense for Policy. From 2001 to 2003 he served as Vice President Dick Cheney's principal deputy assistant for national security affairs.

Nancy Ely-Raphel was the U.S. ambassador to Slovenia from 1998 to 2001. From 2001 to 2003, she was the first director of the State's Department's Office to Monitor and Combat Trafficking in Persons.

Carl Gershman was the founding president of the National Endowment for Democracy. During President Reagan's first term he served as Senior Counselor to Ambassador Jeane Kirkpatrick and as the U.S. representative in the Third Committee of the UN General Assembly that deals with human rights.

Frank Kendall served as Secretary of the Air Force from 2021 to 2025. From 2012 to 2017, he served as the Undersecretary of Defense for Acquisition, Technology, and Logistics. He is a 1971 graduate of West Point and a retired Lieutenant Colonel in the Army Reserves..

Deborah A. McCarthy is a nonresident senior fellow at the Atlantic Council's Scowcroft Center for Strategy and Security. She served U.S. ambassador to Lithuania from 2013 to 2016. She also served as deputy ambassador to Greece and Nicaragua and as principal deputy assistant secretary of state for economic and business affairs, deputy assistant secretary for narcotics and law enforcement, senior advisor for counterterrorism, and special coordinator for Venezuela.

John Negroponte is the former J.B. and Maurice C. Shapiro Professor of International Affairs at George Washington University's Elliott School of International Affairs. He served as the first Director of National Intelligence from 2005 to 2007, and as U.S. Ambassador to Iraq in 2004-2005, both during the George W. Bush Administration. During the Bush Administration Mr. Negroponte also served as U.S. Ambassador to the United Nations. From 1960 to 1997, he served in the U.S. Foreign Service, including as U.S. Ambassador to Honduras, Mexico, and the Philippines.

Thomas R. Pickering is a retired American diplomat. From 1997 to 2000, he served as Undersecretary of State for Political Affairs. Prior to that, over his four-decade career in the Foreign Service, he served as U.S. Ambassador to Russia, India, the United Nations, Israel, El Salvador, Nigeria, and Jordan.

William Howard Taft IV served as Legal Adviser to the Department of State during the George W. Bush Administration, from 2001 to 2005. Earlier in his career, he served as U.S. Permanent Representative to NATO from 1989 to 1992; as Acting Secretary of Defense from January to March 1989; as Deputy Secretary of Defense from 1984 to 1989; and as general counsel of the Department of Defense from 1981 to 1984.

General Joe Votel is a retired U.S. Army four-star officer and the former president and CEO of Business Executives for National Security. He served as Commander of U.S. Central Command from 2016 to 2019. In that capacity, he was responsible for U.S. and coalition military operations in the Middle East, the Eastern Mediterranean, and Central and South Asia.

APPENDIX B**DECLARATIONS**

1. GAO YU
2. MARTINA NAVRATILOVA
3. MOHAMED ABDIRIZAK
4. VLADIMIR KARA-MURZA
5. AFSOON NAJAFI
6. DAMARIS ROSTRAN

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

—v.—

KARI LAKE, in her official capacity as Senior
Advisor to the Acting CEO of the United States
Agency for Global Media;

VICTOR MORALES, in his official capacity as
Acting CEO of the United States Agency for
Global Media;

and

UNITED STATES AGENCY FOR GLOBAL
MEDIA,

Defendants.

Case No. 1:25-cv-00887-RCL

DECLARATION OF GAO YU

1. I am independent Chinese journalist and a two-time recipient of the Courage in Journalism Award from the International Women’s Media Foundation. Born in 1944, I am 81 years old. Because of my reporting I have been imprisoned by the Chinese authorities and I am classified by the government as a tightly controlled dissident.

2. Since the founding of the People’s Republic of China (PRC) in 1949, VOA has been classified by the Communist government as a “hostile station.” Generations of Chinese citizens risked their lives to listen to VOA just to access truthful information. After the Cultural Revolution, which lasted from 1966 to 1976, the Chinese Communist Party (CCP) somewhat loosened its jamming of VOA broadcasts. Like many others in China, I was able to regularly

tune in to VOA's Mandarin programs. Its reporting was accurate, comprehensive, and objective. Every program clearly and powerfully conveyed U.S. policies and ideals. VOA's programming not only challenged my outdated knowledge, but also subtly reshaped my worldview, outlook on life, and core values.

3. On the morning of June 3, 1989, I was kidnapped by the Beijing State Security Bureau and became the first intellectual arrested during the Tiananmen Movement. Fifteen months later, I was released, but my employer, the Chinese Academy of Social Sciences, refused to reinstate me. I was forced to become an independent journalist.

