

**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 subsequently assumed the role of Deputy Chief Executive Officer (CEO). In late July, I assumed the role of Acting CEO. I base this declaration on knowledge and information I have gained in the course of performing my official duties via these three positions.

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. This declaration incorporates the entirety of all previous information in not only my previous sworn declaration, but also the previous sworn declaration of Frank Wuco, in order to avoid repetition where possible. *See* Declaration of Frank Wuco, dated June 27, 2025, and Declaration of Kari Lake, dated July 18, 2025, both incorporated herein by reference in their entireties.

4. The following information is provided to the Court pursuant to its July 30, 2025, Court Order (Order) requesting additional information from USAGM about the sufficiency of its overall operations, including its operations of VOA.

5. As discussed in my previous declaration, USAGM has already determined, pursuant to both the President's inherent executive authority under Article II of the Constitution of the United States and USAGM's own discretion to fulfill the President's priorities, to reduce USAGM's functions to the statutory minimum in its efforts to streamline functions and make operations more efficient.

6. In accordance with that determination, USAGM has identified the language services it is required to maintain – namely, Mandarin, Farsi, Dari, and Pashto – in accordance with the International Broadcasting Act and other federal statutes, as follows:

- a. Consistent with 22 U.S.C. § 6201(4), VOA covers news in Mandarin via the internet and major social media platforms. VOA's Mandarin language service focuses on and amplifies top news stories that, in VOA's judgment, would resonate most with the Chinese people.

- b. 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 covers news in Farsi via its Persian News Network. The Persian News Network not only shares content via the internet and major social media platforms, but also currently broadcasts one hour of live television every Monday through Friday. Also, during major breaking news events in the United States — including Presidential addresses to the nation, Presidential multilateral and bilateral summits with foreign leaders, statements and press conferences, White House press conferences or significant newsworthy national security developments — VOA Persian carries these events live, providing simultaneous translation, in satellite television and live-streaming the events on digital platforms. As discussed in depth in Mr. Wuco’s prior declaration, the Persian News Network well demonstrated VOA’s capacity to surge in order to cover breaking news events.
- c. Consistent with 22 U.S.C. § 6215(a), VOA covers news in Pashto and Dari via radio, the internet, and major social media platforms. Of note, the radio program, which was originally a five-minute broadcast split between the two languages, is now a 30-minute program split between the two languages.

7. Similarly, USAGM has decided, utilizing its inherent executive discretion to manage its operations as it moves forward, not to broadcast in languages or to nations or locations around the world that are not required by the International Broadcasting Act.

8. One of those geographic foci in which the court has expressed previous interest is Africa, but USAGM is not statutorily required to broadcast into Africa. USAGM made this decision after considering several important 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 (which are in abundance now as compared to at the time of creation of VOA), many of which currently broadcast throughout Africa and have done so for some time.

9. In short, USAGM leadership has determined to both focus on those statutorily required functions and not focus on non-statutorily required functions. Any decisions by previous USAGM leadership, but especially any 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 inherently and indefinitely retains the right to make different decisions.

10. Regarding the present state of USAGM staffing, although the number is always subject to change as USAGM manages its inherently executive operations, at present, ¶USAGM has 135 full-time employees who are responsible for the execution of USAGM's inherent executive duties.

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

- a. USAGM Front Office - 3
- b. USAGM Chief Financial Officer (CFO) Office - 20
- c. USAGM Office of General Counsel (OGC) Office – 3
- d. USAGM Office of Management Services (OMS) - 58
- e. USAGM Office of Policy Research (OPR) - 3
- f. USAGM Office of Technology, Services and Innovation (TSI) - 48

12. Also, VOA presently has 74 full-time employees who are responsible for the execution of VOA's statutorily directed functions.

