

**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 26, 2025, *see* ECF 99, *Abramowitz v. Lake*, No. 25-cv-00887—which ordered that the deposition of Mr. Wuco be filed on the public docket subject to two redactions—Defendants respectfully submit the deposition of Mr. Wuco, which is attached as Exhibit A.

Dated: November 19, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

ERIC J. HAMILTON
Deputy Assistant Attorney General
Civil Division, Federal Programs Branch

/s/ Abigail Stout
Abigail Stout
(DC Bar No. 90009415)
U.S. Department of Justice
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Washington, DC 20530

Exhibit A

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VIDEOTAPED DEPOSITION OF

FRANK WUCO

DATE: Thursday, September 18, 2025

TIME: 9:11 a.m.

LOCATION: Zuckerman Spaeder LLP
2100 L Street Northwest, Suite 400
Washington, D.C. 20037

REPORTED BY: Austin K. White

JOB NO.: 7583811

A P P E A R A N C E S

ON BEHALF OF PLAINTIFFS PATSY WIDAKUSWARA, JESSICA
JERREAT, KATHRYN NEEPER, AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEES, AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AMERICAN FOREIGN SERVICE
ASSOCIATION, AND THE NEWSGUILD-CWA:

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ON BEHALF OF PLAINTIFFS PATSY WIDAKUSWARA, JESSICA
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3 COUNTY, AND MUNICIPAL EMPLOYEES, AFL-CIO:

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11
12 ON BEHALF OF PLAINTIFFS MICHAEL ABRAMOWITZ AND ANTHONY
13 LABRUTO:

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21
22

A P P E A R A N C E S (Cont'd)

ON BEHALF OF PLAINTIFF REPORTERS WITHOUT BORDERS:

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1 A P P E A R A N C E S (Cont'd)
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9 brian.miller@usagm.gov
10 (202) 920-2000

11
12 ALSO PRESENT:
13 Ellen Hebert, Veritext Videographer
14
15
16
17
18
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22

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

2 THE VIDEOGRAPHER: Okay, good morning.

3 We are going on the record at 9:11 a.m. The date
4 today is September 17 [sic], 2025. Please note that
5 the microphones are sensitive and may pick up
6 whispering and private conversations. Please mute
7 your phones at this time. Audio and video recording
8 will continue to take place unless all parties agree
9 to go off the record.

10 This is Media Unit No. 1 of the
11 videorecorded deposition of Frank Wuco, taken by
12 counsel for the plaintiffs in the matters of Patsy
13 Widakuswara, et al. vs. Kari Lake, et al., and Michael
14 Abramowitz, et al. vs. Kari Lake, et al. filed in the
15 United State District Court for the District of
16 Columbia, Case Nos. 25-cv-1015-RCL and
17 25-cv-00887-RCL. The location of the deposition is
18 Zuckerman Spaeder, LLP, located at 2100 L Street
19 Northwest, Washington D.C.

20 My name is Ellen Hebert, representing
21 Veritext; I am the videographer. The court reporter
22 is Austin White from Veritext.

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

7 MR. BOURLAND: Good morning, Mr. Wuco.
8 I'm Nick Bourland, with Emery Celli; here for the
9 plaintiffs in the Widakuswara case.

10 MR. BLUMIN: Hi, I'm Matt Blumin; with
11 the plaintiff, American Federation of State, County
12 and Municipal Employees.

13 MR. WUCO: Good morning.

14 MS. DOTZEL: Good morning. I'm Peggy
15 Dotzel; I'm from Zuckerman Spaeder, and I am counsel
16 for the Abramowitz Plaintiffs.

17 MR. WUCO: Good morning.

18 MS. WILGUS NULL: Taryn Wilgus Null,
19 from Democracy Defenders Fund; for Plaintiff,
20 Reporters Without Borders.

21 MS. SINHA: Sana Sinha, Democracy
22 Defenders Fund; for Plaintiff, Reporters Without

1 Borders.

2 MS. STOUT: Abigail Stout, Department
3 of Justice; for Defendants.

4 MR. KHOJASTEH: Sarmad Khojasteh;
5 Department of Justice, for Defendants.

6 MS. DRAKE: Anna Katherine Drake; from
7 U.S. Agency for Global Media.

8 THE VIDEOGRAPHER: Will those attending
9 remotely identify themselves for the record?

10 MR. MILLER: Brian Miller; for U.S.
11 Agency for Global Media.

12 THE VIDEOGRAPHER: Thank you very much.
13 Will the court reporter please swear in
14 the witness, and then Counsel may proceed.

15 THE REPORTER: Good morning. My name
16 is Austin White, and I'm the reporter assigned by
17 Veritext to take the record of these proceedings.

18 I am a notary authorized to take
19 acknowledgements and administer oaths in the District
20 of Columbia.

21 Additionally, absent an objection on
22 the record, the -- and before the witness is sworn,

1 all parties understand and agree that any certified
2 transcript produced from the recording of this
3 proceeding:

- 4 - is intended for all uses permitted
5 under applicable procedural and
6 evidentiary rules and laws in the
7 same manner as a deposition recorded
8 by stenographic means; and
9 - shall constitute written stipulation
10 of such.

11 And hearing no objection, I will now
12 swear in the witness.

13 Please raise your right hand.

14 WHEREUPON,

15 FRANK WUCO,

16 called as a witness and having been first duly sworn
17 to tell the truth, the whole truth, and nothing but
18 the truth, was examined and testified as follows:

19 THE REPORTER: You may proceed.

20 EXAMINATION

21 BY MR. BOURLAND:

22 Q All right. Good morning, Mr. Wuco.

1 A Morning.

2 Q Can you please state your full name for the
3 record?

4 A Frank Edward Wuco.

5 Q All right. My name is Nick Borland; I am an
6 attorney for the plaintiffs in one of the two lawsuits
7 that this deposition was noticed for. You and I have
8 not met before today; right?

9 A Correct.

10 Q Okay. What is your current title at the
11 United States Agency for Global Media, or USAGM?

12 A I am a senior advisor.

13 Q And where do you currently live? I don't
14 need an address, just state will do.

15 A Capitol Hill region.

16 Q Okay. So here in D.C.?

17 A Yes, sir.

18 Q All right. I'm going to go over the ground
19 rules. First, just for context, have you ever
20 taken -- or been deposed before?

21 A No.

22 Q Okay. Have you ever given sworn testimony

1 of any kind before?

2 A No.

3 Q All right. So I'm just going to give you
4 some basic ground rules for how today's going to work.
5 First off, you understand that you're under oath, just
6 like an oath you would take in court; right?

7 A Yes.

8 Q And you swore to tell the truth under a
9 penalty of perjury? You understand that; right?

10 A I do.

11 Q It's important today that unlike in a normal
12 conversation, where we may shrug our shoulders, or nod
13 our head, or say "uh-huh," that we keep all verbals --
14 all answers verbal. So for example, if I ask you a
15 yes or no question, and you forget to say, "yes," and
16 you just nod your head, I'll try to remind you; okay?

17 A Okay.

18 Q Great. It's also important that we try to
19 maintain a clean record and make life easy for our
20 court reporter here today. That means that we should
21 try to avoid crosstalk. It's something us lawyers and
22 witnesses are always guilty of doing. So we'll try to

1 keep it on top of mind.

2 That means even if you think you know where
3 my question is going, please wait a beat until I'm
4 done asking before you start your answer, because the
5 court reporter can only write down one person's
6 testimony or question at a time. And likewise, I will
7 do my absolute best to wait until you're done with
8 your answer. And of course, if I happen to cut you
9 off, please let me know you weren't finished, and I'll
10 give you a chance to finish your answer; okay?

11 A Okay.

12 Q Great. If at any point today you do not
13 understand a question, whether it's the context you
14 don't understand, you don't understand the words
15 coming out of my mouth, whatever it is, just please
16 let me know and I'll do my best to rephrase it. If
17 you don't say that you don't understand, then I will
18 assume that you do; okay?

19 A Okay.

20 Q Great. Throughout the day today, your
21 attorney, Ms. Stout, may object to questions. That's
22 a normal part of the process. We'll wait a beat for

1 her to get her objection on the record. And if --
2 unless she instructs you not to answer a question, you
3 can then go ahead and answer after the objection has
4 been stated; okay?

5 A Okay.

6 Q Great. If at any point today you would like
7 to take a break, you don't have to give me a reason;
8 you can take a break for -- whenever you want. I only
9 ask that if there's a question pending, you answer
10 that question before you take a break; okay?

11 A Okay.

12 Q Great. All right. Let's start with just
13 some basics here. This deposition was noticed; right?
14 Did you receive a deposition notice to appear today?

15 A I did.

16 MR. BOURLAND: Okay. We can mark this
17 as Wuco Exhibit 1. I think we're going with numbers.

18 (Wuco Exhibit 1 was marked for
19 identification.)

20 THE REPORTER: Did you say Wuco 1?

21 MR. BOURLAND: That would be great,
22 yeah. Thank you.

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1 THE REPORTER: Here you are, sir.

2 THE WITNESS: Thank you.

3 THE REPORTER: You're welcome.

4 BY MR. BOURLAND:

5 Q All right. So you've just been handed
6 what's been marked as Wuco Exhibit 1. Do you
7 recognize this document?

8 A I do.

9 Q All right. Is that the deposition notice
10 you received in this case?

11 A Yes.

12 Q And you are appearing for this deposition
13 today pursuant to that Notice in these cases; correct?

14 A Correct.

15 Q And are you -- you'll notice at the top of
16 the Notice there is a caption for two different
17 lawsuits. Do you see that?

18 A I do.

19 Q And are you generally familiar with the
20 allegations in these lawsuits, what these cases are
21 about, in other words?

22 A Yes.

1 Q Okay. What is your -- and I'm not asking
2 you as a lawyer, just your general understanding as a
3 USAGM employee of what these lawsuits are about?

4 MS. STOUT: Object to the extent that
5 your understanding comes from conversations that
6 you've had with your attorney, whether it be at USAGM
7 or the Department of Justice, then I would instruct
8 the witness not to answer. But if you have any
9 understanding outside of conversations that happened
10 with your attorneys then you may answer.

11 THE WITNESS: The -- the lawsuits
12 are -- are multifarious to the point that I can't
13 provide a -- a concise answer.

14 BY MR. BOURLAND:

15 Q Okay. Well, let me ask it differently. And
16 I'll qualify with my question that I don't want
17 anything that -- any legal advice or communication for
18 the purpose of legal advice from any lawyer. Do you
19 have any general lay-understanding of what these
20 lawsuits are about, even at a high level?

21 A Yes.

22 Q Okay. And can you just briefly tell me what

1 that understanding is?

2 A Largely, grievances sought by former
3 employees.

4 Q Regarding what, if you know?

5 A General reorganization of Voice of America.

6 Q And Voice of America is a broadcaster under
7 the umbrella of USAGM; right?

8 MS. STOUT: Objection; lacks
9 foundation.

10 BY MR. BOURLAND:

11 Q You can answer.

12 A Repeat the question, please?

13 Q You just referred to Voice of America. That
14 is a federal broadcaster under the umbrella of USAGM;
15 is that right?

16 MS. STOUT: Object to form; lacks
17 foundation.

18 THE WITNESS: That's the general
19 understanding.

20 BY MR. BOURLAND:

21 Q Okay. When did you first learn about these
22 two lawsuits that we're talking about?

1 A When I came on board USAGM.

2 Q And when was that?

3 A May of 2025.

4 Q Was it May 19, 2025?

5 A I believe so.

6 Q And did you have any involvement with the
7 Agency in any sort of informal capacity before that
8 date, during this administration?

9 A Yes.

10 Q How so?

11 A I -- advising transition.

12 Q And who were you advising?

13 A I don't recall.

14 Q Were you advising people at the Agency
15 itself?

16 A No.

17 Q What office were these people working for
18 that you were advising?

19 MS. STOUT: Object to form; lacks
20 foundation.

21 BY MR. BOURLAND:

22 Q You can answer.

1 A No office specified.

2 Q Okay. This, sort of, informal advising
3 role, which is what I'm going to refer to what you
4 just told me about, to be clear, when did that take
5 place; during what time period?

6 A Very briefly following the election.

7 Q So sometime between November of 2024 and
8 when you started in May of 2025; is that correct?

9 A More accurately, sometime in November.

10 Q Okay. So really shortly after the election
11 last year?

12 A Correct.

13 Q Okay. And how did you end up in that, sort
14 of, informal advising role?

15 A My advice was sought.

16 Q By whom?

17 A Transition personnel.

18 Q And who specifically within these transition
19 personnel sought your advice?

20 A I don't recall.

21 Q Do you recall any of the people that you
22 advised in this capacity as an advisor for the

1 transition?

2 MS. STOUT: Objection; asked and
3 answered.

4 BY MR. BOURLAND:

5 Q You can answer.

6 A Nothing more than I've already provided.

7 Q Okay. Do you know whether any of the people
8 you advise in that capacity are now working for the
9 Agency?

10 MS. STOUT: Objection; lacks
11 foundation.

12 BY MR. BOURLAND:

13 Q You can answer.

14 A I don't know. I don't -- somewhere in the
15 admin. I have no idea.

16 Q All right. So you're being represented by
17 an attorney today; right?

18 A I am.

19 Q Okay. I just want to talk a little bit
20 about preparation. And before I get into this line of
21 questioning, I just want to make super clear that I'm
22 not asking about the content of any conversations

1 you've had with your lawyers; okay? So the extent
2 that they prepared you and talked you through certain
3 things, I don't want to hear about that. I'm just
4 asking about logistics basically; okay?

5 Did you do anything to prepare for today's
6 deposition, generally?

7 A Generally, yes.

8 Q What did you do to prepare for today?

9 MS. STOUT: And just for the record,
10 I'll object to the extent that this asks about
11 attorney-client communications.