4. Through years of reporting and investigation, I came to deeply understand how critical VOA's attention and reporting were to Chinese political prisoners. VOA was not only a spiritual lifeline to the prisoners themselves, but also to their families.

5. Because of my independent reporting, I myself became one of the CCP's key political prisoners. I was arrested and sentenced twice by the CCP regime—on October 2, 1993, and again on April 24, 2014. VOA provided ongoing, factual coverage of my cases, which generated widespread international support. That coverage was a critical source of strength that helped me maintain my dignity during the darkest periods of my life and sustain my long struggle for freedom of speech against the CCP regime.

6. I am still currently classified as a tightly controlled "dissident" in Beijing. The authorities have shut down my Weibo and WeChat accounts, leaving the US-based X (formerly Twitter) as my only way to speak publicly. To force me to stop speaking up on X, in 2020, the Beijing Public Security Bureau pressured my son's employer to fire him—citing "issues related to his mother." He has been unemployed for five years.

7. On August 26, 2024, Chinese authorities cut off my home's Internet, landline, and mobile phone services. At the age of 80, I found myself trapped in Beijing—unable to register for hospital appointments, shop online, pay with cards, call a taxi, or even communicate with relatives. VOA's timely reporting on these incidents helped the world understand the severe and often unimaginable human rights abuses in China.

8. The CCP rules through lies, deceiving its people, and banning truthful speech. In the Internet age, it has built a national firewall, monitoring all cross-border communications, and disrupting, blocking, or censoring content it deems politically unacceptable. Its methods include DNS poisoning, TCP reset attacks, countermeasures against firewall circumvention, and email interception. Such a national firewall not only violates freedom of expression but also serves as a major trade barrier for foreign companies.

9. The CCP's investment in state media, party-controlled websites, and its national firewall is astronomical. Its spending on international propaganda and infiltration of Western mainstream media is equally vast. In this context, shutting down VOA—a highly influential U.S. government media outlet that the CCP regime fears—is akin to cutting off one of America's own arms or slitting its own throat. It is ceding the information battlefield to the authoritarian regime, causing pain for the Chinese people and joy for the CCP.

On this ____ day of April 2025 I declare under penalty of perjury that the foregoing declaration is true and correct.

Gao Yu

[illegible][illegible]

4. The CCP's involvement in this matter, given its political interests, and its apparent failure to give priority to its spending on environmental programmes and the interests of Chinese citizens, suggests that it is a priority issue in the general election campaign. It is highly probable that the government would rather that the CCP regime loses, or at least is cutting off one of its main sources of funding, than that it is taking the responsibility for dealing with the pollution problem seriously, something that the Chinese people and even the CCP would not like.

(The ~~first~~ day) of April 2025 I declare under penalty of perjury that the foregoing declaration is true and correct.

03.7.17

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

—v.—

KARI LAKE, in her official capacity as Senior
Advisor to the Acting CEO of the United States
Agency for Global Media;

VICTOR MORALES, in his official capacity as
Acting CEO of the United States Agency for
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and

UNITED STATES AGENCY FOR GLOBAL
MEDIA,

Defendants.

Case No. 1:25-cv-00887-RCL

DECLARATION OF MARTINA NAVRATILOVA

1. I grew up during the 1960s under Communist rule in the small Czech village of Revnice, about 25 kilometers outside of Prague.
2. Behind the Iron Curtain, state radio was pure Communist propaganda – a total joke – and ultimately, soul crushing. There were polkas and waltzes and, every once in a while, a strange Czech version of a Western song such as “Your Cheatin’ Heart.” But the bland music was always interrupted by pronouncements and sloganeering by the regime: “*Ať žije naše dělnická třída a její bojový předvoj Komunistická strana Československa!*”: “Long live our working class and its fighting vanguard, the Communist Party!” Or: “*Jak budeme dnes pracovat, tak budeme zítra žít!*”: “How we work today is how we will live tomorrow!”

3. It all had the effect of numbing our minds and deadening our spirits, instilling in us the idea that the only path was work for the state machine. Individual hopes and dreams were not permissible.

4. Voice of America broke through this wall of oppression and hopelessness for us. As hard as the regime tried, it could not censor or block VOA's transmissions that came crackling through our radio. Those broadcasts were like oxygen to us.

5. First came the international news hour each night; VOA broadcasters speaking Czech reviewed the events of the day, reporting what the state media omitted, whether it was facts about the Soviet invasion of my homeland in 1968 or the first moon landing. I heard names of places I knew nothing about but that sounded beautiful: "Philadelphia," "California," "Florida."