13. The number of current VOA full-time employees is broken down according to the following components housed under VOA's Programming Directorate, which covers all production and broadcasting operations, and is a simplified version of a similar list provided in my previous declaration:

- a. Broadcast Operations, Central Production Services, Traffic Branch/Traffic Services – 2 employees
- b. Broadcast Operations, Central Production Services, Traffic Branch/Television Operations Services – 2 employees
- c. Broadcast Operations, Central Production Services, Product Support Branch, Video Editors Services – 1 employee
- d. Broadcast Operations, Operations Support Division – 1 employee
- e. Broadcast Operations, Operations Support Division, Radio Multimedia – 5 employees
- f. Broadcast Operations, Operations Support Division, Television Operations/Master Control Services – 4 employees
- g. Broadcast Operations, Operations Support Division, Television Operations/Studio Services – 2 employees
- h. Broadcast Operations, Technical Support Division – 1 employee
- i. Broadcast Operations, Technical Support Division, Television Maintenance Services – 2 employees
- j. Broadcast Operations, Digital Management Division – 3 employees

- k. Broadcast Operations, Digital Media Support – 4 employees
- l. FM Programming – 1 employee
- m. VOA News Center – 1 employee
- n. VOA News Center, Coverage Desk – 1 employee
- o. VOA News Center, Real Time News Desk – 3 employees
- p. Africa Division – 4 employees (currently detailed to the News Center)
- q. Africa Division, Somali Service – 1 employee (currently detailed to the News Center)
- r. China Division, Mandarin Service – 3 employees
- s. East Asia and Pacific Division – 1 employee
- t. East Asia and Pacific Division, China Branch, Mandarin Service – 1 employee
- u. Persian News Network – 6 employees
- v. Persian News Network, Central News and Production Unit – 21 employees
- w. South and Central Asia Division – 2 employees
- x. South and Central Asia Division, Afghanistan Branch – 1 employee
- y. South and Central Asia Division, Afghanistan Branch, Dari Service – 4 employees
- z. South and Central Asia Division, Afghanistan Branch, Pashto Service – 2 employees
- aa. South and Central Asia Division, Kurdish Service – 1 employee (currently detailed to the Persian News Network)

14. Also, as previously stated, VOA continues to operate and execute 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.

15. Over the course of the past few months, USAGM has recalled full-time employees who had been placed on administrative leave on an as-needed basis. The number of USAGM full-time employees who have been recalled from administrative leave in total between March 14, 2025, as of this writing is 145.

16. USAGM is also taking steps to supplement content by contracting with domestic news networks to obtain lawful permission to use, translate, and disseminate their content on USAGM-controlled means of transmission. The goal is to share content of these other networks, which reflect different perspectives and tones, with the populations to which we are statutorily required to broadcast. USAGM has already reached such an agreement with One America News Network and is engaged in ongoing discussions with Newsmax in pursuit of a similar agreement. The plan is to reach out to other networks to achieve similar agreements.

17. USAGM has discretion to manage its workforce and personnel, including the right to consider statutorily authorized exercise of reduction-in-force (RIF) options that best serve not only the policy priorities and direction of the President, but also improve the functionality of USAGM as it is required to operate by law and ensure judicious use of the tax dollars of the American people.

18. In accordance with these statutory obligations, USAGM has, since on or about July 8, 2025, been regularly and in good faith engaged with both the American Federation of Government Employees (AFGE), the American Federation of State, County and Municipal

Employees (AFSCME), and the American Foreign Service Association (AFSA), which are the three major public employee unions that represent USAGM's employees, regarding the possibility of one or more future RIFs of USAGM employees who are currently on administrative leave and are not part of the currently active USAGM full-time employees identified above.

19. An additional example of something USAGM may do in the near future to streamline its functions and ensure greater efficiency, regardless of personnel levels, is to leverage the use of increasingly sophisticated and low-cost artificial intelligence (AI) tools to accelerate graphics production. By integrating AI into the graphics workflow, USAGM can optimize resource allocation, streamline production processes, and improve overall creative output while maintaining the highest professional standards.

20. Also, as noted in at least one previous declaration, USAGM continues its work to ensure that statutorily required obligations that have been ignored for decades by multiple previous administrations will finally be fulfilled, such as VOA's 50 States Initiative and Editorial efforts.

21. Further, as noted in at least one previous declaration, USAGM is currently operating, and will continue to operate, several medium wave and shortwave transmission facilities both domestically and abroad, as well as direct-to-home satellite transmissions, to ensure that VOA content is transmitted clearly and effectively to our statutorily required broadcast audiences.

22. In the United States, our flagship transmission facility is the Edward R. Murrow Shortwave Transmitting Station in Greenville, North Carolina.

23. USAGM, via OCB, also operates a medium wave transmission facility in Marathon Key, Florida, and while this facility generally does not broadcast VOA-produced content, it represents a potential backup medium wave transmission facility that VOA could use in the event of exigent circumstances.

