

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

PATSY WIDAKUSWARA, *et al.*,

Plaintiffs,

–v.–

KARI LAKE *et al.*,

Defendants.

Case No. 25-cv-1015-RCL

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

–v.–

KARI LAKE *et al.*,

Defendants.

Case No. 25-cv-00887-RCL

NOTICE

Pursuant to the Court’s Order entered on September 17, 2025, *see* ECF 91, *Abramowitz v. Lake*, No. 25-cv-00887—which ordered that the deposition of Ms. Lake be filed on the public docket—Defendants respectfully submit the deposition of Ms. Lake, which is attached as Exhibit A.

Dated: September 22, 2025

Respectfully submitted,

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/s/ Abigail Stout
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Exhibit A

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A P P E A R A N C E S

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17 ALSO PRESENT:

18 Anna Katherine Drake, USAGM
19 Brian Miller, USAGM (Via Zoom)
20 Ellen Hebert, Video Technician

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(*Exhibits attached to transcript.)

1 P R O C E E D I N G S

2 VIDEO TECHNICIAN: Good morning. We
3 are going on the record at 10:04 a.m. The date
4 today is September 9th, 2025. Please note that
5 the microphones are sensitive and may pick up
6 whispering and private conversations. Please
7 mute your phones at this time. Audio and video
8 recording will continue to take place unless all
9 parties agree to go off the record.

10 This is Media Unit No. 1 of the
11 video-recorded deposition of Kari Lake, taken by
12 counsel for plaintiffs in the matters of Patsy
13 Widakuswara -- apologies -- Widakuswara, et al. v
14 Kari Lake, et al., Case No. 25-cv-1015-RCL, and
15 Michael Abramowitz, et al. v. Kari Lake, et al.,
16 Case No. 25-cv-00887-RCL, filed in the United
17 States District Court for the District of
18 Columbia.

19 The location of the deposition is
20 Zuckerman Spaeder, LLP, at 2100 L Street,
21 Northwest, Washington, D.C.

22 My name is Ellen Hebert, representing

1 Veritext. I am the videographer. The court
2 reporter is Erick Thacker.

3 If there are any objections to
4 proceeding, please state them at the time of your
5 appearance. Counsel and all present, including
6 remotely, will now state their appearances and
7 affiliations for the record beginning with the
8 noticing attorney.

9 MS. GREENBERGER: Debbie Greenberger,
10 Emery Celli Brinckerhoff Abady Ward & Maazel for
11 the plaintiffs.

12 MR. BLUMIN: Matthew Blumin, American
13 Federation of State, County and Municipal
14 Employees, AFL-CIO, for plaintiffs.

15 MS. YEOMANS: Georgina Yeomans,
16 American Federation of Municipal -- State, County
17 and Municipal Employees, AFL-CIO, for the
18 plaintiffs as well.

19 MR. SCHULTZ: Bill Schultz, Zuckerman
20 Spaeder, for the Abramowitz plaintiffs.

21 MS. DOTZEL: Peggy Dotzel, Zuckerman
22 Spaeder, for the Abramowitz plaintiffs.

1 MR. BEATON: Brian Beaton, Zuckerman
2 Spaeder, for the Abramowitz plaintiffs.

3 MR. SEIDE: David Seide, Government
4 Accountability Project, for the Widakuswara
5 individual plaintiffs.

6 MS. LIAO: Cynthia Liao, Democracy
7 Forward Foundation, for the plaintiffs and
8 Widakuswara.

9 MR. KHOJASTEH: Sarmad Khojasteh for
10 the United States Department of Justice for
11 defendants.

12 MS. STOUT: Abigail Stout, also for
13 defendants.

14 MS. DRAKE: Anna Katherine Drake, U.S.
15 Agency for Global Media.

16 VIDEO TECHNICIAN: Will those attending
17 remotely please identify themselves?

18 MR. CELLI: Hi, this is Andy Celli from
19 Emery Celli for the plaintiffs.

20 MR. BOURLAND: Nick Bourland, also from
21 Emery Celli, for the Widakuswara plaintiffs.

22 MR. MILLER: This is Brian Miller with

1 USAGM.

2 VIDEO TECHNICIAN: Thank you. The
3 court reporter will now please swear in the
4 witness, and then counsel may proceed.

5 WHEREUPON,

6 KARI LAKE
7 called as a witness, and having been first duly
8 sworn, was examined and testified as follows:

9 EXAMINATION BY COUNSEL FOR PLAINTIFFS
10 BY MS. GREENBERGER

11 Q Good morning, Ms. Lake. Have you been
12 deposed before?

13 A No.

14 Q Okay. So let me go over some basic
15 ground rules. Okay. If -- while there's a
16 videographer here, the important thing is to get
17 your testimony on the transcript, so please
18 answer yes or no. Don't just shake your head or
19 nod. Okay? Just so we can --

20 A Okay.

21 Q -- have a clean record. And for that
22 same reason, I'd ask that you let me finish my

1 question before answering, even if, in normal
2 parlance, you know where I'm going and you are
3 prepared to answer.

4 Is that okay?

5 A Yeah.

6 Q Great. If I -- if you need to take a
7 break at any time, you can do so, but I would ask
8 that you answer any question that's pending
9 before you take a break.

10 A Okay.

11 Q You may hear your -- you're being
12 represented by counsel today, correct?

13 A Yes.

14 Q And you may hear your counsel
15 objecting. Unless your counsel specifically
16 directs you not to answer, the objection is
17 simply for the record, and you should answer the
18 question. Okay?

19 If you don't understand any of my
20 questions, please let me know. If you answer my
21 question, I'll assume that you understood it. Is
22 that fair?

1 A Yes.

2 Q Okay. And you understand that you're
3 here today for a deposition in Widakuswara versus
4 Lake and Abramowitz versus Lake?

5 A Uh-huh. Yes.

6 Q And your deposition was ordered by the
7 Court?

8 A Yes.

9 Q And what do you understand those
10 lawsuits to be about?

11 MR. KHOJASTEH: Object to form.

12 And I'm going to instruct the witness
13 not to answer to the extent that doing so would
14 reveal attorney-client communications. Of
15 course, you can give your generalized knowledge
16 of the lawsuits independent from anything your
17 lawyers have told you about the cases.

18 THE WITNESS: These lawsuits are
19 employees, a couple of employees from the agency,
20 from VOA, an outlet at the agency, who are suing,
21 I'm guessing to get their jobs back.

22

1 BY MS. GREENBERGER

2 Q And what do you understand you're here
3 today to testify about?

4 A What do I understand what?

5 Q You're here today to testify about.

6 MS. GREENBERGER: And I assume you have
7 the same objection.

8 MR. KHOJASTEH: Same objection.

9 MS. GREENBERGER: Same instruction.

10 MR. KHOJASTEH: To the extent that --
11 to the extent that -- you can answer the question
12 to the extent that doing so does not reveal
13 attorney-client communications.

14 THE WITNESS: I think we're here to
15 answer some of the questions, some of the same
16 questions that perhaps have been asked already,
17 and maybe to give more information about the
18 questions that have already been asked.

19 BY MS. GREENBERGER

20 Q You mean already been asked by the
21 Court?

22 A Yes.

1 Q Let me start by just asking generally
2 about your professional background. I don't
3 think we need to spend a lot of time on this.

4 Before you joined USAGM, you were a TV
5 news anchor in Phoenix for a long time?

6 A I was a broadcast journalist and news
7 anchor.

8 Q In Phoenix?

9 A In Phoenix and other places --

10 Q Okay.

11 A -- for 30 years.

12 Q For 30 years. And you ran for governor
13 of Arizona in 2022; is that correct?

14 A Yes.

15 Q And what was the result of that
16 election?

17 A Well, I think the results were
18 questionable, but the result is that I'm sitting
19 here running U.S. Agency for Global Media.

20 Q And then you ran for senator for the
21 Arizona seat in 2024?

22 A Uh-huh. Yes.

1 Q And what was the result of that
2 election?

3 A Well, as I said, I'm sitting here at
4 U.S. Agency for Global Media.

5 Q But that didn't actually answer my
6 question. What was the result of that election?

7 MR. KHOJASTEH: Object to form. Asked
8 and answered.

9 MS. GREENBERGER: She did not answer
10 the question.

11 MR. KHOJASTEH: Object to form. Asked
12 and answered.

13 BY MS. GREENBERGER

14 Q Okay. You can answer the question.

15 A The result of the election is that I'm
16 sitting here in Washington, D.C. working for the
17 Trump Administration.

18 Q So elections --

19 A I'm wondering what your question is.
20 What do you mean, the result of the election?

21 Q Let me ask it another way. Did you win
22 or lose the -- your race for Senate in 2024?

1 A The -- the Senate race was confirmed
2 for Ruben Gallego.

3 Q Why did --

4 A It was certified. Pardon me.
5 Certified.

6 Q Why did you want to work in the new
7 administration at USAGM?

8 A Because I believe in the America First
9 agenda of President Donald J. Trump.

10 Q And specifically as to USAGM, what do
11 you hope to accomplish in your role?

12 A Can you expound on that?

13 Q I'll ask it -- I'll come back to that.

14 So, during the course of this
15 litigation, you filed two sworn declarations with
16 the Court so far?

17 A Yes.

18 Q Okay. So let me hand you those. One
19 was on July 18th and another on August 13th?

20 A I'm assuming, yeah. I don't have the
21 exact date.

22 MS. GREENBERGER: Okay. So I will hand

1 you -- Exhibit 1 is your August 13th declaration.

2 (Deposition Exhibit Number 1 was
3 marked for identification.)

4 THE WITNESS: Okay.

5 MS. GREENBERGER: And I will hand you
6 Exhibit 2. These have been premarked.

7 THE WITNESS: You know what? I forgot
8 my reading glasses. Is there a way someone could
9 grab those for me?

10 MS. GREENBERGER: Sure. Why don't we
11 go off the -- well, I don't know. Is there
12 somebody who --

13 MR. KHOJASTEH: We can go off the
14 record for a second if you want to just run out
15 and get it.

16 THE WITNESS: I'm sorry, guys.

17 MS. GREENBERGER: You know what?

18 THE WITNESS: They're in my bag. Yeah.

19 MR. KHOJASTEH: We can keep going, and
20 I won't ask you questions that you have to look
21 down while she's getting --

22 THE WITNESS: Well, I would like to

1 have them.

2 MS. GREENBERGER: No, no, I mean, she
3 should get them.

4 THE WITNESS: Okay. Can you just
5 check? They're in a black lens holder.

6 BY MS. GREENBERGER

7 Q And I know you can't look at them till
8 you get your glasses --

9 A I mean, I can a little bit.

10 Q It's okay. But just -- those
11 declarations, you understand you signed both of
12 them?

13 A Yes.

14 Q And I'll give you the second one. It's
15 Exhibit 2. This is your --

16 A This is July?

17 Q -- July 18th declaration.

18 A Okay.

19 (Deposition Exhibit Number 2 was
20 marked for identification.)

21 BY MS. GREENBERGER

22 Q And when you signed them, you

1 understood that they were under penalty of
2 perjury?

3 A Yes.

4 Q And you understand that they needed to
5 be truthful and accurate?

6 A Yes.

7 Q And do you believe that they are both
8 truthful and accurate?

9 A To the best of my knowledge and
10 ability, yes.

11 Q Okay.

12 THE WITNESS: Oh, you're so sweet.
13 Excuse me, everyone. Thank you.

14 BY MS. GREENBERGER

15 Q Who wrote these declarations?

16 A I worked with my team to put the
17 information together in these declarations.

18 Q And so let's start at the July 18th
19 declaration. Who's the team that you worked with
20 to prepare that declaration?

21 A Just a variety. I mean, if there were
22 questions about number of staffing, I'd work with

1 people in HR to make sure that we had the right
2 staffing. You'll see this is changing, so I
3 wanted to make sure we had the accurate
4 information as of the date that it was filed.

5 Q And so who in HR did you work with for
6 the July 18th declaration?

7 A I don't recall.

8 Q Other than somebody in H- -- and same
9 question for the August 13th declaration. Did
10 you work with someone in HR?

11 A I worked with my team, and if we had
12 questions about numbers of staffing, numbers of
13 individuals, then that would be -- involve a
14 question to HR, and somebody on my team would
15 reach out to HR to get accurate numbers.

16 Q Do you recall the names of any specific
17 people on your team that you worked with for
18 either declaration?

19 A A variety of people. I worked with
20 Frank Wuco, John Zadrozny and -- and my legal
21 team.

22 Q I won't ask any questions about your

1 legal team.

2 But other than Wuco and Zadrozny, do
3 you recall any other people on your team that you
4 worked with for either declaration?

5 A Well, other people were most likely
6 contacted, but may have been contacted by other
7 people who were helping me put this together.

8 Q Right. And I'm only asking today for
9 this question and generally about your personal
10 knowledge. Okay?

11 Did you work with Mr. Wuco for both
12 declarations?

13 A I think he worked a lot on the first
14 one.

15 Q And how about Mr. Zadrozny?

16 A I think they both worked a little bit
17 in helping me put these together.

18 Q For both declarations?

19 A Yeah.

20 Q Okay. And did you review them before
21 you signed and filed them?

22 A Yes.

1 Q Okay. So let's -- why don't you put
2 Exhibit 1 in front of you. You can put Exhibit 2
3 at the side right now.

4 A So the later one?

5 Q The later one, yeah.

6 MR. KHOJASTEH: We're starting with
7 August 13th?

8 MS. GREENBERGER: Correct.

9 MR. KHOJASTEH: Okay.

10 MS. GREENBERGER: We're going to come
11 back to the other one.

12 MR. KHOJASTEH: Yeah, sure.

13 BY MS. GREENBERGER

14 Q So paragraph 33 states that "as his
15 politically" -- I'll let you get there. I'm
16 sorry.

17 A Yes, please do.

18 Q "As his politically appointed
19 representative to run USAGM, I intend to help him
20 do so within the bounds of current future and
21 federal law."

22 Did you see that?

1 A May I read this real quick?

2 Q Of course.

3 A You're just talking about --

4 Q Just paragraph 33.

5 A -- 33? Okay.

6 Q Is it fair to say that from day 1 at
7 USAGM, your role has been to serve as President
8 Trump politically appointed representative to run
9 USAGM?

10 MR. KHOJASTEH: Object to form. Lacks
11 foundation.

12 BY MS. GREENBERGER

13 Q You can answer.

14 A I mean, I am the first and -- I was the
15 first political appointee for the agency, and so
16 I don't know what that means, if that answers
17 your question.

18 Q Was your role to run the agency when
19 you first joined it?

20 A I came in as a senior advisor.

21 Q As a senior advisor, were you running
22 the agency?

1 A No.

2 Q Okay. We'll come back to that.

3 So, as your political -- as the
4 political appointee, where -- since March 3rd,
5 where is your office?

6 A I have -- I have an office over at
7 USAGM, and I have an office at the State
8 Department.

9 Q And when did you get an office at
10 USAGM?

11 A When I first got there. I mean,
12 there's -- it's a very vast building with a lot
13 of space, but I primarily use the office at the
14 State Department.

15 Q How often do you come into the office
16 at USAGM?

17 A Occasionally.

18 Q If you were to estimate, what would
19 that mean?

20 A I can't even estimate. Some weeks I'm
21 there more than others.

22 Q Paragraph 1 of that exhibit, you state

1 that you've been serving in a role of senior
2 advisor at USAGM since on or around March 3rd,
3 2025; is that correct?

4 A Of which one? Two? Exhibit 2?

5 MR. KHOJASTEH: Exhibit 1.

6 BY MS. GREENBERGER

7 Q Exhibit 1. We're sticking with Exhibit
8 1.

9 A Okay. Yes.

10 Q Now, the President appointed you to
11 that position?

12 A Yes.

13 Q And before President Trump's
14 inauguration, you were announced as the future
15 director of VOA; is that correct?

16 A Correct.

17 Q And, ultimately, you recognized that
18 you would have needed approval from a bipartisan
19 board to become the director?

20 MR. KHOJASTEH: Object to form. Lacks
21 foundation.

22

1 BY MS. GREENBERGER

2 Q You can answer.

3 A Will you repeat the question?

4 Q Sure. Did you -- so I think you
5 already just said that you were -- that Trump had
6 announced you as the future director --

7 A Uh-huh.

8 Q -- correct?

9 A Yes.

10 Q It's -- it's normal. It's just how
11 people talk. Depositions are different.

12 And then, ultimately, when you joined
13 in March, you did not join as director, correct?

14 A Correct.

15 Q And why is that?

16 A It was going to take some time, and I
17 wanted to be sure that I was helping at the
18 agency in any way that I could, helping in the
19 Administration.

20 Q Why was it going to take some time to
21 become director?

22 A I think the backlog and getting

1 confirmations and such.

2 Q And you understood that you -- to
3 become director, you needed approval from a
4 board, correct?

5 MR. KHOJASTEH: Object to form. Lacks
6 foundation.

7 THE WITNESS: That's what I've been
8 told.

9 BY MS. GREENBERGER

10 Q And you made public statements to that
11 effect, correct?

12 A Yes.

13 Q Okay. And, ultimately, the President
14 fired the members of that board, so it lacked a
15 quorum, correct?

16 A You'd have to ask the President that.

17 Q Well, it was -- it happened publicly.
18 Did you see that happen? Are you aware of that?

19 A He publicly fired them?

20 Q We can move on.

21 So, when you became senior advisor of
22 USAGM, were you an advisor to anyone specific?

1 A Senior advisor advising the CEO, acting
2 CEO at the time.

3 Q And who was that?

4 A And -- and, frankly, others in
5 management.

6 Q So you -- so the question was, were you
7 an advisor to anyone specific, and it sounds like
8 the answer is no. You were advisor to multiple
9 people in management?

10 A I was an advisor to acting CEO.

11 Q And who was that at the time?

12 A Victor Morales.

13 Q But you also advised other people in
14 management? You were also the senior advisor to
15 other people in management?

16 A I guess, yeah.

17 Q Okay. How did you learn you would be
18 appointed as senior advisor?

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation.

21 THE WITNESS: What do you mean, how did
22 I learn?

1 BY MS. GREENBERGER

2 Q Well, did you appoint yourself as
3 senior advisor to -- to --

4 A No.

5 MR. KHOJASTEH: Well, object to form.
6 That's -- we don't need the -- she of course
7 knows that she didn't appoint herself. Just ask
8 the question -- a better question.

9 THE WITNESS: What specifically are you
10 --

11 MR. KHOJASTEH: Just ask her --

12 MS. GREENBERGER: I'd appreciate --

13 MR. KHOJASTEH: -- a question.

14 MS. GREENBERGER: -- no speaking
15 objections. If you have an objection, you can --

16 MR. KHOJASTEH: Just be --

17 MS. GREENBERGER: -- note it.

18 MR. KHOJASTEH: -- polite.

19 MS. GREENBERGER: I've been being
20 polite.

21 MR. KHOJASTEH: I know. That's why I
22 objected this time, because that was the one --

1 first time you haven't been polite. Fair?

2 BY MS. GREENBERGER

3 Q So the question was: How did you learn
4 that you would be appointed to senior advisor?

5 A I got word from The White House.

6 Q And when did you get word from The
7 White House?

8 A I think it was maybe -- I'm guessing.
9 Maybe February, January, sometime in January or
10 February. I mean, that is truly a guess. I
11 don't -- I don't remember.

12 Q And what documents reflect your
13 appointment as senior advisor?

14 MR. KHOJASTEH: Object to form.

15 THE WITNESS: I don't remember if it
16 was an e-mail or how they officially told HR
17 that.

18 BY MS. GREENBERGER

19 Q Are there any documents that you know
20 of that reflect that appointment?

21 A I'm sure there's something, because I
22 didn't just walk in.

1 Q But you don't know what the document
2 is?

3 A I -- at this moment, I don't recall
4 what the document is. However, PPO makes those
5 announcements to an agency.

6 Q Now, as senior advisor, who did you
7 report to?

8 A The President. The White --

9 Q Directly?

10 A -- House. Pardon?

11 Q Directly?

12 A The White House, the Administration.

13 Q Was there anyone you reported to
14 between you and the President?

15 A I mean, I guess PPO.

16 Q And what is PPO?

17 A Presidential Personnel Office.

18 Q Are there any documents that reflect
19 who you reported to?

20 MR. KHOJASTEH: Object to form.

21 THE WITNESS: I think reporting to -- I
22 guess I need you to define that, because I'm

1 thinking who is my contact, and that's PPO. But
2 reporting to as a part of -- I guess what does
3 reporting to mean in your --

4 BY MS. GREENBERGER

5 Q Who -- let me ask it a different way.
6 Is it fair to say the President gave you
7 direction?

8 MR. KHOJASTEH: Object --

9 BY MS. GREENBERGER

10 Q -- on how to do your job?

11 MR. KHOJASTEH: Object to form.

12 You can answer the question yes or no.
13 However, any substance as to the communications
14 between you and the President, we're going to
15 invoke executive privilege. But you can answer
16 the question yes or no as to whether you
17 communicated with the President regarding the --
18 your role at the agency.

19 THE WITNESS: Yeah. Could you repeat
20 the question, then?

21 BY MS. GREENBERGER

22 Q Sure. Did the President direct your

1 duties as -- in your role at USAGM as senior
2 advisor?

3 A What do you mean by direct my duties?

4 Q Did the President direct you on what to
5 do?

6 A No.

7 Q Did you report to the President as to
8 what you would be doing; yes or no?

9 I'm not asking for the substance at the
10 moment.

11 A I think no. I mean, no.

12 Q Was there anybody that you were
13 reporting to that was your boss? Let's ask it
14 that way.

15 A Well, I consider the President of the
16 United States my boss.

17 Q And do you consider anyone else other
18 than the President your boss?

19 A No.

20 Q Okay.

21 A God.

22 Q Fair enough. Does USAGM have an order

1 of succession?

2 MR. KHOJASTEH: Object to form.

3 THE WITNESS: I'm not sure. I think
4 there may be one that might be outdated. I'm not
5 sure.

6 BY MS. GREENBERGER

7 Q Do you know if the order of succession
8 has the senior advisor in the order somewhere?

9 A I'm not sure.

10 Q So I'm going to ask some questions to
11 understand how you fit as senior advisor in the
12 organizational chart at USAGM.

13 So, first of all, was there an
14 organizational chart that included senior
15 advisor?

16 A I don't know.

17 Q Have you ever seen an organizational
18 chart of the agency?

19 A Yeah.

20 Q And is senior advisor on that
21 organizational chart?

22 A I don't know.

1 Q When did you see that organizational
2 chart?

3 A I think I've seen it, you know,
4 throughout my time there, maybe on website or --

5 Q Okay. And who reported to you as
6 senior advisor?

7 MR. KHOJASTEH: Object to form. Do you
8 want to narrow a time frame?

9 MS. GREENBERGER: Sure.

10 MR. KHOJASTEH: Just -- I'm just
11 helping you. I'm just --

12 BY MS. GREENBERGER

13 Q We can start with March 2025 --

14 A Okay.

15 Q -- if that is helpful.

16 A Yeah.

17 Q So you started as senior advisor --

18 A Right.

19 Q -- on March -- on March 3rd --

20 A Right.

21 Q -- correct?

22 A Uh-huh.

1 Q Yes --

2 A Yes.

3 Q -- or no?

4 And who reported to you in March 2025
5 as senior advisor?

6 A Well, I advise -- my -- my role was to
7 advise the CEO, the acting CEO. So he would be
8 the boss.

9 Q Who was the acting CEO -- you just
10 referred to the acting CEO. So who are you
11 referring to?

12 A I think I've already answered that.

13 Q Okay. Well, answer it again.

14 A Victor Morales.

15 Q Okay. Now, you announced Victor
16 Morales joining the agency; is that correct? I'm
17 sorry, not joining the agency. Becoming acting
18 CEO, correct?

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation.

21 THE WITNESS: I -- I don't recall. I
22 mean, I may have. It may have come out of HR.

1 BY MS. GREENBERGER

2 Q Does the role of senior advisor have a
3 position description?

4 A Yes.

5 Q And that's a document describing your
6 duties and responsibilities as senior advisor?

7 A Yes.

8 Q And who prepared that document?

9 A I'm not sure if it was PPO or another
10 agency, OPM.

11 Q And what were the job duties that you
12 understood senior advisor -- what were the job
13 duties of senior advisor as you understood them?

14 MR. KHOJASTEH: I'm going to object to
15 form. Just to the extent that you can answer the
16 question without disclosing any communications
17 you've had with counsel regarding this issue, you
18 can. If you have independent thoughts separate
19 and apart from what you've talked to counsel
20 about on these issues, you can, of course,
21 talk -- answer the question.

22 THE WITNESS: You know, there's a lot

1 of different descriptions that -- you know,
2 duties, so I can't remember all of them.

3 BY MS. GREENBERGER

4 Q Okay. Well, just tell me what you do
5 remember. What are the job duties you can recall
6 as senior advisor?

7 A To help make sure that the President's
8 agenda is being followed and advise the team.
9 How's that?

10 Q Anything else?

11 A No.

12 Q So some might say those are goals, not
13 duties or obligations. Is there any obligations
14 or specific duties that, as senior advisor, you
15 were required to perform?

16 MR. KHOJASTEH: Object to form. Asked
17 and answered.

18 BY MS. GREENBERGER

19 Q You can answer.

20 A Without having the PD in front of me,
21 I'd rather not speculate.

22 Q So you can't recall any specific

1 duties; is that your testimony?

2 A Well, I'm under oath, and I'd rather
3 not speculate.

4 Q I don't want you to speculate, so we're
5 on the same page. So the question I just had is
6 what you recall, and if your answer is you don't
7 recall any, that's your answer.

8 MR. KHOJASTEH: Object to form.

9 BY MS. GREENBERGER

10 Q I'm just trying to understand your
11 answer.

12 MR. KHOJASTEH: Object to form.

13 Mischaracterizes the testimony. Also asked and
14 answered.

15 THE WITNESS: I think I answered that.

16 BY MS. GREENBERGER

17 Q Do you recall any job duties other than
18 making sure the agenda of the President is
19 followed and advising the team?

20 A And advising the acting CEO.

21 VIDEO TECHNICIAN: Apologies, Counsel.

22 Could I ask you to brush your hair back a bit?

1 It's rubbing against the mic.

2 And, Ms. Lake, could I ask you to move
3 to your left a little bit?

4 THE WITNESS: Move to my left?

5 VIDEO TECHNICIAN: Yes.

6 THE WITNESS: This way?

7 VIDEO TECHNICIAN: Yes. Thank you very
8 much.

9 BY MS. GREENBERGER

10 Q Now, did the title of senior advisor
11 exist at the agency before you joined the agency?

12 A I don't know. I think it's a common --
13 it's a common job in an Administration.

14 Q Did you replace someone as senior
15 advisor --

16 A I don't know.

17 Q -- at USAGM?

18 A I don't know if they had somebody in
19 that position.

20 Q Did anyone hold the position of senior
21 advisor at USAGM at the same time as you did?

22 A I think we brought in John Zadrozny as

1 senior advisor.

2 Q And when did you bring in John
3 Zadrozny?

4 A That I don't know. I don't have an
5 exact date.

6 Q Can you estimate?

7 A I want to say -- I mean, this is a
8 guess. I might be completely wrong. May or
9 June.

10 Q And when you say we brought in John --
11 John Zadrozny, who's the we?

12 A The White House. And Mora Namdar held
13 it before him.

14 Q Mora Namdar held what? I'm sorry.

15 A Senior advisor.

16 Q And when did Mora Namdar join the
17 agency as --

18 A I believe it was --

19 Q -- senior advisor?

20 A -- sometime in March.

21 Q And then did Mora Namdar leave the
22 agency or --

1 A Yes.

2 Q When did she leave the agency?

3 A I don't have the dates in front of me.

4 I -- well, if you want me to guess --

5 Q I don't want you to guess.

6 A Okay.

7 Q Thank you, though.

8 A She left before John started.

9 Q That's helpful. Thank you.

10 And so you and Ms. Namdar were senior
11 advisors at the same time?

12 A I believe that was her job title.

13 Q And was there a hierarchy between you
14 and Ms. Namdar?

15 MR. KHOJASTEH: Object to form. Lacks
16 foundation.

17 THE WITNESS: I -- I think because I
18 maybe had a different PD than she did, possibly.
19 I don't know.

20 BY MS. GREENBERGER

21 Q Can you explain why you -- what you
22 mean by that?

1 A I don't know if our -- if our position
2 descriptions were exactly the same. I would have
3 to look at both of them next to each other and
4 see.

5 Q Do you think you had a similar role in
6 terms of one being more or less powerful within
7 the agency?

8 A You know what? I actually don't even
9 know if she had the same job description, so I
10 don't want to answer that unless I know for sure.

11 Right now we're assuming that we had
12 the exact same job description. I don't recall
13 what her job description was, if it was senior
14 advisor. I -- that was a guess, and I want to
15 make sure that we did have the same job
16 description before I continue answering questions
17 on that.

18 Q John Zadrozny, was he senior advisor at
19 the same time that you were senior advisor?

20 A Yeah. I think we did overlap.

21 Q And between the two of you, who had
22 more power at the agency?

1 MR. KHOJASTEH: Object to form. Lacks
2 foundation.

3 THE WITNESS: I like to think I am kind
4 of a team player, and I lean on a lot of people.

5 BY MS. GREENBERGER

6 Q Do you ever have disputes within the
7 agency?

8 MR. KHOJASTEH: Object to form. Lacks
9 foundation.

10 THE WITNESS: Not really. I mean,
11 disputes, what do you -- define dispute.

12 BY MS. GREENBERGER

13 Q Let me ask it a different way.

14 A A fight?

15 Q I'm not envisioning fisticuffs, if
16 that's what you mean. Let me ask it a different
17 way.

18 Between you and John, is your testimony
19 that you were at the same level within the
20 hierarchy at USAGM?

21 MR. KHOJASTEH: Object to form.

22 THE WITNESS: I think in --

1 MR. KHOJASTEH: Lacks foundation.

2 THE WITNESS: I think in the federal
3 government, we were both SESs. So that's kind of
4 an equal level. Mora came in as GS-15 and then
5 moved to SES.

6 BY MS. GREENBERGER

7 Q How did you divide responsibilities
8 between you and John Zadrozny when you were both
9 senior advisors?

10 MR. KHOJASTEH: Object to form. Lacks
11 foundation.

12 THE WITNESS: How did -- pardon me?
13 How did we?

14 BY MS. GREENBERGER

15 Q So there was a time that you and John
16 Zadrozny were both senior advisors, correct?

17 A Uh-huh. Yes.

18 Q And so, speaking of that time period,
19 what were the responsibilities that fell into
20 your camp and the responsibilities that fell into
21 Mr. Zadrozny's camp?

22 MR. KHOJASTEH: Object to form. Lacks

1 foundation.

2 THE WITNESS: We divide the work.
3 There's a lot of work to be done, and we divide
4 it.

5 BY MS. GREENBERGER

6 Q And how did you divide it?

7 A It just depends on what we had to
8 accomplish each day. And sometimes I would ask
9 John to take on some things. He's got a
10 background and had worked with legislative
11 affairs before, leaning on his strengths and some
12 things I -- I did.

13 Q So you would decide which tasks would
14 stay on your plate and which would go to John's
15 plate. Is that fair to say?

16 A Yeah. We both would.

17 Q Is Brian Miller also a senior advisor?
18 I'm sorry. Before I get to that, is
19 John Zadrozny still a senior advisor today?

20 A Yes.

21 Q Okay. And is Brian Miller also a
22 senior advisor at the agency?

1 A I think Brian Miller just got a new
2 description, senior -- I'm trying to remember --
3 counsel. Senior counsel.

4 Q Was he senior advisor at some point?

5 A Yes.

6 Q And when -- from when to when was Brian
7 Miller senior counsel?

8 A When he started.

9 Q I'm sorry. Let me repeat the question.
10 I'll take that back.

11 From when to when was Brian Miller
12 senior advisor?

13 MR. KHOJASTEH: Object to form. Lacks
14 foundation.

15 THE WITNESS: Oh, when he started, and
16 I don't recall the date, you know, roughly, maybe
17 sometime in July or August until recently.

18 BY MS. GREENBERGER

19 Q When you say recently, the defendants
20 filed a notice on August 28th saying that
21 Mr. Miller was senior advisor.

22 A Yes.

1 Q So this is something that is --

2 A This is something probably in the last
3 few days.

4 Q And why did Mr. Miller stop being
5 senior advisor in the last few days?

6 A I wanted him to be on our general
7 counsel team. That's where I wanted him to be.

8 Q Now, when Mr. Zadrozny was appointed by
9 the White House to be senior advisor, was there
10 documentation to that effect?

11 MR. KHOJASTEH: Object to form. Lacks
12 foundation.

13 THE WITNESS: I think the HR team put
14 together documentation along with PPO, The White
15 House.

16 BY MS. GREENBERGER

17 Q Same question for Mr. Miller.

18 Well, first of all, was he also
19 appointed by the White House as senior advisor?

20 A Yes.

21 Q And same question about documentation.
22 Is there, you believe, documentation from the HR

1 team and PPO about Mr. Miller's appointment as
2 senior advisor?

3 A We don't let people just roam off the
4 street. We have to go through the proper
5 channels, yes.

6 Q Mr. Wuco, has he ever been senior
7 advisor?

8 A I think we're just making him senior
9 advisor right now.

10 Q And when do you -- is that effective
11 already or effective in the past?

12 A I have been caught up in this, so I
13 haven't checked.

14 Q But sometime either -- just this week,
15 he's going to be senior advisor?

16 A This week or last week, yeah.

17 Q Okay. And what was his title before
18 senior advisor?

19 A He was a part-time -- I want to say --
20 is it SGE? Is that the appropriate term? Kind
21 of a part-time consultant.

22 Q And when did Mr. Wuco start being a

1 part-time consultant for the agency?

2 MR. KHOJASTEH: Object to form.

3 THE WITNESS: I don't --

4 MR. KHOJASTEH: Lacks foundation.

5 THE WITNESS: -- recall. I don't
6 recall.

7 MS. GREENBERGER: And --

8 THE WITNESS: Late spring, early
9 summer.

10 BY MS. GREENBERGER

11 Q And who made him the part-time
12 consultant for the agency?

13 A PPO, The White House.

14 Q The White House appointed him to be a
15 part-time consultant for the agency in the late
16 spring; is that correct?

17 A I would need to go look and get the
18 exact date for you, but I -- that's my best
19 guess.

20 Q Right. So, going back to the
21 8/13 declaration, which I think is Exhibit 1, in
22 paragraph 1 -- you don't even really need to look

1 because -- it says, I subsequently assumed the
2 role of Deputy CEO.

3 Is that correct?

4 A Deputy Chief Executive Officer, yeah.

5 Q And when did you become deputy CEO?

6 A I believe that was the beginning of
7 July.

8 Q And how did you become deputy CEO?

9 A The White House appointed me.

10 Q And how were you notified that The
11 White House was appointing you as deputy CEO?

12 A By e-mail.

13 Q And are you aware of any documentation
14 other than that e-mail about your appointment as
15 deputy CEO?

16 A I mean, the same protocol that happens
17 when PPO brings somebody in. It starts with an
18 e-mail and then HR documentation.

19 Q And did you talk to anyone in the Trump
20 Administration about your appointment to deputy
21 CEO?

22 MR. KHOJASTEH: Object to form. It's a

1 yes or no question. You can answer it. However,
2 any substance regarding your communications with
3 the President, we're going to be claiming
4 executive privilege over the substance, but you
5 can answer the question yes or no.

6 THE WITNESS: Yes.

7 BY MS. GREENBERGER

8 Q And other than the President -- well,
9 let me start there. Did you have communications,
10 yes or no, with the President about being
11 appointed deputy CEO?

12 A No.

13 Q Who did you speak to in the
14 Administration about becoming deputy CEO?

15 A PPO.

16 Q PPO are bureaucrats, correct?

17 MR. KHOJASTEH: Objection to form.

18 THE WITNESS: They're appointees by the
19 President.

20 BY MS. GREENBERGER

21 Q Did you speak to Mr. Miller about
22 becoming deputy CEO?

1 A No.

2 Q Did you speak to Secretary Rubio?

3 A No.

4 Q Can you let me know who specifically
5 you spoke to about becoming deputy CEO?

6 MR. KHOJASTEH: Object to form. Asked
7 and answered.

8 THE WITNESS: I don't recall exactly
9 who.

10 BY MS. GREENBERGER

11 Q Was there any sort of hiring or
12 interview process before you became a deputy CEO?

13 A No.

14 Q Did you express interest in the role
15 before you were appointed?

16 A Yes.

17 Q And who did you express interest to?

18 A White House and PPO.

19 Q Who in The White House or PPO?

20 A The head of PPO.

21 Q And who is that?

22 A Sergio Gor.

1 MS. GREENBERGER: And just getting back
2 to the date -- can I have tab 11? And I don't
3 know that I'll need to show this to you, but --

4 MR. BLUMIN: I already distributed it.

5 MS. GREENBERGER: Oh, I'm sorry.

6 That's Exhibit 2. So Exhibit 2 -- hang on one
7 second. Give me a second.

8 BY MS. GREENBERGER

9 Q Exhibit 2, which is filed on July 18th,
10 in that exhibit, paragraph 1, you state that you
11 have been serving in the role of senior advisor,
12 correct?

13 A Correct.

14 Q So does this refresh your recollection
15 that as of July 18th, you were senior advisor and
16 not yet deputy CEO?

17 A I was senior advisor with the delegated
18 authorities of the CEO.

19 Q Okay. So by July 17 -- I'm sorry. By
20 July -- I'll retract that.

21 By July 18th, you were senior advisor
22 and deputy CEO?

1 MR. KHOJASTEH: Object to form.
2 Mischaracterizes testimony.

3 THE WITNESS: Since March, I had
4 delegated authorities of the CEO granted to me by
5 Victor Morales.

6 BY MS. GREENBERGER

7 Q And did you have all the authorities of
8 Mr. Morales starting in March?

9 A I think probably 95 percent of them.

10 Q And what's in the 5 percent that were
11 not delegated to you?

12 A Writing reports that were due and, you
13 know, annual reports, quarterly reports.

14 Q So, as senior advisor starting on
15 March 3rd, you had the authority of the CEO; is
16 that correct?

17 A Not starting March 3rd.

18 MR. KHOJASTEH: Object to -- object to
19 form. Calls for a legal conclusion.

20 To the extent that answering the
21 question discloses any communications you had
22 with counsel, I'm going to instruct you not to

1 answer, but you can otherwise answer if you have
2 an independent understanding of your authority as
3 of that date.

4 THE WITNESS: Can you reask the
5 question? I apologize.

6 BY MS. GREENBERGER

7 Q Sure. So, at some point in March, you
8 were delegated what you have said is 95 percent
9 of the CEO's authority; is that correct?

10 A Roughly 95 percent.

11 Q Roughly.

12 A I didn't do the math.

13 Q What was that point in March when you
14 were delegated roughly 95 percent of the CEO's
15 authority?

16 A I would have -- I would be making a
17 guess. Sometime early March.

18 Q Was this before or after the
19 President's EO concerning USAGM?

20 A It was before.

21 Q Okay. So that EO was March 14th,
22 correct?

1 A Yes.

2 Q Okay. So sometime between March 3rd
3 and March 14th, you were delegated roughly
4 95 percent of the CEO's authority, correct?

5 A Sometime between March 3rd, yes.

6 Q And you continued to have that
7 delegated CEO authority through the entire time
8 that you've served as senior advisor?

9 A Yes.

10 Q Okay. And so just going back to
11 Exhibit 2, which we were looking at, which says
12 that as of July 18th, you were senior advisor,
13 were you also deputy CEO as of July 18?

14 A Which one of these?

15 Q Two.

16 A Two.

17 Q Just the first paragraph.

18 A Okay. The question you're asking -- is
19 what I wrote here true, are you asking?

20 Q Well, I'm asking to try to understand
21 your roles.

22 A Okay.

1 Q So when it says that you were senior
2 advisor as of July 18th, I assume that was true,
3 correct?

4 A Uh-huh.

5 Q Sorry. You have to say yes or no.

6 A Yes.

7 Q And were you also deputy CEO as of
8 July 18th?

9 MR. KHOJASTEH: Object to form. Asked
10 and answered. If you know.

11 THE WITNESS: You know what? I don't
12 recall on this if -- when we filed this if I was.
13 I really need to look at dates. I mean, I would
14 be guessing.

15 BY MS. GREENBERGER

16 Q Okay. And are you still senior advisor
17 today?

18 A I am deputy CEO with -- I'm acting CEO.

19 Q And are you also still senior advisor?

20 A No.

21 Q Okay. So when did you stop being
22 senior advisor?

1 A When I became deputy CEO.

2 Q So this is the part I'm just trying to
3 understand. If you were senior advisor on
4 July 18th, could you have also been deputy CEO at
5 that same time?

6 MR. KHOJASTEH: Object to form. If you
7 know.

8 THE WITNESS: I don't know. I think --
9 I think that when I became deputy CEO, there
10 would be maybe some overlap, but, eventually, I
11 would just be deputy CEO.

12 BY MS. GREENBERGER

13 Q Okay. But there might have been a time
14 of overlap where you were senior advisor and
15 deputy CEO?

16 A When the paperwork was -- yeah.

17 Q All the paperwork was getting
18 accomplished?

19 A Yeah.

20 Q Okay. When you -- when you fully
21 transitioned to deputy CEO, did someone take over
22 your role as senior advisor?

1 A Well, John Zadrozny --

2 MR. KHOJASTEH: Object to form. Lacks
3 foundation. Go ahead.

4 BY MS. GREENBERGER

5 Q You can answer. John Zadrozny?

6 A Yes.

7 Q Okay.

8 A Well, no, I mean, he kept his role.

9 Q Well, did someone take over your role
10 as senior advisor?

11 The work that you had said that you had
12 divided responsibilities with Mr. Zadrozny,
13 did -- did someone take over your portion of
14 those responsibilities?

15 A I think we just get the job done. I
16 don't think there's any you have to take on my
17 responsibilities.

18 Q You had earlier testified that you
19 expressed interest in being deputy CEO to
20 Sergio -- I'm sorry. I missed his last name.

21 A Gor.

22 Q Gor. When did you express interest to

1 Mr. Gor in being deputy CEO?

2 A I think it was sometime early July.

3 Q And what did you tell Mr. Gor about why
4 you wanted to be deputy CEO?

5 A I was concerned that our acting CEO was
6 on a extended vacation and if that if anything
7 were to happen to him, the agency would be left
8 vulnerable.

9 Q And the acting CEO at the time was
10 Mr. Morales?

11 A Yes.

12 Q And when you say an extended vacation,
13 you mean a personal vacation?

14 A Yes.

15 Q And how long was he on a personal
16 vacation?

17 A I think it was a month or longer.

18 Q And where was he?

19 A Somewhere -- maybe the Philippines.

20 Q And what was Mr. Gor's response to your
21 expression of interest in becoming deputy CEO and
22 the concerns you raised about Mr. Morales?

1 A It was a real concern and that they
2 agreed.

3 Q And when you say "they," who are you
4 referring to?

5 A Well, PPO. I think it's not one
6 conversation. It becomes more than one
7 conversation.

8 Q And when did you learn that you would
9 be appointed to deputy CEO?

10 A Sometime in early July.

11 Q Now, as deputy CEO, is it fair to say
12 you're now at the top of the organizational chart
13 at USAGM?

14 MR. KHOJASTEH: Object to form. Lacks
15 foundation.

16 BY MS. GREENBERGER

17 Q Let me ask it a different way.

18 When you became deputy CEO, were you at
19 the top of the USAGM organizational chart?

20 A The acting CEO was above.

21 Q And I think we -- we already discussed
22 how functionally you had all -- I shouldn't say

1 all -- roughly 95 percent --

2 A Yeah.

3 Q -- of the authority of the acting CEO,
4 correct?

5 A Yes.

6 Q Okay. So starting at some time in
7 early March before March 14th, you had roughly
8 95 percent of the authority of the acting CEO all
9 the way up till the time when you became acting
10 CEO, correct?