6. My family was very athletic, and we hungered for accurate sports news. When the Czech national hockey team beat the Soviets – twice! – at the 1969 world championships, I lived every second of it and can still to this day name the stars of the team – Jaroslav and Jiri Holik, Jaroslav Jirik, Vladimir Dzurilla.

7. After those victories, hundreds of thousands poured into the streets for a celebration that turned into demonstrations. People were chanting: "*Vy nám tanky, my vám branky!*": "You used tanks against us. We scored goals against you!" But I only heard the truth about the hockey protests on Voice of America, since the state media told a very different story.

8. After I defected to the United States in 1975, which I had confided to my father before I left for the U.S. Open, Voice of America became more important than ever to my family. It was the only way for them to know of my existence or receive any news about me. It was from VOA that my family learned I had sought political asylum in the U.S. To state media, I had become a

nonperson. The regime would not utter my name. Even when I returned to Prague in 1986 to play in a Federation Cup match, I was announced as “the woman player from the United States.”

9. I have a pretty good idea of what it looks and feels like to live in a country with only state-sponsored “news,” where people are starved for the truth and look to a free press as a North Star. I’m sure it’s just as important to those living in places today where they’re fed nothing but propaganda as it was to me. That 12-year-old hung onto every forbidden word, every colorful jazz tune, and every sports report that shined through the hissing static of our red plastic radio.

10. Voice of America showed me the kind of life that was possible if you were free to express yourself, use your mind and imagination, your talents and skills, and pursue your dreams. It gave me and so many others hope that one day we, too, might have those possibilities. And it gave us the will and the courage to fight for that chance. I can’t imagine what my life would have become without those hopes and dreams, without that VOA lifeline.

On this 1st day of April 2025 I declare under penalty of perjury that the foregoing declaration is true and correct.

A handwritten signature in black ink, appearing to be 'Martina Navratilova', written over a horizontal line.

Martina Navratilova

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

—v.—

KARI LAKE, in her official capacity as Senior
Advisor to the Acting CEO of the United States
Agency for Global Media;

VICTOR MORALES, in his official capacity as
Acting CEO of the United States Agency for
Global Media;

and

UNITED STATES AGENCY FOR GLOBAL
MEDIA,

Defendants.

Case No. 1:25-cv-00887-RCL

DECLARATION OF MOHAMED ABDIRIZAK

1. I am a naturalized U.S. citizen originally from Somalia, currently residing in Nairobi, Kenya. This affidavit reflects my personal experiences with the Voice of America (VOA).
2. I grew up in Somalia and have been a longtime listener of VOA. Though I cannot recall exactly when I first encountered VOA, I consistently turned to its broadcasts for unbiased news on Somalia and the Horn of Africa (HOA).
3. I regularly listened to VOA's news programs. My participation as a guest on *Straight Talk Africa* in 2016, hosted by the late Shaka Ssali, deepened my connection to the network, and I became a frequent listener of the program. I also valued hearing perspectives from Somali expatriates featured on VOA.

4. As Chief of Party for the National Democratic Institute's Somalia program, I worked with VOA to conduct a survey assessing the impact of our civic education initiatives on Somalia's constitutional process. This collaboration highlighted VOA's vital role in disseminating credible information.

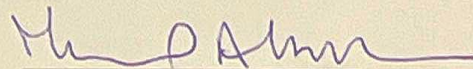
5. VOA serves as a trusted news source for countless individuals in Somalia and the HOA, where misinformation exacerbates conflict. Its reporting provides a critical counterbalance to unreliable narratives.

6. While my understanding of the United States stems primarily from decades of living, working, and studying in the US, VOA reinforced my respect for independent journalism. During my tenure in Somalia's government, VOA's coverage offered valuable insights into my administration's actions.

7. A particularly memorable moment was my interview with VOA as Somalia's former Minister of Foreign Affairs and International Cooperation. This opportunity allowed me to publicly address my unexpected removal from office.

8. In a region rife with conflict and disinformation, VOA's commitment to impartial reporting helps dispel rumors and mitigate tensions, making it an indispensable resource.

On this 10th day of April 2025 I declare under penalty of perjury that the foregoing declaration is true and correct.



Mohamed Abdirizak

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

—v.—

KARI LAKE, in her official capacity as Senior
Advisor to the Acting CEO of the United States
Agency for Global Media;

VICTOR MORALES, in his official capacity as
Acting CEO of the United States Agency for
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and

UNITED STATES AGENCY FOR GLOBAL
MEDIA,

Defendants.

