

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

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

Plaintiffs,

-against-

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

Defendants.

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

DECLARATION OF GEORGINA YEOMANS

I, Georgina Yeomans, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746,
that the following is true and correct:

1. I am an Associate General Counsel at the American Federation of State, County,
and Municipal Employees, AFL-CIO. I am personally familiar with the facts set forth in this
Declaration and, if called, could testify competently thereto.

2. Attached to this declaration as Exhibit A is a letter from USAGM to AFSCME
Local 1418, purporting to cancel the local's collective bargaining agreement with the agency.

3. Attached to this declaration as Exhibit B is a letter from USAGM to AFGE Local 1812, purporting to cancel the local's collective bargaining agreement with the agency.

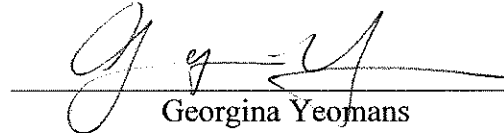
4. Attached to this declaration as Exhibit C is a sample reduction in force notice.

5. Attached to this declaration as Exhibit D is an excerpt from the collective bargaining agreement between AFSCME Local 1418 and USAGM.

6. Attached to this declaration as Exhibit E is an excerpt from the collective bargaining agreement between AFGE Local 1812 and USAGM.

7. Attached to this declaration as Exhibit F is the Executive Order dated August 28, 2025, entitled "Further Exclusions from the Federal Labor-Management Relations Program."

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in Washington, D.C. on September 8, 2025.


Georgina Yeomans