11 MR. KHOJASTEH: Object to form.
12 Mischaracterizes the testimony. Lacks
13 foundation. Go ahead.

14 THE WITNESS: One more time.

15 BY MS. GREENBERGER

16 Q Fair enough. I just want to make sure
17 the testimony is clear.

18 So from the time that we already
19 determined was between March 3rd and March 14th
20 that you joined the agency, you had 95 percent,
21 roughly, of the CEO's authority until the point
22 when you became yourself acting CEO --

1 MR. KHOJASTEH: Same objection.

2 BY MS. GREENBERGER

3 Q -- correct?

4 A Sounds right, yeah.

5 Q Okay. Was there a position description
6 for deputy CEO?

7 A Yes.

8 Q And what are the duties and
9 responsibilities of deputy CEO?

10 A In some ways similar to CEO. And one
11 of the -- one of the duties is to be acting CEO
12 in the absence of CEO.

13 Q And are extended vacations considered
14 absences in your view?

15 MR. KHOJASTEH: Object to form.

16 THE WITNESS: No. I mean, I guess
17 they're physically absent, yes.

18 BY MS. GREENBERGER

19 Q So you did -- you did have the
20 responsibility of the acting CEO while
21 Mr. Morales was on an extended vacation?

22 A Well, I --

1 MR. KHOJASTEH: Object to form.

2 Mischaracterizes the testimony.

3 BY MS. GREENBERGER

4 Q You can answer.

5 A I had delegated authorities of CEO.

6 Q Did your responsibilities change when
7 you became deputy CEO as compared to when you
8 were senior advisor?

9 A I think the PD is different, yeah.

10 Q But from a day to day, you know, work
11 that you were doing, did your responsibilities
12 change?

13 A You know, maybe a little bit. I'm
14 the -- I had the delegated -- the delegated
15 authority to be the CEO.

16 Q Did you take on that 5 percent of
17 responsibilities that previously had been staying
18 on Mr. Morales's plate?

19 A He --

20 MR. KHOJASTEH: Object to form. Lacks
21 foundation.

22 Can you just in your question frame

1 what time frame you're discussing?

2 MS. GREENBERGER: Sure.

3 BY MS. GREENBERGER

4 Q During the time that you were deputy
5 CEO, did you have the responsibilities of that --
6 of that 5 percent that had not previously been
7 delegated?

8 A Of the delegated CEO? No. Victor did
9 not give me those -- that 5 percent --

10 Q Okay.

11 A -- did not delegate that to me.

12 Q Okay. And we said earlier that that
13 5 percent was report writing?

14 A And other things. I don't recall all
15 of it.

16 Q Do you recall anything besides report
17 writing?

18 A No, I don't recall. There's other
19 things in there, I'm sure, but I don't recall.

20 Q Okay. And when you had the delegated
21 authority from Mr. Morales, that meant that
22 Mr. Morales didn't have to approve your decisions

1 as to that 95 percent, correct?

2 A During what --

3 MR. KHOJASTEH: Object --

4 THE WITNESS: -- time?

5 MR. KHOJASTEH: Go ahead. Object to
6 form. Calls for a legal conclusion. You can --
7 lacks foundation.

8 You can answer.

9 BY MS. GREENBERGER

10 Q So starting that time period in early
11 March, between March 3rd and March 14, while you
12 were senior advisor before you became deputy CEO,
13 did you understand that Mr. Morales had to
14 approve any of your decisions?

15 A Yeah. I mean, I don't know if I -- if
16 he had to approve my decisions, but I consulted
17 with him on a lot of -- everything.

18 Q You consulted with him and you had the
19 authority, correct?

20 MR. KHOJASTEH: Object to form.
21 Mischaracterizes testimony. Lacks foundation.

22

1 BY MS. GREENBERGER

2 Q Go ahead.

3 A I tried to be very open with Victor and
4 make sure that he had his eyes on things.

5 Q Okay. Now, starting in late July, you
6 became acting CEO; is that correct?

7 A Yes.

8 Q And when in late July?

9 A I don't have the exact date.

10 Q Okay. And did you become late July --
11 I'm sorry.

12 Did you become acting CEO when
13 Mr. Morales was put on leave?

14 A I became acting CEO earlier than that.
15 Oh, I'm sorry. I thought you said deputy.

16 Q Oh, it's fine.

17 A Will you repeat that?

18 Q Of course.

19 A When did I become acting CEO?

20 Q Yeah. So my question was: Did you
21 become acting CEO when Mr. Morales was --

22 A I thought you said deputy. Apologies.

1 Q That's fine.

2 A I became deputy CEO while Victor
3 Morales was on vacation.

4 Q So let me go back. So your
5 declaration, paragraph 1 of Exhibit 1, which is
6 the 8/13 declaration, states that you became
7 acting CEO starting in late July, correct?

8 A I assumed the role of acting CEO in
9 late July, yes, that is correct.

10 Q Okay. And that's accurate?

11 A Yes.

12 Q Okay. And did you become acting CEO
13 when Mr. Morales was placed on leave?

14 MR. KHOJASTEH: Just to be -- I think
15 there's a confusion. You're saying placed on
16 leave. You're not referring to his month-long
17 vacation. You're talking about when he's placed
18 on administrative leave, right?

19 MS. GREENBERGER: I'm happy to clarify.

20 MR. KHOJASTEH: That was -- that's why
21 there's a disconnect here.

22 MS. GREENBERGER: Fair enough. I

1 appreciate that.

2 BY MS. GREENBERGER

3 Q So Mr. Morales was placed on
4 administrative leave on roughly July 22nd; is
5 that right?

6 A Paid administrative leave. I don't
7 know the date.

8 Q And did you become acting CEO when
9 Mr. Morales was placed on paid administrative
10 leave?

11 A I was deputy CEO when he was placed on
12 administrative leave.

13 Q And after he was placed on paid
14 administrative leave, did you immediately become
15 acting CEO?

16 A I think when The White House -- no.
17 No, I don't think so, not immediately.

18 Q And were you the one who decided to
19 place Mr. Morales on paid administrative leave in
20 late July?

21 A In consultation with The White House,
22 The White House placed him on administrative

1 leave.

2 Q And he remains on leave?

3 A He's on paid administrative leave, and
4 he's still employed.

5 Q And going back to you becoming acting
6 CEO, did you express any interest to anyone in
7 wanting to be acting CEO?

8 A A deputy CEO?

9 Q Acting CEO.

10 A Acting CEO. An interest in like --
11 describe what you mean in interest. Like --

12 Q Did you tell anyone, I'd like to be
13 acting CEO?

14 A No, I don't think I did.

15 Q Was it automatic going from deputy CEO
16 to acting CEO, or was this -- was that another
17 appointment?

18 MR. KHOJASTEH: Object to form. Asked
19 and answered.

20 THE WITNESS: Answer?

21 MS. GREENBERGER: Please.

22 THE WITNESS: I -- that would be the PD

1 when the acting CEO is not -- or when -- yeah,
2 when the acting CEO or the CEO is not available,
3 the PD says that I would fill in in that
4 position.

5 BY MS. GREENBERGER

6 Q So the PD for deputy CEO says that you
7 will serve as acting CEO when the acting CEO is
8 not available, correct?

9 A Correct.

10 Q Automatically?

11 A That's what the PD says.

12 Q Okay.

13 A If the --

14 Q And then --

15 A -- acting -- if the CEO is not there.

16 Q Great. And then, when Mr. Morales was
17 placed on paid administrative leave, did you
18 automatically become acting CEO pursuant to that
19 PD?

20 MR. KHOJASTEH: Object to form. Asked
21 and answered.

22 THE WITNESS: I had the delegated

1 authorities of the CEO while I was deputy.

2 BY MS. GREENBERGER

3 Q And did you get appointed as acting CEO
4 separate from being appointed as deputy CEO?

5 A This would -- I mean, I've had many
6 conversations with my lawyers on this, and I feel
7 that if I speak on this that it could -- it could
8 be problematic when it comes to the privilege I
9 have with my lawyers.

10 Q I don't want to impose on that
11 privilege. Let me ask it a different way.

12 MR. KHOJASTEH: And I can help you if
13 you want on that. What she's asking is as a
14 fact, not communication with lawyers about what
15 this meant or what that meant.

16 Just as a fact, was there a separate
17 PPO -- you already said there's an e-mail that
18 started with the --

19 THE WITNESS: Oh, I see.

20 MR. KHOJASTEH: -- to make you -- that
21 starts this process. Was there something
22 separate for becoming acting CEO? I believe

1 that's the question she --

2 MS. GREENBERGER: Sure. Was there --

3 MR. KHOJASTEH: -- where she's going
4 with this.

5 BY MS. GREENBERGER

6 Q Was there a separate appointment
7 process through PPO to become acting CEO?

8 A No.

9 Q And so there's no separate
10 documentation about becoming acting CEO --

11 A No.

12 Q -- correct? Correct, meaning yes.

13 THE WITNESS: You said --

14 MR. KHOJASTEH: Can you --

15 THE WITNESS: -- there's no
16 documentation --

17 BY MS. GREENBERGER

18 Q Right. Is there -- let me ask it a
19 different way. Is there --

20 A I see what you're saying.

21 Q It's two negatives. Is there
22 documentation for you becoming acting CEO?

1 A Documentation from?

2 Q PPO.

3 A No.

4 Q Is there documentation from The White
5 House?

6 A No.

7 Q Is there any documentation --

8 MR. KHOJASTEH: Object to form.

9 BY MS. GREENBERGER

10 Q -- that you know of?

11 MR. KHOJASTEH: To the extent you know.

12 BY MS. GREENBERGER

13 Q Is there any documentation that you
14 know of?

15 A From PPO?

16 Q From anyone.

17 A Well, who's anyone?

18 Q Well, it's okay. I'll move on.

19 A My neighbor?

20 Q Have you been formally nominated by the
21 President to serve as the CEO, not the acting
22 CEO?

1 A No.

2 Q Okay. And you've never been confirmed,
3 correct?

4 A No.

5 Q Do you understand that Mr. Bozell was
6 nominated to head USAGM?

7 A Yes.

8 Q And why were you not nominated?

9 MR. KHOJASTEH: Object to form. Calls
10 for speculation.

11 BY MS. GREENBERGER

12 Q If you know.

13 A I asked the President to serve in the
14 role at VOA.

15 Q To serve in what role at VOA? CEO?

16 A To help at VOA.

17 Q Did you make the decision to place
18 Mr. Morales on paid leave?

19 MR. KHOJASTEH: Object to form. Asked
20 and answered.

21 THE WITNESS: I answered that already.

22

1 BY MS. GREENBERGER

2 Q I'm sorry. Can you just repeat it?

3 A With the consultation with PPO, we
4 discussed that I'd lost some confidence in
5 Victor, and PPO made that decision.

6 Q And right now, as acting CEO, you're
7 the highest decision-maker at USAGM right now?

8 A Yes.

9 MR. KHOJASTEH: Object to form. Lacks
10 foundation.

11 BY MS. GREENBERGER

12 Q And who do you report to as acting CEO?
13 Do you report directly to the President?

14 A The President is my boss.

15 Q Other than the President, is there
16 anyone from the executive branch who gives you
17 directives or policies to carry out?

18 A Just the President.

19 Q Okay. Is there anyone you notify or
20 consult with outside of the branch over actions
21 you're going to take?

22 A What do you mean, the branch?

1 Q Outside the agency.

2 A Other agencies have an influence on our
3 agency and other agencies in the government, for
4 example, OPM, OMB, and other agencies.

5 Q Okay. I'll come back to that.

6 Now, as acting CEO, you ordered that
7 Michael Abramowitz, the VOA director, be
8 transferred and fired if he refused the transfer;
9 is that correct?

10 MR. KHOJASTEH: Object to form. Lacks
11 foundation.

12 THE WITNESS: No. Can you repeat the
13 question the way you answered it --

14 MS. GREENBERGER: Sure. Let me ask
15 it --

16 THE WITNESS: -- or the way you --

17 MS. GREENBERGER: -- a different way.

18 THE WITNESS: -- asked it?

19 MR. KHOJASTEH: And, Counsel, if we're
20 about to start another line of questioning, I
21 just want to note that we've been going for an
22 hour, so if -- if it's -- if there's -- I don't

1 want to interrupt your flow, so if it's --

2 MS. GREENBERGER: I think we have five
3 or ten minutes --

4 MR. KHOJASTEH: Sure.

5 MS. GREENBERGER: -- when it will be --

6 MR. KHOJASTEH: Sure.

7 MS. GREENBERGER: -- a good time --

8 MR. KHOJASTEH: Sure.

9 MS. GREENBERGER: -- for a break.

10 BY MS. GREENBERGER

11 Q So you understand that Mr. Abramowitz
12 received on August 1st a notice of proposal to
13 remove, correct?

14 A Can I see that?

15 MS. GREENBERGER: Of course. Can I
16 have tab 24, please? Thank you. The court
17 reporter can mark it, and then you can have it.

18 (Deposition Exhibit Number 7 was
19 marked for identification.)

20 MR. KHOJASTEH: I just want to note
21 that -- is this -- is this properly within the
22 scope of this deposition? Just -- I understand

1 there's -- there's --

2 MS. GREENBERGER: There's not going to
3 be a lot of questioning, and I think that will --

4 MR. KHOJASTEH: Yeah. I just want
5 to -- I'll give you like --

6 MS. GREENBERGER: There's not going to
7 be --

8 MR. KHOJASTEH: -- some leeway, but
9 just --

10 MS. GREENBERGER: -- a lot of
11 questioning.

12 MR. KHOJASTEH: Let's not make this
13 about --

14 THE WITNESS: I need to look this over.

15 MR. KHOJASTEH: -- something that's
16 from another --

17 BY MS. GREENBERGER

18 Q Okay. But let me ask you the question
19 that I'm going to ask --

20 A Okay.

21 Q -- just before you spend a lot of time
22 looking it over.

1 My question is just going to be that on
2 page 5, it lists you -- under "Notice of
3 Opportunity to Respond," it lists you as the
4 deciding official --

5 A Right.

6 Q -- and my question was just going to
7 be -- and then I'll ask it formally once you've
8 had your time -- but whether you were the
9 decision-maker and this was your decision.

10 A That's not the question you just asked
11 previous to this, though --

12 Q No. It's -- I was building up to that.

13 A -- about reassigning. You asked a
14 question previous, which I answered.

15 Q So I'm going to ask the question. Just
16 take the time that you need to look at the
17 document knowing that's the question I'm going to
18 ask, and you let me know when you're ready.

19 MR. KHOJASTEH: Ms. Lake, it's a
20 separate question. You've made it clear that you
21 didn't understand the prior question. She's
22 asking a separate question.

1 THE WITNESS: Okay.

2 MR. KHOJASTEH: So just don't worry
3 about it. You can --

4 MS. GREENBERGER: And just for the
5 record, this is Exhibit 7, because I premarked
6 some other documents.

7 THE WITNESS: What was the paragraph of
8 the page you wanted me to --

9 BY MS. GREENBERGER

10 Q Sure. Page 5. And I'll just show you
11 right here, under "Notice of Opportunity to
12 Respond."

13 Let me know when you're ready.

14 A I'm ready.

15 Q The proposal to remove Mr. Abramowitz
16 from his position as director was a proposal that
17 was your decision, correct?

18 MR. KHOJASTEH: Object to form.
19 Mischaracterizes the document and the testimony.

20 THE WITNESS: The proposal to remove
21 him?

22

1 BY MS. GREENBERGER

2 Q I'm reading the first sentence. It
3 says, "This is a notice I propose your removal
4 from the position of director."

5 A This is --

6 MR. KHOJASTEH: Object to form. You're
7 mischaracterizing. This was written by someone
8 else.

9 THE WITNESS: Yes.

10 MR. KHOJASTEH: Go to the back page.
11 It's from someone else.

12 MS. GREENBERGER: No, I understand
13 that.

14 MR. KHOJASTEH: So the I's are not
15 referring to her, so don't try to trick her.

16 MS. GREENBERGER: I was not trying to
17 trick anyone.

18 MR. KHOJASTEH: Okay.

19 BY MS. GREENBERGER

20 Q Mr. Lake -- Ms. Lake, it says that you
21 are the deciding official on page 5; is that
22 correct?

1 A Correct.

2 MR. KHOJASTEH: Object to form.

3 BY MS. GREENBERGER

4 Q And what were you --

5 MR. KHOJASTEH: Object --

6 BY MS. GREENBERGER

7 Q -- the deciding official --

8 (Reporter clarification.)

9 MS. GREENBERGER: So sorry. Go ahead,
10 please.

11 MR. KHOJASTEH: Object to form.

12 Mischaracterizes the document. Go ahead.

13 BY MS. GREENBERGER

14 Q Okay. What you were the deciding
15 official about?

16 A In the process of reassigning an SES,
17 we followed all of the procedures, and in the
18 process of doing that, this letter is part of
19 that process and must go out, and there must be
20 one person who sends the letter out, but that
21 person cannot be then the decider, the deciding
22 official. It must be two separate people

1 according to the procedures in removing somebody
2 who refuses reassignment. We followed those
3 procedures to a T.

4 Q After -- let me ask it a different way.
5 If Mr. Abramowitz were removed as director, who
6 would have stepped in as acting director of VOA?

7 MR. KHOJASTEH: Object to form. Calls
8 for speculation.

9 THE WITNESS: If -- pardon me? If he
10 was --

11 BY MS. GREENBERGER

12 Q Let me ask it a different way.

13 Was there a succession plan at VOA so
14 that if the director is removed, there is an
15 acting director who steps in automatically?

16 MR. KHOJASTEH: Object to form. Lacks
17 foundation.

18 THE WITNESS: Answer?

19 BY MS. GREENBERGER

20 Q You can answer.

21 A Leili Soltani serves as the director of
22 programming, and the director of programming in

1 the absence of the director of VOA serves as an
2 interim director.

3 Q Thank you. We spoke earlier about how
4 you have an office at the State Department, and
5 that's primarily where you are; is that correct?

6 A Occasionally.

7 Q Okay. And there had been reporting in
8 The Washington Post that you would be detailed to
9 the State Department. So were you, in fact,
10 detailed to the State Department?

11 A Yes.

12 Q And when were you detailed to the State
13 Department?

14 A I don't recall.

15 Q Was it before or after you joined
16 USAGM?

17 A After.

18 Q And was it in the spring?

19 A I'm assuming, yeah.

20 Q And what's your role at the State
21 Department?

22 A I'm a liaison.

1 Q A liaison between who and who?

2 A I guess the State Department and USAGM.

3 Q And are you still the liaison between
4 USAGM and the State Department?

5 A Yes.

6 Q And who decided to make you the liaison
7 between the State Department and USAGM?

8 A Well, I guess it would go through PPO.

9 Q Who informed you that you were going to
10 be the liaison between USAGM and the State
11 Department?

12 A Who informed me that that was going to
13 be the title I had at State Department?

14 Q Yes.

15 A The White House liaison for State, Cate
16 Dillon.

17 Q And what are your duties and
18 responsibilities as the liaison between USAGM and
19 the State Department?

20 A Liaising between USAGM and the State
21 Department.

22 Q On what particular issues?

1 A A variety of issues.

2 Q What are some issues that you have been
3 liaising on?

4 A Making sure that we are being
5 responsible as we run USAGM and making sure that
6 we are following local laws when it comes to our
7 overseas folks who are working there,
8 decommissioning some of our towers and
9 transmission sites, et cetera.

10 MS. GREENBERGER: Okay. I think this
11 is a good time for a break.

12 THE WITNESS: Great.

13 VIDEO TECHNICIAN: This marks the end
14 of Media Unit No. 1. Going off the record, the
15 time is 11:10 a.m.

16 (Recess 11:10 a.m. to 11:31 a.m.)

17 VIDEO TECHNICIAN: This marks the
18 beginning of Media Unit No. 2. Going back on the
19 record, the time is 11:31 a.m.

20 BY MS. GREENBERGER

21 Q Ms. Lake, I just want to follow-up on a
22 couple of questions from --

1 A Okay.

2 Q -- before the break. Was there a
3 deputy CEO before you were appointed deputy CEO?

4 A I don't believe so. I don't know.
5 Maybe in the past there was one.

6 Q How about immediately before?

7 A No.

8 Q And during your time at the agency
9 since March, there has not been a deputy CEO?

10 A Not that I'm aware of.

11 Q Okay. And while you were deputy CEO in
12 July, did you ever seek approval from
13 Mr. Morales?

14 A For what?

15 Q For any actions you took.

16 A While I was deputy CEO, did I seek
17 approval for what?

18 Q Let me -- let me start a different way.
19 Mr. Morales was on vacation in the Philippines,
20 you said?

21 A Correct.

22 Q And from when to when was he on

1 vacation in the Philippines?

2 MR. KHOJASTEH: Object to form. Calls
3 for speculation.

4 THE WITNESS: I don't have his
5 schedule. I think it was sometime in June
6 through July.

7 BY MS. GREENBERGER

8 Q And he was on vacation in the
9 Philippines while you were deputy CEO?

10 A During the time he was on vacation, I
11 became deputy. Reask --

12 Q Sure.

13 A Could you --

14 Q Was --

15 A -- clarify?

16 Q While you were deputy CEO, was he in
17 the Philippines that entire time, to your
18 knowledge?

19 A While I was deputy?

20 Q Yes.

21 A For part of the time.

22 Q And did he return during part of that

1 time?

2 A Did he return --

3 MR. KHOJASTEH: Object to form. Lacks
4 foundation and --

5 MS. GREENBERGER: Let me --

6 MR. KHOJASTEH: -- confusing.

7 MS. GREENBERGER: Let me ask it --

8 THE WITNESS: I don't --

9 MS. GREENBERGER: -- a different way.

10 THE WITNESS: -- get what you're
11 asking.

12 BY MS. GREENBERGER

13 Q Okay. When Mr. Morales was on
14 vacation, were you in communication with him?

15 A Yes.

16 Q And how did you -- excuse me -- how did
17 you communicate with him?

18 A I think through maybe Teams calls and
19 e-mail.

20 Q Okay. And you said that there was a
21 period in July that you were deputy CEO before
22 you became acting CEO?

1 A There was a period in July when I
2 became deputy CEO during the month of July.

3 Q And during the time that you were
4 deputy CEO, before Mr. Morales was placed on paid
5 leave, did you ever seek his approval for any
6 actions?

7 A What -- what actions?

8 Q Do you recall any actions that you
9 sought his approval for?

10 MR. KHOJASTEH: Object to --

11 THE WITNESS: From what date --

12 MR. KHOJASTEH: -- form. Object to
13 form. Lacks foundation.

14 THE WITNESS: I don't -- I mean, give
15 me an example of what you're looking for, because
16 he was on vacation and we had minor
17 communication, maybe. I don't recall everything,
18 but he was still checking in and perhaps, you
19 know, hey, can you take a look at this document,
20 that kind of thing.

21 BY MS. GREENBERGER

22 Q I hear you. I don't want perhaps. I'm

1 just asking if you recall specifically any steps
2 you took as deputy CEO that you checked with him
3 for his approval before you took it.

4 MR. KHOJASTEH: Object to form.
5 Lacks -- lacks foundation. Asked and answered.

6 THE WITNESS: I don't know. I may
7 have. I don't know what you're getting at, so
8 I -- I may have. If you could be more clear,
9 more direct on what you're asking.

10 BY MS. GREENBERGER

11 Q Well, as deputy CEO, you were running
12 the agency; is that right?

13 MR. KHOJASTEH: Object to form.
14 Mischaracterizes testimony. Lacks foundation.

15 THE WITNESS: I think we were sharing
16 the responsibility because Victor had given me
17 delegated authorities, which means that he has
18 the authority as well.

19 BY MS. GREENBERGER

20 Q Was there a documentation -- a document
21 that indicated that Mr. Morales was delegating
22 authority to you?

1 A Yes.

2 Q And what did that document look like?

3 A It looks like a memo.

4 Q Okay. And who wrote the memo?

5 A I believe that may have come from our
6 general counsel, so I wouldn't want to divulge
7 too much of that.

8 Q What was the date of the memo?

9 A Of the memo from back in March, when
10 he --

11 Q Well --

12 A -- first delegated his authorities?

13 Q So it sounds like there were multiple
14 times when he delegated authority to you?

15 A He --

16 MR. KHOJASTEH: Object to form.

17 Mischaracterizes testimony. Lacks foundation.

18 BY MS. GREENBERGER

19 Q Go ahead.

20 A I think we already established that he
21 delegated his authorities to me back in March.

22 Q And you said that there was a document

1 that reflected that, in March, he delegated his
2 authority to you, correct?

3 A Yes.

4 Q And is that document a memo from March
5 from your general counsel?

6 A I believe so. I don't know who drafted
7 it.

8 Q And other than that memo, are you aware
9 of any other documentation reflecting that
10 Mr. Morales delegated authority to you?

11 A Other than the March memo?

12 Q Correct.

13 A There was a July memo.

14 Q And was -- who drafted the July memo?

15 A GC.

16 Q And was the July memo issued at the
17 time that you were senior advisor or deputy
18 CEO --

19 MR. KHOJASTEH: Object to form.

20 BY MS. GREENBERGER

21 Q -- or something else?

22 MR. KHOJASTEH: Object to form. If you

1 know.

2 THE WITNESS: The July memo was
3 delegating the authorities of the CEO to me as
4 deputy CEO.

5 BY MS. GREENBERGER

6 Q And your formal title right now, is
7 that deputy CEO or acting CEO?

8 A Acting CEO.

9 Q I want to show you -- can you pull up
10 tab 3, please -- the President's executive order
11 that was issued on March 14th.

12 I assume you're familiar with the
13 executive order?

14 A Very.

15 Q Did you -- and I'll show it to you in a
16 minute, but did you play in role in drafting that
17 executive order?

18 A No.

19 Q Did you have any conversations with The
20 White House concerning that executive order
21 before it was issued on March 14th?

22 MR. KHOJASTEH: Object to form. Asked

1 and answered.

2 And I will also say, to the extent that
3 answering the question discloses any
4 communications you had with the President, I'm
5 going to -- I'm going to instruct you not to
6 answer, as we're invoking executive privilege.

7 BY MS. GREENBERGER

8 Q You can answer.

9 A He instructed me not to answer.

10 Q Did you have any communications with
11 anyone other than the President about the
12 executive order prior to it being issued?

13 A Prior to? No. I didn't know about
14 this executive order until the 14th, but I had
15 seen that there were a lot of executive orders
16 coming down.

17 MS. GREENBERGER: Did you -- well, let
18 me show you the executive order. So it's Exhibit
19 4, if you don't mind -- it's been premarked.
20 Have you given it to counsel?

21 MS. YEOMANS: Yes.

22 MS. GREENBERGER: Thank you so much.

1 (Deposition Exhibit Number 4 was
2 marked for identification.)

3 MR. KHOJASTEH: This is Exhibit 4?

4 MS. GREENBERGER: Yes.

5 MR. KHOJASTEH: Okay.

6 MR. BLUMIN: Sorry. I just have one
7 copy for the two of you.

8 MR. KHOJASTEH: We can share.

9 BY MS. GREENBERGER

10 Q The EO applies to six agencies besides
11 USAGM, correct?

12 A Let me count. It looks like seven.

13 Q Including USAGM?

14 A Oh, including USAGM. Yeah.

15 Q Okay. And did you tell anyone that
16 USAGM should be included in the executive order
17 other than the President?

18 MR. KHOJASTEH: Object to form.
19 Mischaracterizes testimony. Lacks foundation.
20 And asked and answered. She already testified
21 she didn't speak --

22 MS. GREENBERGER: Asked and answered is

1 the objection. There doesn't have to be more.

2 MR. KHOJASTEH: Okay. I was just
3 trying to help you understand why I was doing it.

4 MS. GREENBERGER: I appreciate that.

5 MR. KHOJASTEH: Yeah.

6 THE WITNESS: I think you were
7 insinuating about me speaking to the President
8 without me answering that.

9 BY MS. GREENBERGER

10 Q I was trying to avoid the privilege
11 objection.

12 A Okay.

13 Q So I'm not asking about your
14 communications with the President. I'm asking
15 about, other than any potential communications
16 with the President, did you tell anyone that
17 USAGM should be included in an executive order
18 to -- to reduce the scope of the federal
19 bureaucracy?

20 MR. KHOJASTEH: Object to form. Lacks
21 foundation. Asked and answered.

22 THE WITNESS: Asked and answered.

1 Answer? Okay. No, I did not have -- I did not
2 tell anybody to add them.

3 BY MS. GREENBERGER

4 Q And I think you said you didn't know
5 about the executive order until the day it was
6 issued, correct?

7 A I heard rumblings that there may be an
8 executive order, but we didn't know if our agency
9 or what agency could be on it.

10 Q And the executive order was issued on
11 March 14th, correct?

12 A Yes.

13 Q And that's when you learned about the
14 order, correct?

15 A Yeah.

16 Q And the very next day, you worked to
17 implement that order, correct?

18 A Yeah.

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation.

21 BY MS. GREENBERGER

22 Q And you submitted written testimony to

1 Congress, correct?

2 A At some point --

3 Q In June?

4 A -- yes. Yes.

5 Q Okay. And in that testimony, you told
6 Congress, "I'm working with speed and precision
7 to execute that order and have already cut the
8 agency workforce by 85 percent."

9 Is that accurate?

10 MR. KHOJASTEH: Object to form. Lacks
11 foundation.

12 THE WITNESS: I think at that point,
13 yes, it was accurate.

14 BY MS. GREENBERGER

15 Q Okay. So let's talk about the actions
16 that you took on March 15th. Okay?

17 A Uh-huh.

18 Q So, on March 15th, you decided to place
19 nearly all USAGM staff on paid administrative
20 leave; is that correct?

21 MR. KHOJASTEH: Object to form. Lacks
22 foundation. Mischaracterizes testimony.

1 THE WITNESS: What was the first part
2 of that again?

3 BY MS. GREENBERGER

4 Q Sure. On March 15th, you decided to
5 place nearly all USAGM staff on paid
6 administrative leave?

7 MR. KHOJASTEH: Object to form. Lacks
8 foundation.

9 THE WITNESS: Yes.

10 BY MS. GREENBERGER

11 Q Okay. And I believe that was over
12 90 percent of the staff. Was that about right?

13 A I -- I don't know.

14 Q That's fine. And on March 15th, you
15 decided to terminate all the personal service
16 contractors, correct?

17 MR. KHOJASTEH: Object to form. Lacks
18 foundation. Mischaracterizes testimony.

19 BY MS. GREENBERGER

20 Q You can answer.

21 A Yes.

22 Q There were about 600. Does that sound

1 right?

2 A Roughly.

3 Q And you tweeted on that day that staff
4 should check their e-mail, correct?

5 A Correct.

6 Q Who did you confer with in making those
7 decisions to place staff on leave and terminate
8 the personal service contractors?

9 MR. KHOJASTEH: I'm going to object to
10 form. I'm also going to instruct you, you can
11 disclose the names of the individuals with whom
12 you spoke to the -- strike that.

13 To the extent that these communications
14 involved lawyers, you can disclose the names of
15 the individuals with whom you spoke, but I'm
16 going to instruct you not to divulge any of the
17 substance of the communications you had with
18 those individuals only to the extent that lawyers
19 were involved in those communications.

20 THE WITNESS: Okay.

21 MR. KHOJASTEH: Do you understand, Ms.
22 Lake?

1 THE WITNESS: I think if lawyers were
2 involved in any part of the communication --

3 MR. KHOJASTEH: You don't -- you don't
4 disclose what was said, but you can disclose who
5 was on those communications, like -- so who
6 participated in the meeting, but not what was
7 said at the meeting. I'm just -- and I'm not
8 trying to --

9 MS. GREENBERGER: I mean --

10 MR. KHOJASTEH: I'm just -- I'm just
11 trying to --

12 MS. GREENBERGER: That's a -- that's a
13 broad view of the privilege, but let me ask it a
14 different way.

15 MR. KHOJASTEH: Well, I mean, we'll
16 drill down on it, but --

17 MS. GREENBERGER: Well, I'm going to
18 start --

19 MR. KHOJASTEH: -- that's a broad --

20 MS. GREENBERGER: -- just by --

21 MR. KHOJASTEH: Yeah.

22 MS. GREENBERGER: -- asking with who

1 before we go to --

2 MR. KHOJASTEH: Sure.

3 MS. GREENBERGER: -- why.

4 MR. KHOJASTEH: Just -- yeah.

5 BY MS. GREENBERGER

6 Q So I think there's no objection on the
7 who. So who did you consult with before deciding
8 on March 15th to place nearly all staff on paid
9 administrative leave and terminate the personal
10 service contractors?

11 A We had some staff that I had been
12 consulting with, hearing that there were agencies
13 that could be put on an executive order, not
14 knowing if our agency would be on there, and
15 trying to prepare to make sure what if, what
16 would we do, how do we handle that.

17 Q So, first, who are the staff you
18 consulted with?

19 A We had some people that we had -- that
20 were detailed over from OPM. Mora, who was
21 senior advisor. And I believe the OPM staffer
22 had done a lot of consulting with a litany of

1 other people who were the senior career leaders.

2 Q Who was the OPM leader?

3 A Tarak Macheka (ph) -- Makecha.

4 Q And so on -- was it on March 14th or on
5 March 15th, when you learned about the EO, you
6 consulted with Tarak and Mora? Is that correct?

7 Am I understanding your testimony?

8 A March 14th, I learned about it at
9 night, so I don't think I -- I may have -- may
10 have sent -- you know, or called them and said,
11 hey, it looks like this came down. And we
12 decided to get busy to work the next day.

13 Q And what did you do the next day?

14 A You just listed what I did the next
15 day.

16 Q In terms of deciding to place people on
17 leave and terminate the personal service
18 contractors, did you discuss that with Tarak and
19 Mora on March 15th, or had you discussed that
20 with Tarak and Mora previously?

21 A In terms of what?

22 Q Placing people on leave and terminating

1 the PSCs.

2 A I can't recall if we discussed it
3 earlier, but in the executive order, it says
4 right here in Section 2(a), "such entities shall
5 reduce the performance of their statutory
6 functions and associated personnel to the minimum
7 presence and function required by law."

8 Q And so, after reading the EO, you
9 understood that you were required to place nearly
10 all staff on leave and terminate the PSCs?

11 MR. KHOJASTEH: Object to form.

12 THE WITNESS: We made the decision to
13 determine what statutory minimum was, and in the
14 process of doing that, we worked with the senior
15 leadership at the agency to come up with what our
16 plan would be. We placed everybody on paid leave
17 and worked with senior leadership, career
18 leadership, and they came up with the plan.

19 BY MS. GREENBERGER

20 Q Okay. So I'll -- I'll come back to the
21 plan because I will have many questions on that.

22 But the decision that you made to

1 determine what the statutory minimum was, that
2 was a decision you made on March 15th that you
3 were going to go through a process to determine
4 the statutory minimum; is that correct?

5 A Yeah.

6 Q Okay.

7 A I think that's accurate.

8 Q And while you were determining the
9 statutory minimum, you placed everyone on -- all
10 staff on -- strike that.

11 While you were determining the
12 statutory minimum, you terminated all contractors
13 and placed all staff on paid leave, correct?

14 A Paid administrative leave.

15 Q So that's correct?

16 A Yes.

17 Q Okay.

18 A So they -- the staff was not fired, was
19 not terminated. They were placed on paid leave.

20 Q And on March 15th, you also directed
21 that VOA cease all programming, correct?

22 MR. KHOJASTEH: Object to form. Lacks

1 foundation.

2 THE WITNESS: I don't remember if that
3 was exactly that date.

4 BY MS. GREENBERGER

5 Q Shortly after March 14th --

6 A Yes.

7 Q -- you directed that VOA cease all
8 programming, correct?

9 A Yes.

10 MR. KHOJASTEH: Same objection.

11 BY MS. GREENBERGER

12 Q Within the same -- on March 15th or
13 within days after?

14 A Correct.

15 Q And within days after March 14th, you
16 ordered that the VOA news services, the foreign
17 news services, should shut down their
18 transmitters?

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation. Vague.

21 THE WITNESS: That sounds about right.
22 I need to look back at all of the -- every step

1 that I took, that we took.

2 BY MS. GREENBERGER

3 Q And you made that decision to shut down
4 the foreign transmitters while the agency was
5 determining the statutory minimum, correct?

6 MR. KHOJASTEH: Object to --

7 THE WITNESS: I --

8 MR. KHOJASTEH: -- form.

9 THE WITNESS: I don't --

10 MR. KHOJASTEH: Same --

11 THE WITNESS: -- recall.

12 MR. KHOJASTEH: Lacks foundation.

13 BY MS. GREENBERGER

14 Q Before directing that VOA cease all
15 programming, did you consider stakeholder
16 interest?

17 A Define what you mean.

18 Q Sure. Did you consider the interest of
19 audiences abroad before cease -- ordering that
20 VOA cease all programming?

21 A I effectuated -- I got busy working to
22 effectuate the President's executive order.

1 Q And as part of effectuating that order,
2 you didn't think you needed or even should
3 consider those stakeholder interests; is that --

4 MR. KHOJASTEH: Object to form.

5 BY MS. GREENBERGER

6 Q -- fair to say?

7 MR. KHOJASTEH: Object to form. I'm
8 going to instruct the witness not to answer to
9 the extent that doing so will disclose agency
10 deliberative process, meaning pre-decisional
11 communications you have regarding decisions made,
12 as well as attorney-client privilege, meaning
13 communications you have with your general counsel
14 or lawyers otherwise concerning the decision.

15 Go for it.

16 THE WITNESS: I'm going to refrain from
17 answering that.

18 MS. GREENBERGER: Let's mark that for a
19 ruling, please.

20 MR. KHOJASTEH: Just so I understand,
21 what's the specific thing we're marking for a
22 ruling?

1 MS. GREENBERGER: Your position is that
2 any consideration she did or didn't give is
3 deliberative process and we can't probe it?

4 MR. KHOJASTEH: Well, let's put that
5 aside. First, to the extent those communications
6 involved lawyers, I'm asserting attorney-client
7 privilege.

8 MS. GREENBERGER: Okay. So let me stop
9 there.

10 BY MS. GREENBERGER

11 Q Did you have any communications with
12 lawyers concerning whether or not before you
13 ceased VOA programming on March 15th you should
14 consider the interests of audiences abroad or
15 other stakeholders?

16 MR. KHOJASTEH: You can answer the
17 question yes or no.

18 THE WITNESS: Me or the team had
19 communication with lawyers, and I don't recall if
20 that was something or if I want to share if that
21 would be something that we would talk about.

22

1 BY MS. GREENBERGER

2 Q So I'm not interested in your
3 communications with lawyers. Okay.

4 My question is: Other than potential
5 communications with lawyers, did you consider the
6 interests of audiences abroad before deciding to
7 have VOA go dark --

8 MR. KHOJASTEH: Object --

9 BY MS. GREENBERGER

10 Q -- on or about March 15th?

11 MR. KHOJASTEH: And you're asking
12 whether Ms. Lake personally did or the career
13 team that she was working with?

14 MS. GREENBERGER: First I'm going to
15 ask about Ms. Lake.

16 MR. KHOJASTEH: Okay. Just to clarify
17 that with the you's right now.

18 THE WITNESS: Yes, I did.

19 BY MS. GREENBERGER

20 Q What did you determine about the import
21 of the impact on audiences abroad?

22 A I determined that I didn't want any of

1 the TV stations to go to what we call snow or
2 like static or go to black and had a graphic made
3 with music that had the VOA charter written on it
4 so that that could play on a loop until we
5 determined what the statutory minimum was so that
6 we could effectuate the President of the United
7 States executive order dated March 14th to reduce
8 this agency to its statutory minimum.

9 Q And when -- from when to when did that
10 graphic with a loop play on the TV?

11 MR. KHOJASTEH: Object to form. Lacks
12 foundation.

13 THE WITNESS: It depends. For the --
14 for the agencies or the outlets that were brought
15 back up and the languages, it stopped once the
16 languages were brought back up.

17 BY MS. GREENBERGER

18 Q And for other outlets --

19 A For example --

20 Q Go ahead.

21 A -- Office of Cuba Broadcasting, we
22 brought that back up right away and, therefore,

1 the graphic ceased.

2 Q Are there outlets where that graphic is
3 up still today?

4 A You know, Frank Wuco would be a better
5 person to answer that question.

6 Q And how about the Persian News Network?
7 When did that come back up?

8 A I don't have the --

9 MR. KHOJASTEH: Object to form.

10 THE WITNESS: I don't have the exact
11 date right now.

12 BY MS. GREENBERGER

13 Q Roughly?

14 A I don't know.

15 Q It went dark for weeks, right?

16 MR. KHOJASTEH: Object to form. She
17 already -- well, strike that. Asked and
18 answered.

19 BY MS. GREENBERGER

20 Q Do you believe it went dark for weeks,
21 or are you not sure?

22 A I'm just not sure.

1 Q How about the VOA website? Did you
2 have any similar graphic with a loop to update
3 the website?

4 MR. KHOJASTEH: Object to form. Lacks
5 foundation.

6 THE WITNESS: No.

7 BY MS. GREENBERGER

8 Q So the VOA website continued to have
9 outdated journalism content, correct, after
10 March 15th?

11 MR. KHOJASTEH: Object to form. Lacks
12 foundation.

13 THE WITNESS: I wouldn't -- I wouldn't
14 describe it that way, but if that's how you want
15 to describe it.

16 BY MS. GREENBERGER

17 Q How would you describe it?

18 A We didn't put new content on.

19 Q Did -- are there any documents
20 reflecting your decision to put a graphic with a
21 loop instead of providing new broadcasting
22 content?

1 A No.

2 MR. KHOJASTEH: Object to form. Lacks
3 foundation.

4 BY MS. GREENBERGER

5 Q Are there any documents concerning your
6 decision to not put new content on the VOA
7 website?

8 MR. KHOJASTEH: Same objection.

9 THE WITNESS: Are there any documents
10 what?

11 BY MS. GREENBERGER

12 Q Reflecting that decision?

13 A To not put new content?

14 Q Yeah.

15 A Where?

16 Q On the VOA website.

17 A I don't believe so.

18 Q Did you liaison with the State
19 Department about the impact of VOA going dark on
20 members of the Foreign Service?

21 MR. KHOJASTEH: Object to form. Lacks
22 foundation. Also vague as to "you."

1 THE WITNESS: Could you be more
2 specific on what you're --

3 MR. KHOJASTEH: And I would note that
4 for the entire series of questions regarding what
5 was done in response to the EO, standing
6 objection that using -- using the term "you" is
7 vague and lacks foundation.

8 Go for it.

9 BY MS. GREENBERGER

10 Q Well, let's go back given your
11 counsel's objection.

12 I had asked about the interests of
13 audience abroad, and you spoke about how you
14 considered that interest by replacing the -- you
15 didn't want snow, and so you replaced it with a
16 graphic, correct?

17 A Yes.

18 Q And how did you believe that served the
19 interest of audience abroad -- audiences abroad?

20 A I think until we determined what the
21 statutory minimum, if -- if they would have tuned
22 in to their VOA station and seen it had just gone

1 to black, they would think that it was gone, but
2 with that graphic and -- and the music and the
3 charter, it would let the audience know that this
4 is still the station where you can tune in to VOA
5 until we would determine what is statutorily
6 mandated, and then we could proceed from there.