Case No. 1:25-cv-00887-RCL

DECLARATION OF VLADIMIR KARA-MURZA

1. I was born in Moscow in 1981. I'm a journalist, author, opposition politician, historian and documentary filmmaker.

2. I have been involved in the Russian democratic movement for many years. I worked closely with Boris Nemtsov, the leader of the Russian opposition, who was murdered on Vladimir Putin's orders on a bridge near the Kremlin in February 2015.

3. I have protested the Russian government's human rights abuses, including by participating in campaigns to pass Magnitsky laws in many Western countries, including the United States, Canada, Great Britain, Australia, and the European Union. Magnitsky laws impose targeted personal visa and financial sanctions on those corrupt actors and human rights violators in the leadership of authoritarian governments such as the Putin regime.

4. In response to my work, the Kremlin had me poisoned twice, once in May 2015 and again in February 2017. Both times the poison sent me into a coma and nearly killed me. Thanks to an investigation by *Bellingcat*, the open-source investigation group based in the United Kingdom, we know that a special death squad working within the main Russian security service, the FSB, carries out these attacks in order to eliminate anyone Putin considers a political threat.

5. In April 2022, I was arrested near my home in Moscow after publicly speaking out against Putin's full-scale invasion of Ukraine, and in April 2023 I was sentenced by the Moscow City Court after a closed-door trial to 25 years in a strict penal colony. That sentence was based on five public speeches I made opposing Putin's war in Ukraine and opposing political oppression in Russia.

6. I grew up in a communal apartment in central Moscow. One of my earliest childhood memories is my granddad switching on his Latvian-made *Spidola* radio transistor every evening and tuning into the short-wave broadcasts, especially the Voice of America Russian service and the BBC. It was often difficult to get the signals because of the heavy jamming, but listening to these radio programs allowed us to get truthful information that was lacking at home.

7. VOA was like a breath of fresh air, and in a totalitarian regime like the Soviet Union these broadcasts were the only way people in Russia and other nations behind the Iron Curtain could actually find out truthful information about their own countries and about the world at large. We now know from internal KGB reports that were declassified after the collapse of the U.S.S.R. in 1991 that there were millions of people in the Soviet Union who were regular listeners to these broadcasts. One report showed that at least 15 % of the adult population of the U.S.S.R.—that's 30 million people—listened, and a large proportion listened regularly, meaning

daily or weekly. In my view, this was one of the most important reasons for the eventual collapse of the Soviet dictatorship, because for a system that is based on lies, as the Soviet regime was, the words of truth that would be broadcast over these programs were incompatible with the regime's continued existence.

8. Putin came to power in 2000, and his first goal was to shut down independent media. Within the first three years, he shut down every single nationwide independent television network and started turning all of Russian television into a gigantic state propaganda machine. Eventually he began to subjugate even small independent media outlets. The result was a total information blackout, which was completed at the same time as the full-scale invasion of Ukraine in February 2022. Simultaneously with attacking Ukraine, Putin shut down the remaining pockets of independent television, radio broadcasting, and print media in Russia.

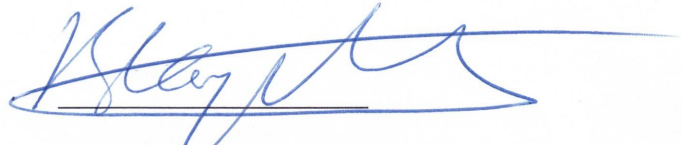
9. When it is not possible for independent journalists to operate inside a country, as today in Russia, the importance of international media, particularly the media supported by the U.S. Agency for Global Media, cannot be overstated. They may well be even more important today than they were back in Soviet times. The scale of repression in Russia today is something that we have never seen in our post-Soviet history, but the current regime also very clearly presents a threat to the outside world. To reach people inside of Russia with truthful and objective information about what is going on in Ukraine, about what is going on in Russia, and about what is going on in other parts of the world is crucial.

10. VOA's Russian service is one of the few platforms for real free substantive debate that we can have among ourselves as members of Russian civil society, either inside the country or in exile. For many years I have frequently been a guest on VOA programs, both in Moscow and in Washington, D.C.