24. Internationally, USAGM maintains several medium wave and shortwave transmission facilities, including in Germany, Kuwait, the Philippines, Tajikistan, and Thailand.

25. USAGM is not simply maintaining the status quo regarding these facilities; we are taking steps to ensure that the equipment at these facilities is fit for continued service. For instance, the transmission station in Kuwait is presently in the final phase of a five-year project to fully modernize its antenna array and transmitter suite, which will make it the most advanced shortwave transmitting facility in the world.

26. In the Philippines, we are also significantly upgrading the transmission facilities by replacing transmitters that were designed and built in the 1960s with newer, more capable transmitters that are being repurposed from our transmitting facilities on Tinian Island, Commonwealth of the Northern Mariana Islands (CNMI), which are being closed and turned over to the Department of Defense. This upgrade and repurposing of resources will ensure that the Philippines facilities remain our most capable platform for VOA transmissions into the Communist People's Republic of China and elsewhere as needed.

27. To be clear, USAGM is consolidating, and may eventually close, some of its redundant and operationally unnecessary overseas medium-wave and shortwave transmission facilities. That said, USAGM is maintaining, and even extensively modernizing, these overseas transmission facilities, which will fortify our ability to continue transmitting content to every corner of the globe if and when needed, including to places not presently statutorily mandated but may at times require content during emergent situations such as wars or other crises.

28. Also, as noted in at least one previous declaration, regarding funding, USAGM received \$260.032 million in appropriated funding for Fiscal Year 2025 for VOA and plans to use approximately \$232.19 million (as of August 8, 2025) of that total amount to fulfill VOA's above-

discussed statutory missions. An approximate breakdown of VOA's fiscal year spending as of August 8, 2025, 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 – \$12.89 million

29. USAGM does not take any of the taxpayer-provided funding it receives for granted, and we are currently taking additional steps to ensure that we are being even more efficient and responsible in the use of taxpayer-provided funding. The purposes for which this funding is being spent, such as salaries and benefits, operational costs, and broadcasting efforts, are consistent with both the purposes for which USAGM requested them and prior practice.

30. For example, USAGM is currently in the process of abandoning its leased space in the excessively large and somewhat dilapidated Cohen Building, which has been in operation for more than a half century without a significant structural, safety-focused, or health-focused upgrade. USAGM is working closely with the General Services Administration (GSA) – which owns the Cohen Building – to, in an organized and methodical way, return our leased Cohen Building space to GSA, locate a more appropriate space for all of USAGM's management and broadcasting operations, and shift USAGM's operations to that more appropriate space.

31. While USAGM plans to abandon the Cohen Building before the end of this calendar year, USAGM will, in the short term, remain in the Cohen Building but reduce its staff footprint

in order to save additional funding. We anticipate reducing our Cohen Building office space within the next few weeks and anticipate saving an as-yet-unspecified amount of funding in the process.

32. As part of this effort to return Cohen Building space and functionality to GSA, USAGM began the process of removing obsolete transmission equipment, including several decommissioned satellite dishes and other associated equipment, from the rooftop of the Cohen Building. It is important to emphasize that the removal of this equipment in no way interferes with, or disrupts, USAGM's current broadcasting operations, as those satellite dishes and associated equipment have not been used for some time. We anticipate completing this long-overdue removal and cleanup process within the next few weeks.

33. Regarding the claim that we are seeking to close USAGM, it is true that the President, who runs the executive branch of the federal government pursuant to Article II of the Constitution of the United States, has expressed strong interest in the public domain in closing USAGM, and as his politically appointed representative to run USAGM, I intend to help him do so within the bounds of current and future federal law. That said, the formal closure or reorganization of USAGM's current personnel and resources under the banner of another federal agency are not possible without further legislative action from Congress. Until such time as Congress deems it appropriate to pass legislation to either close or reform USAGM, USAGM has no present plans to wind down USAGM's operations.

34. USAGM has also informed Congress via the congressional notification of any major changes of its operations, including regarding its presidentially ordered reduction to statutory minimum functionality. This congressional notification was sent to the relevant congressional committees on or about June 3, 2025.

35. USAGM appreciates the court's ongoing interest in our executive mission and efforts, and will, to the best of our abilities, ensure to keep the court posted on any future changes or developments regarding agency structure, personnel changes, major shifts in programming, and major changes in transmission capacity or logistics, and adjustments in funding.

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

Dated: August 13, 2025

Washington, District Columbia


KARI LAKE