7 Q And with the graphic, would that
8 provide to audiences any journalism content?

9 MR. KHOJASTEH: Object to form. Asked
10 and answered.

11 THE WITNESS: I don't -- I don't think
12 so, but, you know, the charter is interesting, so
13 they could read that. They know that the -- they
14 know that the station still is the VOA station.
15 And that's what we did.

16 BY MS. GREENBERGER

17 Q How about others in your agency, to
18 your knowledge? Did they consider the interests
19 of audiences abroad who relied on VOA news that
20 weren't able to get it once you went dark --

21 MR. KHOJASTEH: Object to --
22

1 BY MS. GREENBERGER

2 Q -- once VOA went dark?

3 MR. KHOJASTEH: Object to form. Calls
4 for speculation.

5 THE WITNESS: I can't get into other
6 people's heads, nor do I want to.

7 BY MS. GREENBERGER

8 Q To your knowledge.

9 A I don't know.

10 Q Okay.

11 A I'm not a therapist.

12 Q How about members of the Foreign
13 Service? Did you consider the impact on members
14 of the Foreign Service by having -- of having VOA
15 go dark on March 15th or thereabouts?

16 A I considered a lot of things.

17 Q Are there any documents reflecting that
18 you considered the impact on members of the
19 Foreign Service?

20 MR. KHOJASTEH: Object to form. Vague
21 as to documents. Lacks foundation.

22 THE WITNESS: I don't know if there

1 are. There may be. I don't know.

2 BY MS. GREENBERGER

3 Q To your knowledge.

4 A I don't know. There may be. I don't
5 know.

6 Q As -- as senior advisor, you ordered
7 the cancellation of the lease at 1875
8 Pennsylvania Avenue?

9 A Yes.

10 Q And that --

11 A With -- in consultation with the CEO,
12 acting CEO.

13 MR. KHOJASTEH: Yeah. Same objection
14 as -- on vagueness as to "you."

15 MS. GREENBERGER: I think we premarked
16 13, right?

17 MR. BLUMIN: Correct. That's Exhibit
18 6.

19 MS. GREENBERGER: I want to deal with
20 your counsel's objection -- objection about the
21 vagueness as to who.

22 MR. KHOJASTEH: As to you.

1 MS. GREENBERGER: As to you.

2 MR. KHOJASTEH: Just because there was
3 a series of questions, you did this, you did
4 that. I'm just -- yeah.

5 MS. GREENBERGER: Yeah. It's just one
6 page. Here is Exhibit 6.

7 (Deposition Exhibit Number 6 was
8 marked for identification.)

9 THE WITNESS: Whoa.

10 MS. GREENBERGER: I'm handing
11 you Exhibit 6.

12 THE WITNESS: Can I have a magnifying
13 glass, guys?

14 MS. GREENBERGER: Well, I'm actually
15 going to start asking you about the headline.
16 And, certainly, I was not intending to make this
17 an ophthalmology exam. The --

18 MR. KHOJASTEH: This one's exhibit --

19 MS. GREENBERGER: Six.

20 MR. KHOJASTEH: Six.

21 BY MS. GREENBERGER

22 Q So, Exhibit 6, have you seen this

1 document before?

2 A I didn't know it was a document. I
3 think this was on a website.

4 Q And this was on USAGM's website,
5 correct?

6 A Yes, I believe so. Let me see. It
7 looks like it. Yeah.

8 Q And the headline on this website is
9 "USAGM Senior Advisor Kari Lake cancels obscenely
10 expensive 15-year lease," correct?

11 A Correct.

12 Q And you approved this portion of the
13 website before it was posted?

14 A Yes.

15 Q And this states that you were the one
16 who canceled the lease, correct?

17 A Yes, in consultation with the team.

18 Q And it was ultimately your decision?

19 A In consultation with the team.

20 Q But ultimately your decision?

21 MR. KHOJASTEH: Asked and answered.

22 MS. GREENBERGER: She didn't answer.

1 MR. KHOJASTEH: She did.

2 THE WITNESS: I consulted with the
3 team, and we decided it was the best thing to
4 do --

5 MS. GREENBERGER: Okay. But that --

6 THE WITNESS: -- for the American
7 taxpayer in light of the presidential executive
8 order, which asked for us to reduce elements of
9 the federal bureaucracy that the President has
10 determined are unnecessary.

11 BY MS. GREENBERGER

12 Q But, Ms. Lake, you're not claiming that
13 someone else made the decision to cancel the
14 lease. You've repeatedly taken credit for
15 canceling the lease, right?

16 MR. KHOJASTEH: Object to form. Asked
17 and answered.

18 THE WITNESS: I'll take credit for it.
19 I'm proud of it.

20 BY MS. GREENBERGER

21 Q Now, this part is a little harder to
22 read, so apologies.

1 A Are you serious?

2 Q But I'm going to work with you.

3 A Oh, boy. You're making me feel like I
4 need to get even stronger glasses.

5 Q So under the bullets -- there are five
6 bullets. I'm not asking you about that.

7 Right under the bullets, it states,
8 "This agency is not salvageable," correct?

9 A Yes.

10 Q And that was the statement that you
11 approved --

12 MR. KHOJASTEH: That's amazing. Thank
13 you.

14 BY MS. GREENBERGER

15 Q -- being --

16 MR. KHOJASTEH: Do you want this?
17 That's awesome.

18 THE WITNESS: Whoa. I don't know. Is
19 this better or -- gosh. Okay. Yeah.

20 What was the question again?

21 MS. GREENBERGER: Sure.

22 THE WITNESS: Oh, great. Now I see my

1 cuticles. Great. Okay.

2 BY MS. GREENBERGER

3 Q Under the bullets, it states, "This
4 Agency is not salvageable," correct?

5 A That's what it says, yes.

6 Q And that was the statement that you
7 approved being posted on the USAGM website,
8 correct?

9 A That's my opinion.

10 Q That was your opinion on March 15th,
11 and it's your opinion today, correct?

12 A It's my opinion based on many bullet
13 points, but you see the five bullet points at
14 top --

15 Q I may ask you about the basis for your
16 opinion, but right now I'm just asking that it
17 was your --

18 MR. KHOJASTEH: She can answer the
19 question without you interrupting her.

20 MS. GREENBERGER: I'm not interrupting.
21 I'm --

22 THE WITNESS: That's --

1 MS. GREENBERGER: -- clarifying.

2 THE WITNESS: That's --

3 MR. KHOJASTEH: You literally
4 interrupted --

5 THE WITNESS: -- my --

6 MR. KHOJASTEH: -- her.

7 THE WITNESS: -- opinion based on --

8 MR. KHOJASTEH: There's a video that
9 will show it.

10 THE WITNESS: -- massive national
11 security violations, including spies and
12 terrorist sympathizers and/or supporters
13 infiltrating the agency, eye-popping self-dealing
14 involving contracts, grants and high-value
15 settlement agreements, obscene over-spending
16 including nearly a quarter-of-a-billion-dollar
17 lease for a swanky -- I added swanky --
18 Pennsylvania Avenue high-rise that has no
19 broadcasting facilities to meet the needs of the
20 agency and included in a -- included a
21 \$9 million commission to a private real estate
22 agent with connections, hundreds of millions of

1 dollars being spent on fake news companies, a
2 product that often parrots the talking-points of
3 America's adversaries.

4 BY MS. GREENBERGER

5 Q Ms. Lake, I have a large number of
6 questions, and it's going to go faster if you --

7 A But I want to explain why --

8 Q -- answer my --

9 A Because you asked if --

10 Q I asked --

11 A -- how I came to --

12 Q -- a simple -- no, I didn't ask --

13 A You asked --

14 Q -- how you came to it. I asked simply
15 whether that was your view that the agency is not
16 salvageable and whether that was your view on
17 March 13th and remains so today.

18 MR. KHOJASTEH: Object to form.

19 MS. GREENBERGER: It's a yes or no --

20 MR. KHOJASTEH: Compound.

21 MS. GREENBERGER: -- question. Sure.

22 I'll ask it --

1 THE WITNESS: That was my view --

2 MS. GREENBERGER: -- separately.

3 THE WITNESS: -- based on those
4 findings.

5 BY MS. GREENBERGER

6 Q Great. And that's your view today?

7 A My view is that whatever the President
8 decides to do with this agency in conjunction
9 with the legislature, we will abide by that.

10 Q Is your view today that the agency is
11 not salvageable?

12 A I believe the agency is very corrupt.
13 We're working to make it not corrupt.

14 MS. GREENBERGER: I want to -- can I
15 have tab 14, please? Can you mark this tab 14 --
16 I'm sorry -- exhibit -- what are we up to? He
17 knows. Thank you.

18 (Deposition Exhibit Number 8 was
19 marked for identification.)

20 BY MS. GREENBERGER

21 Q I'm showing you Exhibit 8, which is a
22 tweet that you issued on March 17th, 2025; is

1 that correct?

2 A Uh-huh. Well, let me look.

3 Q Sure.

4 A March 17th, yes.

5 Q And in that tweet, you stated that the
6 agency is irretrievably broken? It's the end of
7 your first sentence.

8 A Yes.

9 Q And irretrievably broken means not
10 capable of being fixed?

11 MR. KHOJASTEH: Object to form.

12 THE WITNESS: I believe, at the time,
13 yes. As you'll see, the follow-up says, "there
14 are bright spots within the agency." So we're
15 working the best we can to make sure it's no
16 longer corrupt and wasting taxpayer dollars.
17 There's two sentences --

18 MS. GREENBERGER: Do you --

19 THE WITNESS: -- there.

20 BY MS. GREENBERGER

21 Q No, I see. Is your position today that
22 the agency is salvageable?

1 A I'm proud that we've done things to
2 root out some of the corruption and take control
3 of the agency so that we're not wasting
4 exorbitant amounts of hardworking taxpayers'
5 dollars.

6 Q And your position as a result of the
7 work that you've done that the agency is
8 salvageable?

9 A My opinion doesn't matter.

10 Q Well --

11 A It's the opinion of the President of
12 the United States that matters. He's --

13 Q I understand that, but you're in a
14 deposition and I'm asking you for your opinion.

15 Is your opinion today that the agency
16 is salvageable?

17 A Maybe. It could possibly be if we work
18 really hard and if the President decides he wants
19 to keep it and Congress decides, but --

20 Q Have you ever made a public
21 statement --

22 MR. KHOJASTEH: Just let her finish her

1 answers, please.

2 MS. GREENBERGER: I'm sorry. I thought
3 she was done. I'm so sorry.

4 THE WITNESS: Where was I? You know --
5 BY MS. GREENBERGER

6 Q You said if Congress decides.

7 A Yeah. I mean, I am the -- I am the
8 acting CEO of the United States Agency for Global
9 Media. I'm not the emperor of the United States
10 Agency for Global Media. So there's a lot of --
11 there's a lot of people who have a say in this.

12 Q Have you ever made a public statement
13 that you thought the agency was salvageable?

14 A I don't know if I have.

15 Q Can you point to any --

16 A But my public --

17 Q -- statement?

18 A -- statements are reflective of the
19 President's agenda. When I'm working at the
20 agency, we're working to follow the law.

21 Q I want to show you a different -- I
22 want to turn to a different issue, which is, one

1 particular criticism you have levied is that the
2 Chinese Communist Party has infiltrated the VOA,
3 correct?

4 MR. KHOJASTEH: Object to form. Lacks
5 foundation. If you want to show her something,
6 go for it.

7 BY MS. GREENBERGER

8 Q Well, do you remember --

9 A Well, let me see. I --

10 Q Do you not remember making that
11 accusation?

12 MS. GREENBERGER: It's tab 39, please.

13 THE WITNESS: Yeah, I've talked about
14 that.

15 MS. GREENBERGER: Okay.

16 THE WITNESS: I've talked about that.

17 BY MS. GREENBERGER

18 Q I'm trying not to show you excessive
19 documents because there's -- I have to show it --

20 A Oh, okay.

21 Q -- give it to the court reporter. He
22 has to mark it.

1 A Okay.

2 Q It just makes the day longer, but --

3 MR. KHOJASTEH: Right. But, Counsel,
4 in all fairness, you showed her a document before
5 that you wanted to show her one sentence and
6 not -- if you just relied on the one sentence,
7 the record wouldn't reflect the second sentence,
8 so just --

9 THE WITNESS: Which we never got in the
10 record --

11 MR. KHOJASTEH: Yes.

12 THE WITNESS: -- by the way.

13 MS. GREENBERGER: But that's okay,
14 because your attorney at the end can ask
15 questions if he needs to and --

16 THE WITNESS: Yeah.

17 MS. GREENBERGER: -- I can ask the
18 questions --

19 THE WITNESS: Which I did say there are
20 talented and dedicated public servants at the
21 agency.

22 MS. GREENBERGER: There's no question

1 pending, Ms. Lake.

2 THE WITNESS: Okay.

3 MS. GREENBERGER: Is the document
4 marked?

5 (Reporter clarification.)

6 MS. GREENBERGER: Thank you, sir.

7 (Deposition Exhibit Number 9 was
8 marked for identification.)

9 BY MS. GREENBERGER

10 Q I'm going to hand the witness Exhibit
11 9. Ms. Lake, is Exhibit 9 is tweet that you
12 tweeted -- I'm sorry -- yes, that you tweeted on
13 August 8th, 2025?

14 A Yeah.

15 Q And in this tweet, you state that "the
16 CCP has infiltrated VOA and you are paying for
17 it"?

18 A Yes.

19 Q And CCP is the Chinese Communist Party,
20 correct?

21 A Yes.

22 Q And you've said to the press that the

1 Chinese Communist Party has been meeting
2 regularly with VOA management to tell them how
3 they should be covering China?

4 A In the past, they have.

5 Q Okay. And are you aware of a recent
6 Washington Post op-ed that explains how you've
7 gotten this wrong?

8 MR. KHOJASTEH: Object to form.

9 THE WITNESS: How do I want to word
10 that? The Washington Post is the biggest piece
11 of garbage in journalism in this country, and so
12 I know that whenever something happens in this --
13 in this agency, immediately somebody -- and I'm
14 not sure who -- runs out and reports to The
15 Washington Post --

16 MS. GREENBERGER: And --

17 THE WITNESS: -- and I think that was a
18 needed article for these purposes to put that
19 out.

20 MS. GREENBERGER: Do you understand
21 that -- well, I can show it to you.

22 Can you pass me --

1 THE WITNESS: I know what you're
2 talking about.

3 BY MS. GREENBERGER

4 Q Okay. And you know that one of the
5 op-ed authors is a senior fellow at the Hoover
6 Institute?

7 A Yes.

8 Q And would you agree with me that the
9 Hoover Institute is a conservative think tank?

10 MR. KHOJASTEH: Object to form.

11 THE WITNESS: Sometimes.

12 BY MS. GREENBERGER

13 Q And you said that you reviewed The
14 Washington Post op-ed?

15 MR. KHOJASTEH: Object --

16 THE WITNESS: A bit of it.

17 MR. KHOJASTEH: -- to form.

18 Mischaracterizes testimony.

19 BY MS. GREENBERGER

20 Q Would you admit that your tweet is
21 erroneous?

22 A No.

1 Q Okay. Let's move on. On March 13th --
2 you can put that aside, Ms. Lake.

3 A I didn't get my information from just
4 the Hoover Institute.

5 Q On March 13th, you also canceled the
6 wire services?

7 A Yes.

8 Q Okay.

9 MR. KHOJASTEH: Same objection. Vague
10 as to "you."

11 THE WITNESS: Let me -- let me scratch
12 that. I don't know if that was the exact date,
13 but, yes, I did cancel.

14 BY MS. GREENBERGER

15 Q And you personally ordered the
16 cancellation of the wire services, correct?

17 A In consultation with -- I think Victor
18 was made aware of it.

19 Q And --

20 A I believe.

21 Q Did you consult with anyone before
22 canceling those contracts?

1 A I'm sure --

2 MR. KHOJASTEH: Same --

3 THE WITNESS: -- I did.

4 MR. KHOJASTEH: I'm going to instruct
5 you not to --

6 BY MS. GREENBERGER

7 Q Other than counsel --

8 MR. KHOJASTEH: Yeah. Apologies.

9 (Reporter clarification.)

10 BY MS. GREENBERGER

11 Q I'm going to restate the question.

12 Other than counsel, did you consult with anyone
13 before canceling the newswire contracts?

14 MR. KHOJASTEH: Object to form. Vague
15 as to you.

16 THE WITNESS: Vague as to what?

17 MR. KHOJASTEH: "You," the word "you."

18 But go ahead. You can answer.

19 THE WITNESS: Consult with, what do you
20 mean by consult with?

21 BY MS. GREENBERGER

22 Q Did you -- did you personally discuss

1 with anyone the decision to cancel the wire
2 contracts before you canceled the contracts?

3 A I don't recall who I discussed it with.

4 Q Are you aware of any documentation
5 reflecting that you consulted with anyone before
6 canceling the contracts?

7 MR. KHOJASTEH: Object to form. Vague
8 as to documentation.

9 THE WITNESS: I'm not sure.

10 BY MS. GREENBERGER

11 Q Did staff -- well, strike that. Let me
12 ask something else.

13 The newswire contracts include AP,
14 correct?

15 A Yes.

16 Q And Reuters?

17 A Yes.

18 Q And did staff express any concerns
19 about the need for those wires?

20 A Perhaps. I mean, I think that -- I
21 think that perhaps they were wondering how they
22 would work without them because those wires had

1 become a crutch for a vast majority of American
2 newsrooms.

3 Q You also ordered in late March a future
4 reduction in force and you -- of the radio
5 broadcast technicians and most other employees;
6 is that correct?

7 A Can you give me --

8 MR. KHOJASTEH: Object to -- object to
9 form. Lacks foundation. Vague as to "you."

10 MS. GREENBERGER: Okay. Can I have tab
11 33, please? That's not it.

12 (Deposition Exhibit Number 5 was
13 marked for identification.)

14 BY MS. GREENBERGER

15 Q I'm showing you a document that's been
16 premarked as Exhibit 5, which is Ms. Thomas'
17 declaration, which she submitted in this case on
18 March 27th.

19 So, first, have you seen this
20 declaration before?

21 A I may have. I may have.

22 Q And did Ms. Thomas show you this

1 declaration before it was submitted to the Court?
2 Strike that.

3 Did you see this declaration before it
4 was submitted to the Court on March 27th?

5 A Most likely, I did. I just need to
6 refresh my memory, if you don't mind, real quick.

7 Q Take your time.

8 A I'm trying to do this quick. Sorry.

9 Q Sure. I'm going to be asking you about
10 paragraphs 9 and 10 specifically.

11 A Okay. Let me --

12 Q Or, actually, 9 through 12, so --

13 A Okay. Okay. I think I'm ready for
14 your question.

15 Q Okay.

16 A I'm skimming this, so -- go ahead.

17 Q So Ms. Thomas sent an e-mail about an
18 intent to implement a reduction in force, two
19 e-mails, according to paragraphs 9 and 10,
20 correct?

21 A Okay. Yes. It looks like, on March
22 25th, she sent an e-mail.

1 Q And Ms. Thomas did not decide on her
2 own to implement a reduction in force, correct?

3 A Correct.

4 Q And that -- was that your decision to
5 implement the reduction in force that's reflected
6 in this document?

7 A Well, I think we've established that
8 the President put out an executive order calling
9 for the reduction to the statutory minimum.

10 Q So was that your decision to issue this
11 intent to implement a reduction in force as part
12 of implementing the EO?

13 A It was the decision of the team, the
14 senior leadership team, that we needed to follow
15 the President's executive order, and in doing so,
16 such entities shall reduce the performance to
17 their statutory functions and associated
18 personnel to the minimum presence and function
19 required by law.

20 Q So my question is just about the who,
21 not the why. Okay?

22 A Okay.

1 Q So --

2 A And I just told you. The team.

3 Q And so who was the team?

4 A Senior career leadership.

5 Q And who was senior career leadership?

6 A Well, I -- my attorney, Royce Min, 20
7 years as a government attorney in the federal
8 government, Victor Morales, 36 years at the
9 agency, Crystal. These are the people who signed
10 off on the -- on the statutory minimum plan.

11 Q And --

12 A Crystal --

13 Q -- ultimately, it was your --

14 A Crystal -- I'm not done.

15 Q Oh, I'm so sorry.

16 A We had the head of -- the CMO, Chris
17 Luer. I'm trying to recall that document. I'm
18 sure you have it. Head of HR was Crystal. I
19 think there were -- Roman Napoli, the chief
20 financial officer. And I think there were a
21 couple more. Terry Balazs and -- did I say Chris
22 Luer?

1 Q We'll definitely come back to the
2 document, but my question was: Who made the
3 final decision to issue the notice of intention
4 to implement a reduction in force on March 25th
5 --

6 MR. KHOJASTEH: Object --

7 BY MS. GREENBERGER

8 Q -- 2025?

9 MR. KHOJASTEH: Object to form. Lacks
10 foundation. Vague as to "final decision."

11 THE WITNESS: Who made the decision to
12 send the e-mail? Well, ultimately, Crystal sent
13 the e-mail, so she had to make the decision, but
14 this is part of the process. If you are going to
15 consider a RIF, you have to follow a process, and
16 we were following the process.

17 BY MS. GREENBERGER

18 Q Who decided to implement a RIF?

19 A We didn't implement a RIF --

20 MR. KHOJASTEH: Object to form. Asked
21 and answered.

22 THE WITNESS: We didn't implement a RIF

1 at that point. As it says here --

2 MS. GREENBERGER: No, I understand
3 that. My --

4 THE WITNESS: USAGM's -- we are
5 "enclosing a preliminary notification to the
6 union stating USAGM's intent to implement a RIF
7 for multiple competitive areas."

8 And then it goes on to say the
9 notifications -- I'm trying to find where -- it
10 doesn't necessarily mean that those people will
11 be RIF'd. It's just notifying. It's a
12 requirement.

13 BY MS. GREENBERGER

14 Q It's a requirement that arises once the
15 agency determines --

16 A What the statutory minimum is.

17 Q Please let me --

18 A Sorry.

19 Q -- finish my question. It's a
20 requirement that arises once the agency
21 determines that it's intending to implement a
22 reduction in force, correct?

1 A Yes.

2 Q And so my question is: Who at the
3 agency decided that it intended to implement a
4 reduction in force? That was you, correct?

5 MR. KHOJASTEH: Object to form. Asked
6 and answered.

7 THE WITNESS: I think it really was the
8 team, because we had what came down on the 14th
9 as an executive order to -- so the President
10 really decided to reduce the agency to its
11 statutory minimum, and then between the 14th when
12 this came out and when the e-mail was sent out,
13 they came up with what the statutory minimum was.
14 BY MS. GREENBERGER

15 Q Okay. So let's turn to that. So you
16 said that you came up with the statutory minimum
17 between the 14th when the EO came out and the
18 e-mails that were sent on March 25th?

19 A That's what it looks like, yeah.

20 Q And I think you're referring to a plan
21 that you gave to Congress on June 3rd?

22 Well, let me ask it a different way.

1 Are you referring to the plan you gave Congress
2 on June 3rd?

3 A Can you see -- can you show me what
4 that is?

5 MS. GREENBERGER: Sure. It's been
6 premarked as Exhibit 3, so let me hand that to
7 you.

8 (Deposition Exhibit Number 3 was
9 marked for identification.)

10 MR. KHOJASTEH: Thank you.

11 MS. GREENBERGER: You can put those
12 aside. I'm not sure we'll need them.

13 THE WITNESS: Are we still talking
14 about Crystal Thomas' --

15 MS. GREENBERGER: No. We'll come back
16 to it, but not right now.

17 THE WITNESS: Okay.

18 BY MS. GREENBERGER

19 Q So I'm handing you Exhibit 3 --

20 A Three.

21 Q -- which is a document signed by you on
22 June 3rd, 2025, enclosing what you're calling the

1 USAGM Stat Min, correct?

2 A Well, yes, I signed the first page, and
3 then senior career leadership signed the last
4 page of this exhibit.

5 Q And, first, just as a preliminary
6 matter, you signed this as the senior advisor to
7 the chief operating officer?

8 A Yes.

9 Q Who was the chief operating officer on
10 June 3rd?

11 A The acting chief operating officer is
12 Victor Morales.

13 Q Victor Morales was both the CEO and the
14 chief operating officer?

15 A Oh, I'm sorry. I thought that said
16 chief -- pardon me. That might be a typo,
17 actually.

18 Q And so what do you believe that was
19 supposed to say?

20 A CEO.

21 Q It should say senior advisor to the
22 CEO?

1 A Yeah.

2 Q Okay. And turning to the first --
3 there's the letter that's on page 1 and then the
4 enclosure that's a --

5 A Stat min document.

6 Q -- three-page enclosure. That's the
7 stat min document. Okay. So I'll try to be
8 clear as to my questioning which I'm asking
9 about.

10 Who drafted the stat min document?

11 MR. KHOJASTEH: I'm going to object to
12 form, and I'm also going to instruct the witness
13 not to answer questions regarding the preparation
14 of this document to the extent that doing so
15 would disclose attorney-client communications.

16 You can answer the question she asked,
17 which is a who question.

18 THE WITNESS: Well, I think it would
19 actually go to attorney-client privilege, because
20 our GC was very much involved in the creation of
21 this, so I don't want to go there.

22

1 BY MS. GREENBERGER

2 Q This document on the top says
3 "Recommendation," correct?

4 A Yeah.

5 Q And who is the recommendation being
6 made to?

7 A I would say to, you know, the CEO,
8 recommendation to whoever is going to ultimately
9 make the decision and how we make the decision.
10 And it's going to be a recommendation to a lot of
11 people at the agency because somebody might be in
12 charge of the Farsi language. Somebody might be
13 in charge of China. So this is recommendation to
14 people as we go forward implementing the
15 executive order.

16 Q So is this a recommendation that
17 somebody else at the agency needed to approve or
18 disapprove, or is this a final decision?

19 A It's a recommendation guideline so that
20 we can go forward and effectuate the continuing
21 reduction of the federal bureaucracy executive
22 order.

1 Q So this was a final decision of the
2 agency, not a recommendation that needed
3 approval, correct?

4 MR. KHOJASTEH: Object to form. Calls
5 for legal conclusion.

6 Also will instruct you not to answer to
7 the extent that doing so discloses communications
8 you've had with attorneys regarding the issue of
9 whether this is a -- what did you say, final?

10 BY MS. GREENBERGER

11 Q Let me ask it a different way.

12 Did you understand that after this
13 document was issued, someone had to evaluate it
14 and decide whether to accept or reject the
15 recommendation?

16 MR. KHOJASTEH: Object --

17 THE WITNESS: Yeah, I guess.

18 MR. KHOJASTEH: Yeah, go ahead.

19 THE WITNESS: Yeah.

20 BY MS. GREENBERGER

21 Q And who was that someone who had to
22 decide whether to accept or reject -- or reject

1 the recommendation?

2 A I think a lot of people had to at least
3 understand what was going on. And I don't think
4 it needed to be accepted. What needed to be
5 accepted was that the President had ordered us to
6 reduce the agency to its statutory minimum. This
7 is guidance for what statutory minimum is.

8 Q And it's guidance because the agency
9 had made its determination that this was the
10 statutory minimum, correct?

11 MR. KHOJASTEH: Object to form. Calls
12 for a legal conclusion.

13 You can answer.

14 THE WITNESS: The top senior career
15 leadership signed off and made the decision that
16 this was statutory minimum. I was simply asking
17 them, what is statutory minimum? This is the
18 document.

19 BY MS. GREENBERGER

20 Q And they -- when did you -- strike
21 that.

22 You spoke about the senior leadership,

1 and there's six people listed at the -- at the
2 bottom. That's the senior leadership you're
3 discussing?

4 A Yes.

5 Q And when was this plan, the statutory
6 minimum plan, completed?

7 A I think it was completed on the date --
8 the 18th. That's what I believe.

9 Q March 18th?

10 A Yeah. Based on the signatures.

11 Q And --

12 A It looks like Roman signed it on the
13 18th.

14 Q He digitally signed it on the 18th,
15 correct?

16 A Uh-huh.

17 Q Sorry. You have to say yes.

18 A Yes.

19 Q And I think you said earlier that you
20 had -- on March 15th, you took those actions
21 while the agency determined what the statutory
22 minimum was, correct?

1 MR. KHOJASTEH: Object to form. Vague.
2 Same objection as earlier. Vague as to "you."

3 Go ahead.

4 THE WITNESS: Yes. It is -- I mean, I
5 worked in consultation with the leadership and
6 senior career leadership at the agency, including
7 Victor.

8 BY MS. GREENBERGER

9 Q When did USAGM start preparing the stat
10 minimum plan?

11 MR. KHOJASTEH: Object to form. Asked
12 and answered.

13 THE WITNESS: I don't have that date.
14 I mean, it was somewhere between --

15 BY MS. GREENBERGER

16 Q Not before March 14th, right?

17 A I don't believe it was, no.

18 Q Yeah. So it would be sometime between
19 March 15th and March 18th --

20 A I can't get --

21 Q -- they started --

22 A -- into the mind of general counsel if

1 they were starting to, you know, look at the --
2 read the tea leaves of what was happening in the
3 government being -- you know, if people started
4 to think about it, but --

5 Q But to your knowledge, it started after
6 the EO was issued, correct?

7 A The creation of this memo or this
8 executive summary, that came after the 15th.

9 Q And when you received this
10 recommendation -- well, first of all, when did
11 you receive this recommendation?

12 A Somewhere around the 18th.

13 Q And when you received it, did you adopt
14 it?

15 MR. KHOJASTEH: Go ahead. You can
16 answer that question.

17 THE WITNESS: It became guidance for
18 what statutory minium was so that we could
19 effectuate the President's executive order.

20 BY MS. GREENBERGER

21 Q And it became guidance as of what date?

22 A Right around that date.

1 Q March 18th. And you were the one who
2 determined that this should become the guidance
3 that the agency follows, correct?

4 MR. KHOJASTEH: Object to form.
5 Mischaracterizes testimony. Vague as to "you."

6 THE WITNESS: I don't know if it was
7 just me, no. I think, you know, we've --
8 obviously, there were several people who signed
9 off on this.

10 BY MS. GREENBERGER

11 Q You had said in your letter to Congress
12 on the first page --

13 A Okay.

14 Q -- that it was -- the plan was
15 developed by senior career USAGM leadership.

16 Other than the six people who are
17 listed at the back of the document, are there any
18 other career USAGM leadership to your knowledge
19 that were involved in developing the plan?

20 MR. KHOJASTEH: Object to form. I'm
21 going to instruct you not to answer to the extent
22 that doing so reveals attorney-client

1 communications.

2 THE WITNESS: I'm going to pass on
3 answering that on the recommendation of my
4 attorney.

5 MS. GREENBERGER: The identity of
6 career USAGM leadership that were involved in
7 this is not privileged.

8 MR. KHOJASTEH: If she has -- if she
9 has independent knowledge -- do you want to go
10 off the record and talk about this real quick?

11 MS. GREENBERGER: Why don't we come
12 back to this. Why don't we talk about it at a
13 break, because I think --

14 MR. KHOJASTEH: Sure.

15 MS. GREENBERGER: -- we'll take a break
16 soon.

17 BY MS. GREENBERGER

18 Q Speaking of the signatories, Ms. Thomas
19 and Mr. Luer and Mr. Balazs -- apologies for the
20 pronunciation -- they did not either sign it or
21 digitally sign it, correct?

22 A They did not? No, they did. They did

1 sign it.

2 Q Do you understand there's a difference
3 between a digital signature and someone pasting
4 somebody's name in italics?

5 A Are you accuse --

6 MR. KHOJASTEH: Object -- object to
7 form. If you think there's a distinction, lay a
8 foundation.

9 MS. GREENBERGER: Okay.

10 BY MS. GREENBERGER

11 Q Did Mr. Min hand sign this document?

12 A Yes. Some people choose to hand sign.

13 Q And did Mr. Morales hand sign this
14 document?

15 A It looks like it.

16 Q And did Mr. Morali (ph) digitally sign
17 this document?

18 MR. KHOJASTEH: Mr. --

19 THE WITNESS: Mr. Morali?

20 BY MS. GREENBERGER

21 Q I'm sorry. Mr. Napoli.

22 A Yeah. That looks like a digital

1 signature.

2 Q And what's a digital signature?

3 A I think it's something that you've
4 placed your signature in a -- you've approved and
5 put it in, right.

6 Q And the final three signatories didn't
7 digitally sign it; is that correct?

8 MR. KHOJASTEH: Object to form. Lacks
9 foundation.

10 THE WITNESS: I mean, this is kind of,
11 I guess, a form of digital signature. They
12 adhered that themselves and sent it back.

13 BY MS. GREENBERGER

14 Q You have personal knowledge that each
15 of those three final three signatories adhered
16 their name in italics and sent it back?

17 A I --

18 MR. KHOJASTEH: Object to form. Lacks
19 foundation.

20 THE WITNESS: Should I answer?

21 MR. KHOJASTEH: You can answer.

22 THE WITNESS: I did not watch them with

1 the keystrokes, but they sent this back with
2 their signature on it, unless somebody had
3 commandeered their keyboard.

4 Are you assuming -- are you asking like
5 it was --

6 MS. GREENBERGER: I'm just asking a
7 question.

8 THE WITNESS: -- somebody else did
9 that?

10 MS. GREENBERGER: Ms. Lake, I'm really
11 just asking a question.

12 THE WITNESS: Okay.

13 MS. GREENBERGER: I'm not making
14 accusations.

15 MR. KHOJASTEH: It sounds like an
16 accusation.

17 THE WITNESS: It really does.

18 MS. GREENBERGER: It does seem to sound
19 that way --

20 MR. KHOJASTEH: Before --

21 MS. GREENBERGER: -- to you guys. It
22 was not my intent, and I think we should move on.

1 BY MS. GREENBERGER

2 Q Did USAGM send the statutory minimum
3 document to any other agencies before it was
4 finalized, to your knowledge?

5 A Send? What do you mean by send?

6 Q Share a draft of this --

7 A Share, yes.

8 Q Okay. And what agencies saw a draft of
9 this document before it was finalized?

10 MR. KHOJASTEH: Object to form. Lacks
11 foundation.

12 THE WITNESS: Not a draft, but when
13 this form was completed and signed by the senior
14 career leadership at our agency, this was shared
15 with the United States Department of State.

16 And I believe it was shared -- I don't
17 know if it was shared with OPM. I don't --
18 strike that. I don't know -- I'm not sure, so I
19 don't want to say if it was.

20 BY MS. GREENBERGER

21 Q You're not sure about OPM, but you are
22 sure about Department of --

1 A Yes.

2 Q -- State? Okay.

3 And was this shared with Department of
4 State after the statutory minimum was finalized
5 or before the statutory minimum was finalized?

6 MR. KHOJASTEH: Object to form. Asked
7 and answered.

8 THE WITNESS: This -- are you saying
9 this -- before this was created? This was shared
10 with State -- after this was created, this
11 executive summary recommendation, it was shared
12 with the Department of State.

13 BY MS. GREENBERGER

14 Q And was there a step between it being a
15 recommendation and it being what the agency was
16 going to follow?

17 A I don't know about a step. I mean --

18 Q Was there an approval process?

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation.

21 THE WITNESS: This is a guideline to
22 how we would effectuate the statutory minimum.

1 BY MS. GREENBERGER

2 Q And once it was --

3 A And as you can see, we've done a little
4 bit different than this, because this -- the
5 senior career leadership of this agency only
6 wanted 81 or 82 people, and we have more than
7 that.

8 Q And I'm -- I'll ask you some questions
9 about that.

10 Does this statutory minimum plan
11 consider how many languages VOA was required to
12 broadcast in?

13 A It looks like it did.

14 Q Where in the document is that?

15 A What's the question? How many
16 languages?

17 Q Yes.

18 A Will you repeat that, what you are
19 asking?

20 Q Sure. Does this statutory minimum plan
21 consider how many languages VOA was required to
22 broadcast in?

1 A It looks like it says Farsi, China
2 broadcasting, Afghanistan and -- oh, here it is.
3 Afghanistan, Cuba broadcasting, Farsi, Pashto.
4 It would be Pashto and Dari for Afghanistan,
5 Spanish for Cuba.

6 Q And is your understanding that the
7 statutory minimum plan is saying that there is no
8 requirement to broadcast in any other language?

9 MR. KHOJASTEH: Object --

10 THE WITNESS: That's --

11 MR. KHOJASTEH: -- to form. To the
12 extent that -- you're just asking her to
13 understand this, not -- no communications with
14 her lawyers about what this means and --

15 MS. GREENBERGER: I'm not asking about
16 her communications with her lawyers. I'm asking
17 about what the document means.

18 THE WITNESS: What I see in this
19 document, it does not have -- what was the
20 question? What language?

21 BY MS. GREENBERGER

22 Q Whether this document is taking the

1 position that USAGM does not need to broadcast in
2 any of the other languages other than the four
3 that are mentioned.

4 A What this document says is that these
5 four that are mentioned are the statutory
6 minimum.

7 Q Did this document -- you said this
8 document was finalized on March 18th, correct?

9 A That's what it looks like based on
10 the --

11 Q And --

12 A -- date.

13 Q -- did it immediately become the agency
14 position as of March 18th?

15 A It became a guideline.

16 Q And what's the difference between a
17 guideline and a position in your view?

18 MR. KHOJASTEH: Object to form. Lacks
19 foundation.

20 THE WITNESS: I mean, that's pretty
21 obvious. A guideline is something you use as a
22 guideline to decide -- a guide to decide

1 decisions going forward.

2 BY MS. GREENBERGER

3 Q Well, you understood that the EO said
4 that you needed to reduce the performance of the
5 agency's function to the statutory minimum,
6 correct?

7 A It said -- no. It said, "the
8 non-statutory components and functions of the
9 following governmental entities shall be
10 eliminated to the maximum extent consistent with
11 the law."

12 Q And so --

13 A To the maximum extent.

14 Q And wasn't this statutory minimum
15 document laying out the maximum extent consistent
16 with law?

17 A Yes.

18 Q And so how is it that it was only a
19 guideline to guide your decision?

20 A Well, we --

21 MR. KHOJASTEH: Object to form. I'm
22 going to instruct the witness not to answer to

1 the extent that doing so would disclose legal
2 advice you received from your general counsel.

3 THE WITNESS: I'm going to forego
4 answering that.

5 BY MS. GREENBERGER

6 Q So, as of March 18th, the stat minimum
7 document guided the agency's decisions; is that
8 correct?

9 A That's correct.

10 Q And is that true till today? This is
11 still the document that is guiding the agency's
12 decisions in implementing the EO?

13 A It's a foundational document that we
14 can rely on.

15 Q Are there other foundational documents
16 that the agency is relying on in implementing the
17 EO?

18 A I think it's just the advice of people
19 who are working in the newsroom, leading the
20 newsroom, and we want to make sure that we are
21 covering those four languages. So we have the
22 ability to have more people occasionally if we

1 have breaking news or fewer people, but we use
2 this as the guideline for which languages we
3 should be covering.

4 Q And are there other foundational
5 documents that you look at in guiding the
6 agency's decision-making in implementing the EO?

7 A Executive order.

8 MR. KHOJASTEH: Object to form. Asked
9 and answered.

10 BY MS. GREENBERGER

11 Q Other than that document?

12 MR. KHOJASTEH: Same objection.

13 THE WITNESS: The other -- what was the
14 question?

15 BY MS. GREENBERGER

16 Q Were there any documents other than the
17 EO itself and the stat min memo that the agency
18 uses to guide its decision-making to implement
19 the EO?

20 A Well, a lot of the statute, I guess --
21 I mean, what my attorneys, which I won't go into,
22 did to come up with -- I'll just stop that.

1 Q Okay. Other than the statutes and the
2 EO itself and the stat minimum document, are
3 there any other documents that guide the agency's
4 decision-making in implementing the EO?

5 MR. KHOJASTEH: Object to form. Vague
6 as to documents.

7 THE WITNESS: The U.S. Constitution,
8 Article II.

9 BY MS. GREENBERGER

10 Q Any other documents?

11 A I think that's good. I mean, there may
12 be others, but I can't think of any right now.

13 MR. KHOJASTEH: Is this an okay time to
14 take a break?

15 MS. GREENBERGER: Sure.

16 THE WITNESS: Are we going to continue
17 on this? How much more do we have on this?
18 Because I'm fine not eating right now.

19 MR. KHOJASTEH: If there's --

20 MS. GREENBERGER: I have a good amount
21 more.

22 MR. KHOJASTEH: So why don't we wait --

1 why don't we take a five-minute break, and we'll
2 come back.

3 THE WITNESS: Okay.

4 MS. GREENBERGER: All right. That's
5 fine.

6 VIDEO TECHNICIAN: This marks the end
7 of Media Unit No. 2. Going off the record, the
8 time is 12:39 p.m.

9 (Recess 12:39 p.m. to 12:55 p.m.)

10 VIDEO TECHNICIAN: This marks the
11 beginning of Media Unit No. 3. Going back on the
12 record, the time is 12:55 p.m.

13 BY MS. GREENBERGER

14 Q I guess good afternoon, Ms. Lake. So,
15 continuing on with Exhibit 3, when did you first
16 see the statutory min document?

17 A It would be right around between the
18 14th, but probably between Monday and -- what day
19 of the week was the 18th? Does anybody know?

20 Q I believe it was a Tuesday. The 14th
21 was a Friday, Saturday, Sunday. Tuesday.

22 A I would guess probably -- this is a

1 guess -- the night before or earlier in the day.

2 Q Earlier in the day of the day --

3 A If this was signed --

4 Q -- before it was --

5 A What time was this signed? Noon. I
6 don't remember if I saw it that -- I just don't
7 remember, so I'm -- I mean, it's within a window
8 of a few days.

9 Q But you saw it shortly before it was
10 finalized?

11 A I saw it before it had all of the
12 signatures.

13 Q And did you -- did you ask for any
14 changes to the text?

15 MR. KHOJASTEH: Object to form. To the
16 extent that your communications regarding this
17 document were with general counsel, I'm going to
18 instruct you not to answer.

19 BY MS. GREENBERGER

20 Q Let me ask it a different way. Is the
21 version that you first saw the same as the
22 version that we're looking at in Exhibit 3, other

1 than the signatures?

2 A I relied on senior career officials to
3 come up with this plan. They have the experience
4 of many, many decades at the agency and in the
5 government, and so I did not call for them to
6 change the plan.

7 Q So it sounds like the answer to my
8 question is yes, the version you first saw is the
9 same as the version we're looking at here in
10 Exhibit 3?

11 A I believe so. I mean, maybe a typo
12 here or there was -- roughly the same.

13 Q And this document says there's an
14 executive summary. Is there --

15 A Where?

16 Q I'm sorry. On the top of the statutory
17 minimum.

18 A It says executive summary?

19 Q Yes.

20 A Yeah.

21 Q And is there another document that's
22 the longer version?

1 A I don't know.

2 MR. KHOJASTEH: Object to form. Lacks
3 foundation. I think misunderstands the document.

4 THE WITNESS: When you say document, I
5 think of this as being a document and this as
6 being a document. Is that what you're referring
7 to? Is there some sort of a memo or a paper that
8 would be a document? What are you referring to
9 as document?

10 BY MS. GREENBERGER

11 Q So, at this point, I'm saying, is there
12 a longer version of this plan, this statutory
13 minimum plan, other than this three-page version?

14 A Anything that would have come before
15 this would be communications had with my
16 attorney.

17 Q And I understand there was an objection
18 from your counsel, so I just want to make clear
19 that when I'm asking a question about you, I mean
20 you, Ms. Lake, personally. Okay?