12 BY MR. BOURLAND:

13 Q Yeah. And my qualification still applies to
14 this question; right? So just generally, what did you
15 do to prepare?

16 A Yeah, I would rather leave that under the
17 attorney-client privilege.

18 Q You're not being instructed not to answer.
19 So I'm just asking you about whether you prepared.
20 You said, "yes," and I'm asking what you did to
21 prepare.

22 A Procedurally.

1 Q How so?

2 A The conduct of a deposition in general.

3 Q Okay. Did you meet with your counsel?

4 A I did.

5 Q And again, not asking about the content of
6 any of those conversations. How many times did you
7 meet?

8 A Twice.

9 Q And when were those meetings?

10 A It would have been yesterday and the day
11 before.

12 Q And approximately how long in total did you
13 spend preparing with your counsel for this deposition?

14 A I -- total time, approximately six hours.

15 Q Were those meetings in person?

16 A One was.

17 Q And what was the format of the other one?

18 A Teams.

19 Q Okay. So a videoconference?

20 A Correct.

21 Q Got it. Was anyone besides your counsel
22 present at either of those meetings?

1 A No.

2 Q Anyone else from the Agency?

3 A Nobody outside of legal counsel.

4 Q Understood. Did you review any documents in
5 preparation for today's deposition?

6 MS. STOUT: Object for the record. To
7 the extent that this would implicate attorney-client
8 communications, I would instruct you not to answer.
9 But if it's just asking about the who, what, when,
10 why, where, you can answer.

11 THE WITNESS: Okay. I mean, I'll
12 maintain the attorney-client privilege. I'm familiar
13 with, you know, the documents that appear to be in
14 your binder.

15 BY MR. BOURLAND:

16 Q Okay. So you did review some underlying
17 documents?

18 A Well, I was a participant in drafting so I'm
19 familiar with the documents.

20 Q Are you referring to your Declaration that
21 was submitted in this case?

22 A Correct.

1 Q So you did review your Declaration in
2 preparation for today's deposition?

3 A No.

4 Q You did not?

5 A I didn't need to.

6 Q Okay. So what documents did you review?

7 A Briefly, other declarations.

8 Q Other declarations that were submitted in
9 this case?

10 A Correct.

11 Q Do you remember which ones?

12 A There are just a handful. So two from Ms.
13 Lake, and one from Ms. Soltani.

14 Q Okay. And just to make sure we're talking
15 about the same people, Ms. Lake is who?

16 A Ms. Lake is Kari Lake, the acting CEO of
17 USAGM.

18 Q And who's Ms. Soltani?

19 A Ms. Soltani is the programming director of
20 the Voice of America.

21 Q Did you bring any documents with you today?

22 A No.

1 Q Any notes?

2 A No.

3 Q Under -- other than the three declarations
4 we just talked about, the two from Ms. Lake, and the
5 one from Ms. Soltani, did you review any other
6 documents in preparation for today's deposition?

7 A No.

8 Q Did you discuss your deposition today with
9 anyone other than counsel in those meetings?

10 A No.

11 Q And just to be clear, did you discuss your
12 deposition today with anyone else at the Agency other
13 than legal counsel?

14 A Only insofar as that I was having a
15 deposition today.

16 Q Okay, fair enough. All right. Let's talk
17 a -- I'll shift gears here. Let's talk a little bit
18 about just your general background. Let's start with
19 your education. Did you finish college?

20 A I did.

21 Q Where was that?

22 A As a long time night-schooler, I cobbled

1 together my credits. I was in the Navy for 23 years,
2 so I attended college courses wherever I could,
3 whenever I could. And I received a -- my degree from
4 Excelsior College, at State University of New York
5 school system.

6 Q And what kind of degree was that?

7 A Liberal studies.

8 Q Okay. You're smirking.

9 A Well, it became a matter of counting up
10 semester hours and when deciding a major with my
11 student counselor, when he asked me what I wanted to
12 major in, I said, "Well, I've taken so many college
13 courses, I didn't know. Which do I have the most
14 amount of credits in?" And his reply was, "None,
15 really." I'm like, "Okay. So what do we" -- so
16 liberal studies became my -- my major. I was just
17 interested in everything so --

18 Q That's relatable. When did you complete
19 that degree; when did you graduate?

20 A August 19, twenty -- 2001, actually.

21 Q And did you -- have you ever gone to grad
22 school?

1 A No, I have not.

2 Q Okay. You said you were in the Navy for how
3 long was that?

4 A Twenty-three years.

5 Q What was your rank when you finished your
6 time in the Navy?

7 A I was a Lieutenant Commander.

8 Q Did you receive an honorable discharge?

9 A Yes.

10 Q Did you hold any jobs before you joined the
11 Navy?

12 A Yes.

13 Q What were those jobs, generally?

14 A High school jobs.

15 Q Okay. I won't go into those. During your
16 time in the Navy, did you exclusively work in the
17 Navy, or did you hold other employment as well?

18 A Exclusively in the Navy.

19 Q And where were you posted in the Navy?

20 A Everywhere. I was posted in the -- the
21 Philippines on a carrier battle group staff. So lots
22 of time in other Western Pacific and Indian Ocean

1 ports. I was posted in London, England, at the Fleet
2 Intelligence Center. I was posted in San Diego on
3 board the USS Fox, a guided missile cruiser, and at
4 SEAL Team 1, as the team intelligence rep. That's
5 where I got commissioned; I was enlisted up until that
6 time.

7 I went to officer indoctrination school in
8 Pensacola, Florida, then to Naval Air Station Agana,
9 Guam, with Fleet Reconnaissance Squadron 1 and 5. I
10 then went to Berlin, Germany, as the officer in charge
11 of the Navy Human -- Human Intelligence Detachment in
12 Berlin. Then to Naples, Italy, as the officer in
13 charge of the Naval Human Intelligence Detachment
14 there.

15 Then I was posted to the US 6th Fleet staff
16 as a -- as an intelligence officer. From there, I was
17 at Joint Interagency Task Force East in Key West,
18 Florida -- as the -- the Intelligence Watch Chief in
19 the command center.

20 Then, I was -- I -- I was then changed. My
21 permanent change of station was to Special Operations
22 Command Central. Shortly after 9/11, I was the Deputy

1 Director of Intelligence for Operations at SOCCENT,
2 between 2001 and 2004, in multiple deployments. So
3 then, I retired.

4 Q All right. Is it fair to say that you spent
5 most of your time in the Navy working in intelligence?

6 A All of my time.

7 Q Okay. Did you ever -- were any of your
8 responsibilities in the Navy in -- ever in public
9 relations or media?

10 A No.

11 Q All right. What did you do after you
12 retired from the Navy?

13 A Immediately upon retirement, I was -- I
14 became a defense contractor; fairly common. I
15 established and organized the Analytical Red Team at
16 Special Operations Command Central, [REDACTED]

17 [REDACTED]
18 [REDACTED].

19 I then was asked to go to US Central Command
20 to establish the Analytical Red Team there, which was
21 first at both places. And I was both the Deputy Chief
22 and the Chief of the Analytical Red Team at US Central

1 Command for five or so years under four separate
2 CENTCOM commanders.

3 I also worked in the [REDACTED]
4 [REDACTED]. And
5 after that, I stepped off -- I stepped away from
6 contract support work, and went into business
7 development in defense contracting.

8 Q And when was that, that transition that you
9 just ended on there?

10 A 2010.

11 Q And just focusing on this period -- strike
12 that.

13 When did you retire from the Navy again
14 before you started the defense contract work; when was
15 that?

16 A January 1st of 2004.

17 Q Okay. So in this period that you just
18 talked about, from 2004 to 2010, did you ever hold any
19 jobs in journalism or the media?

20 A Yes.

21 Q Tell me about those.

22 A Radio, local radio talk show host.

1 Q When was that?

2 A I don't recall the exact date I started, but
3 I stepped away in 2014, I believe.

4 Q Do you know approximately how many years you
5 did that?

6 A Approximately, five.

7 Q And what type of program was that?

8 A Local AM talk radio, Tampa Bay.

9 Q In Tampa Bay?

10 A Yes, sir.

11 Q Was there any sort of specific theme or
12 areas that you covered on that show?

13 A Yes -- yes.

14 Q Describe that for me.

15 A Two different programs; the first, with --
16 with Salem Communications. I was working with them,
17 helping them develop content for their national
18 broad -- programmers, national hosts. During the
19 course of the meeting, I pointed out that there didn't
20 seem to be a radio talk show format that focused on
21 national security issues exclusively. And they asked
22 if I was interested in doing that, and two weeks later

1 I was on the radio trying to figure out how to work a
2 microphone.

3 Q And when you started then, was that your
4 first time working in any kind of broadcast media?

5 A Absolutely.

6 Q And what type of -- strike that.
7 What was the format of that show?

8 A Be more specific, please.

9 Q Sure. You said it was an AM talk radio
10 show. How did that show work, generally? Did you
11 have callers call in? Tell me a little bit about how
12 it worked.

13 A Yes. Call -- there -- there were segments
14 that were call-in segments. The rest was primarily --
15 my content was focused then talking about national
16 security issues, terrorism, and other current events
17 at the time.

18 Q Was the content that you yourself were
19 creating, was that editorial content; is that how you
20 would describe it?

21 MS. STOUT: Objection; lack of
22 foundation.

1 BY MR. BOURLAND:

2 Q You can answer.

3 A Insofar as the content was my own and I
4 spoke freely.

5 Q Sure. Did you work with any journalists in
6 that role?

7 A Except for an occasional interview of --
8 well, strike that. I may be conflating my two
9 programs. No.

10 Q Okay. Then let's talk about the second
11 program. I think we were just talking about the first
12 one; right?

13 A Correct.

14 Q Okay. Well, starting from square one, tell
15 me about that second program and what it was.

16 A So I was hired by Crosstown Station, which
17 at the time was run by Clear Channel, now iHeart
18 Media, who -- they -- they had a -- a favorable view
19 of my Salem program and -- and my conduct of -- of
20 that program. So they asked me if I would come over
21 and -- and work for them. So I crossed town and --
22 and went to AM 970 WFLA.

1 Q And was the format or style of that show any
2 different from the first one?

3 A Yes.

4 Q How so?

5 A It was broader in content.

6 Q So not just national security-focused; is
7 that accurate?

8 A Correct.

9 Q Okay. And did you work with journalists in
10 that role?

11 A Occasionally.

12 Q In what way? Just describe that for me,
13 generally?

14 A An example would be a defense military
15 correspondent for the Tampa Bay Times. I would
16 interview him occasionally on ongoing topics of -- of
17 national interest.

18 Q Was there any -- at either of these
19 stations, was there any, sort of, in-house reporters
20 or newsroom that you worked with?

21 A Yes.

22 Q Tell me about that.

1 A Very standard radio studio layout with a
2 production booth in front, the broadcast booth behind.
3 Directly behind me was the news traffic and weather
4 team. So insofar as during normal breaks, where we --
5 hard breaks, where we broke for -- for news, or
6 traffic, or weather, yeah, we were -- we were all in
7 the same corridor together.

8 Q And when you were working on those radio
9 shows, did you oversee or assign any journalists on a
10 beat or to cover anything?

11 A No.

12 Q Have you yourself ever worked as a
13 journalist, used that title to describe your work?

14 A No.

15 Q And what was the name of the radio shows --
16 or what were the names of the radio shows that you
17 were talking about?

18 A The first program with Salem Communications
19 was called, Need to Know with Frank Wuco.

20 Q And the second one?

21 A More cleverly named, the Frank Wuco Radio
22 Show.

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1 Q All right. So my understanding is you did
2 work for or at USAGM during the first Trump
3 presidential administration; is that correct?

4 MS. STOUT: Objection; lack of
5 foundation.

6 BY MR. BOURLAND:

7 Q Is that right?

8 A Yes.

9 Q Okay. When did that start?

10 A To the best of my recollection, June of
11 2020.

12 Q Okay. All right. So between -- I believe
13 you said that -- and correct me if I'm wrong -- that
14 your talk radio broadcasting was until around 2014; is
15 that right?

16 A Correct, with one caveat.

17 Q What's the caveat?

18 A I would occasionally co-host the Morning
19 Drive show for 970 WFLA, when one of the primary hosts
20 was either on leave or sick. So I was the primary
21 fill-in.

22 Q Okay. So you would sub-in sometimes after

1 2014, but that wasn't a regular gig; is that correct?

2 A Correct.

3 Q Okay. So between 2014 and summer of 2020
4 when you started working at USAGM, did you have any
5 other jobs?

6 A Well, yes, I -- I -- like I said, I worked
7 as a business development capture manager for one
8 defense contracting firm, small business out of Tampa,
9 Florida. And when I left that, I established a -- a
10 private consultancy where I did, sort of, hired hand
11 business development support to other companies,
12 including larger ones such as Lockheed Martin --

13 Q What was that -- go ahead.

14 A No, please.

15 Q What was that company called?

16 A Red Mind Solutions. Three words, Red Mind
17 Solutions, LLC.

18 Q Was that based in Florida?

19 A It was.

20 Q Okay. Did you hold any other roles in the
21 first Trump administration before you worked at USAGM?

22 A May I -- Interject something pertaining to

1 the last question?

2 Q If you want to clarify something in your
3 last answer, that's fine.

4 A Red Mind Solutions also segued into a --
5 I -- I didn't start it; it was still Red Mind
6 Solutions. But I'd started a new venture, which was
7 a -- a data mapping and analysis company, adapting and
8 licensing data mapping software, semi-natural language
9 programming, and NLP software from the DOD side to the
10 civilian sector. So it was another part of Red Minds.