11. I know that many, many people inside Russia either listen to these programs or watch them or read them, and the programs have a big reach and a big impact, one that is frankly irreplaceable,

12. The potential closure of USAGM's overseas broadcasts would be a big gift to dictators all over the world, from Cuban communists to Iranian mullahs, because what these regimes are most afraid of are their own people knowing the truth. That's why all these dictatorships are based on lies and propaganda. For many years, U.S.-funded broadcasts have offered the voice of truth, reaching into the furthest corners of the most oppressive dictatorships around the world. For decades, dictatorships were unable to silence these broadcasts, and it is completely unfathomable to me that this voice might be silenced by the United States of America itself.

On this 4th day of April 2025 I declare under penalty of perjury that the foregoing declaration is true and correct.



Vladimir Kara-Murza

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

—v.—

KARI LAKE, in her official capacity as Senior
Advisor to the Acting CEO of the United States
Agency for Global Media;

VICTOR MORALES, in his official capacity as
Acting CEO of the United States Agency for
Global Media;

and

UNITED STATES AGENCY FOR GLOBAL
MEDIA,

Defendants.

Case No. 1:25-cv-00887-RCL

DECLARATION OF AFSOON NAJAFI

1. My name is Afsoon Najafi, the sister of Hadis Najafi, whom the Islamic Republic killed. The Voice of America has been essential in amplifying my cry for justice.
2. My sister Hadis was shot multiple times by police during a peaceful protest in September 2022 following the murder of Mahsa Amini by the authorities. She was only 22 years old when she was murdered.
3. We have followed Voice of America for many years through satellite broadcasts. VOA has been a crucial source of information for us Iranians, allowing us to see and hear about issues

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

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

—v.—

KARI LAKE, in her official capacity as Senior
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Agency for Global Media;

VICTOR MORALES, in his official capacity as
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and

UNITED STATES AGENCY FOR GLOBAL
MEDIA,

Defendants.

Case No. 1:25-cv-00887-RCL

DECLARATION OF DAMARIS ROSTRÁN

1. I, Damaris Rostran, was born in Nicaraguan and I moved to United States twenty-five years ago to work for social justice. I am now an American citizen.

2. Since 2016 I have worked to organize Nicaraguans in the diaspora to support civil society organizations in Nicaragua. The organization Mesa de Trabajo NY/NJ works to urge Congress to legislation supporting a return to democracy in Nicaragua.

3. Since its return to power in 2007, the Ortega-Murillo dictatorship has gradually dismantled Nicaragua's democratic institutions and launched a full-scale attack on the

independent press. The events that began in April 2018—when peaceful demonstrations erupted across the country—were met with deadly violence, censorship, and the forced closure of dozens of media outlets. Journalists were harassed, beaten, and jailed. Newsrooms were raided, and iconic newspapers like *La Prensa* were shut down or taken over. Over 200 journalists have been forced into exile, and hundreds of citizens have been detained simply for speaking out or sharing uncensored information.

4. In this context of darkness and fear, Voice of America stood out as one of the few platforms able to consistently reach the Nicaraguan people with factual, unbiased reporting. With its strong editorial independence and its commitment to the principles of press freedom, VOA offered something that was otherwise impossible to find inside the country: truth.

5. Through radio, television, and digital platforms, VOA has continued to inform Nicaraguans about the reality on the ground—reporting on police brutality, political prisoners, media repression, and the experiences of those forced into exile. Stories that the local media could no longer tell were heard through VOA broadcasts, which reached even the most remote areas of the country.

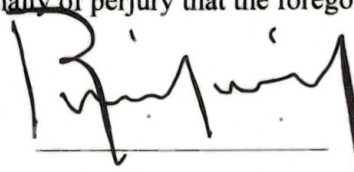
6. This was not the first time VOA made a difference in Nicaragua. During the 1980s civil conflict and under previous repressive regimes, VOA broadcasts brought international news, democratic values, and a voice of hope to those who longed for freedom. That legacy continues today. In times of both war and peace, VOA has offered reliable, professional journalism that helps the people of Nicaragua stay informed and connected to the world.

7. I am grateful to the people and government of the United States for supporting Voice of America. In doing so, the United States affirms its role as a global leader in the defense of

freedom of expression and human rights. I feel particularly indebted to the many VOA journalists—both in Nicaragua and abroad—who have risked their safety to report the truth.

8. As a Nicaraguan, I continue to hope and work for a future in which freedom of the press is once again a reality in my homeland. Until that day arrives, Voice of America remains an essential lifeline—reminding us that the world is watching, and that the voice of truth will not be silenced.

On this 10th day of April 2025 I declare under penalty of perjury that the foregoing declaration is true and correct.

A handwritten signature in black ink, appearing to read 'Damaris Rostrán', written over a horizontal line.

Damaris Rostrán