21 A And I think I've made very clear that
22 I'm not an emperor. I am one person at an

1 agency, and I rely on a team. I rely on the
2 senior career leadership to help come up with
3 this. It wasn't just me. If it were just me, I
4 would have maybe had a different plan --

5 Q So you --

6 A -- but I relied on other people. So I
7 work with others.

8 Q You personally notified Senator Graham
9 on June 3rd about the stat minimum plan, correct?

10 A Yes.

11 Q And why did you not -- well, let me ask
12 it a different way.

13 Did you notify Congress in any other
14 way about this plan between March 18th when it
15 was finalized and June 3rd?

16 A Between March --

17 MR. KHOJASTEH: Object to form.

18 THE WITNESS: -- 18th and June 3rd. I
19 don't know. I'd have to look. I may have had
20 conversations. I talk to people all over. And I
21 don't know, because I don't want to say that I
22 had no conversations with anybody in Congress and

1 maybe, in passing, we talked about the
2 President's executive order. So I don't know. I
3 really don't.

4 BY MS. GREENBERGER

5 Q Do you have any specific memory of
6 telling anybody in Congress about the stat
7 minimum plan prior to June 3rd?

8 A I'd have to look at my schedule. I
9 don't know.

10 Q Okay. And --

11 A And I should note that, you know, you
12 had asked about this, if I thought this was the
13 final -- the end all.

14 I mention right here to Lindsey
15 Graham -- and I know I mentioned it to Chairman
16 Mast and others -- "While we anticipate being
17 above the originally proposed statutory minimum
18 staffing numbers," which are in this document,
19 "the plan to effectuate the President's Executive
20 Order is still developing."

21 This was very early. This was very
22 early in the process.

1 "As we work to adhere to the executive
2 order, please consider this required
3 Congressional Notification."

4 Q And did --

5 A So it's a little more fluid.

6 Q And did you give any prior
7 congressional notification, any formal
8 congressional notification, prior to June 3rd
9 about the stat minimum plan?

10 MR. KHOJASTEH: Object to form. Asked
11 and answered.

12 THE WITNESS: I don't -- I think this
13 was the first, but I'm not 100 percent certain.

14 BY MS. GREENBERGER

15 Q And why did you wait until June 3rd, to
16 the best of your memory, to notify Congress?

17 MR. KHOJASTEH: Object to form. To the
18 extent that -- you can answer the question to the
19 extent that it does not reveal communications you
20 had with your lawyers at the agency or elsewhere.

21 THE WITNESS: I don't think it was any
22 nefarious reason. It was just a lot was

1 happening. This came down on the 14th. We
2 have -- had a lot of decisions to make. We
3 needed to have a plan developed really in seven
4 days. That was -- this was required.

5 As it says in the executive order,
6 within 7 days of the date of this order, the head
7 of each governmental entity listed in subsection
8 (a) shall submit a report to the Director of
9 Office of Management and Budget confirming full
10 compliance with this order.

11 So there's a lot to accomplish, and I
12 think we were working on all -- a lot of moving
13 parts. It's something that was very new to the
14 agency.

15 BY MS. GREENBERGER

16 Q And did the agency issue this report to
17 OMB within seven days?

18 A I believe we did. One of our detailees
19 was from OMB, so I think it was --

20 Q And are you aware that the 2024
21 Appropriations Act requires that if there's
22 significant modifications to USAGM broadcast

1 hours that were previously justified to Congress
2 that that shall be subject to regular
3 notification procedures?

4 MR. KHOJASTEH: Object to form. Calls
5 for legal conclusion.

6 And to the extent that disclosing --
7 you can answer the question. However, to the
8 extent that doing so discloses communications or
9 an understanding you've received from counsel,
10 I'm going to instruct you not to answer.

11 THE WITNESS: Repeat the question. I
12 apologize.

13 BY MS. GREENBERGER

14 Q Do you understand that the 2024
15 Appropriations Act requires you to notify the
16 Committee on Appropriations if there's
17 significant modifications to USAGM broadcasting
18 hours that were previously justified to Congress?

19 MR. KHOJASTEH: Same objection.

20 THE WITNESS: My attorney, GC, was
21 briefing me on a lot of things. I don't want to
22 go into details, but we worked to make sure that

1 we followed every single step. There are a lot
2 of steps when you make any -- any action you make
3 in government, there are steps that you have to
4 follow, and we worked diligently to make sure we
5 did those. If this is considered late, June 3rd,
6 you know, we were working as fast as we could.

7 BY MS. GREENBERGER

8 Q Does this, in your view, constitute
9 notifying Congress of modifications to broadcast
10 hours?

11 MR. KHOJASTEH: Object to form.

12 To the extent you have a view
13 independent from that which you learned from
14 communications with counsel, you can answer.

15 THE WITNESS: The last --

16 MR. KHOJASTEH: Otherwise, I'm going to
17 instruct you not to answer.

18 THE WITNESS: Well, I'll just read
19 what's in the last sentence here.

20 "As we work to adhere to the EO, please
21 consider this the required Congressional
22 Notification to satisfy notice for the potential

1 reorganization, consolidations, and/or program
2 terminations."

3 This way, they wouldn't be caught off
4 guard.

5 BY MS. GREENBERGER

6 Q And would you agree with me that when
7 Congress appropriates money for broadcasting,
8 they like to know whether that money was used as
9 it was justified by the agency?

10 MR. KHOJASTEH: Object to form. Calls
11 for speculation.

12 THE WITNESS: I don't know.

13 BY MS. GREENBERGER

14 Q You don't know whether it would be --

15 A Well, I don't know if somebody might --
16 somebody might be upset about it, and somebody
17 else might not. You're asking me to get into the
18 minds of members of Congress.

19 Q I'm not asking about whether they'd be
20 upset. Whether they'd want to know.

21 Do you believe that the Congress would
22 want to know if money that they had appropriated,

1 hundreds of millions of dollars, was instead not
2 being used for the purpose that was justified to
3 Congress --

4 MR. KHOJASTEH: Same --

5 BY MS. GREENBERGER

6 Q -- namely, broadcasting?

7 MR. KHOJASTEH: Same objection. Calls
8 for speculation.

9 THE WITNESS: There's over 400 members
10 of Congress in the House. I don't know what
11 their desires are.

12 BY MS. GREENBERGER

13 Q Are you aware that USAGM has a plan for
14 a government shutdown?

15 A Yes.

16 Q And in the event of a government
17 shutdown, USAGM can only retain people who are
18 necessary to perform activities expressly
19 authorized by law?

20 A Yes.

21 Q And did you review the most recent
22 government shutdown plan?

1 A I --

2 MR. KHOJASTEH: Object to form. Lacks
3 foundation.

4 THE WITNESS: I believe that came
5 across my desk, yes.

6 BY MS. GREENBERGER

7 Q And are you aware -- the wrong one --
8 that the most recent government shutdown plan has
9 963 people listed as necessary to perform
10 activities expressly authorized --

11 A Can I see that --

12 Q -- by law?

13 A -- please?

14 MS. GREENBERGER: It's tab 44.

15 (Deposition Exhibit Number 10 was
16 marked for identification.)

17 THE WITNESS: I don't know if this is
18 the most recent, to be honest. I think there --

19 MS. GREENBERGER: Has there --

20 THE WITNESS: -- might be something --
21 there might be one that's more recent than this.
22 Do you know what the date --

1 MS. GREENBERGER: This is from --

2 THE WITNESS: -- of this --

3 MS. GREENBERGER: -- 2024.

4 THE WITNESS: Oh, yeah.

5 MR. KHOJASTEH: Do you have anything
6 to, like, establish that other than --

7 THE WITNESS: Yeah. This is --

8 MR. KHOJASTEH: -- say so?

9 MS. GREENBERGER: I mean, I was trying
10 to avoid printing dozens of pages. I could --

11 THE WITNESS: I would rather --

12 MS. GREENBERGER: -- send you the full
13 document.

14 MR. KHOJASTEH: I'm just -- I just
15 mean, like, is there anything that you have like
16 the cover page of this that would show that it's
17 --

18 MS. GREENBERGER: You know what? Why
19 don't we put this aside and we can come back to
20 it after lunch.

21 THE WITNESS: Yeah.

22 MR. KHOJASTEH: Again, I'm not trying

1 to --

2 MS. GREENBERGER: But --

3 MR. KHOJASTEH: -- give you a hard
4 time, Counsel, just --

5 MS. GREENBERGER: But my question --

6 MR. KHOJASTEH: -- an unauthenticated
7 document that you're showing us with no heading,
8 nothing.

9 THE WITNESS: And this is, I believe,
10 an old one.

11 BY MS. GREENBERGER

12 Q Okay. I want to turn back to the plan.
13 I just have a question that I hope you can answer
14 for me. The number on page 2, the 1,033 -- you
15 might need to squint a little.

16 A Yeah.

17 Q Is that the -- what -- what does that
18 number represent?

19 A The number, it looks like the number of
20 workers at VOA that are in a competitive field.
21 There's noncompetitive and there's competitive.

22 Q So is that the number that would be

1 terminated to reach 81, or is that the total from
2 which 81 would be terminated?

3 A I believe if you're reading this, of
4 the 936, this called -- this plan that was signed
5 off on by career agency staff called for the
6 elimination of 90.6 percent of the staff in
7 Washington, D.C., 3.1 percent in Miami,
8 2.6 percent in New York, if I'm following this,
9 .7 percent in Greenville.

10 Q Yeah. So, just so I understand, these
11 are the number of people that would be laid off?

12 MR. KHOJASTEH: Strike -- object to
13 form. I think she -- mischaracterizes her
14 testimony.

15 BY MS. GREENBERGER

16 Q I'm really not. This is not some sort
17 of trick question. I'm just trying to understand
18 this document.

19 A This -- yeah, this is a little
20 confusing. I don't know.

21 Q Okay.

22 A Can you ask Frank that? He would be

1 better off to ask that.

2 Q Okay. That's fine. Okay. So you
3 understand that Judge Lamberth -- you can put
4 that aside; we might come back to it -- issued a
5 preliminary injunction on April 22nd?

6 A Yes.

7 Q And you learned of it promptly after it
8 was issued?

9 A Yeah. I'm sure it was promptly.

10 Q And you understand that Part III of the
11 PI is not on appeal?

12 A Yes.

13 Q And that means it's in force right now?

14 A Yes.

15 Q And what is your understanding of what
16 Part III of the --

17 MR. KHOJASTEH: Go ahead. Answer.

18 I'm --

19 BY MS. GREENBERGER

20 Q -- preliminary injunction requires?
21 I'm not asking you to disclose any information
22 from counsel.

1 MR. KHOJASTEH: I'm going to instruct
2 you not to answer to the extent that your
3 understanding of Part III of the order is based
4 on communications you had with counsel.

5 THE WITNESS: Okay.

6 MS. GREENBERGER: Are you instructing
7 her not to answer at all?

8 MR. KHOJASTEH: My instruction stands.
9 I'm going to instruct her not to answer to the
10 extent that her understanding is based on
11 communications she had with counsel.

12 If you have some independent
13 understanding, meaning you're going to put the
14 order in front of her and ask her what the words
15 on the page mean, go for it, but --

16 MS. GREENBERGER: Let's move on.

17 MR. KHOJASTEH: -- if it's based on
18 her -- conversations with us or agency counsel,
19 it's plainly attorney-client.

20 BY MS. GREENBERGER

21 Q Did you understand as a defendant in
22 the case that you were required to comply with

1 Judge Lamberth's order?

2 A Yes.

3 Q And did you understand that USAGM is
4 also a defendant and had to comply?

5 A Yes.

6 Q Okay. And do you agree that Judge
7 Lamberth was right to issue Part III of the
8 preliminary injunction?

9 MR. KHOJASTEH: Object to form.

10 THE WITNESS: Can I see that? I -- I
11 want to see what -- you're asking --

12 MS. GREENBERGER: I can read it to you.

13 THE WITNESS: -- if I agree with the
14 judge?

15 MS. GREENBERGER: Yeah.

16 MR. KHOJASTEH: What -- could you --
17 could you at least explain --

18 MS. GREENBERGER: Sure. I can read to
19 you --

20 MR. KHOJASTEH: -- read to her or show
21 her what --

22 MS. GREENBERGER: I'll read to you what

1 --

2 MR. KHOJASTEH: -- Part III says?

3 MS. GREENBERGER: -- Part III is. It's
4 just a sentence, so I --

5 THE WITNESS: Okay.

6 MS. GREENBERGER: -- don't know that I
7 printed it up.

8 BY MS. GREENBERGER

9 Q But it says, Defendants must, quote,
10 restore VOA programming such that USAGM fulfills
11 its statutory mandate that VOA, quote, serve as a
12 consistently reliable and authoritative source of
13 news --

14 A Right.

15 Q -- 22 U.S.C. 6202.

16 A Yes. Yes.

17 Q And so my question was: Do you agree
18 that Judge Lamberth was right to issue that
19 preliminary injunction?

20 A I believe we didn't fight that part.
21 Is that correct, we didn't fight that part?
22 Because we agree.

1 Q And --

2 MR. KHOJASTEH: We -- yeah.

3 BY MS. GREENBERGER

4 Q It's okay. I'll go to my next
5 question.

6 And Part III of the preliminary
7 injunction requires you as one of the defendants
8 ensure that VOA continues broadcasting.

9 Is that how you understand it?

10 MR. KHOJASTEH: Object to form.
11 Whatever -- I'm going to instruct her not to
12 answer to the extent that any part of her
13 understanding of that order --

14 MS. GREENBERGER: I'll -- I'll --

15 MR. KHOJASTEH: -- is based
16 on communications --

17 THE WITNESS: That's true.

18 MR. KHOJASTEH: -- with lawyers.

19 MS. GREENBERGER: I'll withdraw the
20 question.

21 THE WITNESS: That's true.

22

1 BY MS. GREENBERGER

2 Q Did you take -- so we already
3 established that the injunction was issued on
4 April 22nd.

5 A I think there was a TRO, right?

6 Q And there was an earlier TRO --

7 A Which was --

8 Q -- from a judge in --

9 A -- on what --

10 Q -- New York.

11 A -- date?

12 MR. KHOJASTEH: For his sake, let her
13 ask the questions.

14 THE WITNESS: Okay.

15 BY MS. GREENBERGER

16 Q So let me -- let me focus on the
17 preliminary injunction.

18 Did you take any immediate steps after
19 April 22nd to restore VOA programming?

20 A Yes.

21 Q And what were the steps that you took?

22 A Well, the reason --

1 MR. KHOJASTEH: Object to form. If you
2 know.

3 THE WITNESS: The reason I asked about
4 the TRO is that we wanted to figure out what the
5 stat minimum was, and as we were in the process
6 of working through all of this, we were hit with
7 the TRO, which froze us.

8 We figured out immediately that Office
9 of Cuba Broadcasting was statutorily required,
10 and we -- even though we had taken everybody at
11 OCB and put them on paid administrative leave, we
12 put the graphic up, and we brought them right
13 back. And then we were trying to come up with
14 our plan for statutory minimum, and we had --
15 we're hit with a TRO and kind of froze in place.

16 So once the preliminary order happened
17 and we started -- were told to start back up,
18 that we could start back up, it takes time. The
19 machine had not moved for that much of time
20 because of the TRO.

21 BY MS. GREENBERGER

22 Q So the TRO, I can represent to you, was

1 on March 28th.

2 A Uh-huh.

3 Q Is your position that you could not
4 start back up, meaning start -- restore VOA
5 programming after the March 28th TRO until the PI
6 was issued?

7 MR. KHOJASTEH: Object to form.

8 I'm going to instruct you not to answer
9 to the extent that your understanding of the
10 impact of the March 28th TRO is based on your
11 communications with counsel.

12 THE WITNESS: I'm going to pass on
13 answering that.

14 BY MS. GREENBERGER

15 Q Let me ask it a different way.

16 Were it not for the TRO on March 28th,
17 would you have different programming on
18 March 29th and thereafter?

19 A No, I -- it's a process to determine
20 what the stat minimum is and then make what is a
21 big machine move. And it's just a long -- it's a
22 process. There's a lot of -- there's a lot of

1 moving parts.

2 Q And on --

3 A So we were working diligently to make
4 that happen.

5 Q And so, on March 18th, you determined
6 what the statutory minimum was, correct?

7 MR. KHOJASTEH: Object to form. Vague
8 as to "you."

9 BY MS. GREENBERGER

10 Q So I want to -- you said to Congress
11 that the judge froze us, and maybe -- maybe the
12 better way to ask without asking about your
13 counsel is: What did you mean when you said that
14 to Congress?

15 A We got hit with numerous malicious
16 lawsuits, and it is a bit of a freezing pattern.
17 You are stuck in the minutia of lawsuits, and it
18 can be -- it can have a chilling effect that kind
19 of freezes you. You're forced to be dealing with
20 this when what you're trying to do is get the
21 agency to stat min.

22 Q And when you say you were frozen, what

1 were you unable to do?

2 A To put 100 percent focus on getting us
3 to stat min.

4 Q So, when you say you were frozen, it's
5 because you were thinking about the lawsuits? Is
6 that what you're saying?

7 A No, I'm not saying that. That's what
8 you're saying.

9 Q I'm really just trying to understand.
10 When you were frozen, what couldn't the
11 agency do?

12 MR. KHOJASTEH: Object -- I'm --

13 THE WITNESS: I've already answered
14 that.

15 BY MS. GREENBERGER

16 Q So between March 15th and April 22nd,
17 did any programming restart?

18 A Office of Cuba Broadcasting, I believe,
19 started up.

20 Q How about anything else?

21 A I don't -- I don't recall.

22 Q Okay.

1 A That would be a question that maybe
2 Leili or Frank would be better to answer.

3 Q And Persian News Network broadcasting
4 on TV restarted at a certain point, correct?

5 A Yes.

6 Q Okay. So -- and was that point after
7 April 22nd?

8 MR. KHOJASTEH: Object to form. Asked
9 and answered.

10 THE WITNESS: I don't have the calendar
11 in front of me.

12 BY MS. GREENBERGER

13 Q Okay. So what steps did VOA take to
14 restore VOA -- I'm sorry.

15 What steps did the agency take to
16 restore VOA programming after it received the PI?

17 A Well, we --

18 MR. KHOJASTEH: Object to form. Lacks
19 foundation.

20 THE WITNESS: Trying to figure out how
21 to take the stat min that the President asked
22 for, which is the reduction to non-statutory

1 components of functions shall be eliminated, so
2 eliminating anything that was non-statutory,
3 keeping what was statutory, and determining how
4 do we take what's statutory and get that over the
5 air.

6 BY MS. GREENBERGER

7 Q In late July, you told the press that
8 your goal is to shut the entire agency down as
9 per the instructions of President Trump; is that
10 correct?

11 MR. KHOJASTEH: Object to --

12 THE WITNESS: Can I see the --

13 MR. KHOJASTEH: Object to form. Lacks
14 foundation. If you want to show her something,
15 go for it.

16 BY MS. GREENBERGER

17 Q Well, this was quoted in the Court's
18 decision. You read the Court's decision, right?

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation.

21 BY MS. GREENBERGER

22 Q Okay. Did you read the Court's

1 decision?

2 MR. KHOJASTEH: Object to form.

3 THE WITNESS: I read a lot of things.

4 MR. KHOJASTEH: Lacks foundation.

5 THE WITNESS: I really do. It would be
6 nice to have the exact quote and not just
7 skipping sentences like the fake news does.

8 MS. GREENBERGER: It's document 27. We
9 can mark this.

10 (Deposition Exhibit Number 11 was
11 marked for identification.)

12 BY MS. GREENBERGER

13 Q This is the Court's order dated
14 July 30th, 2025.

15 A Okay.

16 Q Have you seen this document before?

17 A I'm sure I have.

18 Q Okay. And did you review it soon after
19 it came out?

20 MR. KHOJASTEH: You can -- you can
21 answer whether you reviewed this or not.

22 THE WITNESS: I -- you realize we have

1 a lot of cases? I've seen a lot of this. I
2 probably did.

3 MS. GREENBERGER: Okay.

4 THE WITNESS: I probably relied on my
5 attorneys to advise me on this.

6 BY MS. GREENBERGER

7 Q So turning to the bottom of page 9, do
8 you see that four lines up from the bottom, the
9 Court says, "Defendant Kari Lake made the
10 following on-the-record statement to a news
11 publication, as reported on July 22nd: Our goal
12 is to shut the entire agency down as per the
13 instructions of President Trump And so
14 I'm working to eliminate the agency, and it's
15 been a big job, but we're working hard on it."

16 A What's the question?

17 Q So my question was: Did you say that
18 to the press?

19 A Well, there's a dot dot dot dot, which
20 indicates a whole lot was left out. If you'd
21 like to pull the exact interview and show me
22 that, then I'd be happy to make -- respond to

1 that, but the dot dot dot dot indicates there's a
2 lot that -- a lot that may have been said between
3 the words "President Trump" and the words "and
4 so."

5 Q So are you accusing the judge of
6 selectively quoting you?

7 MR. KHOJASTEH: She's not accusing the
8 judge of anything.

9 THE WITNESS: I'm just telling you I'm
10 not going to respond to it.

11 BY MS. GREENBERGER

12 Q Well, my --

13 MR. KHOJASTEH: Yeah.

14 BY MS. GREENBERGER

15 Q -- question is: Do you recall making
16 those two sentences -- that statement?

17 A I've said a lot of words, but I'd
18 really like to know what's in the middle of that.
19 It could be selective.

20 Q Do you recall, or you don't recall?

21 MR. KHOJASTEH: She just answered.

22 MS. GREENBERGER: No, she didn't.

1 THE WITNESS: I would like to see the
2 entire -- this is a small segment of an
3 interview, and in typical fashion, the media
4 likes to pull apart just little --

5 BY MS. GREENBERGER

6 Q This is not a quote in the media. This
7 is a quote in the court order, correct?

8 MR. KHOJASTEH: That he's citing from
9 media reports.

10 THE WITNESS: Yeah.

11 MR. KHOJASTEH: He's not -- do
12 you think -- just for the record, Counsel, do you
13 think that the judge was the reporter on this?

14 MS. GREENBERGER: I think you're
15 misunderstanding, sir.

16 MR. KHOJASTEH: I think, then, you
17 should ask better questions.

18 MS. GREENBERGER: I think you don't
19 understand the citation.

20 THE WITNESS: If you --

21 BY MS. GREENBERGER

22 Q Let's -- let's move on. I'm going to

1 come back to this.

2 So, since the preliminary injunction
3 has gone into effect, the VOA has only broadcast
4 in four language -- is only providing
5 broadcasting for four language services; is that
6 correct?

7 MR. KHOJASTEH: Object to form.

8 THE WITNESS: I believe so.

9 Afghanistan, Persian, Cuba and Mandarin.

10 BY MS. GREENBERGER

11 Q And prior to your takeover at USAGM,
12 how many languages was VOA broadcasting?

13 A It depends if you're looking at just
14 VOA or you're looking at the grantees, but
15 dozens.

16 Q Over 45?

17 A Sounds good.

18 Q I think 49's the right number. And did
19 you consult with the secretary -- strike that.

20 Did you -- so, first of all, I believe
21 the number is 49. Do you -- do you agree that's
22 accurate?

1 A You say so. It sounds right.

2 Q And did you consult with the Secretary
3 of State concerning the deletion of the other
4 approximately 45 language services?

5 A Consulted with the Department of State.

6 Q And what documents, whether that be
7 e-mails, memos, reflect that you consulted with
8 the Department of State?

9 MR. KHOJASTEH: Object to form. Lacks
10 foundation.

11 THE WITNESS: I put -- there's a memo
12 that shows that we had that --

13 MS. GREENBERGER: And who --

14 THE WITNESS: -- that meeting.

15 BY MS. GREENBERGER

16 Q And who was at the meeting?

17 A Oh, boy. Members of the Secretary's
18 team, high-level members of the Department of
19 State.

20 Q And when was that meeting?

21 A I want to say it was the 18th or the
22 19th.

1 Q Of what month?

2 A Of March. So within that seven-day
3 window of the President's executive order.

4 Q And in that meeting, you said that you
5 were going to stop language broadcast -- stop
6 broadcasting in about 45 languages?

7 A In that meeting, we discussed the
8 President's executive order, what it meant, what
9 he was calling for us to do at the agency in the
10 executive order, which was to bring this agency
11 down to its statutory minimum, reduce -- that the
12 non-statutory components and functions of the
13 agency would be eliminated to the maximum extent
14 consistent with applicable law.

15 And then we presented them with the
16 plan that was developed by senior career
17 leadership, who assessed what the statutory
18 minimum is and signed off on it, which is your, I
19 believe, Exhibit 3, showing them which languages
20 we would be doing and would not be doing.

21 Q And in the fiscal year 2025 budget
22 justification, VOA had represented to Congress

1 that it would broadcast in, you know, whether
2 it's 48 or 49 languages; is that right?

3 MR. KHOJASTEH: Object to form. Lacks
4 foundation.

5 THE WITNESS: In the what? In the
6 what? I'm sorry.

7 BY MS. GREENBERGER

8 Q In the budget justification for the
9 2025 fiscal year.

10 A What about it?

11 Q In that budget justification, did VOA
12 represent how many languages it would broadcast
13 in?

14 MR. KHOJASTEH: Object to form. Lacks
15 foundation.

16 THE WITNESS: The 2025 budget would
17 have been put together approximately when, that
18 justification?

19 MR. KHOJASTEH: If you don't know, you
20 don't know, Ms. Lake --

21 THE WITNESS: Well, I --

22 MR. KHOJASTEH: -- it's okay.

1 THE WITNESS: -- believe it was put
2 together by the previous administration before
3 the executive order of March 14th, Continuing the
4 Reduction of the Federal Bureaucracy, was issued.
5 Is that right?

6 BY MS. GREENBERGER

7 Q So the budget justification that was
8 issued prior to the EO, do you understand that it
9 represented that there would be broadcasting in
10 48 or 49 languages?

11 MR. KHOJASTEH: Object to form. Lacks
12 foundation.

13 Do you want to ask her whether she
14 reviewed it? Do you want to at least lay the
15 foundation? Does she know what it is, when it
16 was created? These are just foundation.

17 MS. GREENBERGER: I just don't think
18 those are necessary, but I appreciate the
19 assistance.

20 MR. KHOJASTEH: It would -- it would
21 have just cut through a lot for you.

22 THE WITNESS: When was it created? Do

1 you know the date? I would like to know, because
2 I know it was --

3 BY MS. GREENBERGER

4 Q Have you -- have you reviewed the
5 budget justification that was sent to Congress
6 prior to the EO?

7 A I believe that I have seen that. It
8 was a -- kind of a shiny brochure type. Is that
9 what I'm -- do you have it in front -- do you
10 have it? I'd like to take a look at it. I think
11 I know what you're talking about.

12 Q Are you aware whether USAGM, prior to
13 the EO, had informed Congress how many languages
14 it would broadcast in?

15 A I'm assuming they did.

16 Q Okay. And what do you understand USAGM
17 prior to the EO had told Congress about how many
18 languages it would be broadcasting in?

19 A Probably dozens, as you said. But,
20 again, the EO came out on March 14th.

21 Q And in your view, after the EO came
22 out, that controlled and USAGM had no obligation

1 to comply with what it told Congress?

2 MR. KHOJASTEH: Object to form.

3 You can answer that question. However,
4 to the extent that your view of what controls and
5 what doesn't control is based on communications
6 you've had with counsel, I'm going to instruct
7 you not to answer.

8 THE WITNESS: What was the question?

9 MS. GREENBERGER: Can you read back the
10 question, please?

11 (Whereupon, the reporter read the
12 record as requested.)

13 MR. KHOJASTEH: Same instruction. If
14 you have an independent view separate from advice
15 you received from counsel, you can testify as to
16 it. Otherwise, I'm going to instruct you not to
17 answer.

18 THE WITNESS: I think I'm going to go
19 with that, you know, I'd rather not discuss what
20 my thoughts are on that based on what my attorney
21 just said.

22

1 BY MS. GREENBERGER

2 Q Do you have no independent view other
3 than what you consulted with counsel?

4 A I'd like to make sure that I'm not
5 going against counsel's advice.

6 Q But counsel and I are both saying that
7 if you have an independent view separate from
8 what your attorney told you, you're required to
9 answer the question.

10 MR. KHOJASTEH: Yeah, if you have a
11 view -- if it's okay -- if you have a view
12 independent of what you had -- the discussions
13 you had with agency counsel or the Department of
14 Justice as to whether the executive --

15 THE WITNESS: Meaning my view is
16 different?

17 MR. KHOJASTEH: Whether the executive
18 order as a matter of law governs -- controls over
19 what prior congressional -- this is what you're
20 asking, right? Prior congressional
21 justifications, budget justifications, which
22 one's controlling? If you have a view as to

1 this, as a matter of law, independent of anything
2 you ever learned from us or from agency counsel,
3 then -- then you can testify --

4 THE WITNESS: I'm not a legal expert,
5 so my view wouldn't even matter in that. I'm
6 going to go with what my attorneys --

7 MR. KHOJASTEH: But if you have a view
8 one way or the other as to -- like that's
9 separate and apart from --

10 THE WITNESS: I understand what you're
11 saying.

12 MR. KHOJASTEH: Yeah. Yeah. That's
13 why I'm just -- that's --

14 BY MS. GREENBERGER

15 Q It's not about whether it matters.
16 It's about whether you have a view. Do you have
17 a view?

18 A No, I don't.

19 Q Your declaration, which you can turn
20 back to, which is Exhibit 1 --

21 A Okay.

22 MR. KHOJASTEH: We're going August?

1 MS. GREENBERGER: August, correct.

2 BY MS. GREENBERGER

3 Q And I'm going to ask you some questions
4 about paragraph 6, if you want to look at that.

5 A Okay. Let me read through that real
6 quick.

7 Q Sure.

8 A This refers to Mr. Wuco's prior
9 declaration. Do you have a copy of that?

10 Q I do, although I'm not asking about
11 that paragraph, but that's fine. I can give that
12 to you.

13 MS. GREENBERGER: Do you remember what
14 that is? Yeah, it's 36.

15 THE WITNESS: As discussed in depth in
16 Mr. Wuco's --

17 MR. KHOJASTEH: Which paragraph are we
18 looking at?

19 MS. GREENBERGER: I'm --

20 MR. KHOJASTEH: Six, right?

21 MS. GREENBERGER: Six, which doesn't --

22 THE WITNESS: Oh, is it b --

1 MS. GREENBERGER: -- refer --

2 THE WITNESS: -- 6(b)?

3 MR. KHOJASTEH: I think you might be
4 looking at the wrong -- is it -- are you looking
5 at August?

6 THE WITNESS: Six. And then I got down
7 to b here.

8 MS. GREENBERGER: Yeah. Oh, here.
9 Yeah, there's a little reference to Wuco, so
10 that's fine.

11 THE WITNESS: Okay.

12 (Deposition Exhibit Number 12 was
13 marked for identification.)

14 MR. KHOJASTEH: Thank you. This one is
15 marked what?

16 MR. BLUMIN: Twelve.

17 BY MS. GREENBERGER

18 Q And I'm handing the witness Exhibit 12,
19 which is the declaration of Frank Wuco, dated
20 June 27th, 2025, at the witness's request.

21 A Okay. Okay. You're just going to ask
22 about 6?

1 Q Correct.

2 A Okay. Okay. I'm trying to find where
3 he referred to that. Maybe it was in here. Dari
4 and Pashto. Oh, here it is. Okay. I think I'm
5 ready.

6 Q Okay. So your declaration of 8/13,
7 which is Exhibit 1, paragraph 6, says that USGM
8 -- "USAGM has identified the language services it
9 is required to maintain" --

10 A Yeah.

11 Q -- "namely, Mandarin, Farsi, Dari, and
12 Pashto in accordance with the International
13 Broadcasting Act."

14 Is USAGM's current view that it is only
15 required to maintain those four language
16 services --

17 MR. KHOJASTEH: I'm sorry. Guys, do
18 you mind just --

19 Go ahead. Sorry. I couldn't follow
20 both. Sorry. Go ahead.

21 BY MS. GREENBERGER

22 Q Is USAGM's current view that it is only

1 required to maintain those four identified
2 language services pursuant to federal statutes?

3 MR. KHOJASTEH: Object to form.

4 Could you -- could you repeat that
5 question? I just want to make sure that we're
6 not invading the attorney-client privilege here.
7 Go for it.

8 BY MS. GREENBERGER

9 Q Well, this says US -- you said to the
10 Court that USAGM has identified the language
11 services it is required to maintain and lists
12 four. Is that still USAGM's position that those
13 are the four required language services?

14 A Well, as I stated in the June 3rd
15 congressional notification, we anticipate being
16 above the originally proposed statutory minimum.
17 And this is a -- this is what we believe is
18 statutorily required, but we could do more,
19 possibly.

20 Q Do you understand the VOA -- that there
21 is a statute that states that VOA is required to
22 broadcast via radio to North Korea specifically?

1 A There's been some --

2 MR. KHOJASTEH: Object to form.

3 Whatever you understand -- if you're asking her
4 to look at a statute and read the words on the
5 page, great.

6 Whatever you understand about any of
7 these statutes and what they require and what --
8 how we're complying with them are subject to
9 attorney-client communications. I'm instructing
10 you not to answer.

11 THE WITNESS: I'm going by what my
12 attorneys have told me.

13 BY MS. GREENBERGER

14 Q Do you understand --

15 A And general counsel.

16 Q As the acting CEO of USAGM, do you
17 understand whether or not there is a statute
18 concerning VOA broadcasting to North Korea?

19 A The general counsel at USAGM put
20 together the stat min documentation. It was part
21 of that process. I didn't pull this out of thin
22 air --

1 Q I'm not asking about --

2 A -- to put this together.

3 Q I'm not asking about the stat min --

4 A So I'm leaning on -- I'm leaning on
5 counsel.

6 MR. KHOJASTEH: And we're going to be
7 very careful with how we start answering these
8 questions.

9 I'm just going to ask you to slow down
10 in your responses --

11 THE WITNESS: Okay.

12 MR. KHOJASTEH: -- because I need to
13 make sure -- I want to give counsel the
14 opportunity to conduct her examination, and I
15 don't want to obstruct her ability to ask you
16 your personal views or personal knowledge. But
17 we need to draw a distinction here between what
18 you've learned from counsel -- explaining it to
19 Ms. Lake, not explaining it to you.

20 You need to draw a distinction between
21 what you learned from counsel and what you
22 yourself know. So go ahead. Go ahead. I'm

1 sorry, Counsel. Go ahead.

2 THE WITNESS: In coming up with what
3 statutory minimum was, as you know, I leaned on
4 the career leadership at the agency. Primarily,
5 the general counsel decided what statutory
6 minimum was. I didn't decide. He did. And the
7 rest of the senior career leadership with decades
8 and decades of experience signed off on that.

9 That's what I lean on. I'm not a
10 lawyer, and so I have to lean on the attorneys at
11 the agency, and I did that.

12 BY MS. GREENBERGER

13 Q Is it fair to say that VOA has not
14 provided any broadcasting in Korea at all since
15 March 15th?

16 MR. KHOJASTEH: Object to form. Object
17 to form. Lacks foundation. But go ahead.

18 THE WITNESS: So is it fair to say they
19 have not?

20 MS. GREENBERGER: Yeah.

21 THE WITNESS: No, it's not fair to say
22 that.

1 BY MS. GREENBERGER

2 Q Okay. So what broadcasting has been
3 done in North Korea since March 15th?

4 A I think we're currently doing some
5 broadcasting.

6 Q Okay. And when did you start doing
7 broadcasting --

8 A I'm not sure --

9 Q -- in North Korea?

10 A -- when we started.

11 Q You notified the Court on August 28th
12 that you plan to resume broadcasting to North
13 Korea; is that --

14 A Yes.

15 Q -- correct?

16 A Yes.

17 Q And so, prior to August 28th, there was
18 no broadcasting to North Korea, correct?

19 A Prior to August 28th, I don't believe
20 there was.

21 Q Okay. And so from March 15th to at
22 least August 28th, there was no broadcasting to

1 North Korea, correct?

2 A Correct.

3 Q Okay. And --

4 A Is that the question you originally
5 asked, or did you say until now?

6 MR. KHOJASTEH: Just let her do her
7 examination.

8 THE WITNESS: Sorry. I may have
9 mis-answered the first question. I thought you
10 meant until now.

11 BY MS. GREENBERGER

12 Q And since August 28th, what
13 broadcasting has occurred in North Korea?

14 MR. KHOJASTEH: Object to form. If you
15 know.

16 THE WITNESS: I would have to have you
17 ask that question of Leili Soltani or Frank Wuco.

18 BY MS. GREENBERGER

19 Q Do you have any knowledge about whether
20 there's been any broadcasting since August 28th
21 to North Korea?

22 A Yes, there has.

1 Q But you don't know any details?

2 A I don't have the details, and I don't
3 want to speculate.

4 Q And is the broadcasting to North Korea
5 in Korean, or do you not know?

6 A What other language would we put it in?

7 Q I would hope it would be in Korean.
8 I'm just trying to get your record -- this on
9 record.

10 A It's in Korean, yeah.

11 Q Okay. And when did the agency decide
12 to resume broadcasting to North Korea?

13 A I think it's been a discussion for a
14 while, and we recently decided to do that with
15 the President's tweet about South Korea.

16 Q And are there -- is there an e-mail or
17 a memo or other documents reflecting VOA's plan
18 to resume broadcasting to North Korea?

19 A I don't know. Likely, maybe. I don't
20 know.

21 Q None that you're aware of?

22 A There's probably -- there may be some.

1 I just don't know.

2 Q None that you can identify right now?

3 A I -- I get a lot of e-mails, so I can't
4 just say yes. I'm sure there were -- I know how
5 I communicate with people. I like to talk to
6 people. Others, in making this decision, may
7 have been e-mailing. I don't know. I don't look
8 at other people's e-mails.

9 Q Do you believe that the statutory
10 minimum document made a mistake in not listing
11 North Korea, or was it right?

12 A As I said, it was a guideline. And
13 then, as I reiterated to Congress and to Senator
14 Lindsey Graham and others, we anticipate being
15 above the originally proposed minimum staffing
16 numbers, and we plan to effectuate President
17 Trump's executive order.

18 Q Is USAGM obligated by statute to
19 broadcast to North Korea?

20 MR. KHOJASTEH: Object to form. I'm
21 going to instruct you not to answer to the extent
22 that your understanding of what this agency's

1 obligated to do or how to comply with statute is
2 based on your communications with counsel.

3 THE WITNESS: That's right. This would
4 violate attorney-client privilege.

5 BY MS. GREENBERGER

6 Q If -- you had earlier testified that
7 the -- if I understood your testimony, that the
8 EO -- let me ask it a different way.

9 Am I right that the EO, in your view,
10 requires USAGM to only broadcast to those
11 countries that it's obligated to broadcast to?

12 MR. KHOJASTEH: Same objection.
13 Whatever your understanding of the EO is, if you
14 have an independent understanding based on your
15 review of the EO, great. Otherwise, if it's
16 based on your communications with your general
17 counsel, Department of Justice or other agency
18 lawyers, I'm going to instruct you not to answer.

19 THE WITNESS: I'm not going to answer
20 that.

21 BY MS. GREENBERGER

22 Q Why would USAGM broadcast to a country

1 that it's not required to if President Trump is
2 saying, go to the statutory minimum? I'm just
3 not understanding.

4 A I am relying on what the attorneys are
5 telling me should be the statutory minimum.

6 Q And is the decision to broadcast to
7 North Korea based on communications from your
8 counsel?

9 MR. KHOJASTEH: Object to form.

10 THE WITNESS: Yes.

11 MR. KHOJASTEH: I --

12 THE WITNESS: I'm sorry.

13 MR. KHOJASTEH: I don't want to start
14 putting attorney-client communications at issue
15 here, so I'm going to -- I'm going to instruct
16 her not to answer.

17 If there's another way you can phrase
18 that question that doesn't put our communications
19 with counsel at issue, that's fine, but I'm not
20 going to walk into a situation where she's
21 putting the attorney-client privilege at issue.
22 There's a better -- there's other ways to answer

1 the question -- to ask the question. So you need
2 to be patient here, Kari.

3 THE WITNESS: Okay.

4 MR. KHOJASTEH: We have to take our
5 time here.

6 BY MS. GREENBERGER

7 Q What's -- I already asked you about
8 what broadcasting has happened to date for North
9 Korea, and you said that I should ask --

10 A Has happened to state?

11 Q To date.

12 A Oh, to date.

13 Q From August 28th to the present. And
14 you said that I should ask your colleagues, which
15 I appreciate.

16 What can you tell me about what the
17 agency's plan is for future broadcasting to North
18 Korea?

19 A Again, I would have you talk to Leili
20 Soltani on that.

21 Q Do you have any knowledge about the
22 agency's future plan for broadcasting to North

1 Korea?

2 A I think decisions are being made and
3 we're assessing.

4 Q Do you view it as important to the
5 agency to broadcast to North Korea?

6 A I think it's important to effectuate
7 the President's executive order and make sure
8 that what we're putting out is honest, truthful
9 reporting.

10 Q And you said something earlier about a
11 tweet concerning South Korea?

12 A Yeah.

13 Q Tell me what that tweet said.

14 A I don't remember the exact part.

15 Q Roughly.

16 A It was critical of what was happening
17 in South Korea, questioning what was happening
18 with their leadership in that country.

19 Q And do you know whether USAGM plans to
20 broadcast in radio or TV or online to North --

21 MR. KHOJASTEH: Object --

22

1 BY MS. GREENBERGER

2 Q -- Korea?

3 A Again --

4 MR. KHOJASTEH: Object to form. Asked
5 and answered.

6 THE WITNESS: Again, I hate to keep
7 saying this.

8 MS. GREENBERGER: You don't know.

9 THE WITNESS: Leili will be able to
10 answer that --

11 MS. GREENBERGER: Okay.

12 THE WITNESS: -- and maybe Frank as
13 well.

14 BY MS. GREENBERGER

15 Q We'll talk more about the recent RIFs
16 later, but is it accurate that you sent
17 termination notices to every member of the VOA
18 Korean language service?

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation.

21 THE WITNESS: I would have to look at
22 the list of people that we sent letters to and

1 compare it with people who didn't get letters.

2 BY MS. GREENBERGER

3 Q And did you discuss with members of
4 your team whether or not to RIF members of the
5 Korean language service?

6 A What date -- the RIF that we just had?

7 Q Correct. The August RIF.

8 A Oh, yeah. What was the question?

9 Q Did you discuss with members of your
10 team whether or not to RIF members of the VOA
11 Korean language service in August?

12 MR. KHOJASTEH: I'm going to object to
13 form.

14 To the extent that any counsel were
15 involved in those discussions, I'm going to
16 instruct -- you can answer yes or no as to
17 whether you had a communication about the issue,
18 but you cannot answer -- you cannot share the
19 substance of the communications if counsel were
20 involved.

21 THE WITNESS: This is regarding the
22 Korean folks who were -- from Korean language

1 that were RIF'd?

2 MS. GREENBERGER: Yes.

3 THE WITNESS: And if I had a
4 conversation with who?

5 MS. GREENBERGER: Anyone on your
6 team --

7 THE WITNESS: No.

8 MS. GREENBERGER: -- other than
9 counsel.

10 BY MS. GREENBERGER

11 Q Does USAGM have any plan to your
12 knowledge to broadcast to North Korea without
13 having staff from the Korean language services?