11 Q And that was under the same company?

12 A Correct.

13 Q And when you said you adapted it to the
14 civilian sector, what -- where was it being used, if
15 you know?

16 A Well, it was a startup, so a considerable
17 number of months were spent developing relationships
18 with investors and developing our -- our team, our
19 engineering team. On the business development side,
20 we eventually landed in the healthcare space
21 processing multiple and disparate Medicare Advantage
22 claims across multiple, you know, interventionists,

1 healthcare companies, things like that for -- for
2 midsize, small-size independent physicians
3 associations.

4 Q Was this data management analysis program or
5 tool, was that something that you ever contracted with
6 anyone in media for?

7 A No.

8 Q Okay. All right. So I'll go back to my --
9 the last topic I was getting into, which is whether
10 you held any other positions in the first Trump
11 presidential administration before you started at
12 USAGM?

13 A Yes.

14 Q What was the first one?

15 A White House Senior Advisor to the Department
16 of Homeland Security.

17 Q And how did you end up in that role?

18 A I -- I was called by transition after my
19 name had come up as a -- a type -- a type with
20 national security experience and -- and you know,
21 media experience, private sector experience, things
22 like that. And as they were setting up this profile

1 for the type of person they were looking for, somebody
2 said they knew a guy, and -- and that was me.

3 Q And just generally, what were your
4 responsibilities in that role?

5 A I was the, what they called the beachhead
6 team lead, which was the -- the lead for the Political
7 Appointee Workforce integrating into the department.
8 So one of my responsibilities was to ensure that our
9 appointee staff understood the department, understood
10 where they were being assigned, understood what their
11 roles and responsibilities would be, their
12 interactions with the career workforce, as well as
13 advising the White House on DHS -- just, sort of,
14 daily operations internally. Staff operations; not
15 law enforcement operations.

16 Q And how long did you have that role?

17 A That role lasted for about a year, slightly
18 less. And it was, you know, a lot of the functions of
19 those roles give way to the political staff being
20 integrated into the department and, you know, there's
21 just not a whole lot of need for the -- the
22 integration supervision.

1 So while I was doing that job, I was asked
2 to step into the role of the Director of the Executive
3 Order Taskforce at DHS.

4 Q So you moved into another role at DHS?

5 A I did both jobs simultaneously until the
6 White House senior advisor positions were gradually
7 dissolved.

8 Q Did you have any other roles in the
9 government between that one and starting at USAGM in
10 summer 2020?

11 A I did work in the Office of Policy, Strategy
12 and Policy at -- at DHS for a time. And then I went
13 to State Department on a six-month detail in the Arms
14 Control Bureau, where I worked missile defense issues.

15 Q Did you have any experience in arms control
16 before you started that role?

17 A In missile defense.

18 Q So you had experience in missile defense; is
19 that what you mean?

20 A Correct.

21 Q Okay. And were you in that position at
22 State until you started at USAGM?

1 A Nope. I was in that position for six
2 months. And six months after that finished, I started
3 at USAGM.

4 Q Okay. And how did you end up there

5 A At State?

6 Q At USAGM?

7 A USAGM, oh. As the confirmation of the CEO
8 at the time, Michael Pack, came to be, they were
9 looking for people to come into the Agency; me
10 specifically for organizational and leadership skills
11 and -- and experience to help run the organization.

12 Q And who appointed you to that role?

13 MS. STOUT: Objection; lacks
14 foundation.

15 THE WITNESS: The CEO.

16 BY MR. BOURLAND:

17 Q Was that Mr. Pack?

18 A Yes.

19 Q What were your responsibilities in that role
20 at USAGM?

21 A As the Vice President for Strategy,
22 Operations, and Research, it was -- I describe it as

1 a -- a melange of CSO and COO. So it was the daily --
2 the day-to-day operations of the Agency, as well as
3 the broadcast organizations. So to include Voice of
4 America, the Office of Cuba Broadcasting, and the
5 grantee organizations as well. So budget, finance,
6 personnel, security, which was a -- an absolute
7 nightmare when I arrived, by the way, as were other
8 elements of -- of the Agency on the whole.

9 Q Who did you report to directly in that role?

10 A Mr. Pack.

11 Q And who reported to you, if anyone?

12 A Oh, yeah.

13 Q Titles; not names, I should say.

14 A Yep.

15 Q Let's start with that.

16 A All network and grantee heads, the Director
17 of the Office of Management Services, security,
18 finance, contracting. It seems like I might be
19 forgetting one, maybe two, but virtually, the entire
20 agency and all of its operations were under my day --
21 day-to-day management.

22 Q And how long did you remain in that role?

1 A Until late-December, early-January of 2020,
2 2021.

3 Q So it was less than one year; is that right?
4 I'm getting that right?

5 A Yes.

6 Q Okay. During your time at the Agency at
7 USAGM, during the first Trump presidential
8 administration, did you participate in any attempts to
9 downsize the Agency?

10 MS. STOUT: Objection; vague and lacks
11 foundation.

12 BY MR. BOURLAND:

13 Q You can answer.

14 A No.

15 Q To your knowledge, were there any such
16 attempts during the first Trump administration?

17 MS. STOUT: Object to form, vague, and
18 lacks foundation.

19 THE WITNESS: No.

20 BY MR. BOURLAND:

21 Q Again, focusing on your first stint at
22 USAGM, during the first administration, did you

1 participate in any attempts to remove any language
2 services from VOA's broadcasting?

3 MS. STOUT: Object to form, lacks
4 foundation.

5 THE WITNESS: And please repeat the
6 question.

7 BY MR. BOURLAND:

8 Q Sure. During the first Trump
9 administration, when you were at USAGM for less than a
10 year, did you personally participate in any efforts to
11 remove any language services from VOAs broadcasting?

12 MS. STOUT: Same objection.

13 THE WITNESS: No.

14 BY MR. BOURLAND:

15 Q Again, focusing on the first Trump
16 administration, during your time there, did you
17 personally participate in any attempts to stop Voice
18 of America from broadcasting to any countries that it
19 had been broadcasting to?

20 MS. STOUT: Object to form, vague, and
21 lacks foundation.

22 THE WITNESS: No.

1 BY MR. BOURLAND:

2 Q What about any attempts to downsize the
3 number of full-time employees? Did you participate in
4 anything like that in your first time there?

5 MS. STOUT: Object to form, vague, and
6 lacks foundation.

7 THE WITNESS: No.

8 BY MR. BOURLAND:

9 Q In your role -- well, it was also a senior
10 advisor title; is that right, during the first
11 administration?

12 A No.

13 Q What was it, actually? I think I --

14 A Vice President of Strategy, Operations, and
15 Research.

16 Q So in this vice president role during the
17 first Trump administration, did you in that role have
18 any control over the newsroom or the actual content of
19 VOA broadcasting?

20 MS. STOUT: Objection; vague and lacks
21 foundation.

22 //

1 BY MR. BOURLAND:

2 Q You can answer.

3 A No.

4 Q Did you interface with anyone in the VOA
5 newsroom in that role?

6 MS. STOUT: Objection; lacks
7 foundation.

8 THE WITNESS: No, with the caveat that
9 I -- Interacted with the acting director.

10 BY MR. BOURLAND:

11 Q The acting director of VOA?

12 A Correct.

13 Q And when you interacted with the acting
14 director of VOA, did you discuss VOA broadcasting
15 content?

16 MS. STOUT: Objection; vague as to
17 content.

18 BY MR. BOURLAND:

19 Q If you understand --

20 A Yeah, if you -- if you can be more clear?

21 Q Sure. Did you discuss the subject matter of
22 what VOA was reporting on?

1 A Occasionally, in past tense, if they briefed
2 us on a project they were working on or something like
3 that, but no -- otherwise, no.

4 Q Did you ever, for example, direct the acting
5 director to cover or not cover a certain topic?

6 A No.

7 Q During the first Trump administration,
8 again, during your time in this VP role at USAGM, were
9 you ever involved in any discussions about bringing
10 private third-party news media content in to VOA?

11 MS. STOUT: Objection; lacks foundation
12 and vague.

13 THE WITNESS: No.

14 BY MR. BOURLAND:

15 Q Were you ever involved in any discussion
16 about bringing in or rebroadcasting content from OAN
17 or Newsmax?

18 MS. STOUT: Object to form, lacks
19 foundation.

20 THE WITNESS: No.

21 BY MR. BOURLAND:

22 Q All right. Did you work anywhere before

1 rejoining USAGM in the second Trump administration?

2 A Yes.

3 Q Just briefly walk me through the other jobs
4 you held then.

5 A It was just -- just one job. It was a
6 private sector position during --

7 Q What was -- go ahead.

8 A Six months. It was a -- a biochemical
9 company.

10 Q What was your position there?

11 A Business development director.

12 Q Anything media or journalism-related at that
13 job?

14 A No.

15 Q All right. Let's talk a bit about your role
16 now, generally, and then we can take a break.

17 MR. BLUMIN: Do you want to take a
18 quick break before we start?

19 MR. BOURLAND: You want to take one
20 now?

21 MR. BLUMIN: It's just going to be a
22 long stretch of time.

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1 MR. BOURLAND: Yeah, let's do it.

2 Yeah. We've been going for about an hour; right?

3 MS. STOUT: Almost.

4 MR. BOURLAND: Okay.

5 MR. BLUMIN: Okay.

6 THE REPORTER: It is 10:02 a.m., and
7 we're going off the record.

8 THE VIDEOGRAPHER: This marks the end
9 of media unit No. 1. Going off the record. The time
10 is 10:02 a.m.

11 (Off the record.)

12 THE VIDEOGRAPHER: This marks the
13 beginning of media unit No. 2. Going back on the
14 record. The time is 10:17 a.m.

15 BY MR. BOURLAND:

16 Q All right. We're back on the record after a
17 short break. Before I turn to another topic, I just
18 want to circle back to one thing that we had discussed
19 earlier in the deposition. We talked a bit about how
20 you had advised -- you had served in some sort of
21 advisory role last November during the transition.
22 You remember that testimony?

1 A I do.

2 Q I don't think I asked you what --

3 A If I may?

4 Q Please, yes.

5 A It wasn't an advisory role.

6 Q Okay.

7 A It was -- I -- I didn't have a role in
8 transition.

9 Q Fair enough. You were serving in some sort
10 of informal capacity; is that a fair way to describe
11 it?

12 A Very much so, yes.

13 Q Okay. We briefly touched on that subject,
14 but I don't believe I asked you what you were advising
15 the transition on, generally, what subject matter; can
16 you please tell me?

17 MS. STOUT: Objection; lacks
18 foundation.

19 MR. BOURLAND: Go ahead.

20 THE WITNESS: Yeah, too -- too general
21 to -- to, you know, discuss or detail.

22 //

1 BY MR. BOURLAND:

2 Q Okay. Well, let me be more specific. What
3 was the purpose of your advising the transition on
4 matters related to USAGM?

5 MS. STOUT: Objection; calls for
6 speculation.

7 BY MR. BOURLAND:

8 Q You can answer.

9 A Just focus on correcting some of the
10 longstanding problems at USAGM.

11 Q And what longstanding problems are you
12 referring to?

13 A Contracting abuse, abuse of US immigration
14 and Visa programs. As a professional intelligence
15 officer, a security failure that was one that I had
16 never encountered in all my years in the intelligence
17 community, as -- also during that time, as a security
18 manager and a special security manager. Not only had
19 I never witnessed something as egregious as the
20 longstanding security failure at USAGM, I could never
21 have imagined the level of mismanagement, willful
22 mismanagement, that occurred.

1 I was asked to correct that situation.
2 It -- it is -- it's one of the worst national security
3 failures that -- that I've ever heard of. It
4 persisted over a ten-year period. Through eight
5 investigations, four each, by the Office of the
6 Director of National Intelligence as well as the
7 Office of Personnel Management, ODNI revoked the
8 delegated authority for USAGM to grant security
9 clearances. It was the first time in DNI'S existence
10 that they had ever done that.

11 The Office of Personnel Management,
12 likewise, revoked USAGM's delegated authority to grant
13 suitability determinations. This was based on a
14 number of -- the majority of -- of deficiencies that
15 Agency leadership refused to correct.

16 Among those, using notional or falsified
17 social security numbers on security and fingerprint
18 forms, largely due to the fact that the subjects were
19 foreign nationals brought in on J-1 Visas;
20 fingerprints taken on paper forms and never submitted
21 to the FBI for national agency checks or even
22 preliminary or precursory background investigations;

1 falsified information on -- on other security
2 documents, essentially, giving people who had not been
3 through proper security background investigations and
4 follow-on adjudication processes.

5 I'm -- I'm not wearing my badge right now,
6 but they were printing badges for them and giving them
7 access to federal facilities. Bear in mind that
8 USAGM, every position developed by human resources is
9 security coded at the tier 3 level minimum; tier 3 or
10 tier 5.

11 Tier 3 is the facilities and information
12 systems access level that is commensurate with secret
13 information, spillage or divulgence of which will
14 cause grave damage to US national security. Tier 5 is
15 the equivalent to the top secret. Everybody who was
16 there, out of 4,000-ish employees, 1400 were present
17 at the Agency for years without valid security
18 credentials.

19 Again, not -- if somebody had told me about
20 this in a fictional setting, a book they read or
21 something, I would've told them to put the book down;
22 nothing like that would ever happen. It -- it -- so

1 that's just one thing.

2 Contract abuses; I can go on and on about
3 far violations, contracting abuses, budgetary abuses,
4 lack of oversight and accountability for millions of
5 dollars of high value television and radio production
6 equipment. It's -- it -- it really runs the gamut of
7 how poorly managed that agency was.

8 Q And these were topics that you were advising
9 the transition on? That was my original question, so
10 is what your testimony is?