14 MR. KHOJASTEH: Object to form. Lacks
15 foundation. Vague and confusing.

16 THE WITNESS: Yeah. We can broadcast
17 without those employees. We can use contractors.

18 BY MS. GREENBERGER

19 Q And does USAGM have a plan to use
20 Korean contractors?

21 A I believe that's how we're going to do
22 a lot of this.

1 Q And have you --

2 A But, again, this would be better asked
3 of Frank and Leili.

4 Q Has USAGM identified how it would hire
5 Korean contractors?

6 MR. KHOJASTEH: Object to form. Asked
7 and answered.

8 THE WITNESS: When you say Koreans, you
9 mean Korean nationals?

10 BY MS. GREENBERGER

11 Q I mean Korean language speakers.

12 A Okay. Not Korean nationals. We will
13 be hiring American citizens.

14 Q I appreciate that explanation, but my
15 question is just about your plan, meaning the
16 agency's plan.

17 Does the agency have a plan to hire
18 Korean language speakers as contractors?

19 A As opposed to people who don't speak
20 Korean?

21 Q As opposed to not having a plan.

22 A Yeah. We will hire people who speak

1 Korean to do the programming.

2 Q And are there e-mails or memos or other
3 documents that --

4 A I just don't know.

5 Q -- describe that plan?

6 A I don't know. I'm sorry. I didn't
7 mean to step on her.

8 MS. GREENBERGER: Okay. Why don't we
9 go off the record.

10 VIDEO TECHNICIAN: This marks --

11 THE WITNESS: Off the record?

12 VIDEO TECHNICIAN: Sorry. This marks
13 the end of Media Unit No. 3. Going off the
14 record, the time is 13:43 p.m.

15 (Whereupon, at 1:43 p.m., a
16 luncheon recess was taken.)

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A F T E R N O O N S E S S I O N

(2:32 p.m.)

VIDEO TECHNICIAN: This marks the beginning of Media Unit No. 4. Going back on the record, the time is 14:32 p.m.

WHEREUPON,

KARI LAKE

was called for continued examination, and having been previously duly sworn, was examined and testified further as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFFS
CONTINUED

BY MS. GREENBERGER

Q Ms. Lake, turning to Exhibit 3, which is the congressional notice from June 3rd.

A Okay.

Q Your second to last paragraph states, "While we anticipate being above the originally proposed statutory minimum staffing numbers, the plan to effectuate the President's Executive Order is still developing."

Do you see that?

1 A Uh-huh.

2 Q And when you say you "anticipate being
3 above the originally proposed statutory minimum
4 staffing numbers," did that mean that you also
5 anticipated being beyond the language services
6 and countries listed on page 2?

7 A Well, when I wrote this, the plan was
8 still developing. I mean, this was just
9 June 3rd. We're dealing with a lot of lawsuits
10 coming in, and we're still developing the plan.

11 Q So, possibly, is that your answer?

12 A I guess you could say possibly. I
13 mean, we are above the number that -- that the
14 career senior staff suggested, which was, I
15 think, 81 or 82.

16 Q And you are also broadcasting to areas
17 that are above what is laid out in the statutory
18 minimum plan, correct?

19 A Yes.

20 Q And what are those areas?

21 A Russia, I believe, and Korea.

22 Q We've already discussed Russia -- I'm

1 sorry -- Korea.

2 When did you -- when did the agency
3 begin broadcasting to Russia --

4 MR. KHOJASTEH: Object to form. Lacks
5 foundation.

6 BY MS. GREENBERGER

7 Q -- after --

8 A Pardon?

9 Q -- after the March 15th shutdown?

10 A Roughly the same time we started
11 broadcasting to Korea.

12 Q So, earlier this month, is that about
13 right?

14 A Earlier this month, yes, I think so.

15 Q Have you notified the Court that you
16 are broadcasting to Russia?

17 A I'm not --

18 MR. KHOJASTEH: Object to form.

19 BY MS. GREENBERGER

20 Q Are you aware whether or not you've
21 notified the Court?

22 A I -- if we haven't, I think we may be

1 doing that shortly. I'm not sure if we have.

2 Q And are you --

3 A A good question for attorneys.

4 Q Are you using contractors or agency
5 staff to broadcast to Russia?

6 A That --

7 MR. KHOJASTEH: Object to form. Lacks
8 foundation.

9 THE WITNESS: That would be a question
10 for Frank --

11 MS. GREENBERGER: Okay.

12 THE WITNESS: -- or Leili.

13 BY MS. GREENBERGER

14 Q And what is the nature in terms of the
15 medium of the broadcast to Russia?

16 MR. KHOJASTEH: Object to form. Lacks
17 foundation:

18 THE WITNESS: Sorry. My wheel is
19 caught on this little outlet under here.

20 What was the question?

21 BY MS. GREENBERGER

22 Q Are you broadcasting to Russia in

1 radio, TV, or some other way?

2 A I'm not sure.

3 Q And when did the agency decide to
4 resume broadcasting to Russia?

5 A I think I just answered that. Roughly
6 about the same time that we did Korea.

7 Q And why did the agency decide to resume
8 broadcasting to Russia?

9 A We just made --

10 MR. KHOJASTEH: Object to form.

11 To the extent that -- you can answer
12 the question to the extent that its -- the reason
13 why we're doing -- we are or are not doing
14 anything is -- strike that.

15 Object to form. I'm going to instruct
16 you not to answer that to the extent that doing
17 so would reveal attorney-client communications,
18 but you can answer the question if it's not based
19 on communications you had with a lawyer.

20 THE WITNESS: It's based on
21 communications I had with a lawyer.

22

1 BY MS. GREENBERGER

2 Q And does the agency have any
3 documentation in terms of an e-mail, memo,
4 other -- other documents about what its plan is
5 to broadcast to Russia?

6 MR. KHOJASTEH: Object to form. Lacks
7 foundation.

8 THE WITNESS: I don't have any -- I
9 don't believe I have any on that. You might want
10 to ask Frank that, how he's communicating.

11 BY MS. GREENBERGER

12 Q Turning back to the language that we
13 had just read in your June 3rd letter, how could
14 the agency effectuate the President's executive
15 order if it goes above the statutory minimum?

16 MR. KHOJASTEH: Object to form.
17 Mischaracterizes the document. Lacks foundation.

18 THE WITNESS: How could the agency
19 effectuate the President -- well, I think we're
20 effectuating it right now. And this was our
21 first document on statutory minimum put -- put
22 together by the career agency staff, and as I

1 said here, we anticipate being above the
2 originally proposed statutory minimum staffing --

3 MS. GREENBERGER: Let me ask --

4 THE WITNESS: -- as we effectuate --
5 and, you know, news -- for example, in the
6 Persian language or any news operation, if it's a
7 slow news day, you're not staffed as big,
8 perhaps, as if there's a ton of things happening.
9 A big story breaks, you bring more people in.

10 BY MS. GREENBERGER

11 Q And is your view that if there's a big
12 story, the agency is required under the statute
13 to bring more people in?

14 MR. KHOJASTEH: Object to form.

15 To the extent that answering that
16 question discloses attorney-client
17 communications, I'm going to instruct you not to
18 answer. If you can answer that question
19 independent of any communications you've had with
20 counsel or any understanding you've obtained from
21 counsel, you can answer.

22 THE WITNESS: I will use an example of

1 the Farsi language, when the strikes happened and
2 we went into breaking news mode, and we brought
3 more people in to cover that story. There's
4 normal news mode and breaking news mode.

5 BY MS. GREENBERGER

6 Q Yeah. I was going to ask you some
7 questions about that.

8 And Mr. Wuco talks about, I think, what
9 you just called the breaking news mode in his
10 declaration, which is in front of you.

11 A Is that the 12-page one?

12 Q I believe so.

13 A That's Kari Lake, Kari Lake.

14 Q It's already been marked.

15 A This is Kari Lake's declaration. Is it
16 stapled to another one?

17 Q No. I'm pretty sure -- because you
18 looked at it --

19 A You took one back. You grabbed one
20 from me. Is it possible that was the one?

21 Q If I did that, that was a mistake.

22 MS. GREENBERGER: Do you know what

1 exhibit it was?

2 MR. KHOJASTEH: It's Exhibit 12.

3 MS. GREENBERGER: It's Exhibit 12.

4 MR. KHOJASTEH: Which I don't think
5 we've been marking them as we've been putting
6 them in front of you.

7 THE WITNESS: No, I don't --

8 MS. GREENBERGER: I have.

9 MR. KHOJASTEH: Oh, they are. That's
10 right.

11 MS. GREENBERGER: I did mark it.

12 MR. KHOJASTEH: Stickers are there.

13 THE WITNESS: Yeah. 1, 6, 9, 8, 7. I
14 don't have it, guys. It's a thicker one, I
15 think.

16 MR. KHOJASTEH: It's not. It's like
17 a -- it is --

18 MS. GREENBERGER: Okay. We'll --
19 we'll --

20 THE WITNESS: Oh, here it is. Okay.

21 BY MS. GREENBERGER

22 Q All right. So you were just talking

1 about the surge capacity in Iran, correct?

2 A Yes.

3 Q And Mr. Wuco discusses that in his
4 declaration, I believe in paragraph 3 and 4.

5 A Yeah. Yeah.

6 Q And do you have an understanding about
7 whether you're required to have surge capacity?

8 MR. KHOJASTEH: Object to form.

9 Whatever understanding you have, as long -- if
10 it's based on communications you had with
11 counsel, I'm going to instruct you not to answer.

12 THE WITNESS: I think that it was
13 important -- it was a really big moment for Iran.
14 This is possibly the biggest moment in the
15 history of -- modern history of Iran in the past
16 40, 50 years, and we decided -- we made a call to
17 surge our coverage, and I think it was an
18 excellent call.

19 BY MS. GREENBERGER

20 Q And Mr. Wuco says, "The surge
21 operation" -- this is paragraph 4 -- "was highly
22 successful because we maintained access to

1 critical talent."

2 Do you agree with that?

3 A Yeah. I think -- I think there's
4 talent inherent in every human being.

5 Q And the critical talent he was
6 referring to was journalists?

7 A Some of them are journalists. Some of
8 them are technicians, people who are able to
9 report.

10 Q And it includes journalists with
11 specific knowledge about the region?

12 MR. KHOJASTEH: Object to form. Calls
13 for speculation.

14 THE WITNESS: Some, yeah.

15 BY MS. GREENBERGER

16 Q And for a journalist to cover events in
17 Iran to the Iranian people, they need specialized
18 language capacity in Farci?

19 MR. KHOJASTEH: Object to form. Calls
20 for speculation.

21 THE WITNESS: I think some do. If
22 they're on the air and we're broadcasting to

1 folks who speak Farsi, it's important to speak
2 Farsi.

3 BY MS. GREENBERGER

4 Q And USAGM was able to maintain
5 access -- that's the phrase he uses here --
6 because it employed those journalists and was
7 able to call them back from leave; is that
8 correct?

9 A That's right. Paid administrative
10 leave. They're all still working. They're -- I
11 mean, they're still on the -- on the payroll.

12 Q And if VOA terminates those
13 journalists, it won't be able to respond in surge
14 capacity as needed?

15 A That's not true.

16 MR. KHOJASTEH: Object to form. Calls
17 for speculation.

18 BY MS. GREENBERGER

19 Q Why is that not true?

20 A Because we can hire contractors.

21 Q Does it take time to hire contractors?

22 MR. KHOJASTEH: Object to form. Lacks

1 foundation.

2 THE WITNESS: Not necessarily. It
3 doesn't take a lot of time.

4 BY MS. GREENBERGER

5 Q Does -- do you know how long it takes
6 to locate contractors with specialized knowledge
7 of the region and language capacity?

8 A Well, we have been able to do that so
9 far.

10 Q And how many contractors have you
11 been -- when you say you --

12 A I don't know. That's a question for
13 Frank. We just hired some Korean broadcasters.

14 Q And you don't know how long it took to
15 hire them, correct?

16 A Not long.

17 Q Going back to your declaration,
18 paragraph 1, the 8/13 declaration. I'm sorry.
19 Paragraph --

20 A Which --

21 Q -- 6?

22 A Exhibit what?

1 Q I think it's Exhibit 1.

2 MR. KHOJASTEH: This is August?

3 MS. GREENBERGER: August.

4 THE WITNESS: Okay. Just gave myself a
5 paper cut. Ouch.

6 MS. GREENBERGER: Oh, I'm sorry to hear
7 that. I'm going to ask the court reporter to
8 mark this.

9 (Deposition Exhibit Number 13 was
10 marked for identification.)

11 BY MS. GREENBERGER

12 Q I'm handing you Exhibit 13, which is a
13 section of the United States Code, 22 U.S.C.
14 6201.

15 Now, your declaration, paragraph 6(a),
16 refers to that section of the code, correct?

17 A Give me a minute here.

18 Q Please.

19 A Just -- just 6(a), not 6(b)?

20 Q Correct. I'm starting with 6(a).

21 A Okay.

22 Q And your declaration cites section 4 of

1 6201, so I'd ask that you read that section.

2 A Uh-huh.

3 Q Let me know when you're ready.

4 A Okay.

5 Q What are the countries in Asia which
6 lack adequate sources of free information?

7 MR. KHOJASTEH: Object to form.

8 To the extent you have independent
9 knowledge, Ms. Lake, as to that question, that's
10 fine, but if you're relying on advice you've
11 received from counsel, I'm going to instruct you
12 not to answer. But if you have an independent
13 understanding of what countries of Asia lack
14 adequate resources -- adequate sources of free
15 information, you can answer the question.

16 THE WITNESS: I think when we're
17 looking at statute, it's important to look at
18 other statute as well, and other statute talks
19 about not being duplicative. As a matter of
20 fact, I think it's in the IBA. It says, do not
21 duplicate. And so areas where other broadcasting
22 is being duplicated -- this is what I'm assuming

1 came into play when we were putting the statute
2 together, when folks were looking at the
3 statute -- there's already programming that's
4 playing out in many Asian countries through
5 credible -- not credible, necessarily. I
6 wouldn't go that far with CNN -- through American
7 broadcast companies.

8 BY MS. GREENBERGER

9 Q So my question was just: Which
10 countries in Asia lack adequate sources of free
11 information?

12 MR. KHOJASTEH: Same objection and same
13 instruction.

14 THE WITNESS: I don't have an opinion
15 on that.

16 BY MS. GREENBERGER

17 Q And as the head of USAGM, you did not
18 come -- strike that.

19 Does the agency have a conclusion as to
20 which countries of Asia lack adequate sources of
21 information --

22 MR. KHOJASTEH: Object to form --

1 BY MS. GREENBERGER

2 Q -- of free information?

3 MR. KHOJASTEH: She's not here as a
4 30(b)(6) witness. If you want to notice a
5 30(b)(6) witness as to what the agency's position
6 is on anything -- she's a fact witness.

7 And what we discussed outside was you
8 wanted to ask her personal knowledge. There's a
9 way you can frame the question to get to where
10 you're going, like, Ms. Lake, do you have any
11 personal knowledge of countries other than China
12 that aren't free -- don't have free information,
13 right? You can ask that question, and you'll get
14 your -- you'll get an answer, but don't turn
15 this -- don't attempt to turn this into --

16 MS. GREENBERGER: I'm not turning this
17 --

18 MR. KHOJASTEH: -- a 30(b)(6)
19 deposition.

20 MS. GREENBERGER: She is the head of
21 the -- we don't have to have more conversation.
22 I hear you.

1 MR. KHOJASTEH: I'm with you.

2 BY MS. GREENBERGER

3 Q Ms. Lake, do you have any personal
4 knowledge of what countries in Asia lack adequate
5 sources of free information?

6 A I think it's up for debate. There's
7 probably some countries that people think aren't
8 fully democratic and some who are -- that are.

9 Q And I'm asking your personal belief.

10 A I think one is China.

11 Q And other than China, are there any
12 other countries of Asia which lack adequate
13 sources of free information?

14 A There may be free information that is
15 coming in from other broadcasters, in which case
16 the statute would require that we don't compete
17 with other American broadcasters.

18 I think -- I think I get where you're
19 going with this, which is why are you not in this
20 country, country A, country B, country C.

21 Q But I'm not asking you to get where I'm
22 going. I'm just asking you to answer the

1 question.

2 So what countries of Asia lack adequate
3 sources of free information to your personal
4 knowledge other than China?

5 A China.

6 Q China is the --

7 A I believe China --

8 Q -- only one?

9 A I believe China is the one.

10 Q Thank you. Now, in paragraph 13(r) of
11 your declaration, you said that there were three
12 employees in the China team; is that correct?

13 A Was this the one in August?

14 Q Yes.

15 A Okay. 13(r). I believe that either
16 Frank or Leili help put this together.

17 Q Do you understand that to be accurate?

18 A If we put it in --

19 MR. KHOJASTEH: Object to form.

20 THE WITNESS: -- it was accurate.

21 MR. KHOJASTEH: Mischaracterizes the
22 document.

1 MS. GREENBERGER: Okay. I'm not trying
2 to mischaracterize the document.

3 BY MS. GREENBERGER

4 Q How many employees --

5 A This --

6 Q -- are involved in --

7 A This says three.

8 Q Do you recall telling Congress, I
9 believe we have about 15 people we'll be staffing
10 for our --

11 A Yes.

12 Q -- Mandarin coverage?

13 A That doesn't mean that just three --
14 that there's only three that are assisting with
15 Mandarin coverage. There's other people who
16 assist. There's people on this list who can do
17 more than one thing.

18 Q And so how many people are working on
19 Mandarin coverage?

20 A Today, I don't know. We'd have to ask
21 Frank or Leili.

22 Q And in June, was it about 15?

1 A If I said it was 15 in June, then I
2 probably checked that day.

3 Q And as of August 13th, do you believe
4 it was also 15?

5 A We -- we may have had more. This is
6 just three that are -- were three employees that
7 were with -- their description of their job was
8 in the Mandarin service.

9 So, if you see here, East Asia Pacific
10 division, China Branch, Mandarin Service, one
11 employee. East Asia Pacific Division, one. So
12 you can add up how many people. And then you can
13 add up also when you look at people who are doing
14 the digital media. They can do it for more than
15 one language.

16 Q And so, when you say the digital media,
17 where are you referring to in your --

18 A I'm --

19 Q -- declaration?

20 A -- just giving an example. There's
21 other job positions where if you are a radio
22 technician or if you do work that's technical,

1 you may work for more than one language.

2 Q Do you understand how many employees
3 VOA will have in the Mandarin division after the
4 August 29th RIFs go through?

5 MR. KHOJASTEH: Object to form. Lacks
6 foundation.

7 THE WITNESS: I'm not sure exactly how
8 many will be in the Mandarin, but I think what
9 we're doing is we're trying to have specific
10 languages for people who actually speak that
11 language where it's needed to speak that
12 language. And then you're going to have some
13 people who work in the organization, the outlet,
14 VOA, that can do work in each language.

15 BY MS. GREENBERGER

16 Q Ms. Lake, I realize there's a question
17 I meant to ask you earlier.

18 You spoke about the agency restarting
19 broadcasting in both -- in both Russian and
20 Korean, correct?

21 A Yes.

22 Q Does the agency currently have plans to

1 restart broadcasting in any other language?

2 A Not that we've discussed.

3 Q And does the agency currently have
4 plans to reclass -- to restart broadcasting in
5 any other countries?

6 A Not that we've discussed.

7 Q And does the agency currently have
8 plans to restart broadcasting in any other
9 mediums, meaning radio where it had only been TV?

10 A That's possible.

11 Q Are there currently any plans to do so?

12 A Not that I'm aware of.

13 Q Okay.

14 A You'll have to talk to Frank. I mean,
15 I don't -- I don't know how far into the Korean
16 and Russian that we've gotten. It could be a
17 little ways in and just doing digital or we could
18 be doing radio and digital, so I don't have the
19 answer.

20 Q Would you agree with me that China is
21 important in terms of United States foreign
22 policy?

1 A Yes.

2 Q I believe you discussed that when you
3 testified to Congress, there was about 15 people
4 staffing the Mandarin coverage, correct?

5 A That's what I said, yes.

6 Q And am I right that the Cuba team is 33
7 people?

8 A 31 or -- somewhere between 31 and 33.

9 Q And the Iran team is 27; is that
10 correct?

11 A Roughly. Again --

12 MR. KHOJASTEH: Object to form.
13 Where -- are you pulling from this thing, or is
14 there some other place you're -- are you
15 referring to --

16 MS. GREENBERGER: I'm just asking
17 her --

18 MR. KHOJASTEH: -- congressional
19 testimony --

20 MS. GREENBERGER: -- a question. If
21 she -- if she needs a document, I'm sure she can
22 tell me.

1 MR. KHOJASTEH: Sure. Then object to
2 form. Lacks foundation. There's no date frame
3 here.

4 THE WITNESS: This could -- these
5 numbers could be a little bit different. This
6 was back in August. Now we're in September. So
7 if you want specific numbers, I'd like -- you'd
8 need to talk to Leili or Frank.

9 BY MS. GREENBERGER

10 Q How did the agency come to the decision
11 to have roughly half the number of people in the
12 Mandarin unit as compared to the Iranian team or
13 the Cuban team?

14 MR. KHOJASTEH: Object to form. Lacks
15 foundation.

16 THE WITNESS: Well, the Cuban team is a
17 different -- completely in a different building
18 in a different city, and so you need -- you need
19 more people to run the operation. You need
20 people who are in different, you know, office
21 positions. So that's -- and that -- and that is
22 a relatively lean operation.

1 BY MS. GREENBERGER

2 Q And then how about as compared to the
3 Iranian team?

4 A Well, I think more --

5 MR. KHOJASTEH: Object to form.

6 THE WITNESS: -- people are -- I think
7 more people are with the Iranian team, but
8 they're also doing other languages besides that.
9 So if somebody from the Iranian team is one of
10 the technicians who just happened to be
11 categorized in the Persian team, and then, when
12 we made changes at the agency to bring it to
13 statutory minimum, that person could also help us
14 with our programming in -- you know, in Dari and
15 Pashto or Mandarin.

16 BY MS. GREENBERGER

17 Q So I'll just turn to right now on -- on
18 paragraph 13 of your declaration, which I think
19 is right in front of you. It lists six employees
20 for the Persian News Network and 21 employees for
21 the Persian News Network Central News and
22 Production Unit. You see that?

1 A Uh-huh. Wait. Which line is that, r?
2 No, wait.

3 Q U and v, I believe.

4 A Okay.

5 Q Is there anyone else on this list in
6 paragraph 13 that are part of the --

7 A If you look --

8 Q -- Iranian team?

9 A -- at production unit, the people that
10 we happened to -- that -- that the news operation
11 happened to utilize to get productions up
12 happened to be people who were with the Persian
13 News Network.

14 We categorize people. There's -- in
15 different languages, and so, 21, many of them are
16 people who are in our -- the technical side, the
17 production side. And they're also used -- being
18 used for -- the way I understand it, they do
19 production work for our Persian news, but they
20 also do production work for China for -- or for
21 the Mandarin language. They also do production
22 work for Dari and Pashto.

1 When it comes to the production and
2 technical side, those are people who can operate
3 in any language. We just happen to have more of
4 them pulled from Persian.

5 Q And what document delineates the
6 countries that people in various categories here
7 actually do the work for? Is there an e-mail, a
8 memo --

9 MR. KHOJASTEH: Object to form. Lacks
10 foundation.

11 THE WITNESS: Explain -- I don't run
12 the news operation.

13 MS. GREENBERGER: You know what? I'll
14 ask someone else that question.

15 THE WITNESS: Yeah. That would be
16 great.

17 BY MS. GREENBERGER

18 Q Turning to paragraph 6(a) of your
19 declaration, this states, "VOA covers news in
20 Mandarin via the internet and major social media
21 platforms."

22 Do you see that?

1 A Yeah.

2 Q And there is no radio broadcasting in
3 Mandarin as of August 13th, correct?

4 A Again, Frank would be better to answer
5 this or Leili.

6 Q Okay. But this was your declaration
7 that you submitted --

8 A That's right. And I'm --

9 Q -- to the Court.

10 A -- answering questions that the judge
11 asked, and so in order to adhere to the judge's
12 orders, I had to lean on people like Frank and
13 Leili to come up with an answer. So you've got
14 this here. If you want me to read it --

15 Q No, I don't want you to --

16 A -- I'm happy to do so. In accordance
17 --

18 Q If the answer is you don't know the
19 answer, that's fine.

20 A The answer is that my team knows the
21 answer.

22 Q What I want to make sure, Ms. Lake, is

1 that I spend our time today making sure I
2 understand what you know. If the answer is,
3 ultimately, we'll follow up with another member
4 of your team, that's --

5 A Yes.

6 Q -- fine. But what I don't want them to
7 say is, oh, yes, Ms. Lake knows, and I go back to
8 this transcript, and Ms. Lake never answered
9 whether or not she knows. So I just want the
10 record to be clear.

11 A I don't run the newsroom. I don't run
12 VOA.

13 Q Do you know whether or not there is
14 radio broadcasting in Mandarin as of August 13th?

15 A And as I've said, this is a question
16 you'll have to ask Leili Soltani or Frank Wuco.

17 MR. KHOJASTEH: Can I help you,
18 Counsel?

19 MS. GREENBERGER: You can instruct --

20 MR. KHOJASTEH: She -- she's --

21 MS. GREENBERGER: -- your client to
22 answer the question, sure.

1 MR. KHOJASTEH: Sure. Yeah. Well, I'm
2 just trying -- I think --

3 THE WITNESS: I don't have an answer --

4 MR. KHOJASTEH: -- the distinction --

5 THE WITNESS: -- and I don't want --

6 MR. KHOJASTEH: -- the distinction --

7 THE WITNESS: I could guess.

8 MR. KHOJASTEH: It's like the
9 distinction -- she is not asking who is best
10 suited to answer the question.

11 THE WITNESS: She's asking --

12 MR. KHOJASTEH: She's asking whether
13 you personally sitting here today have any
14 knowledge anywhere in your brain as to whether
15 radio is being -- Mandarin is being broadcast in
16 radio. It's -- it's not -- you're not testifying
17 as to whether it is or not. It's just as to
18 whether you know it is or not.

19 THE WITNESS: It may be or may not. I
20 don't know and I don't -- I have a guess, but I
21 don't want to guess.

22

1 BY MS. GREENBERGER

2 Q That's fine. I don't know is your
3 answer to whether radio was broadcast in
4 Mandarin. As of August 13th, you didn't -- you
5 don't know, correct?

6 A I have a guess, but I'd rather you ask
7 somebody who can verify it with certainty.

8 Q And do you know one way or another
9 whether USAGM -- I'm sorry -- whether VOA did TV
10 broadcasting in Mandarin at any point since
11 March 15?

12 A Again, I would rather you ask the
13 people who can give you a certain answer.

14 Q Would it have to be a guess for you to
15 answer the question?

16 A Yeah.

17 Q What radio programming has VOA been
18 broadcasting since April 22nd, when the
19 preliminary injunction was issued?

20 MR. KHOJASTEH: Object to form. Lacks
21 foundation.

22 THE WITNESS: I would rather you ask

1 the people who are actually doing that.

2 BY MS. GREENBERGER

3 Q Is your answer that you don't know what
4 radio programming?

5 A No. I can see what you're trying to
6 do. I'm not running VOA. I am the head of the
7 agency right now, and I am leaving it to the
8 people that I have put in charge to do that.

9 Q Ms. Lake, I'm not trying to do
10 anything. I'm just trying to understand what
11 radio programming USAGM has been broadcasting,
12 and you're here today.

13 A Okay.

14 Q And so if the answer is you don't know,
15 that's your answer, but I'm entitled to ask the
16 question --

17 A You may -- you may ask the question.

18 Q -- whether VOA --

19 A And this is -- this is fluctuating, so
20 we may have not been doing it before and now we
21 are, and so --

22 Q And that's what --

1 A -- I don't want to give an answer
2 that's inaccurate. I'm under oath, if I may
3 remind you.

4 MR. KHOJASTEH: Counsel, if -- this is
5 where foundation -- if you ask the question, do
6 you know whether -- right? I'm just saying, if
7 you lay the foundation, I think it's going to --
8 BY MS. GREENBERGER

9 Q Have you ever --

10 MR. KHOJASTEH: It's annoying, but --
11 BY MS. GREENBERGER

12 Q -- received any information about what
13 radio programming VOA was engaged in?

14 A Well, let me look back at this, because
15 I know that we were doing -- well, we obviously
16 were doing radio in Cuban -- to Cuba in Spanish,
17 and I am not sure if we're doing radio -- I think
18 we're doing radio in Dari and Pashto.

19 But, again, I don't want to give you an
20 answer that is not accurate, and so I would much
21 rather you talk to Frank, who I believe is
22 scheduled for a deposition coming up here in

1 the -- in the coming week or so. If you're just
2 trying to get me to say I don't know, I don't
3 know, I get what you're trying to do, and I just
4 would rather you have facts, because I don't like
5 to not give solid answers.

6 Q Ms. Lake, I don't want to argue with
7 you.

8 A I'm not arguing with you.

9 Q The point of a deposition is to ask
10 questions and see the information you know. If
11 you don't know, you can say I don't know,
12 but that --

13 A I'm not --

14 Q -- someone else --

15 A I'm not certain.

16 Q -- might know better --

17 A I'm not certain.

18 Q And that's fine. You can say, I'm not
19 certain, but then give the answer that you
20 believe to be true, so long as it's not a guess.
21 Okay?

22 A I'm not certain --

1 Q And your counsel would instruct you the
2 same.

3 A I'm not certain and I'm going to let
4 somebody who is certain answer, and that's why I
5 hope you ask that question of Frank Wuco and
6 Leili.

7 MS. GREENBERGER: Can you mark that for
8 a ruling, please?

9 MR. KHOJASTEH: Counsel --

10 MS. GREENBERGER: The standard is not
11 being certain.

12 MR. KHOJASTEH: No, I got you, but I
13 think, again, like, you're -- when I asked you to
14 lay a foundation, you asked a slightly different
15 question, have you ever received information.

16 You're asking her, sitting here today,
17 do you -- do you know whether, and whatever your
18 question is, do you know whether. That's -- and
19 then she's either going to say, yes, I know or,
20 no, I don't know.

21 BY MS. GREENBERGER

22 Q Sitting here today, do you know whether

1 the agency has provided any radio programming to
2 Iran?

3 A I'm not certain.

4 Q What is your best understanding of
5 whether or not the agency has provided any radio
6 programming to Iran since March 15th?

7 A I'm truly not certain. I really don't
8 know. You need to ask Leili, who is leading
9 that.

10 MR. KHOJASTEH: I think you have your
11 answer on that one.

12 THE WITNESS: I really -- I mean, I'm
13 not trying to dodge the -- I'm not certain.

14 MS. GREENBERGER: I --

15 MR. KHOJASTEH: Ms. Lake, it's okay for
16 you -- don't worry about what you think she's
17 trying to do.

18 THE WITNESS: Okay.

19 MR. KHOJASTEH: It's okay for you to
20 say I don't know.

21 THE WITNESS: Okay.

22

1 BY MS. GREENBERGER

2 Q Does VOA keep track of audience
3 statistics?

4 A I believe they are tracking that
5 through -- yeah, through social media and the
6 number of hits they're getting on social media
7 and number of views that the videos are seeing.

8 Q And how about as to radio or TV
9 broadcasting? Does VOA track audience statistics
10 for radio or TV broadcasting?

11 MR. KHOJASTEH: Object to form. Lacks
12 foundation.

13 BY MS. GREENBERGER

14 Q Do you track it? Does the agency track
15 it?

16 A The agency does --

17 MR. KHOJASTEH: Object to form.

18 THE WITNESS: -- track that --

19 MR. KHOJASTEH: Lacks foundation.

20 THE WITNESS: -- kind of thing.

21 BY MS. GREENBERGER

22 Q And have you seen any statistics about

1 VOA audience numbers?

2 A Leili gives a report. She tries to
3 keep updated. I have not taken -- she sent me a
4 report a couple days ago, and I've been a little
5 bit busy with other things and I haven't had a
6 chance, but I know she sounded, like, very happy.

7 Q And how frequently does she provide a
8 report about VOA audience statistics?

9 A I think she tries to keep us on top of
10 what's happening with what -- relatively
11 frequently, she sends things to Frank.

12 Q And does her report cover internet
13 audience, TV audience, radio audience or
14 something else?

15 MR. KHOJASTEH: Object to form.

16 THE WITNESS: I --

17 MR. KHOJASTEH: Lacks foundation.

18 THE WITNESS: I assume it's all
19 eyeballs and all ears.

20 BY MS. GREENBERGER

21 Q And when you say you were -- I don't
22 want to misquote you, but I think you said

1 something like relatively happy or quite happy
2 with the most recent report.

3 What did you say?

4 A I said --

5 MR. KHOJASTEH: Mischaracterizes
6 testimony.

7 THE WITNESS: I said Leili seemed very
8 happy.

9 BY MS. GREENBERGER

10 Q Leili seemed happy. And --

11 A Yeah.

12 Q -- why was Leili happy, if you know,
13 about the most recent report?

14 MR. KHOJASTEH: Object to form. Lacks
15 foundation.

16 THE WITNESS: I think I heard her say
17 something -- I don't remember the exact words,
18 but she said something about it's been a great
19 week or something like that, to those effect.

20 BY MS. GREENBERGER

21 Q Do you know how audience statistics
22 from this summer compare to audience statistics

1 from last summer for the agency?

2 MR. KHOJASTEH: Object to form. Lacks
3 foundation.

4 THE WITNESS: It would be much
5 different because we have been effectuating
6 President Donald J. Trump's executive order, and
7 so to even compare, it would be comparing apples
8 to oranges.

9 BY MS. GREENBERGER

10 Q You would expect the audience numbers
11 to be lower?

12 A We're covering fewer languages, but I
13 would say the way to compare would possibly be to
14 look at the languages that we're covering and
15 maybe compare that way. The beautiful thing is
16 it's -- this is not an agency that is about
17 ratings, per se. We don't have to -- you know,
18 it's a federally funded agency.

19 Q Is it about impact?

20 A It's -- it's about impact. It's --

21 MR. KHOJASTEH: Object to form. Lacks
22 foundation.

1 THE WITNESS: And it's about if the
2 story is reaching people and the story is fair
3 and honest.

4 BY MS. GREENBERGER

5 Q And when you say it's about whether the
6 story is reaching people, do you consider whether
7 the story is reaching a significant audience?

8 MR. KHOJASTEH: Object to form.

9 THE WITNESS: Not necessarily.

10 MR. KHOJASTEH: Vague as to significant
11 audience.

12 BY MS. GREENBERGER

13 Q Ms. Lake, what nations do you consider
14 to be affected by censorship or repression?

15 A I don't have a list.

16 Q Would you agree with me that Russia is
17 a nation affected by censorship or repression?

18 A Probably to some extent.

19 Q How about Vietnam? Would you agree
20 with me that's a country where people are
21 prevented by censorship or repression from
22 speaking to their fellow countrymen?

1 MR. KHOJASTEH: Object to form. Lacks
2 foundation.

3 THE WITNESS: I don't have enough
4 reliable information on that to discuss it right
5 now.

6 BY MS. GREENBERGER

7 Q How about Nicaragua? Would you agree
8 with me that Nicaragua is a country where people
9 are prevented by censorship or repression from
10 speaking to their fellow countrymen?

11 MR. KHOJASTEH: Same -- same objection.
12 Lacks foundation.

13 THE WITNESS: Are we going to go
14 through every 191 countries here?

15 MS. GREENBERGER: No. I have about
16 eight.

17 And you can have a standing objection
18 to this line of questioning, so we can get
19 through it quickly.

20 THE WITNESS: I don't have an opinion.

21 BY MS. GREENBERGER

22 Q On Nicaragua?

1 A On Nicaragua.

2 Q Do you have an opinion about Mali and
3 whether that's a country where people are
4 prevented by censorship or repression --

5 MR. KHOJASTEH: Object to --

6 BY MS. GREENBERGER

7 Q -- from speaking to their fellow
8 countrymen?

9 MR. KHOJASTEH: My objection -- this is
10 just -- you've established what you're referring
11 to. Object to form for this line of questioning.
12 It's --

13 MS. GREENBERGER: Yeah, standing. It's
14 a standing objection to this line.

15 THE WITNESS: What is the question
16 again?

17 BY MS. GREENBERGER

18 Q Mali.

19 A I understand, but what's the rest of
20 the question?

21 Q Would you agree with me that Mali is a
22 country where people are prevented by censorship

1 or repression from speaking to their fellow
2 countrymen?

3 A It's possible.

4 Q Do you have a view whether it is or it
5 isn't?

6 A It's just possible.

7 Q How about Sudan? Would you agree with
8 me that Sudan is a country where people are
9 prevented by censorship or repression from
10 speaking to their fellow countrymen?

11 A Yes, it's possible.

12 Q Have you concluded that it is a
13 country, or you just don't know?

14 MR. KHOJASTEH: Object to form. Asked
15 and answered.

16 THE WITNESS: If Sudan is a country or
17 I don't know?

18 BY MS. GREENBERGER

19 Q If Susanne is -- Sudan is a country
20 affected by censorship or repression. Do you
21 have a view on that?

22 A I don't have a view on that.

1 Q How about the Democratic Republic of
2 Congo? Do you have a view on whether that is a
3 country affected by censorship or repression?

4 A I don't have an opinion.

5 Q Would you agree with me that the United
6 States in promoting democratic values has to
7 compete with misinformation from authoritarian
8 regimes?

9 A Yeah, sure.

10 Q And would you --

11 A That sounds reasonable.

12 Q And would you agree that China is a
13 source of misinformation?

14 A I'm sure, yeah.

15 Q And --

16 A Definitely.

17 Q -- Russia?

18 A Possibly, yes.

19 (Deposition Exhibit Number 14 was
20 marked for identification.)

21 MR. KHOJASTEH: Thank you.

22

1 BY MS. GREENBERGER

2 Q I'm handing the witness an exhibit
3 marked 14 --

4 A Okay.

5 Q -- which is a portion of a federal
6 statute, 22 U.S.C. 6202.

7 Are you familiar with this statute?

8 A A bit, yes.

9 Q And what is this statute?

10 A It's part of the IBA, correct? Am I
11 right? Or I might be wrong. International
12 Broadcasting Act?

13 Q And turn --

14 A Is this right? Is that what this is?

15 Q Let's just move on. So turning to
16 (b)(6) --

17 A No, you asked if I knew --

18 MR. KHOJASTEH: But, listen,
19 she doesn't -- if you're asking her --

20 THE WITNESS: I don't know.

21 MR. KHOJASTEH: -- is this --

22 (Reporter clarification.)

1 MR. KHOJASTEH: If she doesn't -- if
2 you're showing her something and you want to
3 start asking her questions about it and you're
4 asking her if she's familiar with it, she's
5 saying she doesn't know.

6 MS. GREENBERGER: And that's her
7 answer.

8 THE WITNESS: No, no, no. It's not
9 that I don't know. I said, is this the
10 International Broadcasting Act? Is that what
11 it's titled?

12 MS. GREENBERGER: I don't know the
13 title of this document.

14 THE WITNESS: Okay. That's what I was
15 asking. I'm not trying to be a jerk. I'm asking
16 you. You asked if I knew what it was. I said,
17 is this the International Broadcasting Act?

18 MS. GREENBERGER: I want to --

19 THE WITNESS: And then you got terse
20 and said, let's move on. I need to know what I'm
21 looking at here. Is this the International
22 Broadcasting Act? Can we have an attorney who

1 does know answer?

2 BY MS. GREENBERGER

3 Q So the way depositions work is I ask
4 questions, and you just give me the best answer
5 you know.

6 A But I can't answer if I gave you an
7 answer you didn't know, either.

8 MR. KHOJASTEH: And it lacks foundation
9 anyway. So why don't you identify it for her or
10 refer to a document that she's identified in, and
11 she can -- at least she could frame it.

12 It's the work of a deposition. Don't
13 roll your eyes about it. It's -- that's what we
14 have to do. Look, I get annoyed by having to do
15 it, too, but that's what --

16 MS. GREENBERGER: Okay. I --

17 MR. KHOJASTEH: -- conducting a
18 deposition is.

19 MS. GREENBERGER: Thank you. I've
20 conducted one or two in my life. I appreciate --

21 MR. KHOJASTEH: I'm sure you're
22 talented. I'm just saying it's -- don't get

1 terse about it because she's asking for you to
2 lay a foundation.

3 THE WITNESS: If I had my phone, I
4 could check, but I don't have my phone.

5 MR. KHOJASTEH: No.

6 BY MS. GREENBERGER

7 Q So I'm handing you Exhibit 12, which is
8 the International Broadcasting Act.

9 And I believe you already answered that
10 you're familiar with this generally, this
11 statute?

12 MR. KHOJASTEH: So this is Exhibit 12?

13 MS. GREENBERGER: I'm sorry. 14.

14 MR. KHOJASTEH: 14, yeah.

15 MS. GREENBERGER: 14. Apologies.

16 Thank you.

17 THE WITNESS: Okay.

18 BY MS. GREENBERGER

19 Q Now, paragraph (b)(6), do you see that?

20 A Shall not duplicate activities of
21 private U.S. broadcasters?

22 Q That's not (b)(6).

1 A Sorry.

2 MR. KHOJASTEH: You were looking at
3 (a)(3), Ms. Lake.

4 BY MS. GREENBERGER

5 Q And we can -- we can talk about (a)(3)
6 as well later, but let's turn to (b)(6).

7 A Okay.

8 Q What is your understanding of the
9 statutory requirement --

10 MR. KHOJASTEH: Go ahead. I'm just
11 going to do my one objection on this, and then
12 you'll -- you know -- we talked about this. I'll
13 just do the one objection, and I will let you do
14 your thing.

15 BY MS. GREENBERGER

16 Q What is your understanding of the
17 statutory requirement that "United States
18 international broadcasting shall include
19 information about developments in each
20 significant region of the world"?

21 And your counsel's about to have a
22 standing objection. Go ahead.

1 MR. KHOJASTEH: Object to form. Calls
2 for a legal conclusion.

3 Ms. Lake, to the extent that answering
4 counsel's question discloses or reveals
5 communications or an understanding you've
6 obtained from communications with counsel, I'm
7 going to instruct you not to answer --

8 THE WITNESS: I don't see that.

9 MR. KHOJASTEH: I'm going to instruct
10 you not to answer. However, if you want to
11 provide your understanding of the words on this
12 page as a layperson, you're free to answer.

13 MS. GREENBERGER: You're required to
14 answer, Counsel.

15 MR. KHOJASTEH: Sure.

16 THE WITNESS: B --

17 MR. KHOJASTEH: You're required -- I'm
18 saying --

19 THE WITNESS: B what?

20 MS. GREENBERGER: (b)(6).

21 THE WITNESS: Okay. I see what it
22 says.

1 BY MS. GREENBERGER

2 Q What do you consider significant
3 regions of the world?

4 A Regions that are significant to our
5 policy, I guess. I mean, I'm not an attorney.
6 And I see you're trying to get me to say we
7 should be covering news in every significant
8 region. I think that significant regions, we're
9 covering.

10 Q And what are the significant regions of
11 the world in your view?

12 MR. KHOJASTEH: Same -- same objection.
13 She's just asking about in your view --

14 THE WITNESS: Okay.

15 MR. KHOJASTEH: -- your personal
16 knowledge --

17 THE WITNESS: I think --

18 MR. KHOJASTEH: -- as Kari Lake.

19 THE WITNESS: -- in my view, Iran is
20 significant. I think that Cuba is significant.
21 And I think China is significant.

22

1 BY MS. GREENBERGER

2 Q And is your view that -- what is your
3 view as to whether Africa is a significant region
4 of the world?

5 A I mean, you could say it's significant.
6 You could argue it is, and some could argue it's
7 not.

8 Q Have you reached an opinion personally
9 as to whether it's a significant region of the
10 world?

11 A No, I haven't.

12 MR. KHOJASTEH: Object to form. Asked
13 and answered.

14 BY MS. GREENBERGER

15 Q You can answer.

16 A You can -- you may think it is. I may
17 think it's not. I'm not saying I don't. I just
18 haven't -- I haven't put out an opinion on that.
19 I haven't given it a lot of thought.

20 Q How about South America? Have you
21 reached an opinion as to whether that's a
22 significant region of the world?

1 MR. KHOJASTEH: Again, Ms. Lake, as a
2 layperson, not as a --

3 THE WITNESS: Yeah. I think there's --

4 MR. KHOJASTEH: -- lawyer.

5 THE WITNESS: -- some significance in
6 South Africa [sic]. There's significance
7 everywhere. There's significance on Mars.

8 BY MS. GREENBERGER

9 Q Have you reached an opinion as to
10 whether South America is a significant region of
11 the world?

12 MR. KHOJASTEH: Object --

13 THE WITNESS: Yes.

14 MR. KHOJASTEH: -- to form. Lacks
15 foundation.

16 THE WITNESS: Sure.

17 BY MS. GREENBERGER

18 Q Sure, it is a significant region?

19 A Sure, yeah.

20 Q And is VOA broadcasting information to
21 South America?

22 A Actually, I think Cuba broadcasting is

1 making it to parts of South America.

2 Q Which parts?

3 A I believe it's in either my declaration
4 or Frank's.

5 Q Okay. We can come back to that.

6 A Yeah. I'm not sure where. You can --
7 that's a good question for Frank.

8 Q How about Central America? Would you
9 say that's a significant region of the world?

10 A Sure.

11 MR. KHOJASTEH: And, again, object to
12 form. Lacks foundation.

13 In what respect are you meaning
14 significant nation of the world? What does that
15 mean?

16 THE WITNESS: Is it significant in
17 size? Is it significant in culture, significant
18 in political importance, significant in import,
19 export, significant in culture?

20 MS. GREENBERGER: So --

21 THE WITNESS: Lots of different --

22

1 BY MS. GREENBERGER

2 Q As your understanding of the statute,
3 where it says significant region of the world,
4 what is your understanding of the word
5 "significant region"?

6 MR. KHOJASTEH: Ms. Lake, if you
7 have -- separate and apart from the words
8 "significant region," if you're -- if you're
9 opining as to an interpretation -- your
10 interpretation of the statute -- of the statute,
11 not the words on the page, the statute, and
12 that's based on communications you've had with
13 counsel, I'm going to instruct you not to answer.

14 THE WITNESS: I don't have an opinion
15 of those words in that -- in the statute, and
16 I -- this is why I lean on my general counsel.

17 BY MS. GREENBERGER

18 Q Turning to section c, which speaks
19 about the --

20 A Are we still on the --

21 Q Same --

22 A -- International Broadcasting Act?

1 Q Yes. Last page. It speaks -- it says,
2 "The long-range interests of the United States
3 are served by communicating directly with the
4 peoples of the world by radio."

5 A Okay.

6 Q Do you have a belief as to whether the
7 United States' interests are served by
8 communicating directly by radio to peoples of the
9 world?

10 A In some places, yes, maybe.

11 Q And in what places are those?

12 A Cuba.

13 Q Any other places other than Cuba where
14 the United States' interests are served by
15 communicating by radio?

16 A I haven't given it much thought.

17 Q And why -- why is Cuba a country where
18 the United States' interests would be served by
19 communicating directly with peoples of the world?

20 A Well, it's 90 miles from our shore, and
21 it poses a significant threat being 90 miles from
22 our country. And the people don't have access

1 to -- and some people don't have -- actually, I
2 think I got a stat from our office down there
3 that there's roughly 9 million people, I believe,
4 and 8 million have smartphones. So smartphones
5 are -- they don't have -- they don't have great
6 electricity down there and -- radio is still
7 listened to in some ways, but I really think
8 smartphones are kind of where it's going. Even
9 radio's played on digital.

10 Q I want to talk -- I want to turn to a
11 different topic. We might come back to some of
12 this, but you can put that aside.

13 Ms. Lake, Ms. Thomas -- I think we
14 looked at it already -- issued a declaration or
15 submitted a declaration in this case.

16 A Crystal, Crystal Thomas?

17 Q Crystal Thomas, yeah. And paragraph 3
18 of that declaration, I'll refer you to.

19 A Okay.

20 Q Let me know when you've read it.

21 A Okay.

22 Q And just so I'm clear on the math, here

1 it says, USAGM, as of March 27th, employs a total
2 of 1,147 full-time employees and has active
3 employment contracts with 598 contractors,
4 correct?

5 A As of March 14th, 1,147. Yeah.

6 Q And those two numbers would be added
7 together to determine the number of staff that
8 USAGM had, correct?

9 MR. KHOJASTEH: Object to form. Lacks
10 foundation.

11 BY MS. GREENBERGER

12 Q Let me ask it another way. Are the 598
13 personal service contractors part of the 1,147?

14 A I believe they're separate.

15 Q Okay. I believe so, too. I just want
16 the record to be clear.

17 So, when I add those two numbers up, I
18 get 1,745. Does that sound right to you?

19 A That sounds good. I'd need to go back
20 and double-check these numbers.

21 Q But you believe they were accurate at
22 the time of Ms. Thomas' --

1 A Well, I'm --

2 Q -- declaration?

3 A -- assuming because she signed this
4 under penalty of perjury. So she must have
5 looked up those numbers somewhere.

6 MS. GREENBERGER: I think we already
7 marked the Court's July 30th order. It's tab 27
8 and Exhibit 11.

9 MR. BLUMIN: Eleven.

10 BY MS. GREENBERGER

11 Q Do you have that in front of you?

12 A Exhibit 11?

13 Q Yes.

14 A There we go.

15 Q And the Court, on page 4 -- and this is
16 the start of the first full paragraph -- states,
17 "VOA's staffing levels are inextricably enmeshed
18 with its operational capacity and, in turn, its
19 ability to carry out its statutory mandate,
20 because VOA cannot operate without employees."

21 Do you agree with that statement?

22 A Well, obviously, we need employees, but

1 the question is how many.

2 Q And you agree that your staffing levels
3 are enmeshed with the operational capacity?

4 A Not necessarily.

5 MR. KHOJASTEH: Object to form. Lacks
6 foundation.

7 THE WITNESS: No.

8 BY MS. GREENBERGER

9 Q So you disagree that how much -- I'll
10 strike that.

11 The term "operational capacity," what
12 do you understand that to mean? Is that a phrase
13 you know?

14 A Our ability to operate.

15 Q And do you believe your ability to
16 operate is connected to the number of staff you
17 have?

18 MR. KHOJASTEH: Object to form. Vague
19 as to connected.

20 THE WITNESS: I think the -- you're
21 trying to ask me how many people we need
22 to operate?

1 BY MS. GREENBERGER

2 Q I'm not yet going to the number. I'm
3 just trying to say -- ask if you agree with the
4 Court's statement that how many people you have
5 and your ability to operate are enmeshed, they're
6 connected.

7 MR. KHOJASTEH: Object to form. Asked
8 and answered.

9 THE WITNESS: I mean, you have to have
10 some staff to be able to operate, so I guess you
11 could make a correlation that having staff is
12 important to being able to operate. The question
13 is how many staff members.

14 BY MS. GREENBERGER

15 Q And you need a certain level of staff
16 to broadcast enough to comply with your statutory
17 mandate, correct?

18 MR. KHOJASTEH: Object to form. Lacks
19 foundation. Calls for a legal conclusion. And
20 I'll instruct you to -- that's fine.

21 THE WITNESS: Can you repeat that,
22 please?

1 BY MS. GREENBERGER

2 Q Sure. And I think this is just common
3 sense that when we looked at the June 3rd letter
4 and the attachments, you concluded -- or I'm
5 sorry -- you submitted to Congress that -- I
6 can't remember if the number's 81 or 82 -- I'll
7 withdraw the question.

8 So when we looked at the June 3rd
9 letter, you submitted to Congress that 81 people
10 were necessary for the statutory minimum,
11 correct?

12 A The -- the career staff, the career
13 leadership, senior career leadership, determined
14 that number.

15 Q And --

16 A And my -- and then I followed up with
17 the CN that said this is fluctuating and we're
18 going to be determining it.

19 Q And the basic idea that I don't think
20 is controversial is, you need a certain number of
21 people to do the broadcasting that is the
22 statutory mandate, correct?

1 A You need a certain number of people,
2 yes. The question is, what is a certain number?

3 Q Right. And if you have too few people,
4 you can't do the statutory mandate, correct?

5 MR. KHOJASTEH: Object to form. Calls
6 for speculation.

7 THE WITNESS: If you have too many
8 people, you can't do statutory minimum.

9 BY MS. GREENBERGER

10 Q But if you have too few people, you
11 can't do what the statute obligates you to do,
12 correct?

13 MR. KHOJASTEH: Object to form. Calls
14 for speculation.

15 THE WITNESS: I mean, I think
16 there's -- you could have a differing opinion.
17 You could say, there's too few, and I could say,
18 we got it.

19 BY MS. GREENBERGER

20 Q I hear you, but whatever the number --
21 you know what? Let's move on.

22 Now, when we were looking at

1 Ms. Thomas' declaration, paragraph 6 states that
2 the agency terminated the contracts with all
3 personal services contractors, who will be paid
4 through March 31st, 2025.

5 Do you see that?

6 A No, I don't see that. I see placed --

7 Q Paragraph 6.

8 A In paragraph 6, placed 1,042 facility
9 employees on administrative leave.

10 Q It's the next sentence.

11 A On March 16th, 2025, and terminated the
12 contracts with all personal service contractors
13 who are being paid through -- yes.

14 Q Okay. And --

15 A "The agency has retained the ability to
16 recall employees from administrative leave to
17 work."

18 Q And, ultimately, those personal service
19 contractors did not have their contracts
20 terminated in March, correct?

21 MR. KHOJASTEH: Object to form. Lacks
22 foundation.

1 THE WITNESS: I'm not sure. What are
2 you referring to?

3 BY MS. GREENBERGER

4 Q Do you recall that the temporary
5 restraining order that the court in New York
6 issued stayed the termination of the contractors?

7 A Yes.

8 Q Okay. And then, in May, you determined
9 that the contractors should be terminated; is
10 that correct?

11 A Somewhere about there --

12 MR. KHOJASTEH: Object to form.

13 THE WITNESS: -- but we --

14 MR. KHOJASTEH: Lacks --

15 THE WITNESS: -- had --

16 MR. KHOJASTEH: -- foundation.

17 THE WITNESS: Yeah, I don't --

18 MR. KHOJASTEH: Vague as to "you."

19 THE WITNESS: Dates are going to be
20 tough because I don't have a calendar in front of
21 me.

22 MR. KHOJASTEH: Kari, Ms. Lake, when

1 I'm objecting, you have to stop --

2 THE WITNESS: Okay.

3 MR. KHOJASTEH: You have to not answer
4 so that he -- we can get a clean record.

5 MS. GREENBERGER: Did you get her
6 answer?

7 (Reporter clarification.)

8 THE WITNESS: What was the question?

9 BY MS. GREENBERGER

10 Q So the question was -- let me ask it
11 another way.

12 At some point, you ordered that the
13 contractors should be -- the personal services
14 contractors should have their contracts
15 terminated, correct?

16 MR. KHOJASTEH: Object to form. Vague
17 as to "you."

18 THE WITNESS: Yes. I -- when you ask
19 "you," I see the agency, so just so that you know
20 that, when you're saying "you," I -- there --
21 sometimes this was -- if it was before, when
22 Victor was there, there was consultation with

1 Victor. If it's -- if you're asking me about
2 now, it would maybe be just me deciding that.

3 BY MS. GREENBERGER

4 Q Okay. So you said you don't know the
5 date, but it was some date -- is it fair to say
6 it was some date in the spring that the
7 contractors' contracts were terminated?

8 A I don't know the date.

9 Q Okay. And was it after the injunction
10 was issued?

11 A I would have to look. I'd have to go
12 back and look.

13 Q Okay. And who made the decision to
14 terminate the contracts for all the contractors?

15 A I think that was made through --

16 THE WITNESS: Is this kind of
17 pre-decisional through our team? Can I talk
18 about that?

19 MR. KHOJASTEH: No, no, you can make --
20 you can say who makes it.

21 THE WITNESS: Ultimately, if it was in
22 March, there's a good chance that Victor -- I

1 would have consulted with Victor, and either
2 Victor would have made that decision or I would
3 have made the decision with the ability that I
4 have.

5 BY MS. GREENBERGER

6 Q And to be clear, I'm not talking about
7 the March decision that was ultimately rescinded.
8 I'm talking about the later decision that
9 actually went through that -- that were -- ended
10 up that the contractors had their contracts
11 terminated.

12 MR. KHOJASTEH: When was that, just so
13 I can --

14 MS. GREENBERGER: May.

15 MR. KHOJASTEH: Okay.

16 THE WITNESS: Okay. So you're asking
17 who made the decision?

18 BY MS. GREENBERGER

19 Q Yes. Who made the decision in May?

20 A It was -- it was probably me consulting
21 with Victor, I'm guessing.

22 Q Well, I don't want you to guess. Is

1 that your best memory?

2 A Well, I -- yeah, I -- we -- we, as an
3 agency, made the determination to do that --

4 Q And is your --

5 A -- and --

6 Q -- best memory that you made that
7 decision after consulting with Victor?

8 A After consulting with the team, yeah.
9 Victor gave me delegated authorities.

10 MS. GREENBERGER: You know what? Why
11 don't we take a break now, if that's okay.

12 MR. KHOJASTEH: Fine with us.

13 THE WITNESS: I don't need one.

14 MR. KHOJASTEH: Yeah, but if she wants
15 to get organized.

16 THE WITNESS: Oh, okay.

17 MR. KHOJASTEH: We've been going an
18 hour. It helps her.

19 THE WITNESS: Okay.

20 VIDEO TECHNICIAN: This marks the end
21 of Media Unit No. 4. Going off the record, the
22 time is 15:30 p.m.

1 (Recess 3:30 p.m. to 3:48 p.m.)

2 VIDEO TECHNICIAN: This marks the
3 beginning of Media Unit No. 5. Going back on the
4 record, the time is 15:48 p.m.

5 BY MS. GREENBERGER

6 Q Paragraph 8, Ms. Lake, of Ms. Thomas'
7 declaration, do you have that in front of you?

8 A I do now.

9 Q Okay. Thank you so much. Her
10 March 27th declaration. It states that "In
11 addition to the employees recalled from
12 administrative leave at the Office of Cuba
13 Broadcasting, the agency has recalled
14 approximately 31 other employees from
15 administrative leave."

16 Do you see that?

17 A Yes.

18 Q And since March 27th, has the agency
19 recalled other employees from administrative
20 leave?

21 A Yes.

22 MR. KHOJASTEH: Object to form.

1 Calls -- lacks foundation.

2 BY MS. GREENBERGER

3 Q Can you describe to me the process the
4 agency has followed since March when recalling
5 people from administrative leave?

6 MR. KHOJASTEH: Object to form. Lacks
7 foundation.

8 THE WITNESS: Well, when somebody's put
9 on paid administrative leave with the United
10 States government, you're still an employee, and
11 you can be called back at any moment. And they
12 know that when they're put on paid administrative
13 leave, so they're being paid while they're at
14 home. They still get all the benefits. And at
15 times we determine we need somebody, and they
16 come back. This has happened across the
17 government, and it's quite normal.

18 BY MS. GREENBERGER

19 Q And what e-mail or memo or
20 documentation is created about the need to return
21 someone back from administrative leave?

22 MR. KHOJASTEH: Object to form. Lacks

1 foundation.

2 THE WITNESS: Usually, it will come
3 if -- if somebody in the agency says, you know, I
4 need somebody who can do this or we have a need
5 for this, we need to bring somebody back, or what
6 about bringing somebody back from admin leave,
7 and then we go through HR, contact the person,
8 and they come back from administrative leave.

9 BY MS. GREENBERGER

10 Q Are you -- strike that.

11 Have you been involved in the decision
12 whether to recall employees back from
13 administrative leave?

14 A Sometimes I've been asked if we can
15 call employees back, or it's suggested to me.

16 Q And have you sometimes approved that
17 request?

18 A I have.

19 Q And have there been other times where
20 you have not approved that request?

21 A Perhaps, yes. There's probably been a
22 few times where I haven't.

1 Q And what were the situations when you
2 did not approve the request?

3 A We -- maybe -- there were several,
4 being maybe there were -- there was a situation
5 where somebody was asking for three people or
6 four people to return back to do the same job,
7 when we didn't think it was necessary to have
8 four people. We could do it with two.

9 Q And so you personally at that point
10 would say you think two is enough?

11 MR. KHOJASTEH: Object to form.
12 Mischaracterizes testimony.

13 THE WITNESS: I would interact with the
14 person requesting four -- this is hypothetical --
15 four, and I would say, do we really need four?
16 Can two do that job or three?

17 MS. GREENBERGER: Let's turn to a
18 different topic. Is -- can I have --

19 MR. BLUMIN: It's not ready yet, but
20 you may not need it.

21 BY MS. GREENBERGER

22 Q Okay. There were RIF notices that were

1 sent out by the agency between June 5th and
2 June 20th; is that correct?

3 A I believe those are the correct dates.

4 Q Okay. And the reporting -- and I can
5 show you tab 34 -- that is sourced to a senior
6 official at the agency states that there were 639
7 people who were -- received RIF notices in June
8 from the agency.

9 A Can I see this?

10 Q Of course. Let me mark it as an
11 exhibit first.

12 THE WITNESS: What's the source of
13 this? What agency put this out?

14 MS. GREENBERGER: This is TheDesk.net.

15 THE WITNESS: Okay. Oh, Matthew Keys.
16 You pick all the good ones, all the good fake
17 news. Okay.

18 (Deposition Exhibit Number 15 was
19 marked for identification.)

20 BY MS. GREENBERGER

21 Q Did you see this story when it was
22 published?

1 A No, I didn't see this.

2 Q Did you hear this story when it was
3 published?

4 A I try not to read the fake news.

5 Q Did you hear about this story when it
6 was published?

7 A What's the story? What do you want me
8 to focus on here?

9 Q So my question was really pretty
10 simple. The reporting on the second paragraph on
11 page 2 says that "639 employees received RIF
12 notices between June 5th and Friday afternoon."

13 Is that accurate?

14 A That seems very accurate, yeah.

15 Q And the next sentence says that "Among
16 the affected employees were Persian-language
17 workers who were laid off earlier this year, but
18 asked to return to work last week in order to
19 cover the Israel-Iran conflict."

20 Do you see that?

21 A "Among the affected employees" --
22 uh-huh.

1 MR. KHOJASTEH: And what's the
2 question?

3 MS. GREENBERGER: I was getting there.

4 MR. KHOJASTEH: Sure.

5 BY MS. GREENBERGER

6 Q Is that accurate that the June RIF
7 included Persian language workers who had been
8 asked to return from leave to cover the
9 Israel-Iran conflict?

10 MR. KHOJASTEH: Object to form. Lacks
11 foundation.

12 THE WITNESS: I mean, you're asking me
13 to verify Matthew Keys' reporting.

14 BY MS. GREENBERGER

15 Q I'm not. I'm asking you for facts
16 about the agency. So what I'm trying to
17 understand --

18 A Yes. Some Persian language workers who
19 were laid off earlier this year but asked to
20 return to work were RIF'd, yes.

21 Q Thank you. And you signed the RIFs
22 that went out in June?

1 A Yes.

2 Q And you signed them because that was
3 your decision to RIF those workers?

4 MR. KHOJASTEH: Object to form. Lacks
5 foundation.

6 THE WITNESS: We are effectuating an
7 executive order dated March 14th by the President
8 of the United States, which calls for reducing
9 the agency to its statutory minimum, including
10 personnel.

11 BY MS. GREENBERGER

12 Q And so my question was: You personally
13 made the decision in June to RIF 639 employees,
14 correct --

15 MR. KHOJASTEH: Object to form.

16 BY MS. GREENBERGER

17 Q -- in order to effectuate the executive
18 order?

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation. Vague as to personal decision.

21 THE WITNESS: This was an agency
22 decision based on everything that's led up to

1 this, that we needed to reform the agency and
2 bring it to a statutory minimum.

3 BY MS. GREENBERGER

4 Q Why did you sign those RIF notices?

5 A Because Victor Morales refused to do
6 his job and do that.

7 Q And did Victor Morales tell you why he
8 was refusing to sign the RIF notices?

9 A I don't recall.

10 Q Did you have any communications with
11 Mr. Morales about signing the RIF notices?

12 MR. KHOJASTEH: Object to form. To the
13 extent that those communications happened in the
14 presence of counsel, I'm going to instruct you
15 not to answer. If they didn't, you're free to
16 answer the question.

17 THE WITNESS: I don't recall if he just
18 didn't feel that he wanted to do it or he just
19 said, why don't you do it.

20 BY MS. GREENBERGER

21 Q And those 639 RIF notices were
22 rescinded, correct?

1 A They were.

2 Q And why is that?

3 A I think it was because there was some
4 sort of an error detected on a few of them, and
5 we engaged in union bargaining, so we reissued
6 those based on a couple of numbers that they said
7 weren't accurate. And we decided to rerun the
8 RIF after we did some collective bargaining with
9 the unions.

10 Q And there was also a union grievance
11 filed concerning the RIF?

12 A Perhaps, yes.

13 MR. KHOJASTEH: Object to form. Lacks
14 foundation.

15 BY MS. GREENBERGER

16 Q Okay. I can show it to you and see if
17 that refreshes your recollection.

18 A Okay. I wasn't -- I wasn't a huge
19 part -- I mean, the RIF is done in a very
20 specific way, and I was not a huge part of
21 deciding on it.

22 Q Who was --

1 A What was the union grievance? May I
2 see that?

3 MS. GREENBERGER: Sure. Can you hand
4 me tab 46, please?

5 MR. BLUMIN: Yeah.

6 BY MS. GREENBERGER

7 Q And while we're getting that, you said
8 you were not a huge part of deciding that RIF.

9 Who played a huge part in your view?

10 A Well, we decide which employees are
11 needed, not which specific employees, but what do
12 we need to do the job. And then we can't choose
13 an employee -- you might -- in the private
14 sector, you might say, we need our star employees
15 to remain. That's not how it works in the
16 government.

17 You just choose the titles of -- of the
18 positions that are needed, and then it goes
19 through a process where those positions will
20 remain, but you're not certain who will be in
21 those positions. It's a way to maintain fairness
22 in the government, and so that's how it works.

1 Q And so when you say you didn't have a
2 huge role, you had a role in choosing the title,
3 but not -- of the positions that were needed, but
4 not a role in determining who would --

5 A No. I let my team decide the title. I
6 let the people who were running the Voice of
7 America decide who -- which titles -- not who,
8 but which titles, what positions are needed to
9 run Voice of America.

10 Q And when you say you let the people who
11 were running Voice of America decide that, who
12 were you referring to?

13 A Management there, Leili and -- and I'm
14 sure she consulted with others to say, what do we
15 need to run our operation?

16 Q Remind me. What was Leili's title in
17 June?

18 A I think she -- I don't know if she
19 was -- I don't know if she had been moved into
20 the programming director yet, so I'm not sure,
21 but she was probably the top manager in the
22 newsroom.

1 MS. GREENBERGER: And once there
2 were -- well, we can get there. Can you please
3 mark that?

4 (Deposition Exhibit Number 16 was
5 marked for identification.)

6 THE WITNESS: Okay.

7 MR. KHOJASTEH: What is this marked as?

8 MR. BLUMIN: I'm so sorry.

9 MR. KHOJASTEH: It's okay.

10 MR. BLUMIN: I think we're at 16.

11 MR. KHOJASTEH: Okay. And what was
12 this one, just so I'm --

13 MS. YEOMANS: 15.

14 MR. BLUMIN: That was 15.

15 MR. KHOJASTEH: Okay. Great. Thank
16 you.

17 BY MS. GREENBERGER

18 Q And let me know when you're ready to be
19 asked questions. And I can just tell you, I'm
20 not going to ask such specific questions, so...

21 My question will be -- when you're
22 ready is: Does this refresh your recollection

1 that one of the unions, AFGE, filed a grievance
2 concerning the June RIFs?

3 MR. KHOJASTEH: And that's a yes or no
4 question, Ms. Lake. To the extent that you
5 learned about this document or learned about the
6 grievance from counsel, I'm going to instruct you
7 not to answer as it would disclose
8 attorney-client --

9 THE WITNESS: Yeah, I learned --

10 MR. KHOJASTEH: -- communications.

11 THE WITNESS: -- from counsel, and this
12 kind of thing goes through our HR people that
13 deal with the unions.

14 BY MS. GREENBERGER

15 Q And so in -- in or about the time the
16 grievance was filed, you were aware of it,
17 correct?

18 A The grievance on July 29th?

19 Q Correct.

20 A I'm sure they made me aware that there
21 had been a grievance. We -- we expected this.
22 You know, this is not unusual to have a grievance

1 when you're going through a RIF.

2 Q And that's because the CBA has a
3 process for dealing with RIFs, correct?

4 A Right.

5 Q And there's also a process to deal with
6 the grievances?

7 A Uh-huh.

8 Q You have to say yes or no.

9 A Yes.

10 Q Now, in August, on August 29th, at that
11 point, you were acting CEO?

12 A Yes.

13 Q And you can put that aside.

14 You directed a RIF of 532 employees; is
15 that correct?

16 A Uh-huh. Yes.

17 Q And just so the record's clear, when I
18 say you, I mean you personally directed that.

19 MR. KHOJASTEH: Okay. Object to form.
20 Lacks foundation. Vague as to "you," but go
21 ahead.

22 THE WITNESS: I mean, the original RIF,

1 we're planning to reduce the force, the number of
2 people, right? That was pretty obvious. We
3 decided to rerun the RIF. During that time while
4 we were rerunning it, we were -- before we reran
5 it, we started negotiating with the unions. And
6 I think we had great negotiations from all I
7 heard. They asked for, at one point, 42
8 different items that they requested, and I think
9 we delivered on -- out of 42, I think we
10 delivered on 39, maybe even 40.

11 And then we always planned to rerun the
12 RIF, and so this was just a rerunning of the RIF,
13 and that's how it happened. So this was the
14 same -- the same process that went into the first
15 one. We knew we had to reduce the size of the
16 staff because we were effectuating the
17 President's March 14th executive order, so this
18 was that process continuing out.

19 BY MS. GREENBERGER

20 Q And just so I'm clear, when you say you
21 had to rerun the RIF, you're referring to the
22 June RIF, correct?

1 A Yes.

2 Q Okay. And you said you had
3 negotiations with the unions and at the -- on
4 August 29th, when you reran the RIF, had those
5 negotiations been completed, or were they
6 ongoing?

7 MR. KHOJASTEH: Object to form. Calls
8 for -- lacks foundation.

9 THE WITNESS: I think we felt that they
10 were -- they had -- we had completed the -- I'm
11 not sure the union's happy, but, you know, that's
12 their prerogative as well.

13 BY MS. GREENBERGER

14 Q Did you consult with OPM on the
15 decision to issue the RIF notices on August 29th?
16 And here, when I say "you," I mean to your -- let
17 me ask it a different way.

18 To your knowledge, did the agency
19 consult with OPM on the decision to issue the RIF
20 notices on August 29th?

21 A I don't know that. If it's part of
22 what we need to do, then I'm assuming we did.

1 Q And who in the agency as a matter of
2 general practice would have been tasked with
3 coordinating with OPM?

4 A Probably --

5 MR. KHOJASTEH: Object to form. Lacks
6 foundation.

7 THE WITNESS: I don't know.
8 Probably -- probably our LER at HR, maybe
9 Michelle Stewart, perhaps somebody -- we had
10 several HR people that were working on conducting
11 the RIF. And possibly Chris Luer, who's our
12 acting CMO. I think he's our acting CMO. Maybe
13 he's acting head of HR, actually.

14 BY MS. GREENBERGER

15 Q We talked earlier about the process of
16 a RIF. Who made the decision who would be -- as
17 to the names of the human beings who would be on
18 the retention register?

19 MR. KHOJASTEH: Object to form. Lacks
20 foundation.

21 THE WITNESS: I think I just told you
22 you don't choose the name. You just choose a

1 position.

2 BY MS. GREENBERGER

3 Q And who chooses the name, though, or
4 what's the process by which a name is chosen?

5 A The process -- and I went through
6 this --

7 MR. KHOJASTEH: Object to form and
8 instruct you not to answer to the extent that
9 your knowledge of the process is based on
10 communications you've had with your lawyers.

11 THE WITNESS: That's true, and it's
12 also based on communication with people who were
13 involved in the RIF.

14 MR. KHOJASTEH: So you can --

15 THE WITNESS: So it's hearsay.

16 MR. KHOJASTEH: Don't -- you don't have
17 to worry about hearsay. Your -- whatever you
18 learned from the people involved in the RIF that
19 aren't the lawyers, you can --

20 THE WITNESS: Okay.

21 MR. KHOJASTEH: -- you can
22 communicate -- you can testify as to that. On

1 that stuff you learned from lawyers, I'm
2 instructing you not to answer.

3 THE WITNESS: Okay. So repeat the
4 question if you don't mind.

5 BY MS. GREENBERGER

6 Q Sure. What was the process --

7 A Of choosing the people that were RIF'd?

8 Q -- of choosing the people that were
9 RIF'd?

10 A I think I already went through this
11 before. It's the same as with the first RIF. We
12 just reran the RIF, and you determine --

13 Q You said you chose the titles, so I'm
14 asking --

15 A I didn't choose the titles.

16 Q The agency chose the titles?

17 A Yes.

18 Q And then how did it come to be that --

19 A The agency -- people in the agency.

20 Q How did it come to be that specific
21 people were on the retention list?

22 A Well, what happens from the way I

1 understand it -- and, again, I wasn't involved in
2 the nitty-gritty on this. This was done through
3 people in HR, the unions. There's a very, very
4 specific way that a reduction in force plays out,
5 and we wanted to follow every single rule and not
6 miss one line of it.

7 We asked our, you know, team members
8 who are running the VOA -- this is the way I
9 understand it went -- who do you need to -- not
10 who, not specifically who, but what positions do
11 you need to do the job, to do the programming
12 that we need.

13 And a list of positions was given, and
14 then they decide to not have -- they decide to
15 reduce in force the other positions that aren't
16 needed. But let's say you fall in one of those
17 lines. Let's say you're a radio broadcast
18 technician, and you happen to be a GS-14, and you
19 may be working doing the radio -- doing the news.
20 And once your position gets RIF'd -- I'm sorry --
21 if your position gets saved and somebody else's
22 position got RIF'd who's higher than your GS

1 level, then they call a bump and retreat. That
2 person can come in and take your job.

3 So it's a very complicated process that
4 the people who -- Leili may have said, we need
5 these positions, and maybe, you know, just for
6 hypothetical's sake, maybe John Doe was in one
7 position, and she wanted to keep that title.
8 That doesn't mean John Doe's going to remain in
9 that, because there could be somebody who has
10 seniority over him who will end up -- who was
11 RIF'd who will end up taking that job. So it's
12 not picking individuals. It's picking titles.

13 Q And are there e-mails or memos or other
14 documents that reflect how the agency decided
15 what positions to eliminate or retain with the --

16 MR. KHOJASTEH: Object to form.

17 BY MS. GREENBERGER

18 Q -- as part of the RIF?

19 MR. KHOJASTEH: Lacks foundation.

20 MS. GREENBERGER: I said "are there."

21 THE WITNESS: I don't know how --

22 MR. KHOJASTEH: You didn't say -- ask

1 her whether she knows whether there are.

2 THE WITNESS: Do I know whether
3 there were? I don't know whether there were. I
4 was not involved in that.

5 BY MS. GREENBERGER

6 Q We talked earlier about the agency's
7 surge capacity, right?

8 A Uh-huh.

9 Q And I think we talked about how many of
10 the agency's journalists have specialized
11 language or subject matter skills.

12 Would you agree with that?

13 A In some cases.

14 Q And many of the people who -- is it
15 fair to say that many of the people who were
16 RIF'd on August 29th have specialized language or
17 subject matter skills?

18 A I mean, yeah, specialized language, a
19 lot of people speak these languages in America.

20 Q A lot of people speak what languages in
21 America?

22 A Farsi. It's a big country.

1 Q And one of the things you said earlier
2 is that the agency could hire contractors to deal
3 with surge capacity issues, correct?

4 A Yes.

5 Q And is there any e-mails or memos or
6 other documents about how long they would take or
7 the process the agency would have to go through
8 to hire contractors for surge capacity?

9 A I think you asked me that before we
10 took a break. I'm unaware if there are.

11 Q Okay.

12 A Frank might know that.

13 MS. GREENBERGER: Can I have 35,
14 please? Can you mark this, please?

15 (Deposition Exhibit Number 17 was
16 marked for identification.)

17 BY MS. GREENBERGER

18 Q And I just showed the witness Exhibit
19 17, which is a tweet that it looks like you sent
20 on August 29th.

21 A Uh-huh.

22 Q Is that correct?

1 A Yes. Yes.

2 Q And in this tweet, you're talking about
3 the August RIF, correct?

4 A Correct.

5 Q And you state that this RIF will,
6 quote, likely -- "will likely improve its ability
7 to function and provide the truth to people
8 across the world who live under murderous
9 Communist governments and other tyrannical
10 regimes."

11 A Yes.

12 Q And do you agree with me that it's
13 important that VOA broadcast to people in
14 Communist regimes?

15 A In some, yes.

16 Q In what? I'm sorry.

17 A In some, yes.

18 Q And what countries are controlled by
19 Communist governments?

20 MR. KHOJASTEH: Object to form. Lacks
21 foundation.

22

1 BY MS. GREENBERGER

2 Q To your knowledge.

3 A I mean, we could -- we could talk about
4 China. Let's start there. I mean, I could go
5 down the list of countries. I'm not interested
6 in doing that. It's pretty obvious. You can
7 Google it.

8 Q Well, I'm trying to understand your
9 knowledge based on the decision we're talking
10 about here.

11 What countries other than China are
12 controlled by Communist governments?

13 A China.

14 Q Are you aware of any countries other
15 than China that are controlled by Communist --

16 A It didn't say --

17 Q -- governments?

18 A It didn't say in my tweet, its ability
19 to function and provide the truth to all
20 Communists. It said, "murderous Communist
21 governments."

22 Q What are non-murderous Communist

1 governments?

2 A I don't know.

3 Q Okay. Are you aware of any Communist
4 governments others than China?

5 A I would argue that Cuba is Communist.
6 I would argue that a lot of socialist countries
7 are Communist. Venezuela.

8 Q Okay. So other than the three
9 countries you just named, are you aware of any
10 other countries that are --

11 A Yes.

12 Q -- Communist --

13 A There are many. There are many.

14 Q And I'm asking for which ones those
15 are.

16 A I'm not going to go down and list all
17 the countries. You can Google it right now.

18 Q I'm asking for your knowledge, Ms.
19 Lake. Please let me know --

20 A I can't recall right now.

21 Q Okay. So your testimony is that the
22 only countries that you are aware of --

1 A No, I didn't say that. I said I can't
2 recall. I didn't say the only countries are. I
3 said I can't recall all of them at this moment.

4 Q And I'm not asking you whether you
5 recall all of them. I'm asking whether -- please
6 don't interrupt me. I'm asking whether you
7 recall whether there's any countries other than
8 China and Cuba -- and you also named Venezuela --
9 that are controlled by Communist governments.

10 MR. KHOJASTEH: Object to form. Asked
11 and answered.

12 THE WITNESS: I would throw in a lot of
13 socialist countries, too, but we could disagree
14 on that. But I've listed several, and I -- at
15 this moment, I don't recall.

16 BY MS. GREENBERGER

17 Q Okay. Are you aware that Vietnam is
18 controlled by a Communist --

19 A Yeah.

20 Q -- government?

21 A I'm aware of that.

22 Q And are you aware that North Korea is

1 controlled by a Communist government?

2 A Yes.

3 Q And are you aware that Laos is
4 controlled by a Communist government?

5 A Yes.

6 Q And does VOA have any plans to
7 broadcast to Laos?

8 A No.

9 Q And how about to Vietnam? Does Vietnam
10 --

11 A Nope. Nope. No.

12 MS. GREENBERGER: Turning to tab 30 --
13 oh, sorry. Let me see. Have we already marked
14 this 8/28 notice, which is tab 38?

15 MR. BLUMIN: No.

16 MS. GREENBERGER: Okay. So I'm going
17 to show you the notice that your attorneys filed
18 on the court docket on 8/28 about the RIFs.

19 THE WITNESS: Okay.

20 MR. BLUMIN: We could use a stapler.

21 MS. YEOMANS: Stapler?

22 MR. BEATON: I can get one.

1 MR. BLUMIN: Should we just fold it?

2 MS. GREENBERGER: Sure.

3 (Deposition Exhibit Number 18 was
4 marked for identification.)

5 MR. BLUMIN: We can pass the stapler
6 around. Sorry for this.

7 MR. KHOJASTEH: We'll live.

8 MR. BLUMIN: We'll pass a stapler
9 around.

10 BY MS. GREENBERGER

11 Q And I'm handing the witness an exhibit
12 marked 18, which is notice filed on the court
13 docket on August 28th.

14 A Okay.

15 Q Have you seen this document before?

16 A I don't know if I have.

17 Q Sure. Take your time.

18 A Let me put my eyeballs on it.

19 Q Please do.

20 MR. KHOJASTEH: Counsel, was your last
21 question, have you seen this document before?

22 MS. GREENBERGER: Yeah.

1 MR. KHOJASTEH: Okay. Has Ms. Lake
2 answered yet?

3 MS. GREENBERGER: No.

4 MR. KHOJASTEH: Okay.

5 THE WITNESS: I may have seen this come
6 across my e-mail. Just reading it to be familiar
7 with it.

8 MS. GREENBERGER: I'm just taking it
9 from you to staple it.

10 THE WITNESS: Okay.

11 MR. BLUMIN: Yeah, don't want to staple
12 you.

13 MS. GREENBERGER: Thank you.

14 MR. KHOJASTEH: Thanks.

15 BY MS. GREENBERGER

16 Q There you go, just because there's a
17 lot of paper in front of you.

18 You'll see on the second page -- I'll
19 show you where it is on my document. It might
20 help if you just look over. Around here.

21 A Was this filed before the RIF or after
22 the RIF?

1 Q Well --

2 A I've got to look at the date here.

3 Q Yeah. Why don't you look at the dates?

4 A 29th. So -- okay. It looks like it
5 was filed before the RIF; is that right?

6 Q It was filed on August 28th. You have
7 the docket stamp on top.

8 A Okay.

9 Q And on the second page it says, "USAGM
10 plans to retain 158 employees, and VOA to retain
11 108 employees."

12 Do you see that?

13 A No, I don't. Where -- where are we?

14 Q Do you see where my finger is? That's
15 the easiest way.

16 A "The Agency notes that these numbers
17 could change slightly."

18 Q Right. The sentence two sentences
19 above that.

20 A USAGM plans to issue reduction in
21 force, yes. Retain 158 employees. VOA retain
22 108 employees, yes.

1 Q And of those 108 employees who will
2 remain employed, how many will remain on leave?

3 A I don't know that we've determined that
4 yet.

5 Q Do you know how many are on leave right
6 now?

7 A No.

8 Q Roughly?

9 A No.

10 Q Okay.

11 A I don't.

12 Q And the sentence says that USAGM plans
13 to retain 158 employees.

14 So, just so I understand, those 158 are
15 not content producing staff, correct?

16 A I don't know. You'll have to ask Leili
17 that.

18 Q Okay. Am I right that those are
19 administrators, or you don't know?

20 MR. KHOJASTEH: Object to form. Asked
21 and answered.

22

1 BY MS. GREENBERGER

2 Q You can answer.

3 A Well, some of them could be employees
4 at OCB, members of our back office, HR, people
5 who run things like transmission lines and
6 transmission towers and that kind of thing.

7 Q Apologies if I've already asked this.
8 Do you -- have I already asked you, of the
9 employees that will remain after this RIF is
10 effectuated, how many will speak Farsi?

11 A I don't know. That's a great question
12 for Leili.

13 Q Would you agree with me that after
14 these RIFs are effectuated, USGM -- USAGM will
15 not be able to spend the congressional
16 appropriation at levels approaching the prior
17 year?

18 MR. KHOJASTEH: Object to form. Lacks
19 foundation.

20 THE WITNESS: Are you asking if we'll
21 be able to spend the money that was
22 appropriated -- or if we've already spent it or

1 if we'll be able to? Clarify that if you would.

2 BY MS. GREENBERGER

3 Q Sure. Let me do some preliminary
4 questions.

5 Is it fair to say that a significant
6 portion of the agency's budget goes to personnel?

7 MR. KHOJASTEH: Object to form. Lacks
8 foundation. Vague as to "significant portion."

9 BY MS. GREENBERGER

10 Q You can answer.

11 A Yeah, what is a significant portion?

12 Q Well, do you have a rough sense of what
13 portion of the agency budget goes to personnel?

14 A I would -- I would sense that a
15 significant portion goes to people, yeah.

16 Q And many of those people are now being
17 terminated, correct, under the RIF?

18 A Yes.

19 Q And so the portion that had been going
20 to personnel, that significant portion, would not
21 be going to personnel once the terminations go
22 into effect, right?

1 A The terminations go into effect, I
2 believe, on the 30th of September. Is that about
3 right, roughly? That's what I -- that's what I
4 believe to be about the date, which is the end of
5 the fiscal year.

6 Q So if Congress passes a continuing
7 resolution that continues the current fiscal year
8 spending into next year, a significant portion of
9 that budget would not be being spent on personnel
10 because they're being terminated, correct?

11 MR. KHOJASTEH: Object to form. Calls
12 for speculation. Hypothetical and lacks
13 foundation.

14 THE WITNESS: It's hypothetical.

15 BY MS. GREENBERGER

16 Q Well, does the agency have any plan for
17 the spending of its appropriation if it won't be
18 spending that money on the significant costs that
19 are personnel?

20 MR. KHOJASTEH: Object --

21 THE WITNESS: We --

22 MR. KHOJASTEH: -- to form. Calls for

1 speculation. Lacks foundation.

2 THE WITNESS: I'm not going to, you
3 know -- I don't have a crystal ball. I don't
4 know what Congress is going to do. I'm not sure
5 Congress knows what Congress is going to do. But
6 our fiscal year ends on the 30th of September,
7 and that is when these employees will be off the
8 payroll.

9 BY MS. GREENBERGER

10 Q And you're saying the agency has not
11 given any planning to the impact of a continuing
12 resolution for the next fiscal year. Is that
13 your testimony?

14 MR. KHOJASTEH: Object to form. Lacks
15 foundation and mischaracterizes the testimony.

16 THE WITNESS: Yeah. I just said I'm
17 not going to do hypotheticals. I don't know. I
18 mean, they could pass a budget.

19 BY MS. GREENBERGER

20 Q Absolutely, they could, and my --
21 earlier, we had talked about -- well, strike
22 that.

1 Part of good planning is to plan for
2 different outcomes. Would you agree with that?

3 A That's right. That's why we're
4 planning all kinds of things, making sure that
5 we're ready just in case. We've got contingency
6 plans.

7 Q Exactly. And is one of the
8 contingencies that the agency is planning for a
9 continuing resolution?

10 MR. KHOJASTEH: Object to form. Lacks
11 foundation.

12 THE WITNESS: I don't want to get into
13 a hypothetical. We don't know what Congress is
14 going to do. We're hopeful that they will pass
15 with the -- with the majority in the House and
16 the majority in the Senate and an incredible,
17 amazing president like Donald J. Trump and The
18 White House, that we can get something resolved
19 here.