11 A The -- the general --

12 MS. STOUT: Objection; mischaracterizes
13 the question was asked, which just was, "What are the
14 longstanding problems at the Agency?"

15 MR. BOURLAND: Right --

16 THE WITNESS: In -- in much less detail
17 than I've even outlined for you here.

18 BY MR. BOURLAND:

19 Q Okay. During the time that you were
20 advising the transition, did you advise on the subject
21 of downsizing the Agency?

22 A No.

1 Q All right. You're currently working for
2 USAGM?

3 A Yes.

4 Q And I believe you testified earlier that you
5 started in May 2025; right?

6 A Correct.

7 Q All right. Let's show you what we'll mark
8 as Wuco Exhibit --

9 MR. BOURLAND: We're only at 2; right?
10 I got B.

11 MR. BLUMIN: Yes, although I left the
12 tabs in the other room, I'm realizing.

13 MR. BOURLAND: Let's grab it real
14 quick.

15 MR. BLUMIN: Is it okay? We can stay
16 on the record. I'll be right back.

17 MR. BOURLAND: Yeah, we don't have to
18 go off the record. We'll just take a moment of
19 reflection.

20 Great. Okay. We're going to mark this
21 as Wuco 2.

22 //

1 (Wuco Exhibit 2 was marked for
2 identification.)

3 THE REPORTER: Here you go, sir.

4 THE WITNESS: Thank you.

5 BY MR. BOURLAND:

6 Q All right, Mr. Wuco, you've just been handed
7 a document that we're going to refer to today as Wuco
8 Exhibit 2. Have you seen this document before?

9 A Yes.

10 Q What is it?

11 A A declaration written by me.

12 Q And is that declaration that you wrote
13 for -- to be submitted in this lawsuit?

14 A Yes.

15 Q And on the -- it's a six-page document;
16 right?

17 A Yes.

18 Q And did you digitally sign it there at the
19 end?

20 A Yes.

21 Q And you made this declaration under penalty
22 of perjury; is that correct?

1 A Yes.

2 Q And is the content of this declaration
3 truthful and accurate to the best of your knowledge?

4 A Absolutely.

5 Q Great. All right. So it says here in
6 paragraph 1 of your declaration that you "began
7 serving in the role of senior advisor at USAGM on May
8 19, 2025"; you see that?

9 A I do.

10 Q Is that correct?

11 A Yes.

12 Q Did you serve in any other roles at USAGM
13 prior to that date, during this second Trump
14 administration?

15 A No.

16 Q Since May 19, 2025, have you held any other
17 titles at USAGM?

18 A No.

19 Q So sitting here today, you're still in that
20 role as senior advisor; is that accurate?

21 A Correct.

22 Q Okay. Who appointed you to that position?

1 MS. STOUT: Object to form; lacks
2 foundation.

3 BY MR. BOURLAND:

4 Q If you know.

5 A I was invited to join the Agency by Ms.
6 Lake.

7 Q That's Kari Lake?

8 A Correct.

9 Q Okay. And at the time that she invited you
10 to join the Agency, do you know what her title was?

11 A Yes.

12 Q What was that at that time?

13 A Senior advisor.

14 Q Do you know if Ms. Lake still has that
15 title?

16 A Yes, I know.

17 Q Okay. What's the answer?

18 A That's not her title anymore.

19 Q What is it now?

20 A Acting Chief Executive Officer.

21 Q Has she held any other titles since you
22 joined USAGM?

1 A Yes.

2 Q Which?

3 A Acting Deputy Chief Executive Officer.

4 Q When did Ms. Lake ask you to join the
5 Agency?

6 A Early May.

7 Q So sometime in the weeks before you started;
8 is that accurate?

9 A Yes.

10 Q Between the time when you were advising the
11 Agency in some sort of informal capacity in November
12 of last year and your appointment to this role in May
13 2025, did you ever advise anyone at the Agency
14 including Ms. Lake on an informal basis?

15 A No.

16 Q Did you ever have any conversations with Ms.
17 Lake about USAGM at any point in 2025 before she
18 approached you to rejoin the Agency?

19 A No.

20 Q Same question, but for anyone else --

21 A Let me -- let me correct that.

22 Q Please.

1 A Sorry.

2 Q Yes.

3 A There was a brief conversation on the
4 security situation that was a, kind of, a fact
5 finding, you know, five-minute discussion on -- on
6 security.

7 Q And when you're referring to a security
8 situation, you mean the personnel and, sort of,
9 background check issues that you described earlier?

10 A What I just detailed --

11 Q Let me finish my question, just for the
12 record. You're referring to the security and
13 personnel background check issues that you had
14 described earlier today; is that right?

15 MS. STOUT: Object to form;
16 mischaracterizes the testimony.

17 You can answer.

18 THE WITNESS: Yes.

19 BY MR. BOURLAND:

20 Q Did there come a time in twenty -- the
21 conversation you just described, the brief one about
22 personnel security issues, when did that take place?

1 A I don't recall.

2 Q Was it this year?

3 A I don't recall.

4 Q But sometime after Ms. Lake joined USAGM; is
5 that right?

6 MS. STOUT: Objection; asked and
7 answered.

8 BY MR. BOURLAND:

9 Q If you know.

10 A Yes.

11 Q Did there come a time earlier this year
12 before you rejoined the Agency that VOA stopped most
13 of its broadcasting; are you aware of that happening?

14 MS. STOUT: Object to form, lacks
15 foundation.

16 THE WITNESS: I -- I have no knowledge
17 of events before I arrived.

18 BY MR. BOURLAND:

19 Q Before you arrived at -- were you following
20 developments at the USAGM in the press at all?

21 A Yes.

22 Q And had you read anything in the press about

1 changes in VOA's broadcasting in March?

2 A That, yes, in the press. Yeah.

3 Q So you did have some knowledge about what
4 was happening at USAGM before you joined; is that
5 fair?

6 A But I wasn't involved in any of those
7 actions.

8 Q Let's talk about your role as a senior
9 advisor at the Agency now. I understand that position
10 can mean a lot of different things so let's start high
11 level. What do you do as senior advisor?

12 A Very much what I did when I was at the
13 Agency during the first Trump administration.

14 Q And again, I -- I don't want to misstate
15 anything, so correct me if I'm wrong; okay? But just
16 based on what I heard your -- you testify about
17 earlier, is it fair to summarize that as a, sort of,
18 liaison between the top leadership at the Agency and
19 department heads? Again, I'm using, sort of, informal
20 talk here, but --

21 A Maybe you can rephrase that.

22 Q Sure. Well, here. You told me what you did

1 before; why don't you tell me what you're doing now
2 and describe it for me first, and then I'll follow up.

3 A Day-to-day management of the -- the primary
4 administrative and -- and managerial and operational
5 functions of the Agency.

6 Q And who reports to you?

7 MS. STOUT: Objection; lack of
8 foundation.

9 BY MR. BOURLAND:

10 Q Let me take a step back. Does anyone report
11 to you at the Agency?

12 A Yes.

13 Q Who?

14 A The Director of the Office of Management
15 Services, the acting director, the Director of the
16 Technology Services Division, the CIO. And those
17 are -- those are people who directly report to me
18 and/or, you know, coordinate their -- their activities
19 with me.

20 Q Would it be fair to describe those
21 departments generally as the administrative side of
22 the Agency?

1 A The management and operations side; not
2 necessarily just administrative. I also -- I would
3 add to that the directors, the -- the programming
4 manager of VOA and the director, acting director of
5 the Office of Cuba Broadcasting.

6 Q They also report to you?

7 A For resource -- resource management issues.

8 Q What are resource management issues?

9 A Material items required for broadcasting.

10 Q Does that include personnel?

11 A Yes.

12 Q So if VOA needs more staff for broadcasting,
13 they talk to you?

14 MS. STOUT: Objection; lack of
15 foundation.

16 THE WITNESS: Yes.

17 BY MR. BOURLAND:

18 Q And if -- strike that.

19 And what role do you play in those resource
20 management decisions with respect to personnel?

21 MS. STOUT: Object to form, lack of
22 foundation.

1 THE WITNESS: Delegation to and
2 coordination with the managers within the organization
3 who affect those actions.

4 BY MR. BOURLAND:

5 Q What does that mean? Can you provide an
6 example?

7 A What does --

8 Q What you just described?

9 A -- what specifically mean?

10 Q So I don't understand what that means. If
11 you could explain to me an example of that happening
12 at the Agency; your last answer?

13 A If personnel actions are required, such as
14 a -- a PSC hire, those are brought to me. And then I
15 will direct action down to the appropriate elements
16 within the staff.

17 Q And just for the record, when you're
18 referring to PSC, what are you referring to?

19 A Personal services contractors.

20 Q So that's outside contractors; not full-time
21 employees. Is that accurate?

22 MS. STOUT: Object to form, lacks

1 foundation.

2 THE WITNESS: That's what PSCs are,
3 yes.

4 BY MR. BOURLAND:

5 Q So you're involved in the process of
6 sourcing or hiring PSCs if they're needed for
7 broadcasting; is that accurate?

8 MS. STOUT: Object to form, lacks
9 foundation?

10 THE WITNESS: No, it's not accurate.

11 BY MR. BOURLAND:

12 Q Okay. How is that not accurate?

13 A I'm not involved in the process, other than
14 to direct our -- our appropriate Agency elements to
15 fulfill the resources required by our broadcasters.

16 Q So your role is --

17 A I'm -- I'm not the person who does it.

18 Q Okay. So your role is to approve or
19 disapprove those requests; is that accurate?

20 MS. STOUT: Object to form, lacks
21 foundation, mischaracterizes the testimony.

22 //

1 BY MR. BOURLAND:

2 Q You can answer.

3 A Repeat the question, please?

4 Q Sure. Is your role to approve or disapprove
5 requests for additional PSCs, for example?

6 MS. STOUT: Same objection.

7 THE WITNESS: Yes, with the caveat that
8 I've not disapproved any requests made.

9 BY MR. BOURLAND:

10 Q Okay. Do you have any involvement in
11 personnel decisions with respect to full-time
12 employees?

13 A Yes.

14 Q Describe that for me.

15 A Describe what part of it?

16 Q Your involvement.

17 A Okay. Similar to directing action to bring
18 PSCs on board, commensurate with requirements to
19 broadcast, I may direct that full-time employees, for
20 instance, who are on admin leave be brought back to
21 active status.

22 Q And those employees include journalists?

1 A Yes.

2 Q They also include what I would call
3 technical staff, so broadcast technicians, for
4 example?

5 MS. STOUT: Object to form, lacks
6 foundation, and vague.

7 BY MR. BOURLAND:

8 Q You can answer.

9 A Yes.

10 Q When you -- and you have to remind me so I
11 get this right. When you said someone who's in charge
12 of VOA programming reports to you, can you remind me
13 who that title -- the person's title was again?

14 A Repeat the question again?

15 Q Sure. You testified earlier that someone
16 who was in charge of VOA programming reports to you.
17 I believe that's what you had testified. Of course,
18 correct me if I'm wrong. Can you remind me what that
19 title was again, the person who reports to you?

20 A Programming director.

21 Q Okay. And who is that?

22 A Ms. Leili Soltani.

1 Q So Ms. Soltani reports to you; correct?

2 A Well, she is a direct report to Ms. Lake,
3 but via me via delegated responsibilities.

4 Q And when you say via delegated
5 responsibilities, you mean responsibilities delegated
6 from Lake to you; is that right?

7 MS. STOUT: Object to form, lacks
8 foundation.

9 THE WITNESS: Responsibilities that
10 would be part of the normal portfolio of day-to-day
11 operations.

12 BY MR. BOURLAND:

13 Q Okay. Ms. Lake is acting deputy CEO; right?
14 Strike that.

15 Is acting CEO; correct?

16 A Correct.

17 Q Okay. And when you say that you have
18 delegated responsibilities, do you mean
19 responsibilities that were delegated from her as
20 acting CEO to you?

21 A No, just more along the lines of assigned
22 responsibilities.

1 Q Okay. Well, just to be really clear then,
2 when you're referring to assigned responsibilities, do
3 you mean responsibilities assigned to you from Ms.
4 Lake as acting CEO?

5 MS. STOUT: Object to form, lacks
6 foundation.

7 BY MR. BOURLAND:

8 Q You can answer.

9 A As -- as would be the case in any
10 organization.

11 Q Is that yes, the answer, yes?

12 A Yes.

13 Q Okay. Does anyone else report to you other
14 than the titles that you listed before? Just want to
15 make sure I'm not missing anyone. I don't think
16 there's anyone missing.

17 A I think I've covered them all.

18 Q Okay. Beyond interfacing with Ms. Soltani
19 regarding resource issues or whatever the phrasing was
20 you had used -- I'm paraphrasing -- do you -- does Ms.
21 Soltani report to you regarding any other subject
22 matter?

1 A Nothing outside of the -- the conduct of
2 broadcast operations.

3 Q And just so I understand what you mean by
4 that, when you say conduct broadcasting operations,
5 what are you referring to generally?

6 A Just the -- the holistic requirements of --
7 of putting content on the air and broadcasting.

8 Q What does that mean, other than the
9 resources side, if anything?

10 A What does -- what does what mean?

11 Q This holistic putting content on the air,
12 what you just referred to. I'm trying to understand
13 how you're involved, other than resources, if at all.

14 A Not at all, other than -- other than making
15 sure they have the people they need, making sure they
16 have the technical resources and capabilities
17 required. That's -- that's my -- that's my function.

18 Q What about the content that they're
19 broadcasting; does she report to you regarding that?

20 MS. STOUT: Object to form, lacks
21 foundation, and vague.

22 THE WITNESS: No.

1 BY MR. BOURLAND:

2 Q Turning back to your declaration that is
3 Wuco Exhibit 2, which I believe you still have in
4 front of you, who wrote this declaration?