20 BY MS. GREENBERGER

21 Q And the plan is that if your budget
22 justification goes through, you would then wind

1 down the agency, correct?

2 A Well, we --

3 MR. KHOJASTEH: Object to form. Lacks
4 foundation. Vague as to "wind down."

5 BY MS. GREENBERGER

6 Q Sorry. You can answer.

7 A With a -- with a reduced staff, we
8 don't need close to a billion dollars at the
9 agency to -- and we're trying to save the
10 taxpayers dollars.

11 Q Okay. You can put that aside.

12 Are you aware that the plaintiffs had
13 filed with the Court papers about the defendants'
14 noncompliance with Part III of the PI?

15 A Remind me --

16 MR. KHOJASTEH: It's a -- object to
17 form. It's a yes or no question. She's not
18 asking you what you know about it, X, Y and Z.
19 She's just asking you, are you aware, yes or no.

20 Anything -- I'm safe to say this.
21 Anything you know about that filing is based on
22 conversations you've had with the DOJ --

1 THE WITNESS: That's right.

2 MR. KHOJASTEH: -- or your lawyers.

3 THE WITNESS: That's right.

4 MR. KHOJASTEH: Instructing you not to
5 answer. You can ask the yes or no, though,
6 whether she's aware.

7 MS. GREENBERGER: I did ask it.

8 MR. KHOJASTEH: I know. I have to give
9 the instruction.

10 MS. GREENBERGER: Yeah, fine.

11 THE WITNESS: There's been -- I think
12 we have five malicious lawsuits against us, and
13 there's been a lot of, you know, things that come
14 through, and the attorneys brief me on them.

15 BY MS. GREENBERGER

16 Q Do you know, yes or --

17 A So I don't know if it's -- if I look at
18 it, perhaps I might be able to tell you for
19 certain yes or no.

20 Q Okay. Were you aware, yes or no, that
21 on June 23rd, the Court held a hearing regarding
22 defendants' alleged noncompliance with the

1 Court's preliminary injunction, Part III?

2 A Yes.

3 Q Okay. And are you aware that at the
4 end of that hearing, the Court ordered defendants
5 to file a supplemental memorandum with certain
6 additional information?

7 A I believe I am aware of that, yeah.

8 MS. GREENBERGER: And can you hand me
9 tab 25, please?

10 (Deposition Exhibit Number 19 was
11 marked for identification.)

12 BY MS. GREENBERGER

13 Q And I'm going to show you the Court's
14 order, which is dated June 23rd, and my question
15 will just be -- well, my first question will be:
16 Were you aware of that order?

17 I'll show it to you.

18 A Every time I take these off, you make
19 me put them back on.

20 Q I would show you less documents, but
21 you say, can I see the documents.

22 A Well --

1 Q So the question's just: Were you aware
2 of this order?

3 MR. KHOJASTEH: Yes or no, Ms. Lake?

4 THE WITNESS: I'm sure that I was aware
5 of it. I mean, am I -- I'm not overly familiar
6 with every detail on it.

7 BY MS. GREENBERGER

8 Q And did you do anything promptly --
9 well, strike that.

10 Did you do anything in response to this
11 order that is Exhibit 19, the June 23rd order?

12 MR. KHOJASTEH: Object to form. I'm
13 going to instruct the witness not to answer
14 beyond -- you can say yes or no whether you did
15 something. You can't say what you did.

16 If it was -- you can't say what you did
17 if it was done at the direction of counsel.

18 Sorry. Apologies.

19 THE WITNESS: Okay. We did something,
20 but it was at the direction of counsel. You
21 asked if we did anything? Is that the question
22 you asked?

1 MS. GREENBERGER: That was the
2 question.

3 MR. KHOJASTEH: She asked if you did
4 something.

5 THE WITNESS: Oh, if I did something?

6 MR. KHOJASTEH: I mean, if we want to
7 take a quick -- I may know where you're going
8 with this, but I have to make these objections.
9 I have no idea what's going to -- I want to make
10 sure we're not breaching the attorney-client
11 privilege or work product.

12 MS. GREENBERGER: Okay. I'm going to
13 say I don't agree with that objection, but why
14 don't we move on --

15 MR. KHOJASTEH: No, no, I'm just --

16 MS. GREENBERGER: -- because --

17 MR. KHOJASTEH: -- letting you know
18 that I'm happy to revisit the objection with just
19 some more clarity of where you want to go with
20 that. And we can do that off the record like
21 we've done earlier today, and I've been able to
22 help you in terms of getting the information

1 you're looking for for your examination.

2 MS. GREENBERGER: Let's -- let's turn
3 to the Court's next order, which is on July 8th.
4 And tab 26, if you could get that for me, please.
5 I'm sorry. July 8. Yeah. Did I say July 8?

6 (Deposition Exhibit Number 20 was
7 marked for identification.)

8 MR. KHOJASTEH: This is 20?

9 MS. GREENBERGER: What are we up to?

10 MR. BLUMIN: Yes.

11 BY MS. GREENBERGER

12 Q So I'm showing the witness a document
13 marked Exhibit 20, which is a July 8th court
14 order. And my question is: Have you seen this
15 document before?

16 A I know that you live and breathe all of
17 this and you all collect a lot of billable hours
18 on this, but I'm running an agency, so some of
19 this just blends together, and I rely on my
20 attorneys.

21 Q I hear you. And the answer, it's a
22 yes, no, I don't know question.

1 A I'm not sure. I probably am aware of
2 this, yes.

3 Q And were you aware that the Court said
4 that it does not -- I'm turning to the third
5 page. "The Court still does not have a clear
6 picture of what VOA is doing, what the
7 defendants' plan is for VOA moving forward, or
8 how the defendants made any of these decisions."

9 Were you aware of that?

10 A Yes. I think that's why we're here
11 today, right, spending so much quality time
12 together. It's wonderful.

13 Q Turning to the first declaration that
14 you submitted to the Court after this July 8th
15 order, which is exhibit -- which is Exhibit 2,
16 somewhere in that pile.

17 A Let me find it. I should put these in
18 order, perhaps.

19 Q Yeah, let's do that on the next break.

20 MR. KHOJASTEH: What do you mean, next
21 break? No, I'm just kidding.

22 THE WITNESS: Oh, 2. Is that what you

1 said, 2?

2 MS. GREENBERGER: Yes.

3 THE WITNESS: Okay.

4 BY MS. GREENBERGER

5 Q Okay. Now, on paragraph 4 of your
6 declaration, you told the Court that VOA has 72
7 full-time employees; is that correct?

8 A Looks like it, yeah. 72, that's what
9 it says.

10 Q And my understanding -- and correct me
11 if I'm wrong -- is that you did not -- you
12 personally did not understand that 72 was the
13 statutory minimum, correct?

14 A Pardon me?

15 Q The 72 number that you put in your
16 declaration to the Court, you did not understand
17 that to be the statutory minimum?

18 MR. KHOJASTEH: Object to form.
19 Mischaracterizes testimony. I think the
20 statutory minimum's been in reference to USAGM
21 and not VOA.

22

1 BY MS. GREENBERGER

2 Q The statutory minimum you listed in VOA
3 was 11, correct, in your letter to Congress?

4 A In the letter to Congress, we -- we --
5 "While we anticipate being above the originally
6 proposed statutory minimum staffing numbers, the
7 plan to effectuate President Trump's Executive
8 Order is still developing. As we work to adhere
9 to the executive order, please consider this
10 required Congressional Notification."

11 Q Right. I was turning to the next page
12 of that.

13 A Okay. The recommendation?

14 Q Yes.

15 A And your question is on that?

16 Q Yeah.

17 A What was your question?

18 Q My question was: Am I understanding
19 correctly this document that the statutory
20 minimum was calculated -- I'm sorry -- was
21 determined to be 11 people as compared to the 72
22 people that you told the Court on July 18th that

1 you were employing?

2 MR. KHOJASTEH: Object --

3 BY MS. GREENBERGER

4 Q Is that apples to apples or not?

5 MR. KHOJASTEH: Object to form. Lacks
6 foundation. Vague as to "apples to apples."

7 BY MS. GREENBERGER

8 Q You can answer.

9 A We're developing the plan to run the
10 agency. We're running the agency, and we're
11 utilizing information given to us by senior
12 career leadership who helped devise this plan. I
13 thought it seemed very low, and I even mentioned
14 that it was a little bit -- or it seemed low, and
15 I had mentioned in the letter that we were
16 seemingly going to go above that. We anticipate
17 being above the originally proposed statutory
18 minimum.

19 Q When you -- just so the record's clear,
20 when you said it seemed low, you were referring
21 to the March 18th statutory minimum memo,
22 correct?

1 A Yeah. I was kind of surprised by it.

2 Q And you were surprised by it because
3 the numbers were so low?

4 A No. I just was surprised by it.

5 Q Well, what were you surprised by?

6 A It was just surprised.

7 Q What about it surprised you?

8 A I thought that -- I just thought that
9 the careers wanting to eliminate 90-plus percent
10 of their colleagues was a bit shocking. But I
11 understand they understand this -- how this
12 agency works and that they know better because
13 they've been working in this agency for a long
14 time. And many -- most of them are SESs, which
15 tells me they're extra special and extra
16 important when it comes to the federal government
17 for the skills that they have, so they truly are
18 the cream of the crop.

19 Q And so you expected the statutory
20 minimum number to list more than 81 people,
21 correct?

22 A I didn't know what it was going to be.

1 Q But you were surprised that the
2 number -- that, as you said, 90-plus percent of
3 people would be terminated?

4 A No. I was more surprised that why
5 would you have so many people there to start
6 with, but then I realized that it's the
7 government. And I worked in media for 30 years
8 as a journalist, a broadcast journalist, and over
9 that time, every single news operation across
10 this country has been right-sized as technology
11 has picked up, but not the federal government.

12 They just kept growing and growing and
13 growing and adding and adding and adding and then
14 adding contractors on top of it. And it makes
15 sense. It's not their money. It's the
16 hardworking people across the country paying for
17 this. So I was more shocked at what we had
18 before when we could do it with such a small
19 amount.

20 Q In the Court's July 8th order, which I
21 believe you have in front of you --

22 A 18th. There we go. 19, Exhibit 19?

1 Q No. Docket 126 on top.

2 A Oh, here it is.

3 Q Okay.

4 A No, wait. That's weird. What is it?

5 Q This is --

6 A Oh, 20. Okay.

7 Q Do you see on page 4 the Court says,
8 "the supplemental memorandum contains no
9 information on how the defendants determined the
10 activities it would undertake to restore VOA
11 programming such that USAGM fulfills its
12 statutory mandate"?

13 A Which paragraph was that, pointing it
14 out here?

15 Q Right there, the paragraph -- the
16 sentence starting with "Furthermore."

17 A Okay.

18 Q Did you address that issue in your
19 July 18th declaration?

20 A I feel that we did address everything.
21 I think we've addressed this several times.

22 Q Okay.

1 A Same questions are asked, and we keep
2 readdressing them.

3 Q Can you just point to what paragraph in
4 your July 18 declaration describes how the
5 defendants determined which -- the activities you
6 would undertake to restore VOA programming such
7 that it --

8 A Maybe I don't understand what he's
9 asking. What do you make of that? What is how
10 the defendants determined the activities that
11 would undertake -- they would -- maybe I don't
12 understand that. What is he asking there?
13 Because I feel that we've answered these
14 questions over and over.

15 Q So I just wanted to understand what
16 paragraph of your July 18th declaration answers
17 that question or that request from the Court.

18 A Okay. How we are -- to restore VOA
19 programming such that it fulfills the statutory
20 mandate. So statutory mandate is the critical
21 thing there.

22 Well, one of the things we're doing is

1 actually covering the statute that we need to,
2 which is, you know, the VOA 50 states initiative.
3 That wasn't even --

4 Q I'm sorry. The question was what
5 paragraph in the --

6 A Eight.

7 Q -- declaration?

8 A It's one of the -- one of the answers.
9 And six and seven. Paragraph 6, 7, 8.

10 Q Do you believe paragraph 6, 7 and 8
11 discusses how you made the determination about
12 what activities you would undertake -- the agency
13 would undertake?

14 A I mean, I don't know what you mean,
15 how. Do we sit around in a circle and talk to
16 each other? What do you mean by how? What are
17 you -- what are you getting at?

18 MR. KHOJASTEH: To the extent -- I'm
19 going to object to form and just caution counsel
20 to the extent -- at this stage, Ms. Lake has
21 testified that the -- the plan for statutory
22 minimum was developed --

1 MS. GREENBERGER: Sir, I think you're
2 starting to make speaking objections.

3 MR. KHOJASTEH: I'm just -- I'm
4 explaining there's a privilege call here.

5 MS. GREENBERGER: Okay.

6 MR. KHOJASTEH: The how --

7 MS. GREENBERGER: She answered --

8 MR. KHOJASTEH: How it was --

9 THE WITNESS: Yeah.

10 MR. KHOJASTEH: The plan for statutory
11 minimum was developed by general counsel's office
12 and career -- career folks. If you want to get
13 into the how, you're literally asking for
14 attorney-client --

15 MS. GREENBERGER: No. I was --

16 MR. KHOJASTEH: -- communications and
17 work product.

18 THE WITNESS: I think I've said how in
19 talking about the three-page memo that senior
20 career officials from the agency put together.
21 It may not have been satisfactory to the judge,
22 but I can't squeeze blood out of a turnip. I'm

1 telling him how, and he just doesn't like the
2 answers.

3 BY MS. GREENBERGER

4 Q Now, in your July 18th declaration,
5 paragraph 13 -- why don't we turn to that.

6 A What paragraph? 18?

7 Q 13, which is good because there is no
8 18.

9 And this is -- well, why don't you read
10 the paragraph and then we can ask. Let me know
11 when you're ready.

12 A Yeah, I'm ready.

13 Q And in this paragraph, paragraph 13 of
14 your July 18th declaration, you're discussing why
15 USAGM has decided not to broadcast into Africa,
16 correct?

17 A Uh-huh. Yes. Yes.

18 Q And one of the factors that you point
19 to is that the statute's broadcasting principles
20 require that VOA not duplicate the activities of
21 private broadcasters or government broadcasting
22 of democratic nations, correct?

1 A Correct.

2 Q And you point to the fact that CNN
3 International already broadcasts into Africa,
4 correct?

5 A As does, I believe, OAN and Fox, ABC,
6 CBS. They have a reach that reaches into Africa.

7 Q And your declaration didn't mention
8 OAN, Fox, ABC --

9 A No.

10 Q -- or CBC -- CBS?

11 A No, but it gives you the idea that
12 there's already broadcasting going in.

13 Q And -- and CNN, I think you already
14 said earlier in this deposition, you view as not
15 a credible news source --

16 A Well, it's my --

17 Q -- is that correct?

18 A -- opinion. I think it's garbage,
19 trash, the worst of the worst, but some people
20 love it. Some people enjoy it.

21 Q And do you believe that VOA should not
22 be doing broadcasting if there's already trash

1 broadcasting in that space?

2 A Well --

3 MR. KHOJASTEH: Object to form.

4 THE WITNESS: It's not my style of
5 news, but other people love it. So it's in
6 news -- it's in airports and -- you might love
7 it. I don't really care for it. I'm sure you --
8 you maybe don't like other outlets that I
9 actually might like.

10 MS. GREENBERGER: Now --

11 THE WITNESS: Difference of opinion.

12 BY MS. GREENBERGER

13 Q Now, CNN broadcasts only in English,
14 correct, CNN International?

15 A I don't know.

16 MR. KHOJASTEH: Object to form.

17 BY MS. GREENBERGER

18 Q To your knowledge, are you aware of any
19 language other than English --

20 A Yes.

21 Q -- that CNN --

22 A Spanish.

1 Q Okay. And are you aware of any
2 language other than English and Spanish that CNN
3 International broadcasts in?

4 A I think through subtitles you could
5 call broadcasting -- if it's in another language,
6 say, French, they would put subtitles on, which
7 is a possibility. I've seen that, but I'm not
8 certain.

9 Q And how about OAN, Fox, ABC, CBS? Do
10 any of those broadcast in languages other than
11 English, to your knowledge?

12 A I'm just looking at the International
13 Broadcasting Act, (a)(3). Broadcasting
14 standards. United States international
15 broadcasting shall not duplicate the activities
16 of private U.S. -- United States broadcasters. I
17 don't think it said in any language on there.

18 Q And so is your understanding, personal
19 understanding of that provision, that it is
20 duplicating broadcasting even if VOA is providing
21 broadcasting in a nation's language; whereas, the
22 American broadcast is in only English? It's

1 still duplication in your view?

2 MR. KHOJASTEH: Object to form. Lacks
3 foundation.

4 THE WITNESS: Well, I would never want
5 to rely on just my opinion. I'm -- I'm a
6 broadcast journalist, yes, but I'm not an
7 attorney, and so I rely on my attorneys. And I
8 don't want to get into the conversations I've had
9 with my attorneys to determine which languages
10 the agency is covering and which ones we're not.
11 That would go against attorney-client privilege.

12 BY MS. GREENBERGER

13 Q Well, you said in your declaration that
14 because CNN International already broadcasts into
15 Africa, you view that as duplicating -- you view
16 USGM -- sorry. Strike that. Let's start again.

17 You stated in your declaration that
18 USAGM decided not to broadcast into Africa
19 because that would duplicate the broadcasting of
20 CNN International and other U.S.-based news
21 networks, correct?

22 A That's what it says, yeah.

1 Q And --

2 MR. KHOJASTEH: Object to form.

3 Mischaracterizes the documents.

4 BY MS. GREENBERGER

5 Q And you reached that determination --
6 strike that.

7 You -- you believe it's duplication of
8 broadcasting regardless of what language VOA was
9 broadcasting in and what language the private
10 United States broadcasters are broadcasting in,
11 correct?

12 A I just said that I was reading the
13 International Broadcasting Act, and it said not
14 -- "shall not duplicate the activities of private
15 United States broadcasters." It didn't say what
16 language.

17 Q Was the -- was the decision that
18 broadcasting in Africa would be duplicative of
19 major news network broadcasting a decision of the
20 agency that you adopted as the deputy CEO or the
21 acting CEO?

22 MR. KHOJASTEH: Object to form. Lacks

1 foundation.

2 THE WITNESS: We relied on career
3 senior staff to come up with a plan, and we've
4 been working roughly from that plan in
5 conjunction with our -- our general counsel
6 helping us determine what is the statute.

7 BY MS. GREENBERGER

8 Q The Court's July 8th order, which I
9 think you have in front of you at 4, says --

10 A Page 4.

11 Q Yeah. And the third sentence down
12 says, "The Court therefore does not have a sense
13 of how the defendants are using the 260 million
14 that has been appropriated for VOA for Fiscal
15 Year 2025," correct?

16 A Where do you see that? Oh, right up at
17 the top. "The Court therefore does not have."
18 Okay.

19 Q And turning to your July 18th
20 declaration, you address this, I believe, in
21 paragraph 12. Please confirm that I'm right on
22 that.

1 A Paragraph 12? Okay. Yeah, I see that.

2 Q And paragraph 12 provides a list of
3 spending by VOA office?

4 A Yes.

5 Q And in there you say that VOA, for
6 example, spent 137 million on regional
7 broadcasting operations, correct?

8 A Yes. That's what it says.

9 Q And that 137 million was not spent
10 actually producing regional broadcasting
11 operations because there was almost no regional
12 broadcasting happening, correct?

13 A I don't think --

14 MR. KHOJASTEH: Object to form. Lacks
15 foundation.

16 BY MS. GREENBERGER

17 Q Go ahead.

18 A It doesn't say regional broadcasting
19 operations producing programming.

20 Q So most of that 137 million was spent
21 on journalists and staff salaries who were on
22 leave, correct?

1 MR. KHOJASTEH: Object to form. Lacks
2 foundation.

3 THE WITNESS: Paid administrative
4 leave? I'm assuming some of that was, yes.

5 BY MS. GREENBERGER

6 Q Most of that?

7 MR. KHOJASTEH: Same objection.

8 BY MS. GREENBERGER

9 Q To your knowledge.

10 A I'm assuming, yeah.

11 Q And that's not mentioned in your
12 declaration, is it? Or show me where it is.

13 MR. KHOJASTEH: What's not mentioned?

14 MS. GREENBERGER: That most or some of
15 that money is being spent on paid administrative
16 leave.

17 THE WITNESS: It just says what the --
18 it just says studio and production operations,
19 yeah.

20 BY MS. GREENBERGER

21 Q So it's not mentioned, correct?

22 A What?

1 Q Your declaration does not mention how
2 much of the money is spent on people sitting at
3 home?

4 A Are you suggesting we don't pay people,
5 we just let them go and don't pay them?

6 Q Not at all. I'm --

7 MR. KHOJASTEH: So what are you -- what
8 are you -- are you asking her to testify what's
9 in the document or not in the document?

10 MS. GREENBERGER: Correct. I'm asking
11 her --

12 MR. KHOJASTEH: Okay.

13 MS. GREENBERGER: -- to verify --

14 MR. KHOJASTEH: So, like, we're out on
15 five? Come on.

16 MS. GREENBERGER: I am.

17 MR. KHOJASTEH: Move it along.

18 MS. GREENBERGER: I was moving along.

19 MR. KHOJASTEH: All right. Go ahead.

20 MS. GREENBERGER: Actually, I
21 had moved -- I think that was an offensive
22 statement.

1 MR. KHOJASTEH: Just come on.

2 That's -- does it say this and this? Either it
3 says or it doesn't.

4 MS. GREENBERGER: And she might tell me
5 I missed it.

6 MR. KHOJASTEH: Do you believe that?

7 MS. GREENBERGER: Can I have tab 27,
8 please?

9 MR. BLUMIN: Sure.

10 BY MS. GREENBERGER

11 Q You understand -- well, do you
12 understand that the Court issued an order to show
13 cause in this case on July 30th?

14 A I think we already asked that -- asked
15 that question, right?

16 Q We were talking about an earlier order
17 a few minutes ago.

18 A Another show cause?

19 Q Well, the earlier order was not styled
20 as an order to show cause. So there was a
21 July 30th order that was called the order to show
22 cause.

1 A I'm not an attorney.

2 Q I understand. Did you understand that
3 the Court issued an order on July 30th? And
4 that's Exhibit 11. I think we have looked at it.

5 MR. KHOJASTEH: Yeah, it's already in
6 here somewhere.

7 MS. GREENBERGER: It is in here.

8 BY MS. GREENBERGER

9 Q Do you have that in front of you?
10 Thank you.

11 A Somewhere. This is like malicious,
12 insane lawfare. This is what the American people
13 are so sick of.

14 Q Ms. Lake, I have -- I'm trying to move
15 through this.

16 A I know you are. And let me -- let me
17 sort through the insanity. Which one was it
18 again? Dated what date?

19 Q It's July 30th. It's document 130.

20 A Eleven pages?

21 MR. KHOJASTEH: It's Exhibit 11.

22 THE WITNESS: Got it. What does show

1 cause mean? You're a lawyer.

2 MS. GREENBERGER: I'm happy to answer
3 that question, but I think your lawyer would
4 probably prefer that he be the one to advise --

5 MR. KHOJASTEH: Just --

6 MS. GREENBERGER: -- you on that.

7 MR. KHOJASTEH: Just -- just out of
8 curiosity, if this is going to be another, like,
9 20, 25 minutes of questions, can we just take a
10 two-minute break? No one needs to move. I just
11 need to run to the restroom.

12 MS. GREENBERGER: Sure. Why don't we
13 take --

14 MR. KHOJASTEH: Do you want to take
15 more than that? It's been an hour, so --

16 MS. GREENBERGER: Yeah, sure. Why
17 don't we take a break.

18 MR. KHOJASTEH: Okay.

19 MS. GREENBERGER: We can take a
20 ten-minute break.

21 VIDEO TECHNICIAN: This marks the end
22 of Media Unit No. 5. Going off the record, the

1 time is 16:49 p.m.

2 (Recess 4:49 p.m. to 5:07 p.m.)

3 VIDEO TECHNICIAN: This marks the
4 beginning of Media Unit No. 6. Going back on the
5 record, the time is 17:07 p.m.

6 BY MS. GREENBERGER

7 Q Ms. Lake, prior to the break, we were
8 looking at the Court's July 30th order, which was
9 Exhibit 11 in front of you.

10 A Okay.

11 Q And turning to the last page of that
12 order, you see that it says, "Produce all
13 documents otherwise relating to the defendants'
14 plan to wind down USAGM's operations"?

15 A Okay.

16 Q And do you understand that the agency
17 ran a search for responsive documents as a result
18 of the Court's order?

19 MR. KHOJASTEH: I'm going to object to
20 the question and instruct the witness not to
21 answer anything you know about our compliance
22 with this order. Our collection of documents in

1 response to this order was -- is based on
2 client -- attorney-client communications.

3 MS. GREENBERGER: Did -- was DOJ
4 involved in --

5 MR. KHOJASTEH: Agency lawyers were.
6 Instruction stands. The fact that you think you
7 can ask a witness about court filings in a live
8 litigation and think it's not going to be subject
9 to attorney-client communication --

10 MS. GREENBERGER: I don't need --

11 MR. KHOJASTEH: -- is nonsense to me.

12 MS. GREENBERGER: I really don't need
13 the speaking objections.

14 MR. KHOJASTEH: Okay.

15 BY MS. GREENBERGER

16 Q Do you have a USAGM e-mail?

17 A Yes.

18 Q And do you have a State Department
19 e-mail?

20 A Yes.

21 Q And what other e-mails do you use when
22 conducting USAGM business, if any?

1 A I use my -- I really use my USAGM.

2 Q And are there any other e-mails you
3 use?

4 A I had one called, I think, sr47@usagm,
5 but I only used that, I think, once or twice, and
6 I really don't use that.

7 Q Do you use text messaging when doing
8 USAGM work?

9 A Not very often. Occasionally.

10 Q And do you use that on a personal phone
11 or a work-provided phone or both?

12 A On my work phone.

13 Q And what other applications do you use
14 to communicate about work-related things, such as
15 Signal, WhatsApp, et cetera?

16 A I use my -- I use my good old-fashioned
17 telephone, sometimes even a hard line.

18 Q And other than a telephone, do you use
19 any of the services I just talked about or any
20 other services like WhatsApp or Signal for
21 work-related --

22 A I don't have WhatsApp. I do have

1 Signal. I use it occasionally. I don't use that
2 for work.

3 Q We've talked a lot about -- today about
4 the June 3rd statement to Congress, so maybe we
5 can turn back to that. I have another question
6 about it if --

7 A What was that one?

8 Q -- you have it handy. I don't -- I
9 don't even, frankly, need you to look at it, but
10 you can pull it up if you need it.

11 I want to talk about the six career
12 people that have -- that were -- signed on the
13 last page.

14 MR. KHOJASTEH: We're talking about
15 Exhibit 3.

16 MS. GREENBERGER: Exhibit 3.

17 THE WITNESS: Thank you. Let me just
18 get to that.

19 BY MS. GREENBERGER

20 Q Is Mr. Min still with the agency?

21 A My former GC? No.

22 Q And when did he leave the agency?

1 A I don't remember. I think he took a
2 fork in the road, possibly, one of the generous
3 offers for people who were contemplating leaving.

4 Q And do you know roughly when he took
5 that fork in the road?

6 A I don't --

7 MR. KHOJASTEH: Object to form.

8 THE WITNESS: -- recall.

9 BY MS. GREENBERGER

10 Q That's fine. And Mr. Morales, we
11 already spoke about how he is on administrative
12 leave, correct?

13 A I don't have this document. I know --
14 I know -- I know it, but I'd really like to have
15 it in front of me.

16 Q Of course. I'm sure you have it, so we
17 can find it.

18 A Is it there? No. I tried to put
19 the -- all right. That's fine. This is the
20 three -- this is the --

21 Q I'm just asking you about the names.

22 A -- stat min --

1 Q But it must be here somewhere.

2 A -- put together by senior career
3 leadership?

4 MR. KHOJASTEH: You can use mine.

5 THE WITNESS: Okay. I've got it now.
6 He's --

7 MR. KHOJASTEH: I gave her mine.

8 THE WITNESS: Okay. So Victor Morales?

9 BY MS. GREENBERGER

10 Q Yes. Victor Morales, we already
11 established, is on paid administrative leave?

12 A He is a senior policy advisor on paid
13 administrative leave currently.

14 Q And how about Mr. Napoli? What's his
15 current status with the agency?

16 A He is still the chief financial officer
17 and is actually going to go work in the private
18 sector soon.

19 Q So he has announced that he's going to
20 leave the agency?

21 A Yes.

22 Q As of when?

1 A I think it was like the 12th or the
2 13th, somewhere around there.

3 Q Of September?

4 A Yes.

5 Q And how about Ms. Thomas? What's her
6 current status with the agency?

7 A She's on family leave.

8 Q And is she expected to return after
9 family leave, to your knowledge?

10 A I don't know -- actually, I believe she
11 took the fork in the road, DRP, the fork in the
12 road where you have the option.

13 Q Right. So your understanding is
14 Ms. Thomas has taken a fork in the road and
15 was -- is going to leave the agency?

16 A I think that's what it was. It might
17 have been VERA or VSIP. After the first RIF,
18 between the first RIF and then when we reran the
19 RIF, the union asked if we would consider to give
20 people the option of having another -- another
21 crack at taking the opportunity to have the fork
22 in the road, which is a very generous opportunity

1 to be paid, and I think she took them up.

2 I think we had about 100 and -- I made
3 the decision ultimately. I didn't have to, but I
4 wanted to make sure that people were taken care
5 of. And I think about 120, 130 people between
6 the first RIF. Then we reran to the second one.
7 You notice the number came down. It went from
8 like 630 something to 500 and something because I
9 made the generous offer to have people have
10 another crack at VSIP, VERA and the DRP. And a
11 lot of people took us up on that.

12 Q And when did you make that generous
13 offer?

14 A After we reran the -- the first RIF.

15 Q Mr. Luer, what is his current status
16 with the agency?

17 A He is currently working.

18 Q And has he announced any plans to leave
19 the agency?

20 A No.

21 Q And how about Mr. -- I'm sorry. Is
22 Terry Balazs -- how do you pronounce Terry's --

1 A I think it's Balazs.

2 Q And is Terry Balazs -- what's their
3 current situation with the -- with the agency?

4 A He has served many decades, and I just
5 spoke to him the other day, and I think he's
6 planning to stay. He still enjoys his work.

7 Q We discussed earlier the 2026 budget
8 justification and -- which proposes winding down
9 the agency, correct?

10 MR. KHOJASTEH: Object to form. Lacks
11 foundation.

12 BY MS. GREENBERGER

13 Q Does the 2026 budget justification seek
14 appropriations to wind down USAGM?

15 MR. KHOJASTEH: Object to form. Lacks
16 foundation.

17 THE WITNESS: This is, I believe, put
18 together by Roman Napoli, our CFO, and it does
19 call for money if the agency were to be
20 eliminated to wind it down.

21 MS. GREENBERGER: And --

22 THE WITNESS: Or to run the agency.

1 Same amount of money.

2 BY MS. GREENBERGER

3 Q I'm sorry. Can you explain that?

4 A The amount that it calls for could
5 either be used to wind down the agency, if that's
6 what the President and Congress decide, or to
7 keep the agency running.

8 Q And if the agency is eliminated, what
9 do you see USAGM's role in national security?

10 MR. KHOJASTEH: Object --

11 THE WITNESS: That's a --

12 MR. KHOJASTEH: -- to form. Lacks
13 foundation. Calls for speculation.

14 THE WITNESS: It's a hypothetical.

15 MR. KHOJASTEH: Confusing.

16 THE WITNESS: Yeah.

17 BY MS. GREENBERGER

18 Q Do you believe USAGM has a role in
19 national security?

20 MR. KHOJASTEH: If the agency's
21 eliminated?

22

1 BY MS. GREENBERGER

2 Q Today, do you believe the US -- USAGM
3 today has a role in national security?

4 A Yes, I do.

5 Q And if the agency is eliminated, what
6 happens to that role?

7 A I think there's a way to continue to do
8 international broadcasting. If the agency's
9 eliminated, it doesn't mean that we don't do
10 international broadcasting. It just means an
11 agency that has not always been managed properly,
12 been mismanaged, frankly, has had major
13 corruption, doesn't exist, but broadcasting could
14 continue. Voice of America could continue.

15 This agency has hurt Voice of America.
16 The inept people who ran this agency have hurt
17 Voice of America. The decisions made have hurt
18 Voice of America and the people there. The
19 corrupt people who ran it are one of the reasons
20 we're in this situation right now. So I think
21 there is a place for it, and, you know, there's a
22 chance that we could see many different options

1 of where this agency could go.

2 And I know I talked about some of it
3 during my congressional hearing, which I'm sure
4 you're aware of. You know, the last time --
5 arguably, the last time VOA was effective is when
6 it was under the Department of State, and so
7 there's that option. The President has mentioned
8 in his so-called skinny budget the elimination,
9 but there's also, you know, the chance that it
10 could continue.

11 MR. KHOJASTEH: I'm sorry. This just
12 fell. It's your earring, Ms. Lake.

13 THE WITNESS: Oh, my earring. It's
14 like -- excuse me, guys. I'll put my earring
15 back in.

16 BY MS. GREENBERGER

17 Q I want to go back to a question because
18 I'm concerned about the privilege invocation.
19 I'm trying to see whether we can reach an
20 agreement here.

21 To your knowledge, did USAGM search for
22 any documents, including e-mails, in response to

1 the order to show cause?

2 MS. GREENBERGER: Are you directing her
3 not to answer that question?

4 MR. KHOJASTEH: Can I raise -- can I
5 make my objection?

6 MS. GREENBERGER: Yes.

7 MR. KHOJASTEH: I'm instructing you not
8 to answer to the extent you have no independent
9 knowledge other than what your lawyers told you
10 as to what was done in connection with any
11 document collection at the agency in response to
12 this order.

13 So if, somehow, you know independently
14 that there was a document collection done and the
15 parameters of that document collection has
16 nothing to do with what the agency lawyers told
17 you or discussed with you, you're free to answer
18 it. Otherwise, I'm instructing you not to
19 answer.

20 THE WITNESS: And the only way I know
21 about that is through my conversations with
22 lawyers, so is there --

1 MR. KHOJASTEH: So move on.

2 BY MS. GREENBERGER

3 Q Are -- does --

4 MR. KHOJASTEH: Happy to take it to the
5 Court. It's -- it's flagrant and it's like --

6 MS. GREENBERGER: I disagree.

7 MR. KHOJASTEH: So it's either you --
8 (Inaudible crosstalk.)

9 MS. GREENBERGER: There's no point --

10 MR. KHOJASTEH: -- haven't done
11 commercial litigation or not --

12 MS. GREENBERGER: That is rude.

13 MR. KHOJASTEH: Document --

14 MS. GREENBERGER: That was rude, and it
15 was unnecessary.

16 MR. KHOJASTEH: I'm just saying, you're
17 drilling down on something, making it seem like
18 my attorney-client privilege invocation --

19 MS. GREENBERGER: Can we --

20 MR. KHOJASTEH: -- is improper.

21 MS. GREENBERGER: I believe it is, but
22 in any event, we don't have to clutter the

1 transcript. We can talk about it off the record.

2 MR. KHOJASTEH: Okay.

3 MS. GREENBERGER: I do believe it's
4 improper.

5 MR. KHOJASTEH: God bless.

6 BY MS. GREENBERGER

7 Q So my -- my question for you was: Do
8 either of the upcoming two deponents that we
9 have, to your knowledge, were they involved in
10 the search for documents in response to the order
11 to show cause?

12 MR. KHOJASTEH: Same objection. Only
13 if you know independent of discussions with your
14 lawyers.

15 THE WITNESS: I don't know other than
16 what my attorneys have told me on that.

17 BY MS. GREENBERGER

18 Q You've had no communications with --
19 directly with Ms. -- Ms. Soltani or Mr. Wuco on
20 that?

21 A On?

22 Q The collection of documents.

1 A On them searching their e-mails?

2 Q Correct.

3 A I have not.

4 Q And you've had no communications with
5 anyone else in the agency other than counsel
6 about the searching for e-mails?

7 A That's right.

8 Q And did any custodian -- I'm sorry.
9 Did any vendor or data technician say that they
10 needed to search your documents, tell you that?

11 MR. KHOJASTEH: Object -- object to
12 form. That's patently improper. Folks operating
13 at the direction of counsel, you're asking for
14 those communications?

15 MS. GREENBERGER: I completely
16 disagree. I'm going to move on, but I completely
17 disagree.

18 MR. KHOJASTEH: Good. Disagree.

19 MS. GREENBERGER: Can we please mark
20 that?

21 THE WITNESS: You know, we -- I am --
22 my life --

1 MR. KHOJASTEH: You're asking -- I just
2 want to be clear on this. You're asking -- your
3 suggestion is if we -- if the U.S. -- U.S. agency
4 hires a third-party vendor to collect documents
5 and that third-party vendor communicates at the
6 direction of counsel with a witness or a
7 custodian --

8 MS. GREENBERGER: Why don't we have
9 this --

10 MR. KHOJASTEH: -- you --

11 MS. GREENBERGER: No, why don't --

12 MR. KHOJASTEH: I'm just -- I want --

13 MS. GREENBERGER: -- we go off the
14 record?

15 MR. KHOJASTEH: -- the record -- I want
16 the record to be clear. Is that the position?

17 MS. GREENBERGER: I'd like to go off
18 the record. I don't need to waste my time on
19 this. Let's go off the record.

20 THE WITNESS: Can I try to answer this
21 without --

22 MR. KHOJASTEH: We're okay not going

1 off the record.

2 MS. GREENBERGER: I'd like to go off
3 the record.

4 MR. KHOJASTEH: We're okay not going
5 off --

6 THE WITNESS: Let me try to answer --

7 MR. KHOJASTEH: -- the record.

8 THE WITNESS: -- that.

9 MS. GREENBERGER: Well, that's fine,
10 but it's my --

11 MR. KHOJASTEH: So move on.

12 MS. GREENBERGER: -- deposition. No,
13 it's --

14 MR. KHOJASTEH: It's not. Actually,
15 both -- all parties -- D.C., all parties have to
16 agree. I learned that. So keep going.

17 THE WITNESS: I'll try to --

18 MS. GREENBERGER: Go ahead --

19 THE WITNESS: -- answer.

20 MS. GREENBERGER: -- Ms. Lake. Sure.
21 Thank you. I appreciate that.

22 THE WITNESS: My life is an open book.

1 MS. GREENBERGER: I appreciate that.

2 THE WITNESS: I write e-mails. I'm
3 very professional. And we are an agency that has
4 had FOIA requests. We get FOIA requests all the
5 time, and so I don't go through my own e-mails.
6 We have somebody on our staff who's a
7 professional that does that when we have a FOIA
8 request, so --

9 BY MS. GREENBERGER

10 Q And you personally have not searched
11 through your e-mails, correct, for this case?

12 A For this case, I would leave that to
13 what my attorneys would tell me I can answer on
14 that. I'm assuming that --

15 MR. KHOJASTEH: You -- you can answer
16 that as a yes or no, what you personally have
17 done.

18 THE WITNESS: I personally haven't, but
19 I'm trying to tell you, when it comes to
20 requests, I don't have time to check e-mails.
21 Somebody at the agency has a job to do that.

22 MS. GREENBERGER: Okay.

1 THE WITNESS: And they have access to
2 my e-mails, and they can get in my e-mails and
3 look through them.

4 BY MS. GREENBERGER

5 Q We were talking about your
6 8/13 declaration with the Court.

7 A A13?

8 Q Yeah. I think that's tab 1. I'm
9 sorry. Exhibit 1.

10 A What's in A13?

11 Q August 13th.

12 A Oh, 8.

13 Q Now, I don't know that you're
14 necessarily going to have to look at this, but
15 there's no mention in this declaration of the
16 August 29th RIF notices; is that fair to say? Or
17 is it in here? Because I don't think it is.

18 A I see 17 says something about a RIF.

19 Q And 17 says your -- you have the right
20 to consider --

21 A Right.

22 Q -- a RIF, correct?

1 A Uh-huh.

2 Q And it does not say that you plan to
3 issue a RIF, correct?

4 A Yes. I think, at that moment, we
5 didn't know when we were going to and if it was
6 going to be complete and what we were going to
7 do.

8 Q And when did USAGM decide it would
9 rerun the RIFs?

10 A I think that was planned. You know, I
11 think we planned that RIF. And when we sent out
12 the notification to pull back the RIF, I think in
13 that letter, from what I recall, it said
14 something like -- I don't know if it said it
15 would be rerun, but it basically didn't say the
16 RIF isn't happening. I don't have the letter in
17 front of me for when we recalled the first RIF.

18 Q You're speaking about the
19 communications in late -- in late --

20 A The communication --

21 Q -- June when you rescinded the RIFs?

22 A Right.

1 Q Okay. And so are you saying that as
2 soon as you rescinded the RIFs, you had always
3 planned to rerun them?

4 A It was -- after we had -- after we
5 would go through negotiations with the -- with
6 the unions. Pardon me.

7 Q Right. And you talk about this, I
8 think, in paragraph 18, the negotiations with the
9 union and how you had to do that before the RIFs
10 were issued?

11 A "Discretion to manage its workforce and
12 personnel, including the right to consider
13 statutorily authorized exercise of
14 reduction-in-force." Yeah.

15 And then 18. In accordance with these
16 obligations -- and we were -- I think -- I think
17 in August, we were still negotiating with the
18 unions.

19 Q And the CBA required a 60-day notice
20 for a RIF?

21 MR. KHOJASTEH: Object to form. If you
22 know. Lacks foundation.

1 THE WITNESS: That sounds about right.

2 BY MS. GREENBERGER

3 Q Okay. And so the RIFs that you --
4 well, let me go back.

5 So, on August 28th, the President
6 issued an executive order concerning unions at --

7 A Yes.

8 Q -- USAGM? Okay.

9 And was it the same day or the next day
10 that you terminated the CBA with the USAGM
11 unions?

12 A I think it was --

13 MR. KHOJASTEH: Object to form. Lacks
14 foundation. Vague as to "you."

15 THE WITNESS: I didn't put that letter.
16 I believe it was Michelle Stewart in our HR --
17 our LER and our HR department, and I believe it
18 was somewhere about there, within 24 hours or so.

19 BY MS. GREENBERGER

20 Q Okay. And so, within 24 hours, USA --
21 I'm sorry. Let me say that again.

22 Within 24 hours of the President's

1 August 28th EO, USAGM terminated the collective
2 bargaining agreements with the unions, correct?

3 A Yes, thus effectuating the President's
4 executive order.

5 Q And you were the acting CEO, correct,
6 at the time?

7 A Yes.

8 Q And when Michelle Stewart terminated
9 the CBA, did she do that at your direction?

10 A She told me she was going to be writing
11 the letter and that it would be put out, and I
12 glanced and took a look at the letter and
13 directed her that it was okay to send it out.

14 Q Okay. And then the day after the CBAs
15 were canceled, you sent the RIF notices, correct?
16 You reran the RIF notices?

17 A Yeah, I think it was --

18 MR. KHOJASTEH: Object to form.

19 THE WITNESS: -- right around there.

20 I'd have to look at the calendar. Was it 28th or
21 29th?

22

1 BY MS. GREENBERGER

2 Q And at that point, August 29th, by then
3 the CBAs were canceled, correct?

4 A Yeah.

5 Q And so you didn't have to RIF people
6 with 60 days' notice. Now you could give them
7 just 30 days' notice; is that --

8 A You could make --

9 Q -- correct?

10 A -- that argument.

11 Q And so, because the CBAs were canceled,
12 it was easier to RIF people, correct?

13 MR. KHOJASTEH: Object to form. Lacks
14 foundation. Vague as to "easier."

15 THE WITNESS: I think that the union
16 knew that -- I mean, you'd have to have -- if
17 you're not seeing that we're reducing the force
18 in the government right now, you must be living
19 under a rock. We have an executive order saying
20 bring this to statutory minimum signed on the --
21 is it the 14th or issued on the 14th of March?

22 You have key leadership who signed and

1 put together the statutory minimum document
2 leaving the agency, walking away from SES
3 positions, and we'd already issued one RIF. And
4 even though it was rescinded, that was issued,
5 you know, many, many days prior. So I think most
6 union members knew that there was a really good
7 chance of a reduction in force.

8 BY MS. GREENBERGER

9 Q Let me ask the question again.

10 Because at the time of the August 29th
11 RIF there was no CBA, you were able to have the
12 RIFs go into effect quicker, only 30 days instead
13 of 60, correct?

14 A Yeah. I'm not -- I don't know if that
15 played into it or how it played into it. I
16 don't -- I don't know if that was a calculation.
17 That just happened to come down, and we worked
18 with what we had.

19 Q What happened to come down? I'm sorry.

20 A The --

21 MR. KHOJASTEH: I'm going to object.

22 To the extent that your knowledge of what the

1 requirements were under the CBA as it relates to
2 the -- and the legal implications of an executive
3 order and the like or the notice requirements, if
4 that's all based on attorney-client
5 communications with agency lawyers, I'm going to
6 instruct you not to answer.

7 THE WITNESS: Okay.

8 BY MS. GREENBERGER

9 Q Are you aware that the President issued
10 a similar EO back in March about CBAs with other
11 agencies?

12 A I recall that when that came out, yes.

13 Q And do you recall that after that EO,
14 some agencies canceled their CBAs and some
15 agencies kept their CBAs in place?

16 A I was not really following that. I was
17 focused on our agency.

18 Q So you were not aware that any agencies
19 kept the CBAs in place?

20 A I wasn't -- I wasn't following that.

21 Q And did you consider keeping the CBA in
22 place after the President's August 28th EO?

1 A I intentionally tried to stay as far
2 away from the RIF process as possible as to not
3 have any appearance of impropriety, not -- not in
4 building with them, not talking to the unions.
5 This was done through OPM, our HR department and
6 the unions.

7 Q But I'm not asking about the RIF. I'm
8 asking about the decision to cancel the CBA after
9 the EO was issued. So does that help?

10 A Michelle, who is -- Michelle Stewart,
11 who is our union LER -- she works directly with
12 the unions -- told me that she was going to write
13 the letter. I may have had some conversations
14 with our GC, which I won't go into, but I -- she
15 put the letter together, and she's the expert in
16 this, and we decided to move forward.

17 Q Did you ever have any discussions with
18 people in other agencies about whether or not to
19 cancel CBAs?

20 A That would have been something Michelle
21 would have done.

22 Q Why did the agency cancel the CBA so --

1 well, strike that.

2 Why did the agency cancel the CBAs?

3 A You'll have to ask somebody else that.
4 I don't know.

5 Q Well, you approved the decision,
6 correct?

7 A I signed off on the letter, yes.

8 Q But you don't know why the decision was
9 made?

10 A Well, we had an executive order by the
11 President.

12 Q And were there any other reasons other
13 than the executive order that you canceled the
14 CBAs?

15 A No. Executive order.

16 Q And did canceling -- strike that.

17 When did you find out that USAGM would
18 be added to the executive order stripping CBAs?

19 A I heard there was an executive order
20 coming out later in the week that might deal with
21 the unions. I think I heard like 24 hours in
22 advance, and I figured we wouldn't be on it. We

1 weren't on the previous one. And then it came
2 out and we were on it.

3 Q And how did you react to learning that
4 you were on it?

5 A What do you mean, how did I react?

6 Q What was your -- were you happy? Were
7 you upset? Were --

8 A Neutral, had no emotion.

9 Q Did you think it was good news for the
10 agency or bad news?

11 MR. KHOJASTEH: Object to form. Asked
12 and answered.

13 THE WITNESS: It doesn't matter what my
14 opinion is on that.

15 BY MS. GREENBERGER

16 Q It does because I'm asking you, so
17 please answer the question.

18 A I was neutral. I didn't have an
19 opinion.

20 Q And why did you believe that the agency
21 would not be on it?

22 A I just didn't know if it would. I had

1 heard there might be an executive order regarding
2 the unions, and I -- I have a lot going on. I'm
3 not waiting with baited breath to see what comes
4 down. I'm working on things at the agency.

5 Q Other than Michelle, was there anyone
6 else involved in the decision to cancel the CBAs?

7 A I don't know.

8 MS. GREENBERGER: Can you give me tab
9 12?

10 (Deposition Exhibit Number 21 was
11 marked for identification.)

12 BY MS. GREENBERGER

13 Q I'm handing you a document that's been
14 marked as Exhibit 21.

15 Is this a tweet that you issued on
16 August 14th, 2025?

17 A Yes.

18 Q And it says, "I've got a judge who
19 wishes he were running the agency."

20 So, first, is that referring to Judge
21 Lamberth?

22 A Yes.

1 Q And in what way is Judge Lamberth
2 trying to run the agency in your view?

3 MR. KHOJASTEH: I'm going to object to
4 form. This is prejudicial and unnecessary. You
5 want to do a line of questioning on this, all
6 good, but --

7 MS. GREENBERGER: This is a completely
8 inappropriate speaking objection and prejudicial.
9 It's appropriate and it's not prejudicial --

10 MR. KHOJASTEH: Do your thing.

11 MS. GREENBERGER: Go ahead.

12 MR. KHOJASTEH: Do your thing. It's
13 just a room full of people --

14 THE WITNESS: What was the question?

15 MR. KHOJASTEH: -- and you're wasting
16 their time.

17 THE WITNESS: What was the question
18 again?

19 BY MS. GREENBERGER

20 Q In what way do you believe Judge
21 Lamberth is trying to run the agency?

22 A I think there's a lack of respect for

1 Article II and the President's powers.

2 Q And you write, "and literally
3 threatening to put me in contempt of court if I
4 don't produce more propaganda."

5 What propaganda are you referring to
6 there?

7 A Government-funded news is also called
8 propaganda if you look up the definition. So
9 what we put out is propaganda. Would you
10 disagree with that? Government's funding this
11 agency -- actually, the American taxpayer is
12 funding it. The U.S. government is funding this
13 agency, and they say they're independent, but
14 it's being funded by the U.S. government, and
15 when the government funds media, that's called
16 propaganda.

17 Q So, in your view, is everything that
18 VOA publishes propaganda?

19 A If you look up the term "propaganda,"
20 yes.

21 Q And --

22 A We're government funded.

1 Q And does that include --

2 A And this is media. Do you disagree
3 with that?

4 Q And does that include under your watch
5 with your role in the agency; it's still
6 propaganda?

7 A It -- the definition of propaganda is
8 government-funded media. I mean, it really is.

9 Q Have you done anything while with the
10 agency to ensure that it's truthful or accurate?

11 A I have no say in the editorial.
12 There's something called an editorial firewall,
13 which I'm sure you're aware of. I hope you're
14 aware of it. Is that in the IBA? No, that's
15 something different. NDAA.

16 Q And you said that you thought Judge
17 Lamberth didn't have respect for Article II of
18 the Constitution?

19 A I think there's been a -- yes.

20 Q And do you believe that it's improper
21 for him to be reviewing USAGM's actions?

22 A I think it's improper for district

1 court judges to try to take control of the
2 executive branch.

3 Q Did you --

4 A And I'm not alone in that.

5 Q Did you see that in his order, he said
6 that personnel decisions are within the agency's
7 purview, but that discretion is neither boundless
8 nor shielded from judicial review and
9 remediation?

10 A I'm sure I read that at some point,
11 yeah.

12 Q Do you agree that district courts can
13 review and remediate agency personnel decisions?

14 A I can agree with --

15 MR. KHOJASTEH: Object to form. This
16 is irrelevant.

17 MS. GREENBERGER: I disagree. I'm
18 going to -- please continue.

19 MR. KHOJASTEH: I'd love for you to
20 articulate how this --

21 MS. GREENBERGER: I'm happy to off the
22 record when we're done --

1 MR. KHOJASTEH: I'm just saying, I'd
2 love to hear you --

3 (Inaudible crosstalk.)

4 THE WITNESS: Can you ask the --

5 MR. KHOJASTEH: -- articulate it.

6 THE WITNESS: -- ask the question --

7 MR. KHOJASTEH: It seems like to me
8 it's like a big waste of time. But, listen,
9 you'll get your gotcha moment so you can go back
10 to -- go back to --

11 MS. GREENBERGER: Excuse me.

12 MR. KHOJASTEH: --- (redacted) and tell
13 people you took her -- put her on the record for
14 seven hours. Do it. This is fine. It's
15 entirely disrespectful. This is a head of an
16 agency. To go a day away from this --

17 MS. GREENBERGER: Excuse me. This is
18 so deeply inappropriate. I'm going to continue
19 my questions.

20 MR. KHOJASTEH: Go for it. Go for it.
21 And it's going to be -- and I'll have the same
22 view of it. You were --

1 MS. GREENBERGER: Can I --

2 MR. KHOJASTEH: Five hours through --

3 MS. GREENBERGER: Can you please stop?

4 MR. KHOJASTEH: Five hours through

5 today, you were --

6 MS. GREENBERGER: Can you --

7 MR. KHOJASTEH: -- professional.

8 MS. GREENBERGER: I am --

9 MR. KHOJASTEH: This is nonsense.

10 MS. GREENBERGER: This is her tweet
11 that I am asking her about, and I am asking it
12 respectfully, and I'm going to continue to ask
13 it.

14 MR. KHOJASTEH: Go for it.

15 MS. GREENBERGER: And I am not making
16 this personal, and you are the one who is making
17 this personal.

18 MR. KHOJASTEH: I'm just saying, this
19 is -- it's -- this is --

20 MS. GREENBERGER: Can you please stop
21 and let me continue my questioning?

22 MR. KHOJASTEH: Go for it.

1 MS. GREENBERGER: Can you please read
2 back the last question?

3 (Whereupon, the reporter read the
4 record as requested.)

5 THE WITNESS: The district -- I'm not a
6 lawyer.

7 BY MS. GREENBERGER

8 Q Well, you had earlier said that you had
9 a view that this judge was not respecting the
10 Constitution, so I'm trying to understand whether
11 you think district courts can review agency
12 personnel --

13 A Apparently --

14 Q -- decisions.

15 A -- they can, because we're sitting in a
16 district court right now.

17 Q What did you mean by you've got some
18 experience in lawfare? What does lawfare mean?

19 A It means malicious lawsuits that are
20 filed by overly litigious people or by attorneys
21 who stand to make millions of dollars or who have
22 already made millions of dollars from an agency

1 by stringing people along, stringing their hopes
2 along, and suing them nonstop to make a fortune
3 off the federal government, i.e., the American
4 taxpayer, the hardworking men and women across
5 this country, funding a lot of these -- of these
6 lawfare lawsuits that have for many years come
7 through this agency. I've been the victim of it
8 myself.

9 Q You view --

10 A A lot of people have.

11 Q You view these lawsuits as lawfare as
12 you just described it?

13 A I think it could be fit into that
14 category.

15 MS. GREENBERGER: Can you give me tab
16 41, please? I'm going to ask you about another
17 tweet. Oh, so sorry. I'm sorry. I have to have
18 that be marked --

19 (Deposition Exhibit Number 22 was
20 marked for identification.)

21 MR. KHOJASTEH: Thanks.

22 MS. GREENBERGER: -- first.

1 BY MS. GREENBERGER

2 Q I'm handing you an Exhibit 22.

3 A I love that you're following my tweets.

4 Q Is this a tweet that you issued on
5 August 7th, 2025?

6 A Can you read that for me?

7 Q Sure. I'm really just asking about the
8 last three sentences where you say, "A D.C.
9 District Court judge is threatening to place me
10 in contempt of court and throw me in jail for not
11 running enough VOA propaganda."

12 Do you see that?

13 A Yeah.

14 Q "It's absurd. I'm just hoping that the
15 U.S. Marshals don't act on it."

16 A Well, but, again, taking a part of it.
17 "And let me tell you, Mike, the illegal aliens
18 destroyed the border. There was so much trash
19 and destruction on the border. They don't give a
20 shit on the environment. By the way, I noticed
21 your post about how the activist judge's show
22 cause order with Jeff, I have the same thing

1 happening to me. A D.C. district court judge is
2 threatening to place me in contempt of court and
3 throw me in jail for not running enough VOA
4 propaganda. It's absurd. I'm just hoping that
5 the U.S. Marshals don't act on it."

6 Q And this was also referring to Judge
7 Lamberth, the D.C. District Court judge?

8 A I don't think we have another judge
9 that I'm aware of.

10 Q And when did Judge Lamberth threaten to
11 throw you in jail?

12 A Well, that's what I was told, that he's
13 threatening contempt.

14 Q Who told you that Judge Lamberth was --

15 MR. KHOJASTEH: Object to --

16 BY MS. GREENBERGER

17 Q -- threatening to --

18 MR. KHOJASTEH: Object to form.

19 I'm going to instruct her not to answer to the
20 extent that --

21 BY MS. GREENBERGER

22 Q Did anyone other than counsel tell you

1 that Judge Lamberth was threatening to throw you
2 in jail?

3 A I am going to take the advice of my
4 counsel and not answer that.

5 MS. GREENBERGER: Well, I don't think
6 your counsel is saying that he can't answer that
7 question.

8 MR. KHOJASTEH: You can answer yes or
9 no whether someone other than counsel told
10 you that Judge Lamberth was trying to throw you
11 in --

12 MS. GREENBERGER: In jail.

13 THE WITNESS: It was counsel. Not
14 throw me in jail. Put me -- hold me in contempt
15 of court.

16 BY MS. GREENBERGER

17 Q So my question was: Did anybody tell
18 you that Judge Lamberth was threatening to throw
19 you in jail?

20 MR. KHOJASTEH: I'm going to object to
21 form. To the extent that a lawyer told you
22 that --

1 MS. GREENBERGER: Other than a lawyer.

2 MR. KHOJASTEH: So that's asked and
3 answered.

4 MS. GREENBERGER: No. She didn't
5 answer it. She -- she said --

6 THE WITNESS: I answered -- I misheard
7 and I answered the wrong question. My counsel
8 told me that the judge --

9 MR. KHOJASTEH: You don't need to
10 say what your --

11 THE WITNESS: Okay.

12 MR. KHOJASTEH: -- counsel told you.
13 If your counsel's the one who conveyed it, I'm
14 instructing you not to answer the question.

15 THE WITNESS: Okay.

16 BY MS. GREENBERGER

17 Q Did anyone other than a lawyer tell you
18 that Judge Lamberth threatened to throw you in
19 jail?

20 A Not the throw me in jail, but the
21 contempt of court, which you could then
22 extrapolate to mean throw in jail.

1 Q Judge Lamberth never said that he was
2 going to throw you in jail, correct?

3 A Well, what is contempt of court?
4 What's the punishment for contempt of court?
5 Oftentimes, it's being thrown in jail. Is that
6 right? Has any --

7 Q Often -- oftentimes --

8 A Has anybody ever been held in contempt
9 of court and been put behind bars, to your
10 knowledge?

11 MR. KHOJASTEH: Ms. Lake, it's her
12 deposition.

13 THE WITNESS: Okay.

14 MR. KHOJASTEH: Let her ask the
15 questions, please.

16 BY MS. GREENBERGER

17 Q I can show you it if you want, but we
18 can go quicker. You described Judge Lamberth
19 last week as a radical district judge; is that
20 correct?

21 A I have a right to my opinion.

22 Q You absolutely do. I'm just trying to

1 ask what your opinion is.

2 Is that how you described Judge
3 Lamberth?

4 A That's my opinion.

5 MR. KHOJASTEH: You're asking her
6 whether that's her opinion or whether that's how
7 she described him?

8 MS. GREENBERGER: I'm asking her if
9 that's how she described him in a tweet, which
10 I'm happy to show her. I'm just trying to move
11 things along.

12 THE WITNESS: What was the date on that
13 tweet?

14 BY MS. GREENBERGER

15 Q August 28th.

16 A Can I read the tweet?

17 Q Absolutely.

18 A I'm sorry to make you --

19 Q No, it's --

20 A -- do that, but --

21 Q -- fine.

22 MS. GREENBERGER: 42.

1 (Deposition Exhibit Number 23 was
2 marked for identification.)

3 THE WITNESS: Oh, I'm sorry. I'll
4 figure it out. By the time -- by the time we do
5 seven hours, I'll figure it out.

6 Update. Oh, those guys are -- "We
7 fully intend to appeal this absurd ruling.
8 Elections have consequences, and President Trump
9 run the executive branch. I have confidence that
10 the Constitution will eventually be in force,
11 even if not by Judge Lamberth and other radical
12 district judges."

13 Yes, that's my statement.

14 BY MS. GREENBERGER

15 Q And in that statement, were you --

16 A It wasn't a tweet. It was a statement.
17 But he put that in.

18 Q I appreciate that clarification.

19 In that statement, were you
20 characterizing Judge Lamberth as a radical
21 district judge?

22 A Judge Lamberth, I believe, is a

1 district judge. Is that correct?

2 Q He is.

3 A And I think some of his rulings have
4 been very radical.

5 Q And to summarize, you think -- you've
6 made public statements saying Judge Lamberth is
7 trying to run USAGM, correct?

8 A Do I have to love this guy? Is it
9 required that I love the judge?

10 Q Can you answer my question, Ms. Lake?

11 MR. KHOJASTEH: Well, let's not --
12 let's not recover ground you've already covered.
13 You've --

14 MS. GREENBERGER: Well, I --

15 MR. KHOJASTEH: You've -- you've got
16 testimony on each of those points already.

17 MS. GREENBERGER: I can summarize the
18 testimony so it's clear in one place. That's a
19 standard technique.

20 MR. KHOJASTEH: Okay.

21 BY MS. GREENBERGER

22 Q So, to summarize, you've made public

1 statements saying Judge Lamberth is trying to run
2 USAGM, correct?

3 A I've exercised --

4 MR. KHOJASTEH: Object to form.
5 Mischaracterizes the testimony.

6 THE WITNESS: I've exercised my First
7 Amendment right.

8 MS. GREENBERGER: Ms. Lake --

9 THE WITNESS: By saying that, that's my
10 First Amendment right.

11 BY MS. GREENBERGER

12 Q I'm just trying to summarize what
13 you've said, not challenging what you've said,
14 not having a constitutional conversation about
15 your right to say it.

16 Have you or have you not said that
17 Judge Lamberth is trying to run USAGM? You have,
18 correct?

19 MR. KHOJASTEH: Object to form.
20 Mischaracterizes testimony. There's a whole
21 tweet. There's more than that one sentence.
22 Like, if you're going to -- read the whole thing

1 she said.

2 THE WITNESS: Do you have the tweet? I
3 mean, I probably said that, yeah. That's my
4 opinion, and I am the world's foremost expert in
5 my own opinion.

6 BY MS. GREENBERGER

7 Q And your opinion is that Judge Lamberth
8 is a radical judge who produces illegitimate
9 rulings, correct?

10 A I think --

11 MR. KHOJASTEH: Object to form. This
12 is irrelevant --

13 MS. GREENBERGER: I --

14 MR. KHOJASTEH: -- prejudicial. I
15 mean --

16 MS. GREENBERGER: I'm really almost
17 done --

18 MR. KHOJASTEH: I have --

19 MS. GREENBERGER: -- with this line, if
20 you would let me finish it.

21 THE WITNESS: What was the last part?
22 I didn't say -- what did I say, rational, or --

1 MS. GREENBERGER: I thought you said --

2 MR. KHOJASTEH: You're
3 mischaracterizing something. She didn't say --

4 MS. GREENBERGER: These are your words.

5 MR. KHOJASTEH: -- illegitimate
6 opinions. Like, this was like -- you're just,
7 like, editorializing her tweets.

8 THE WITNESS: I didn't say
9 illegitimate.

10 MS. GREENBERGER: Would you please stop
11 with the speaking objections?

12 MR. KHOJASTEH: I will, but this is --

13 MS. GREENBERGER: Then just stop.

14 MR. KHOJASTEH: At this point, we're
15 off the rails. We're going through her tweets.
16 This has no relevance to the case or the order.

17 MS. GREENBERGER: I completely
18 disagree.

19 BY MS. GREENBERGER

20 Q Did you have these views about Judge
21 Lamberth when you were responding to his orders
22 in July seeking information about your plans to

1 run the agency?

2 MR. KHOJASTEH: Object to form.

3 THE WITNESS: I don't know what my
4 views were back in July of this judge. I know
5 that he's made some rulings that I haven't
6 thought were good, and I think the judicial
7 branch has really overstepped its bounds.

8 BY MS. GREENBERGER

9 Q And did your views about Judge Lamberth
10 impact your response to his orders?

11 A Absolutely not. No way.

12 Q You would never do that?

13 A No. I'm answering to the best of my
14 ability questions that have been asked over and
15 over and over.

16 Q And your personal views --

17 A He's trying to force me to give new
18 answers. I mean, my answers are my answers.

19 Q And your personal views about the
20 district judge --

21 A I --

22 Q -- had no impact, correct?

1 MR. KHOJASTEH: Object to form. Asked
2 and answered.

3 THE WITNESS: I don't hate this judge.
4 I really don't. I don't. I don't dislike any
5 one of you. I don't hold -- harbor hate in my
6 heart. I'm doing what the judge is asking. He
7 doesn't like it. He doesn't like it. Four
8 times, he's asking the same questions. He wants
9 me to create new answers. I'm not going to
10 create an answer to make the judge happy. I've
11 got to be honest. I'm trying to run an agency.

12 I walked away from my life to move here
13 away from my children to work for the United
14 States Government and the Administration of
15 President Donald J. Trump because I believe that
16 man wants to save our country. And what is going
17 on is a disgrace in this country with these
18 judges, these judges who are trying to take a
19 huge mandate that President Trump has and take
20 away and try to keep him from getting work done.

21 I don't dislike him. I don't
22 personally know him. I think some of his rulings

1 have been absurd, as I said, terrible. He went
2 crazy on the J6ers. He wants transgender men who
3 are violent, cross-dressing men who are mentally
4 ill to be in a jail cell with women. I actually
5 know the difference between men and women, and I
6 actually give a shit about women and their
7 safety.

8 So I don't love his rulings, but I
9 don't have any disdain in my heart for this man.
10 I don't know him. And we're answering to the
11 best of our ability. And he keeps asking and
12 asking and asking the same questions. I don't
13 know what more I can give him.

14 I've sat here today away from the
15 agency that I've been charged with helping to
16 run, answering all of your questions, and you
17 keep asking the same questions over. I don't --
18 what do you want me to say? What would make you
19 happy? I'm giving you the truth, and I don't
20 know what else I can do.

21 BY MS. GREENBERGER

22 Q In official press releases, you've

1 repeatedly explained that you're trying to
2 eliminate waste, fraud and abuse at USAGM?

3 A Yes, I am.

4 Q Okay.

5 A I'm trying to stand up for the American
6 taxpayer.

7 Q And the Court said that when Congress
8 appropriated \$260 million to VOA for fiscal year
9 2025, it did not anticipate such a significant
10 sum of taxpayer funds would be used to pay
11 employees to sit at home for months on end making
12 no contribution to VOA's statutory mandate.

13 Do you agree with that?

14 A Well, a lot of --

15 MR. KHOJASTEH: Object to form. Calls
16 for speculation.

17 THE WITNESS: A lot of federal
18 employees have been sitting home for a long time.
19 Thanks to President Trump, he's getting butts
20 back in office chairs.

21 BY MS. GREENBERGER

22 Q But it's true that since March 15th,

1 nearly all of VOA's hundreds of millions of
2 dollars have been used to pay VOA journalists and
3 other employees to not work, right?

4 A They're on paid administrative leave.
5 We're following the laws and the -- we are
6 doing -- we did a reduction in force. You can't
7 just fire people. I hope you understand that.
8 There is a process underway to reduce the size
9 and scope of the government, and you can't just
10 fire people. You may want people just to be
11 fired willy-nilly, but I follow the law, and the
12 law requires that you go through a process.

13 And when we went to statutory minimum,
14 we didn't need thousands of people. We needed
15 fewer people. And it sounds like maybe you guys
16 would rather we just throw people to the curb and
17 fire them right away so that we're saving the
18 government money, but we have to go through a
19 process. These are lives that we're talking
20 about.

21 Q Do you think it's wasteful to spend
22 hundreds of millions of dollars to pay employees

1 to stay at home?

2 A I think it's wasteful to continue
3 employing thousands of people when they're not
4 needed. That would be -- over the long term,
5 that would be very wasteful. So we're working to
6 cut the waste, and there's a process involved.
7 When you're trying to cuts the waste, believe me,
8 of the bureaucracy of the federal government,
9 when you're trying to cut the waste, there's a
10 process.

11 I wish it were faster. I wish it were
12 easier. I wish it were less painful. But
13 there's a process we must go through, and we're
14 going through that process, taking all the legal
15 steps to do so, and treating people in the best
16 way we possibly can.

17 Q I want to turn to a different topic,
18 Ms. Lake.

19 On May 6th, you announced an agreement
20 to uses OAN's newsfeed on Voice of America and
21 other USAGM services?

22 A I don't know about the date. That

1 sounds right, if you're -- if you feel
2 comfortable with that date.

3 Q I can show you your tweet.

4 A Okay.

5 (Reporter clarification.)

6 MS. GREENBERGER: Yes. Thank you.

7 (Deposition Exhibit Number 24 was
8 marked for identification.)

9 THE WITNESS: That was not my fault.

10 MS. GREENBERGER: No, it was my fault.

11 MR. KHOJASTEH: This is 24?

12 MR. BLUMIN: Yeah.

13 THE WITNESS: Okay. Let me read this.

14 "This idea came about after OCB suggested we
15 explore OAN as a newsfeed option." I'm a damn
16 good writer.

17 BY MS. GREENBERGER

18 Q So does this refresh your recollection
19 that on May 6th, you announced an agreement to
20 use OAN's newsfeed?

21 A Yes.

22 Q And -- and the terms of this

1 partnership are memorialized in a memorandum of
2 understanding? I can show it to you. I will
3 show it to you.

4 A Yeah, let me see. Let me take a look
5 at it.

6 (Deposition Exhibit Number 25 was
7 marked for identification.)

8 MR. KHOJASTEH: Thank you.

9 BY MS. GREENBERGER

10 Q And I'm handing you what's been marked
11 as Exhibit 25, which is a memorandum of
12 understanding from the U.S. -- United States
13 Agency for Global Media and Herring Networks.

14 A Thank you.

15 Q And turning to the last page, you
16 signed this MOU on behalf of USAGM; is that
17 correct?

18 A Yes, I did.

19 Q As senior advisor?

20 A To the CEO, yes, with delegated
21 authorities given to me by the CEO.

22 Q And do you know whether this document

1 was ever provided to the Court?

2 A I don't know.

3 Q Okay. And was it --

4 A My attorneys would know that.

5 Q Was it your decision to enter into this
6 partnership with OAN?

7 A This came out after a suggestion from
8 our acting director at Office of Cuba
9 Broadcasting. He asked if it would be possible
10 if we could -- if he -- if he and his team could
11 get access to OAN, and I said, I don't know, let
12 me find out.

13 Q And so then you reached out to OAN?

14 A I -- I called OAN and just said, would
15 you consider -- is that something that you would
16 consider, offering your content for free? Before
17 I explore this any further, I didn't want to bark
18 up the tree of bringing in leadership and saying,
19 how do we handle this? I had a very brief
20 conversation, and he said, yes, we would consider
21 that.

22 Q And what did you do next as to the OAN

1 agreement?

2 A Then reached out to my GC, which I
3 won't -- I guess I -- I reached out to my GC and
4 senior leadership, including Victor. I reached
5 out, obviously, to Victor, the CEO, and his
6 right-hand person, and I said --

7 MR. KHOJASTEH: Keep it -- to the
8 extent you're discussing communications you had
9 with counsel and Mr. Morales regarding this
10 agreement --

11 THE WITNESS: Okay.

12 MR. KHOJASTEH: -- I'm going to allow
13 you to answer the question, but keep it very high
14 level.

15 THE WITNESS: Okay.

16 MR. KHOJASTEH: She's asking what
17 happened next. Is that fair?

18 MS. GREENBERGER: Uh-huh.

19 MR. KHOJASTEH: She's not asking what
20 you said to anyone.

21 THE WITNESS: Okay.

22 MR. KHOJASTEH: She's saying, what

1 happened next?

2 THE WITNESS: I wanted to -- I always
3 tried to have the leadership at the agency who
4 have been there many, many years help me make
5 decisions. They've been there -- as I said,
6 Victor's been there 36 years. And this is -- as
7 a leader, I like to ask the team what they need.
8 I can't tell OCB what to produce in the news. I
9 can't tell VOA what to produce. There's a
10 firewall.

11 But if they come to me and say, we need
12 something, could you consider providing this, I
13 like to consider it. And -- and OCB asked about
14 it. I asked our team, would this be a good
15 thing, bad thing, how do you feel about it? And
16 they responded with -- I won't tell you what the
17 attorney said, but I got response from key
18 leadership that this sounds like a good idea, and
19 not only that, but they said they've done this
20 before with other media companies, where they've
21 entered into a memorandum of understanding, an
22 MOU, to share content freely. And so then I put

1 it in their court and said, okay, let's see if we
2 can make that happen for OCB, which is requesting
3 it.

4 BY MS. GREENBERGER

5 Q And other than Mr. Morales and your
6 counsel, who were the senior leadership you
7 discussed this with?

8 A I don't remember. It was an e-mail
9 with counsel -- there may have been more people
10 that I asked, but I don't know if all of them
11 responded.

12 Q And you said this was a communication
13 that occurred over e-mail?

14 A I believe this was an e-mail, yeah.

15 Q And you said that there were similar --
16 did I understand you correctly that you said that
17 there were similar MOUs entered into with other
18 media companies?

19 A Before my time.

20 Q And what were those other media
21 companies?

22 A I don't remember. One of the --

1 Victor's right-hand person said, oh, yeah, we've
2 done this before, and as a matter of fact -- and
3 she sent the attachment. This is what it looks
4 like, that we should do this, and this is great.
5 They loved it.

6 Q Who's Victor's right-hand person that
7 you're referring to?

8 A Joan Mower.

9 Q And I think you already said that under
10 this deal -- let me pull it up, but I gave it to
11 you -- USAGM would pay nothing, correct?

12 A It's free.

13 Q And you would -- the agency would
14 license programming from OAN?

15 A I don't know if license is the right
16 word. They would share their programming with us
17 if the newsrooms chose to use it. They're under
18 zero obligation to use. And none of it has been
19 used at VOA. VOA has not used any of it.

20 Q And do you understand why that is?

21 A They made the choice not to.

22 Q Who made the choice?

1 A I'm assuming the folks in the newsroom.

2 Q And we talked earlier about --

3 A And the reason they haven't is because
4 in the process, apparently, of -- of the deal,
5 they might want to use a 30-second clip of what
6 ran on OAN. Maybe it was a summit or something.
7 And it was determined through the attorneys who
8 were working out the deal that you couldn't just
9 use a 30-minute snippet. You'd have to use the
10 entire newscast, and that's not -- that wasn't
11 conducive for VOA to do that.

12 Q We talked earlier about the requirement
13 that VOA not duplicate domestic broadcasting. Do
14 you recall that?

15 A Yes.

16 Q And did you consider whether this deal
17 where OAN would provide content -- provide its
18 own content would duplicate its domestic
19 broadcasting?

20 MR. KHOJASTEH: Object to form. Lacks
21 foundation. Mischaracterizes her prior testimony
22 and what she was talking about when you guys

1 talked about duplication.

2 THE WITNESS: VOA is not broadcast
3 domestically. VOA is broadcast internationally.

4 BY MS. GREENBERGER

5 Q Is OAN broadcast domestically?

6 A Yes.

7 Q And so if OAN is providing its domestic
8 content for VOA to broadcast internationally, do
9 you think that's a problem with the
10 duplication -- the non-duplication requirement?

11 A Well, you have to talk to the attorneys
12 who pulled this up. I was asked by Office of
13 Cuba Broadcasting if I would work a deal -- if I
14 would check into this. I asked senior
15 leadership. They liked the idea, and I handed it
16 off to our attorneys to do the deal.

17 Q The second bullet says that OAN would
18 "Provide access to OAN's broadcast and select
19 content library for potential use Worldwide,
20 excluding the United States and its territories."

21 Did you understand whether the content
22 provided by OAN would include television

1 broadcasts?

2 A It says "potential use," and I just let
3 the -- the GC put that together.

4 Q No, but I'm --

5 A So it's --

6 Q -- not asking a legal question. I'm
7 asking about the type of content that OAN would
8 be providing. Would they be providing television
9 broadcasts?

10 A I was hoping that it would be video
11 clips that could be used just if we needed video
12 of something, sound bites, but it turned out we
13 have to run the entire show, and that wasn't
14 going to be conducive for the folks in the
15 newsroom. And I don't make the decisions, but
16 they decided not to do it.

17 Q And did you understand that the OAN
18 content would include any radio broadcasts?

19 A I'm unaware of that.

20 Q And did you have an understanding -- am
21 I right that the OAN content would only be in
22 English, or would it be in other languages?

1 A Well, I would say we would have to
2 translate it, and therein lies the problem.
3 There was not an ability to translate it because
4 of the -- as -- I believe as some of the
5 journalists considered using it, it came to their
6 awareness that they had to run it in its
7 entirety, and they could not translate it. That
8 fell outside the agreement, so they never used
9 it. So a lot of people upset about this, but
10 they never used it. It never aired.

11 Q Would you agree that OAN has a
12 pro-Trump perspective?

13 MR. KHOJASTEH: Object to form. Lacks
14 foundation. Vague as to "pro-Trump."

15 BY MS. GREENBERGER

16 Q Let me -- OAN has described itself in
17 its own communications as one of the greatest
18 supporters of Donald Trump.

19 Have you heard that?

20 MR. KHOJASTEH: Object to form. Lacks
21 foundation.

22 THE WITNESS: I think that they love

1 this country, and President Trump loves this
2 country.

3 BY MS. GREENBERGER

4 Q Do you understand whether OAN has a
5 conservative or liberal perspective?

6 A I think they have --

7 MR. KHOJASTEH: Object to form.

8 THE WITNESS: -- common sense.

9 MR. KHOJASTEH: Lacks foundation.

10 Vague as to "conservative."

11 BY MS. GREENBERGER

12 Q So you don't have a view that they have
13 a politically conservative perspective?

14 A They have a common sense, pro-America
15 perspective.

16 Q And you think they're -- you wouldn't
17 agree that they're pro-Trump?

18 A I think they're pro-America, and
19 because President Trump is pro-Trump [sic], they
20 kind of equal each other.

21 MS. GREENBERGER: Why don't we take a
22 break now?

1 THE WITNESS: How long -- much longer
2 are we going to go? I actually do have --

3 MR. KHOJASTEH: She has another hour on
4 the record, so that's how long --

5 THE WITNESS: Okay. Can we make the --
6 can we make this a short break?

7 MR. KHOJASTEH: Sure.

8 VIDEO TECHNICIAN: This marks the end
9 of Media Unit No. 6. Going off the record, the
10 time is 18:01 p.m.

11 (Recess 6:01 p.m. to 6:17 p.m.)

12 VIDEO TECHNICIAN: This marks the
13 beginning of Media Unit No. 7. Going back on the
14 record, the time is 18:17 p.m.

15 BY MS. GREENBERGER

16 Q Ms. Lake, have you ever appeared on
17 OAN?

18 A In the past, yes, I have.

19 Q Roughly how many times?

20 A I have no idea.

21 Q And was that before becoming senior
22 advisor, since you joined USAGM, or both?

1 A Both.

2 Q And did you have a view on OAN's
3 coverage of you when you appeared?

4 A I thought the questioning was fair.

5 Q And I think, in this deposition, you've
6 characterized some news sources as fake news; is
7 that true?

8 A Fake news, yeah, biased, yeah.

9 Q And do you believe that OAN is fake
10 news?

11 A No.

12 Q And do you believe that OAN is biased?

13 A I think -- I think everyone shows a
14 little bit of bias. It's human nature. The
15 question is, can you be fair? Can you be a
16 public service to the -- to the people and put
17 out information? They're not trying to twist the
18 story.

19 Q And do you believe that OAN has been
20 fair?

21 A Generally, I do.

22 Q Okay. In your declaration, which is

1 Exhibit 1, the August 13th declaration, you state
2 that USAGM is in ongoing discussions with Newsmax
3 in pursuit of a similar agreement.

4 A I don't know anything about those
5 discussions because I've asked to not be a part
6 of those intentionally.

7 Q And --

8 A So if they're ongoing, it's only
9 because somebody told me that.

10 Q What was the basis for you writing in
11 your declaration that there were ongoing
12 discussions with Newsmax?

13 A I believe it was Frank or somebody told
14 me that we were in ongoing.

15 Q And do you know when those discussions
16 began?

17 A No.

18 Q And have you been involved in any
19 conversations with anyone at Newsmax concerning a
20 similar agreement?

21 A No.

22 Q What's the status of this potential

1 partnership with Newsmax?

2 A I don't know. I found out that
3 there -- I found out that Victor or Joan or
4 somebody was talking to them, that they had
5 inquired, and I said, I don't want to be a part
6 of any conversation because I do appear on their
7 network, and I appear on a lot of networks, and
8 it's better that I just stay completely out.

9 And if the legal department wants to
10 work on an agreement with Newsmax or any other
11 outlet, CNN, whatever outlet they want, they can
12 do that, and then, at the very end, when they're
13 close to when they have a deal, I will glance at
14 the -- at the document and then either approve it
15 or, you know, ask for changes if I see something
16 that was glaringly wrong.

17 Q And paragraph 16 of your August 13th
18 declaration states that USAGM is taking steps to
19 supplement content by contracting with domestic
20 news networks to obtain lawful permission to use,
21 translate, disseminate --

22 A Pardon me. Where are we?

1 Q Paragraph 16.

2 A 16. "To obtain lawful permission."
3 "The goal is to share content."

4 Q And does USAGM have a goal, if you
5 know, for what portion or percentage of the
6 content you'd like to come from domestic news
7 networks?

8 A I like originally produced content, but
9 if our -- if our team is asking us for this, I
10 think it's important to reflect that they want
11 access to some of this. And if they want access
12 to some of it, as they did with OAN, this was not
13 my idea. I had no -- none of it was my idea. It
14 all came from Office of Cuba Broadcasting.

15 And then if other outlets are saying,
16 oh, you have a deal with them, we'd like to offer
17 you free content, I think it's worth it for the
18 American taxpayer to provide free content. If
19 people want to use it, they do. I don't tell
20 them what to put on the air.

21 Q I'm going to turn to another topic that
22 you testified to. I just want to make sure I

1 understand your testimony.

2 When I was asking you questions about
3 President Trump's August 28th EO about the
4 unions, I believe you said that you were not
5 expecting USAGM to be on the list of agencies
6 covered by that EO.

7 A I was unsure if they would be on it. I
8 heard there was going to be an EO, but you never
9 know until they come out. It's been in the past
10 where people said, there's going to be an EO,
11 potentially, and then it never comes out.

12 Q Am I right that you never contacted
13 anyone at The White House to ask to be added to
14 the EO?

15 A I don't --

16 MR. KHOJASTEH: Object to form.

17 THE WITNESS: -- recall if I did. I
18 don't recall doing that.

19 BY MS. GREENBERGER

20 Q And to the best of your understanding,
21 did anyone at USAGM contact anyone at The White
22 --

1 A Actually -- actually, I think that
2 somebody -- I don't know if it was from The White
3 House -- right before -- I'm sorry. I'm just
4 having -- I'm -- the memory's coming back to me.
5 I think it was like the day before we -- somebody
6 reached out to us from -- I don't know if it was
7 OPM or what it was. Maybe it was The White
8 House -- and said, who is the -- what's the
9 e-mail for the person in charge of the agency?
10 They were given my e-mail, and they sent a draft
11 of that. So I did know with a little bit of
12 knowledge in advance.

13 Q But to clarify my question, I was
14 asking whether you or anyone at the agency, to
15 your knowledge, reached out to The White House to
16 ask to be added to the EO before you received
17 that draft.

18 A I don't recall doing that, no.

19 Q And to your knowledge, you have
20 no information --

21 A To my recollection at this moment, I
22 don't recall. I mean, I don't recall. Are you

1 talking about the EO of -- dated what?

2 Q August 28th.

3 A The EO dated August 28th, not that I
4 recall.

5 Q And you don't recall you reaching out
6 or anyone at the agency, to your knowledge,
7 reaching out, correct?

8 A At this moment -- at this moment, I
9 don't recall.

10 MS. GREENBERGER: Okay. Hold on one
11 second. I have nothing further for you, Ms.
12 Lake, right now.

13 THE WITNESS: We're just getting warmed
14 up.

15 MS. GREENBERGER: It may be -- we're
16 expecting some documents. It may be that we have
17 to call you back, and we'll deal with your
18 counsel if we do that. I don't know if your
19 counsel has any questions, in which case, I
20 reserve the right to follow up.

21 MR. KHOJASTEH: One second.

22 MS. GREENBERGER: Sure. I hope this

1 can get you home earlier than you hoped.

2 THE WITNESS: Pardon me? Are you
3 talking to me?

4 MS. GREENBERGER: It's okay.

5 MR. KHOJASTEH: We're -- we don't need
6 to ask any questions.

7 MS. GREENBERGER: Okay. The deposition
8 is concluded.

9 THE WITNESS: Thank you.

10 MS. GREENBERGER: Thank you.

11 VIDEO TECHNICIAN: Thank you. We are
12 off the record. One moment. We are off the
13 record at 18:24 p.m. This concludes today's
14 testimony given by Kari Lake. The total number
15 of media units used is seven and will be retained
16 by Veritext.

17 (Whereupon, at 6:24 p.m., the
18 deposition of KARI LAKE
19 was concluded.)

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CERTIFICATE OF NOTARY PUBLIC

I, ERICK M. THACKER, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



ERICK M. THACKER

Notary Public in and for the
District of Columbia

My commission expires:
June 30, 2029

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ACKNOWLEDGMENT OF DEPONENT

I, KARI LAKE, do hereby acknowledge I have read and examined the foregoing pages of testimony, and the same is a true, correct and complete transcription of the testimony given by me, and any changes or corrections, if any, appear in the attached errata sheet signed by me.

Date

KARI LAKE

7576480

1 Sarmad M. Khojasteh, Esquire
sarmad.khojasteh@usdoj.gov

2
3 September 15, 2025

4 RE: Patsy Widakuswara, et al. vs. Kari Lake,
et al.

5 9/9/2025, Kari Lake (7576480)

6 The above-referenced transcript is available
7 for review.

8 Within the applicable timeframe, the witness
9 should read the testimony to verify its accuracy.
10 If there are any changes, the witness should note
11 those with the reason, on the attached Errata
12 Sheet.

13 The witness should sign the Acknowledgment of
14 Deponent and Errata and return to the deposing
15 attorney. Copies should be sent to all counsel,
16 and to Veritext at erratas-cs@veritext.com.

17 Return completed errata within 30 days of
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21 Yours,

22 Veritext Legal Solutions

1 Patsy Widakuswara, et al. vs. Kari Lake, et al.

2 Kari Lake (#7576480)

3 E R R A T A S H E E T

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22 KARI LAKE

Date

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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