5 A I did.

6 Q Did you write it by yourself?

7 A No.

8 Q Who else wrote any of it, if anyone?

9 A The -- they're --

10 MS. STOUT: Objection.

11 THE WITNESS: Yep.

12 MS. STOUT: To the extent any of your
13 answer calls for or relies on any communications that
14 you had with attorneys or any advice that you received
15 by attorneys, whether within the Agency or in the
16 Department of Justice, I would instruct you not to
17 answer. But to the extent it doesn't implicate these
18 conversations, you may answer.

19 THE WITNESS: I consulted with our
20 technical experts for some of -- for the technical
21 content, whether it was technology, actual technology,
22 or whether it were -- was, sort of, resources required

1 for content development and -- and programming.

2 BY MR. BOURLAND:

3 Q You just finished with "and programming"; is
4 that someone else you consulted with separate from the
5 technical folks?

6 A No -- no. They -- they're two -- I'm a firm
7 believer in chain of command. So there are two
8 individuals within, for instance, VOA that I would
9 consult with for that type of information. And -- and
10 it's Ms. Soltani and our -- the -- the technical
11 manager as well.

12 Q Do you know whether Ms. Lake reviewed your
13 declaration before it was submitted?

14 A Yes.

15 Q Did she?

16 A Yes.

17 Q Did you speak with her about it?

18 A Nothing other than a technical review, as --
19 as part of normal front office procedure, executive
20 secretarial-type procedures. Generally, anything that
21 leaves the Agency is -- is reviewed by a team for --
22 it could be anything from grammar to technical

1 content.

2 Q Did she give you any -- beyond grammar or
3 technical feedback like that, did she give you any
4 notes or edits or comments?

5 A No.

6 Q And again, not asking about legal counsel;
7 did anyone else review this declaration before it was
8 filed?

9 A Again, please?

10 Q Sure. Setting aside legal counsel, did
11 anyone else review this declaration before it was
12 filed and after you wrote it?

13 A In part, yes.

14 Q And who was that?

15 A Same individual as I discussed before.

16 Q So that's technical folks who were below you
17 in the, sort of, chain of command and Ms. Lake; is
18 that right?

19 MS. STOUT: Objection; mischaracterizes
20 the testimony.

21 BY MR. BOURLAND:

22 Q I'm asking if that's right.

1 A No, that's not right.

2 Q Okay.

3 A What you said is not right.

4 Q Tell me what is right; okay?

5 A Yeah. For the review I'm talking about, it
6 would've been the two individuals I named before, one
7 of whom is Ms. Soltani and the other is our -- our
8 technical chief for these items, Mr. Jeff Reber.

9 Q So Ms. Soltani also reviewed this
10 declaration before it was filed; is that what you just
11 said?

12 A For accuracy, yes.

13 Q Was she one of the staff who provided
14 certain facts that were reflected in this deposition?

15 A Yes.

16 Q Declaration, excuse me.

17 A Yes.

18 Q Generally speaking, what was your goal in
19 writing this declaration? What were you trying to
20 communicate?

21 A That the Agency -- that we maintained the
22 ability to broadcast to the extent of the minimum

1 statutory requirements.

2 Q And you are familiar with VOA's current
3 broadcasting activities generally; right?

4 MS. STOUT: Object to form, lacks
5 foundation.

6 THE WITNESS: Yes.

7 BY MR. BOURLAND:

8 Q Turning back --

9 A Generally, which is the term you used. Yep.
10 Thank you.

11 Q Thank you. Turning back to your declaration
12 that's Exhibit 2, in paragraph 2 -- I'll just read
13 from it quickly. You said, "In that capacity" -- and
14 you're referring to your current role, "I have
15 personal knowledge of and direct involvement in the
16 current operations of the Voice of America." That's
17 what it says here; right?

18 A Yes.

19 Q And that's accurate?

20 A Yes.

21 Q And when you said you had that personal
22 knowledge and you were directly involved in current

1 operations of VOA, did that include broadcasting
2 activities?

3 A Yes.

4 Q Let's talk about some of those broadcasting
5 activities. Does VOA have a Persian language service?

6 A Yes.

7 Q What is your understanding of what the
8 Persian language service is?

9 A To broadcast to Farsi-speaking audiences in
10 Iran, content that is within the -- the VOA charter.

11 Q And you discussed Persian language service
12 broadcasting in your declaration; right?

13 A Repeat the question, please.

14 Q You discussed Persian language service
15 broadcasting in your declaration; is that right?

16 MS. STOUT: Object to form, lacks
17 foundation.

18 THE WITNESS: Yes.

19 BY MR. BOURLAND:

20 Q Let's grab tab G. All right, Mr. Wuco,
21 you've just been handed a document that we're marking
22 as Wuco Exhibit 3.

1 (Wuco Exhibit 3 was marked for
2 identification.)

3 Have you seen this document before?

4 A Yeah.

5 Q And take a second to review it before you
6 answer that question, of course.

7 A Yes, I'm familiar with this document.

8 Q What is it?

9 A It is Ms. Lake's declaration.

10 Q And this is a declaration that was also,
11 like yours, submitted in this lawsuit; right?

12 A Yes.

13 Q And this one is dated August 13, 2025; is
14 that correct?

15 A Yes.

16 Q Have you reviewed this document before
17 today?

18 A Yes.

19 Q When was that?

20 A While it was being drafted.

21 Q Okay. So before it was filed; right?

22 A Correct.

1 Q You said you reviewed it -- while it was
2 being drafted. Did you participate in the drafting
3 process?

4 A Much as was the case with my declaration,
5 yeah.

6 Q So explain that for me in the context of
7 this particular declaration; how did you participate
8 exactly?

9 A Providing technical, accurate content.

10 Q So you provided that to Ms. Lake?

11 A Correct.

12 Q Did you review this declaration for accuracy
13 before it was finalized and filed?

14 A Yes.

15 Q Did you make any suggestions or edits to it?

16 A I don't recall specifically.

17 Q Well, without talking about specific edits,
18 did you?

19 A I provided some technical content if --
20 you -- you may consider those edits, I suppose.

21 Q Okay. And this declaration was made under
22 oath, under penalty of perjury just like yours; right?

1 MS. STOUT: Objection; lack of
2 foundation.

3 THE WITNESS: It's not my declaration.
4 BY MR. BOURLAND:

5 Q It says that on the last page; right?

6 A It does, yes.

7 Q Okay. Just like yours did. That's what I
8 meant; yes?

9 A Yes.

10 Q Okay. And it's signed by Ms. Lake there at
11 the end?

12 A Yes.

13 Q All right. Let's turn to paragraph 13 of
14 Ms. Lake's August 13th declaration. That's on page 5.
15 Do you see that paragraph, No. 13?

16 A I do.

17 Q Okay. It starts with the words, "The number
18 of current VOA full-time employees." I'm not going to
19 read that whole thing out loud, but I would like, if
20 you could take a moment to review, read to yourself
21 paragraph 13. That includes all of the subparts here,
22 A through AA, and continues on to page 6. And just

1 let me know when you're done, and then I'll ask you
2 some questions; okay?

3 A Okay.

4 Q So you just had a chance to review the
5 content of paragraph 13 of Ms. Lake's August 13th
6 declaration; yes?

7 A Yes.

8 Q And that contains a list of current
9 full-time employees working at Voice of America as of
10 the date of this declaration; correct?

11 A Correct.

12 Q And to your knowledge, is this list as it
13 was presented in this declaration accurate?

14 A Yes.

15 Q Was this list that we just read here, was
16 that some of the information that you provided or
17 helped with in making this declaration?

18 A No, this was HR information.

19 Q Did that come through you?

20 A It passed through me in review.

21 Q So you had a chance to review the same
22 information during the declaration drafting process;

1 is that fair?

2 A For accuracy, yes.

3 Q Okay. And if you turn to page 6 of this
4 document, again, there's a list under paragraph 13 of
5 different departments, divisions within VOA; right?

6 MS. STOUT: Objection; mischaracterizes
7 the document.

8 BY MR. BOURLAND:

9 Q You can answer.

10 A Repeat the question, please?

11 Q Sure. Under paragraph 13, there's a
12 lettered list starts with A and it ends with AA, and
13 that's a list of all these different -- I'm going to
14 say offices within VOA; is that accurate?

15 MS. STOUT: Objection; mischaracterizes
16 the document and lacks foundation.

17 THE WITNESS: It's -- it's an accurate
18 list of -- of language services and offices, yes.

19 BY MR. BOURLAND:

20 Q Okay. And if you go to letters U, lowercase
21 U and lowercase V on page 6 --

22 A Uh-huh.

1 Q What do those pertain to; what language
2 service or office at VOA?

3 MS. STOUT: Object to form, lacks
4 foundation.

5 THE WITNESS: By service -- and you
6 know, it's Persian News Network --

7 BY MR. BOURLAND:

8 Q So this is --

9 A -- Persian language service.

10 Q Thank you. These are part of the Persian
11 language services that are broadcast at VOA; is that
12 right?

13 A That and central news and production; not
14 exclusive to Persian.

15 Q And that's because some of the employees
16 under Persian News Network are also simultaneously
17 working for central news and production; is that
18 accurate?

19 MS. STOUT: Object to form, lacks
20 foundation.

21 THE WITNESS: As with other language
22 service personnel.

1 BY MR. BOURLAND:

2 Q So is the answer yes?

3 A Yes.

4 Q So between U, letter U and letter V here, is
5 it correct that there are 27 employees currently
6 working on the Persian language service as full-time
7 employees at VOA?

8 MS. STOUT: Object to form, lacks
9 foundation, and vague as to current?

10 MR. BOURLAND: That's a good point,
11 actually. Let me rephrase that question.

12 BY MR. BOURLAND:

13 Q As of August 13, 2025; that same question.
14 I can rephrase it or restate it if you'd like, but I
15 think you understand.

16 A Those numbers are accurate as of that date.

17 Q Okay. So as of that date, there were 27
18 full-time employees working in the Persian language
19 service; is that correct?

20 MS. STOUT: Object to form, lack of
21 foundation.

22 THE WITNESS: Persian language service

1 personnel, but working towards the -- the efforts
2 of -- or in the effort of central news production.

3 BY MR. BOURLAND:

4 Q That's the 21 employees under V as in
5 Victor; is that right?

6 A I don't know if it's all 21. I don't -- I
7 don't manage the newsroom.

8 Q Okay. I understand. And what about in
9 letter U there that only lists Persian News Network.
10 Do you know whether those six employees are also
11 working in central news and production?

12 A I don't know.

13 Q And this list also states that as of the
14 date of this declaration, if we look at letter AA at
15 the end of the list, that there was one employee
16 working in the Kurdish Service; is that correct?

17 MS. STOUT: Object to form,
18 mischaracterizes the document.

19 THE WITNESS: A Kurdish serviceperson
20 working with Persian for production purposes.

21 BY MR. BOURLAND:

22 Q On a detail?

1 A Correct.

2 Q Okay. Do you know how many journalists are
3 currently working in the Persian News Network?

4 A No.

5 Q Do you know any journalists are currently
6 working in the Persian language service generally?

7 A No, not exactly.

8 Q Who would you expect to know that, if
9 anyone?

10 A The programming director.

11 Q That's Ms. Soltani?

12 A Correct. As well as HR, who manages them,
13 you know, the positions from a personnel standpoint.

14 Q Does that person report to you?

15 A No.

16 Q Who do they report to?

17 A The Director of Management Services, acting.

18 Q Does that person report to you?

19 A Yes.

20 Q Has the number of full-time employees within
21 the Persian language service fluctuated or changed at
22 all since you've joined the Agency in May?

1 MS. STOUT: Object to form, lack of
2 foundation.

3 THE WITNESS: Repeat the question,
4 please?

5 BY MR. BOURLAND:

6 Q Sure. Has the number of full-time employees
7 working in the Persian language service changed at all
8 since you joined the Agency in May?

9 MS. STOUT: Same objection.

10 THE WITNESS: No, with the caveat that
11 the number of full-time employees didn't change,
12 although we did pull full-time employees who were on
13 admin leave back into inactive status to perform
14 certain functions. But the actual number of FTEs
15 didn't change.

16 BY MR. BOURLAND:

17 Q Is it fair to say that the number of
18 employees actively working, so not on administrative
19 leave, has changed since you rejoined the Agency in
20 May?

21 A Yes.

22 Q And what you're referring to right now, is

1 that something that you've also referred to as the
2 surge operation in the Persian language broadcasting?

3 MS. STOUT: Object to form, lack of
4 foundation.

5 THE WITNESS: Repeat the question?

6 BY MR. BOURLAND:

7 Q Sure. You just made an important
8 clarification about the difference between full-time
9 employees, the number that exist, and employees who
10 are on admin leave are working at the Agency.

11 A No, they're all full-time employees.

12 Q No, I understand. But I mean in terms of
13 there are employees who are showing up for work every
14 day and there are some who have been on admin leave;
15 right?

16 A Correct.

17 Q Okay. And there came a point when there
18 have been certain employees who have been recalled or
19 brought back in from admin leave to resume their daily
20 duties; is that fair to say?

21 A Yes.

22 Q Okay. Have you referred to that process of

1 bringing people back in from admin leave to work as a
2 surge operation; have you used that term before?

3 MS. STOUT: Object to form; compound.

4 THE WITNESS: Insofar as we mentioned,
5 surge operations for global events, regional events,
6 yes, we have used that term.

7 BY MR. BOURLAND:

8 Q Do you personally have any input in your
9 role as senior advisor into the programming that the
10 Persian service produces?

11 MS. STOUT: Object to form, lack of
12 foundation, and vague as to input.

13 THE WITNESS: Yeah, can you clarify
14 what you mean by input to programming?

15 BY MR. BOURLAND:

16 Q Sure. Do you play any role whatsoever in
17 what content is produced by the Persian Labor Service?

18 A No.

19 Q All right. Let's talk about this surge
20 operation concept generally, and I'll focus on the
21 Persian service specifically. So I'd like to focus
22 your attention -- we'll talk about some recent events

1 that happened in Iran and VOA's response to the same.
2 Are you aware that there was a Israeli bombing
3 campaign in Iran that started on or about June 13th of
4 this year?

5 MS. STOUT: Object to form, lacks
6 foundation?

7 THE WITNESS: Yes.

8 BY MR. BOURLAND:

9 Q And at that time when that happened, how
10 many, if you know, full-time employees were actively
11 working, so not on admin leave at the Persian language
12 service?

13 A Repeat the question, please?

14 Q Sure. At the time that that bombing
15 campaign started in June, how many full-time employees
16 were working for the Persian language service, not on
17 admin leave, if you know?

18 A I don't know.

19 Q But when that bombing campaign started,
20 there were Persian language full-time employees who
21 were on admin leave at that time; right?

22 MS. STOUT: Object to form, lacks

1 foundation.

2 THE WITNESS: Yes.

3 BY MR. BOURLAND:

4 Q And you ended up recalling some of them,
5 bringing them in for -- to work again?

6 A Whether it was for that event specifically
7 or not, I -- I don't know.

8 Q But sometime after the bombing campaign
9 started, there were Persian language employees who
10 were brought back into work from admin leave; right?

11 A The timings are vague to me.

12 Q Did you participate in that decision to
13 bring those employees back from admin leave?

14 MS. STOUT: Object to form, lacks
15 foundation.

16 THE WITNESS: Insofar as passing
17 tasking to our HR personnel via the director of
18 management services, yes.

19 BY MR. BOURLAND:

20 Q So when you say passing tasking, you mean,
21 sort of, giving the order, if you will, to bring these
22 people back? Is that accurate?

1 MS. STOUT: Object to form, lacks
2 foundation, mischaracterizes the testimony.

3 THE WITNESS: It's -- it's part of
4 resource management.

5 BY MR. BOURLAND:

6 Q So is that a yes?

7 A Yes. I -- I will clarify with that
8 supervisor comes to me with a requirement to fulfill
9 a -- a broadcast function. And I will then direct the
10 director of management services to effect the -- the
11 recall of people from admin leave status. It's an
12 administrative function.

13 Q So you did this into the -- in response to a
14 decision someone else made?

15 MS. STOUT: Objection; lacks foundation
16 and vague.

17 THE WITNESS: No -- no, it's -- no.

18 BY MR. BOURLAND:

19 Q It sounded like something, kind of, came up
20 the chain to you, and that you then ordered for
21 full-time employees to be brought back from admin
22 leave --

1 A It's --

2 Q Let me ask my question first.

3 A Yes -- yes, please. Yeah.

4 Q Who actually made the decision to -- or the
5 request rather, to -- to bring employees back from
6 admin leave?

7 A The programming director makes the request
8 to me, identifies requirements.

9 Q That was Ms. Soltani?

10 A Correct.

11 Q And that was in response to the bombing
12 campaign starting?

13 A I can't recall --

14 MS. STOUT: Object to --

15 Oh, for the record, object to form,
16 lacks foundation, calls for speculation.

17 You may answer.

18 THE WITNESS: There were a number of
19 events taking place over that time period with respect
20 to Iran. I can't recall exactly which of them we --

21 MR. BOURLAND: Okay.

22 THE WITNESS: -- did various responses

1 to.

2 BY MR. BOURLAND:

3 Q Let's go back to your declaration, which
4 is -- I think you have Ms. Lake's in front of you now,
5 but let's grab Wuco Exhibit 2, which is yours, and
6 turn to page 2, paragraph 3. And I'll just read from
7 it:

8 "Together, with all other statutorily
9 required operations, we have retained the output of
10 our Persian language service at the commencement of
11 Israeli air operations against Iranian targets on June
12 13, 2025, has highlighted VOA's ability to respond and
13 surge in a timely and even predictive fashion."

14 Did I read that accurately?

15 A Yes.

16 Q Okay. And that's correct, what you wrote
17 there?

18 A Yes.

19 Q So here, you're talking about VOA's ability
20 to respond and surge in a timely fashion. What did
21 you mean? What events was VOA responding and surging
22 to, as you put it here?

1 A As put there, the event identified.

2 Q Which one is that?

3 A The Israeli air operations.

4 Q Okay. So what did you mean by "surge"?

5 A I tend to want to use the -- the dictionary
6 definition of the word surge, but to me it -- it's
7 a -- a ramp up of personnel required to meet a
8 requirement, an objective.

9 Q And here specifically, ramping up meant
10 bringing people back from admin leave; is that
11 accurate?

12 A Correct.

13 Q And you said that the surge happened in a
14 timely and even predictive fashion. When you say
15 "timely," what did you mean by "timely"? How long did
16 that take?

17 A I don't recall exactly, but it was within
18 this and other events; we've surged personnel within
19 the day.

20 Q And then next paragraph, paragraph 4, again,
21 turning to Exhibit 2, your declaration, you said, "And
22 in less than 24 hours, we began television coverage."

1 Do you see that there?

2 A I do.

3 Q Is that accurate?

4 A Yes.

5 Q Do you know how long it took to get
6 television coverage up and running?

7 MS. STOUT: Object to form; lacks
8 foundation.

9 THE WITNESS: Not exactly.

10 BY MR. BOURLAND:

11 Q Sometime less than 24 hours?

12 A Yes.

13 Q Was television coverage -- television
14 broadcasting -- let me clean that up.

15 Was the Persian language service VOA
16 broadcasting in Persian on television before this
17 surge operation?

18 A I don't know.

19 Q Going back to paragraph 3, you said that
20 this, what we've been referring to as the surge
21 operation, highlighted VOA's ability to respond, and
22 then, "even predictive fashion." What did you mean by

1 that?

2 A That we had, in contingency, discussed
3 the -- the need to surge or flux numbers of personnel
4 and resources based on events on the ground in any
5 scenario within the language services.

6 Q And, sort of, zooming out to what you're
7 talking about right now, not specific to Persian, or
8 Iran, or this bombing. This, sort of, predictive
9 discussion that you had had that you were just talking
10 about, was the plan to be able to surge in response to
11 global events using -- by calling people back from
12 admin leave?

13 MS. STOUT: Object to --

14 BY MR. BOURLAND:

15 Q Is that what you're talking about?

16 MS. STOUT: Object to form, lacks
17 foundation.

18 THE WITNESS: In part, yes.

19 BY MR. BOURLAND:

20 Q And what was the other part?

21 A Personal Services Contractors.

22 Q Did -- so VOA did in fact bring employees

1 back from admin leave to surge the coverage of what
2 was happening in Iran; right?

3 A Repeat the question?

4 Q Sure. Voice of America did in fact -- or I
5 guess, USAGM did in fact bring back employees from
6 admin leave to surge the coverage of what was
7 happening in Iran; is that right?

8 A Yes.

9 Q Did you bring in any new PSCs to help in
10 that goal?

11 MS. STOUT: Objection; lacks
12 foundation.

13 THE WITNESS: For this particular
14 instance, I -- I don't recall. I don't know.

15 BY MR. BOURLAND:

16 Q But you didn't really need PSCs though,
17 because you had employees on admin leave; right?

18 MS. STOUT: Object to form, lacks
19 foundation.

20 BY MR. BOURLAND:

21 Q You can answer.

22 A Yeah, that's not what I said.

1 Q No, I'm asking you. I'm not asking if
2 you --

3 A Can you repeat the question then?

4 Q Sure. Did you need PSCs considering you had
5 people on admin leave who were experienced in that
6 role?

7 A As of the writing of this document, I can't
8 recall what the requirements were for PSCs versus FTE.

9 Q What about now?

10 MS. STOUT: Object to form; vague.

11 THE WITNESS: Yeah. Now, today or --
12 or --

13 MR. BOURLAND: Sure.

14 THE WITNESS: There have been
15 requirements for PSCs. As of today, that -- that
16 requirement could emerge where more are needed. So
17 it's -- it's a steady, pretty steady readiness
18 requirement to have the authority, which we do, to --
19 to bring PSCs on board to accomplish the mission.

20 BY MR. BOURLAND:

21 Q But here in paragraph 4, you described this
22 surge operation. And let me quote from what you said,

1 and I'll ask you some questions. You said:

2 "This was a response and surge operation
3 that was highly successful because we maintained
4 access to critical talent." Did I read that
5 correctly?

6 A Yes.

7 Q And that's true; right? What you said
8 there; that's accurate?

9 A Yes.

10 Q What did you mean in this specific context
11 here of the Persian broadcast surge operation when you
12 said you "maintained access to critical talent"?

13 A That in order to meet the requirements that
14 were -- were set forth based on real world events,
15 that we had access to the personnel necessary to
16 successfully perform that task.

17 Q And specifically, when you say, "access to
18 personnel," you're referring to the experienced full-
19 time employees who were on administrative leave at
20 that point; right?

21 MS. STOUT: Object to form,
22 mischaracterizes the testimony.

1 THE WITNESS: I -- I can't recall for
2 this particular incident, you know, again, FTE versus
3 PSC.

4 BY MR. BOURLAND:

5 Q Well, there were FTEs that were recalled.
6 You said that earlier; right?

7 A Correct.

8 Q Okay. Were those included in the critical
9 talent you were referring to here?

10 A Absolutely.

11 Q VOA relied on those experienced full-time
12 employees to meet the real-world needs of what was
13 happening in Iran with broadcasting; right?

14 MS. STOUT: Object to form, lacks
15 foundation.

16 BY MR. BOURLAND:

17 Q Go ahead.

18 A Yes.

19 Q Based on your experience working for the
20 Agency, do you believe you could have done this surge
21 operation in less than 24 hours without those
22 full-time employees on admin leave?

1 MS. STOUT: Object to form, lacks
2 foundation.

3 THE WITNESS: Yeah, I -- I'm not
4 understanding your question.

5 BY MR. BOURLAND:

6 Q I'm just asking for your opinion based on
7 your experience.

8 A Repeat the question, please?

9 Q Sure. Based on your experience helping run
10 this agency, is it your opinion that you could have
11 responded and surged in a timely and even predictive
12 fashion to what was happening in Iran without
13 maintaining access to these full-time employees who
14 were on admin leave?

15 MS. STOUT: Object to form, lacks
16 foundation.

17 THE WITNESS: It's -- it -- it -- it's
18 a hypothetical that I don't care to --

19 BY MR. BOURLAND:

20 Q You have to answer it though.

21 A It's a hypothetical question; that's my
22 answer.

1 Q Okay. But I'm asking for your opinion, and
2 you can provide that.

3 A Repeat the question, please?

4 Q Sure. And again, I'm just asking for your
5 opinion. I understand that it could be described as
6 hypothetical. But based on your experience in
7 management at this agency, is it your contention that
8 VOA could have -- and this is in your words --
9 responded and surged in a timely and even predictive
10 fashion to what happened in Iran in June 2025 without
11 access to the full-time employees who were on admin
12 leave?

13 MS. STOUT: Object to form, calls for
14 speculation, and lacks foundation.

15 BY MR. BOURLAND:

16 Q You can answer.

17 A It's -- it certainly requires me to
18 speculate. I don't know insofar as the surge could
19 have been perhaps met with PSC support. But I, you
20 know, I -- I will say that having access to FTEs on
21 admin leave was a -- a critical element of -- of the
22 success.

1 Q And in part because these were people who
2 were -- these employees who were on admin leave were
3 highly experienced in Persian broadcasting; right?

4 MS. STOUT: Object to form, lacks
5 foundation, calls for speculation.

6 THE WITNESS: I don't know how
7 experienced they were to the person, except for that
8 they, you know, in -- in whole, as a group, they were,
9 you know, they -- they formed a team that was highly
10 successful.

11 BY MR. BOURLAND:

12 Q And the FTEs that the -- let me use the full
13 term. The full-time employees who were brought back
14 during the surge operation, did that include
15 journalists?

16 MS. STOUT: Object to form, lacks
17 foundation.

18 THE WITNESS: Yeah, I don't know
19 exactly if there was a mix of journalists and
20 technical personnel.

21 BY MR. BOURLAND:

22 Q Are you saying you don't know if there was a

1 mix or that there was a mix? I just didn't understand
2 your testimony.

3 A Again, I -- I don't want to conflate events,
4 because we had this, we had the US airstrikes. Again,
5 we had strikes in -- in Yemen against Houthi and
6 Iranian targets, things of this nature. I -- I -- in
7 my memory, I can't recall which one of those required
8 a particular mix of journalist and technical support.

9 Q Okay, fair enough. And I definitely want to
10 be clear and not conflate those things. So describing
11 all of those events that you just did as surge
12 operations, generally, were there journalists in any
13 of those events who were called back from admin leave?

14 A My -- my assumption is yes.

15 Q But you don't know for sure?

16 A No. It was -- it was a mix of -- of various
17 programming personnel. That's -- that's the best I
18 can -- I can offer.

19 Q Why did you provide these details about the
20 surge operation in June 2025 in your declaration

21 A To --

22 MS. STOUT: I'll object to --

1 THE WITNESS: Yeah.

2 MS. STOUT: -- the extent that any
3 inclusion or any discussion implicates attorney-client
4 privilege or conversations that you had with your
5 attorneys inside the Agency or Department of Justice,
6 and instruct you not to answer. But if you have an
7 independent understanding or opinion of why you
8 included these things separate and apart from those
9 conversations, you can answer.

10 THE WITNESS: Okay.

11 BY MR. BOURLAND

12 Q And let me actually rephrase the question
13 and try to get around that, because I don't want to
14 trigger any of those types of answers. So I'm not
15 asking you about anything a lawyer told you to
16 include, for example; okay? At the end of the day,
17 you approved and signed off on this declaration;
18 right?

19 A I did.

20 Q You decided what was in here at the end of
21 the day; right?

22 A I decided that what was in here was accurate

1 and answered the questions of the Court.

2 Q Okay. And why did you decide -- again, not
3 asking about anything your lawyers told you -- to
4 include this bit here about the surge operation?

5 MS. STOUT: And I'll object to the same
6 for the record to the extent the inclusion included
7 conversations that you had with your attorneys. I
8 would instruct you not to answer to that extent.

9 THE WITNESS: Okay. Then abiding by
10 that, to demonstrate operational capability as driven
11 by events on the ground, factually.

12 BY MR. BOURLAND:

13 Q Is it fair to say your goal was to show the
14 Court that VOA with its current staffing levels could
15 ramp up staffing as needed to meet need?

16 MS. STOUT: Object to form,
17 mischaracterizes the testimony.

18 THE WITNESS: Yeah, the -- the goal was
19 to answer the Court's questions.

20 BY MR. BOURLAND:

21 Q Before this particular surge operation that
22 you talked about in your declaration that you just

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1 testified about in response to the start of the
2 Israeli bombing campaign in Iran, do you know what
3 Persian broadcasting activity was happening before
4 that, immediately before that started?

5 MS. STOUT: Object to form, lacks
6 foundation.

7 THE WITNESS: Yeah, generally.

8 BY MR. BOURLAND:

9 Q Tell me what you know generally about that.

10 MS. STOUT: And I don't want to
11 interrupt a pending question, but we have been going
12 for well over an hour now, so I don't know if there's
13 a place to wrap up this module about the Iran --

14 MR. BOURLAND: Yeah, let me just --
15 sure.

16 Okay. I'll just a couple more
17 questions and we can take a break.

18 Could you read back what the last
19 question and answer?

20 THE REPORTER: Yes, stand by one
21 moment.

22 MR. BOURLAND: Thank you.

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1 (The reporter repeated the record as
2 requested.)

3 MR. BOURLAND: Okay. And I think you
4 were answering generally, yes, that you knew what it
5 was, so maybe we can go off from there.

6 THE REPORTER: I -- okay. One moment
7 then.

8 MR. BOURLAND: Sure, but I don't want
9 to answer for you.

10 BY MR. BOURLAND:

11 Q So I had asked you if you had knowledge of
12 Persian broadcasting generally before the surge
13 operation started in that time immediately before, and
14 I believe you were about to answer that question, or
15 just had. Let's go from there.

16 A Yes.

17 Q Okay. Describe that for me; generally, what
18 type of broadcasting activities were happening at that
19 time immediately before the surge?

20 A My recollection at the time that it was
21 largely digital content and -- and content on various
22 social media platforms for which VOA has accounts.

1 Q Was the Persian service broadcasting TV
2 prior to the surge, immediately before?

3 MS. STOUT: Objection; asked and
4 answered.

5 BY MR. BOURLAND:

6 Q You can answer.

7 A Forgive me while I -- I read this. I'm
8 trying to recall, and it's -- a lot has happened
9 between when I arrived and now.

10 Q Sure. Is there anything in your declaration
11 that would reflect your -- refresh your memory on that
12 particular topic?

13 A I'm -- I'm looking -- I'm looking.

14 Q Okay.

15 A I -- I don't know if TV was being broadcast
16 at that time, but in -- in general terms, we do carry
17 live -- we carry direct-to-home satellite television
18 into Iran.

19 Q Okay. And just so I -- I make sure I have a
20 clear answer on that specific question, and using the
21 phrasing you just did, do you know whether
22 direct-to-home satellite TV was being broadcast into

1 Iran immediately before the surge operation?

2 A Before, no, I don't -- I don't recall.

3 Q Was it being broadcast after the surge?

4 A Yes.

5 Q Okay. And what about -- same question for
6 radio broadcasting. Was there any radio broadcasting
7 from VOA Persian into Iran prior to the surge
8 operation?

9 A I know --

10 MS. STOUT: Object to form, lacks
11 foundation.

12 THE WITNESS: I'm sorry. Yeah --

13 MS. STOUT: You can answer.

14 THE WITNESS: Sorry.

15 No terrestrial radio broadcasts to the
16 best of my knowledge.

17 BY MR. BOURLAND:

18 Q Okay. And what about after the surge
19 happened?

20 A No change.

21 Q Okay. What about today?

22 A No terrestrial radio into Iran, to my

1 knowledge.

2 Q And when you're saying terrestrial radio,
3 are you referring to shortwave?

4 A And medium wave and -- yeah -- yeah.

5 Q So just to summarize all that, as we sit
6 here today, is there any radio broadcasting into Iran,
7 including shortwave, medium wave, or any other format?

8 MS. STOUT: Objection; asked and
9 answered.

10 THE WITNESS: I -- I -- it's a question
11 I just answered, but I'll -- I'll repeat the no -- no
12 terrestrial radio.

13 MR. BOURLAND: Okay. I'd like to wrap
14 up this topic so I just have a few more minutes and
15 then we can take a short break. And we should also
16 talk about lunch.

17 BY MR. BOURLAND:

18 Q But turning back to the surge, you made an
19 important distinction earlier that there was the
20 initial bombing campaign and then there was -- there
21 were some events that happened after, including more
22 Israeli action, the US bombing on Iran. This was a,

1 sort of, prolonged news event; is that a fair way to
2 describe it?

3 A There were a series of -- of breaking news
4 events around this time and shortly after.

5 Q Did the Persian service maintain its
6 coverage throughout those events?

7 MS. STOUT: Object to form, lack of
8 foundation, and vague.

9 THE WITNESS: Yeah. Can you be more
10 specific?

11 BY MR. BOURLAND:

12 Q Sure. Did the Persian service continue
13 broadcasting online throughout the 12-day -- what's
14 been called the 12-day War between Israel and Iran?

15 A Yes.

16 Q Okay. What about on TV?

17 A As far as I know, there was direct -- as far
18 as I know, there was direct-to-home satellite.

19 Q Throughout the duration of that 12-day War?

20 A As far as I know.

21 Q You said in paragraph 4 of your
22 declaration -- and again, this is Wuco Exhibit 2 --

1 that "within hours, detailed coverage of the strikes
2 on VOA's Persian digital platforms was steadily
3 streaming on our websites."

4 That's what you said here; right?

5 A Uh-huh.

6 Q As well as --

7 THE REPORTER: Is that a -- is that a
8 yes?

9 THE WITNESS: Sorry.

10 THE REPORTER: That's okay.

11 THE WITNESS: That's a yes.

12 THE REPORTER: Thank you.

13 MR. BOURLAND: We made it very far
14 about that happening so that's pretty good.

15 THE WITNESS: Wow.

16 BY MR. BOURLAND:

17 Q When you refer to "steadily streaming," what
18 did you mean by that?

19 A There was -- there was continuous streaming
20 content available on -- on our -- our Persian sites,
21 VOA Persian sites, and other social media platforms,
22 you know, which I believe are all listed here;

1 Instagram, X, Facebook, Telegram, YouTube. I think I
2 said YouTube twice, but it was only once.

3 Q Was -- when you said, "steadily streaming,"
4 was that live content?

5 A Some; I know there was looped.

6 Q So some sort of content was streaming
7 steadily, but it doesn't necessarily mean that it was
8 live 24 hours a day; is that accurate?

9 A Correct.

10 Q Do you know how many hours of original
11 content per day were being broadcast throughout this
12 period?

13 A Not at that time, no.

14 Q You said not at that time; what about today
15 in Iran?

16 A I -- I can only guess -- this is a guess, if
17 I may?

18 Q Sure.

19 A If it's advisable that I guess?

20 MS. STOUT: You can answer the question
21 to the best of your ability.

22 //

1 BY MR. BOURLAND:

2 Q Yeah, with that caveat, go ahead.

3 A Yes. Okay. Thank you. I -- I believe it's
4 somewhere around six hours a day of live coverage,
5 give or take. That was a give or take.

6 Q You mentioned earlier that there came a
7 time -- and I can represent to you, that that day was
8 June 21st -- when the United States military bombed
9 nuclear sites in Iran. Do you recall that happening?

10 A Repeat --

11 MS. STOUT: Object to form --

12 THE WITNESS: I'm sorry.

13 MS. STOUT: -- lacks foundation.

14 BY MR. BOURLAND:

15 Q Go ahead.

16 A Repeat the question, please.

17 Q Sure. There came a time when the United
18 States also bombed Iran in June of 2025; yes?

19 A Yes.

20 Q Did the Persian service cover those events?

21 MS. STOUT: Object to form, lack of
22 foundation.

1 THE WITNESS: Yes.

2 BY MR. BOURLAND:

3 Q And that coverage, was that also the result
4 of the surge operation you described in your
5 declaration and that we talked about today?

6 A Yes.

7 MS. STOUT: Object to form --

8 THE WITNESS: Oh, I'm sorry.

9 MS. STOUT: Object to form, lack of
10 foundation.

11 You can answer.

12 THE WITNESS: Yes.

13 BY MR. BOURLAND:

14 Q Was there live coverage of those events?

15 A Of the strikes themselves? There was, you
16 know, live coverage afterwards as events were being,
17 you know, revealed.

18 Q So at the point when the bombing was
19 revealed to the public, was there live coverage at
20 that point? It's an important distinction.

21 MS. STOUT: Object to form, vague as to
22 "reveal to the public," and lack of foundation.

1 BY MR. BOURLAND:

2 Q If you know?

3 A There was live coverage after the strikes,
4 yes.

5 Q Do you know how long after the strikes that
6 live coverage started?

7 A Very shortly after.

8 Q What you mean by --

9 A I don't know exactly how long, but you know,
10 I --

11 Q What'd you mean by "very shortly"?

12 A I -- I can't give you an exact time hack,
13 but certainly within -- within hours, maybe less. I
14 don't know. They were -- they were on -- they were on
15 it quickly.

16 Q And when you say, "they were on it," you're
17 referring to the employees who had been brought back
18 from admin leave who were working at the Persian
19 service with their colleagues?

20 MS. STOUT: Object to form; lacks
21 foundation.

22 THE WITNESS: That's not what I was

1 referring to.

2 BY MR. BOURLAND:

3 Q What were you referring to?

4 A The workforce in general, the news room.

5 Q Did that include the employees who were
6 brought back as part of the surge?

7 MS. STOUT: Object to form; lacks
8 foundation.

9 THE WITNESS: Some.

10 MR. BOURLAND: Let's take a break.

11 THE REPORTER: We are going off the
12 record at 11:40 a.m.

13 THE VIDEOGRAPHER: This marks the end
14 of media unit No. 2. Going -- the record. The time
15 is 11:41 a.m.

16 (Off the record.)

17 THE VIDEOGRAPHER: This marks the
18 beginning of media unit No. 3. Going back on the
19 record. The time is 12:01 p.m.

20 BY MR. BOURLAND:

21 Q All right, Mr. Wuco. We're back on the
22 record after another short break. I do want to turn

1 to some other topics, and before I do, let me just
2 cover one thing from the last thing we were talking
3 about, which was the surge in Persian broadcasting.
4 You remember we were talking about that?

5 A Yes.

6 Q Okay. And correct me if I'm wrong, I
7 believe you had testified that it was Ms. Soltani from
8 the broadcast side who came to you, and was the one
9 who actually asked for specific numbers of employees
10 to call back; is that correct?

11 MS. STOUT: Object to form;
12 mischaracterizes the testimony.

13 BY MR. BOURLAND:

14 Q And correct me if I'm wrong, please.

15 A If -- if you can put that in the context of
16 the testimony --

17 Q Sure.

18 A -- discussed in the -- the objection.

19 Q Okay. Well, let me go back to -- we're
20 talking about the June 13th Israeli air operations
21 against Iran. After that point, that's when the
22 Persian News Service -- language service surged its

1 capacity; is that right?

2 A That was one of the times.

3 Q And was that in response to -- the surging
4 of personnel, was that in response to a request from
5 Ms. Soltani?

6 A Yes.

7 Q And when did Ms. Soltani approach you about
8 surging capacity?

9 A With that event and some others, I mean, it
10 was in near real-time.

11 Q And speaking of this first time, June 13th,
12 surging capacity in response to that event, what
13 exactly did Ms. Soltani ask you for?

14 A I don't recall --

15 Q Did she say why --

16 A -- exactly.

17 Q Go ahead. I interrupted you.

18 A Exactly, I don't recall exactly.

19 Q Well, generally. I'm not asking for a
20 verbatim quote, but what was she asking you for?

21 A Technical professionals to meet the
22 requirement.

1 Q And did she tell you why she needed them?

2 A In -- in some ways, instructively, she would
3 explain why she needed certain people. Other than
4 that, in -- in a breaking news scenario, I've -- I
5 have to trust the professionals on hand -- you know,
6 that what they're telling me they need, they need.

7 Q Okay. And in this specific scenario, did
8 she tell you why she needed what she needed?

9 A I don't recall exactly. Yeah, I would say
10 not in any great detail other than there were people
11 that were required in order to meet the requirement.

12 Q So when you're talking about people required
13 to meet the requirement, does that mean that she was
14 asking you for staff to respond to this event?

15 A Yes.

16 MS. STOUT: Object to form, lack of
17 foundation on the last one.

18 You can answer.

19 BY MR. BOURLAND:

20 Q Did she ask for any specific staff to be
21 brought back in?

22 MS. STOUT: Object to form, vague as to

1 "specific staff."

2 BY MR. BOURLAND:

3 Q Let me rephrase that. Did she asked you to
4 recall anyone from admin leave specifically by name?

5 A I don't recall.

6 Q And this communication with Ms. Soltani,
7 what -- in what form did she communicate with you
8 about her need to surge capacity?

9 A Mostly voice. Whether by Teams call or --
10 or perhaps Team messages. I don't -- there was a lot
11 of -- a lot of movement at the time. I don't recall
12 exactly which means were used when.

13 Q And when you are referring to Teams
14 messages, what do you mean?

15 A Teams chat.

16 Q So that's, like, a instant messaging through
17 Teams; is that a fair description, written messages?

18 A It is part of the Office suite of tools.

19 Q Okay. Did you communicate with Ms. Soltani
20 about surging the Persian service staffing via e-mail?

21 A I don't recall. And at -- at best I'd give
22 it a perhaps.

1 Q What about with Ms. Lake; did you
2 communicate with her about the Persian staffing surge?

3 A Yes.

4 Q And by what means?

5 A Same. Either by -- by voice or, you know,
6 text, e-mail; a combination of -- of communications.

7 Q Did you seek her approval of that action, of
8 that surge?

9 MS. STOUT: Object to form, lacks
10 foundation, and vague.

11 THE WITNESS: Her approval wasn't
12 required. She had confidence that what was being
13 requested was required.

14 BY MR. BOURLAND:

15 Q So you did not seek her approval; is that
16 what happened?

17 MS. STOUT: Object to form;
18 mischaracterizes the testimony.

19 THE WITNESS: Yeah. Per se, no. I
20 mean, I -- I would -- unclear on which events drove
21 particular elements of surge or recall. I would brief
22 her afterwards on -- on what we had done.

1 BY MR. BOURLAND:

2 Q Well, let's talk about this specific example
3 here on June 13th. After the June 13th air operations
4 against Iran, when Persian broadcasting's staffing was
5 surged in response to that, was that particular surge
6 something that you ran by Lake that she signed off on?

7 MS. STOUT: Object to form, lacks
8 foundation.

9 THE WITNESS: I ran it by her, but it
10 wasn't -- if what you mean by "signed off on" was go
11 ahead and do it then --

12 BY MR. BOURLAND:

13 Q That's what she said, more or less?

14 A More or less.

15 MS. STOUT: Object to form on that last
16 question.

17 THE WITNESS: Oh, my apologies.

18 MS. STOUT: But you can answer.

19 THE WITNESS: Okay.

20 BY MR. BOURLAND:

21 Q All right. Let's switch gears and talk
22 about other broadcasting, beyond the Persian service.

1 Generally speaking, you did provide some information
2 in your declaration about other programming in
3 addition to Persian; right?

4 A Yes.

5 Q And again, when I'm referring to your
6 declaration, I'm referring to what's been marked as
7 Wuco Exhibit 2. And I see you already have that in
8 front of you, which is good because I will be asking
9 you some more questions about that soon.

10 Do you know what -- sitting here today, what
11 language services VOA is currently broadcasting in, if
12 any?

13 A Yes.

14 Q What are those?

15 A Farsi, Mandarin, and Dari and Pashto, for
16 Afghanistan.

17 Q All right. Let's start with -- well, let me
18 ask you this. Do you know how many were being
19 broadcast before March of this year?

20 A No.

21 Q Ballpark?

22 MS. STOUT: Objection; asked and

1 answered and calls for speculation.

2 BY MR. BOURLAND:

3 Q You can answer.

4 A No.

5 Q More than four?

6 MS. STOUT: Objection; asked and
7 answered, calls for speculation.

8 THE WITNESS: I don't know.

9 BY MR. BOURLAND:

10 Q Let's start with the ones that are currently
11 being broadcast. Let's talk a bit about Mandarin. Is
12 the Mandarin service currently broadcasting any
13 content by terrestrial radio?

14 MS. STOUT: Objection; lack of
15 foundation.

16 THE WITNESS: No.

17 BY MR. BOURLAND:

18 Q Was VOA broadcasting Mandarin by terrestrial
19 radio before March of 2025; do you know?

20 MS. STOUT: Object to form, lack of
21 foundation.

22 THE WITNESS: I don't know.

1 BY MR. BOURLAND:

2 Q Is VOA currently broadcasting Mandarin by
3 television?

4 MS. STOUT: Object to form, lack of
5 foundation.

6 THE WITNESS: No, I don't believe so.

7 BY MR. BOURLAND:

8 Q Do you know whether VOA was broadcasting on
9 TV in Mandarin before March of 2025?

10 A I don't know.

11 Q So what sort -- what medium is VOA currently
12 broadcasting in Mandarin?

13 MS. STOUT: Object to form, lack of
14 foundation.

15 THE WITNESS: Digital.

16 BY MR. BOURLAND:

17 Q And just so we're clear on our terms, when
18 you say digital broadcasting, what does that refer to?

19 A It refers to web-based platforms. So it'd
20 be similar to those that are listed for the -- the
21 Persian.

22 Q And you're referring to the list in

1 paragraph 4 of your declaration; right?

2 A More or less.

3 Q Okay. So not looking at social media sites,
4 where does VOA broadcast digital content in Mandarin
5 on the internet; where is that accessible,

6 MS. STOUT: Object to form, vague, and
7 lack of foundation.

8 BY MR. BOURLAND:

9 Q You can answer.

10 A This is an assumption on my part, 'cause
11 I -- I really don't get into the -- the weeds with how
12 they do their business. But similar to what you see
13 for voanews.com, ir.voanews.com, my assumption is that
14 in addition to the social media platforms, they're --
15 they're posting digital content on the Mandarin Voice
16 of America site. Like, I believe I've seen some of
17 that.

18 Q Is it also being broadcast on any social
19 media sites in Mandarin?

20 MS. STOUT: Objection; lack of
21 foundation.

22 MR. BOURLAND: Here, let me -- that

1 question's not super clear. Let me try again.

2 BY MR. BOURLAND:

3 Q Is VOA currently broadcasting digital
4 content in Mandarin on any social media websites?

5 A I believe I answered that when I said I -- I
6 believe it's most likely similar to what you're seeing
7 under paragraph 4 for Persian --

8 Q Sure. And I --

9 A -- substitute Persian for Mandarin.

10 Q Okay. So your understanding is that it's
11 similar to what is listed here in your declaration for
12 Persian, but for the Mandarin language?

13 A That's my estimation.

14 Q Okay, thank you. Is the actual broadcast
15 content that VOA is putting out in Mandarin, is that
16 original Mandarin content, or is it translated from
17 something else?

18 MS. STOUT: Object to form, lack of
19 foundation.

20 BY MR. BOURLAND:

21 Q You can answer.

22 A If you would clarify what you mean by

1 "original Mandarin content"?

2 Q So when I say original Mandarin content, I'm
3 referring to content that's originally produced and
4 written in Mandarin.

5 A I don't know. May -- it may be it's, you
6 know, a combination of sources that they use to
7 develop content.

8 Q Do you have any knowledge as to whether the
9 Mandarin language service is using translated content
10 from other languages currently?

11 A Do I have knowledge of that?

12 Q Yes.

13 A Yes, I do. Yeah.

14 Q Okay. I'm just trying to understand what --
15 your previous answer. So is there also -- to your
16 knowledge, is there also content that is original to
17 Mandarin?

18 MS. STOUT: Object to form, vague as to
19 "original," and lacks foundation.

20 THE WITNESS: Yeah, and I -- I think I
21 answered that already in that my assumption or my
22 speculation, not getting into the technical weeds of

1 how they do their business, is that they use a number
2 of information and news sources to develop their
3 content, including content that is originally written
4 in Mandarin.

5 BY MR. BOURLAND:

6 Q Okay. And that's based on your assumption;
7 it's not something you know for sure; is that right?

8 A No, I -- I don't -- I purposefully do not
9 get involved in that.

10 Q Okay. Do you know how many employees are
11 currently working for the Mandarin service at VOA?

12 A Fewer than ten, I believe.

13 Q And of those ten, do you know if and if so,
14 how many of those ten are full-time employees versus
15 PSCs?

16 MS. STOUT: Object to form, lacks
17 foundation.

18 THE WITNESS: Yeah. And my answer is
19 no, I don't know the -- the exact breakout on numbers.

20 BY MR. BOURLAND:

21 Q To your knowledge, does Voice of America
22 have any plans currently to increase Mandarin

1 broadcasting?

2 MS. STOUT: Object to form, vague, and
3 lacks foundation.

4 THE WITNESS: Currently, no.

5 BY MR. BOURLAND:

6 Q And that's just because I asked a "do you
7 know" question; I want to make sure the answer is
8 clear. There currently are no plans to increase
9 broadcasting in Mandarin at Voice of America; is that
10 correct?

11 MS. STOUT: Objection; lacks
12 foundation.

13 THE WITNESS: Generally, correct, with
14 the caveat that our personnel strength and content
15 amounts are dictated by events on the ground.

16 BY MR. BOURLAND:

17 Q And by that you mean there could
18 theoretically be a surge in Mandarin broadcasting
19 based on real-time events?

20 A Sure. If a, you know, south, you know,
21 the -- the Southern Chinese PLAN fleet decides to go
22 charging across the state of Taiwan, you could expect

1 a surge in coverage.

2 Q And as a person who's in charge of ordering
3 a surge in personnel, would you expect to surge at
4 least some of those personnel from full-time employees
5 on admin leave?

6 MS. STOUT: Objection; lacks foundation
7 and mischaracterizes prior testimony.

8 BY MR. BOURLAND:

9 Q You can answer.

10 A Not at this time.

11 Q Why not?

12 A Because most of those numbers -- most of
13 those staffing structures have already been settled.

14 Q What do you mean by that?

15 A My assumption is that as of currently, and
16 into the future, you know, we're going to be dealing
17 with post-RIF staffing numbers. So I -- I would have
18 to more thoroughly analyze the results of that to
19 determine that. But we always reserve the ability and
20 have the authority within the Agency to surge PSCs,
21 and we've done that already so --

22 Q So is it fair to say that the outcomes of

1 the RIF will impact your ability to source talent?

2 A No.

3 MS. STOUT: Yeah, objection lack
4 foundation.

5 THE WITNESS: I'm sorry. My apologies.
6 Yeah.

7 BY MR. BOURLAND:

8 Q What was your answer?

9 A Repeat the question.

10 Q Sure. Is it fair to say that the outcome of
11 the RIF, the impact of the RIFs will impact your
12 ability to source talent to surge?

13 MS. STOUT: Object to form, lack of
14 foundation, and calls for speculation.

15 BY MR. BOURLAND:

16 Q In your opinion?

17 A In my opinion?

18 Q Yes.

19 A Speculatively?

20 Q Yes.

21 A No -- no, we -- we are required to meet our
22 obligations for minimal statutory requirements.

1 Q All right. Let's switch to some of the
2 other languages that are here in your declaration.
3 Well, here, let me go back. You had said moments ago
4 that the VOA is currently operating in four language
5 services, Farsi, Mandarin, Dari, and Pashto; did I get
6 that right?

7 A Correct.

8 Q Okay. So we talked about Mandarin. Let's
9 talk about Dari and Pashto. Just generally, those are
10 languages that are commonly spoken in Afghanistan;
11 yes?

12 MS. STOUT: Objection; form, lacks
13 foundation.

14 BY MR. BOURLAND:

15 Q If you know?

16 A They are the two predominant languages.

17 Q Okay. And as part of VOA's Afghanistan
18 service, VOA broadcasts to Afghanistan in both Dari
19 and Pashto; is that right?

20 A Yes.

21 Q Any other languages broadcast to Afghanistan
22 that you know of?

1 MS. STOUT: Object to form, asked and
2 answered.

3 THE WITNESS: No other languages.

4 BY MR. BOURLAND:

5 Q All right. Is Voice of America currently,
6 as we sit here today -- I don't mean literally this
7 minute, but nowadays, broadcasting in Dari and Pashto?

8 A As a matter of fact, daylight savings time
9 not withstanding or vice versa, they may be
10 broadcasting right now live.

11 Q Okay. So yes?

12 A Yes.

13 Q All right. And how much original content in
14 Dari and Pashto per day?

15 MS. STOUT: Object to form, lacks
16 foundation, and vague as to "original."

17 THE WITNESS: Are -- are we --

18 MR. BOURLAND: No, it's here. Let me
19 take that back, because that's not a very good
20 question.

21 BY MR. BOURLAND:

22 Q How much -- and I'm talking about in time

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1 duration; right? How much is broadcast in Dari and
2 Pashto per day by VOA?

3 MS. STOUT: Object to form --

4 THE WITNESS: Present -- I'm sorry.

5 MS. STOUT: Object to form, lacks
6 foundation.

7 BY MR. BOURLAND:

8 Q And yes, presently?

9 A Okay. 30 minutes per day; 15 each in Dari
10 and Pashto.

11 Q Is it the same content in both languages, if
12 you know?

13 MS. STOUT: Object to form, lacks
14 foundation.

15 THE WITNESS: Yes.

16 BY MR. BOURLAND:

17 Q And by what medium is this 30 minutes per
18 day of Afghanistan broadcasting currently happening?

19 MS. STOUT: Object to form, lacks
20 foundation.

21 THE WITNESS: It's carried into
22 Afghanistan via shortwave and medium wave. That said,

1 it's broadcast live from the Cohen building,
2 physically, by two of our Afghan service journalists
3 and production team. The signal is carried via
4 satellite -- and -- and perhaps others to Kuwait, to
5 the Kuwait shortwave transmitting station, and then
6 reprocessed into shortwave signal and broadcast into
7 Afghanistan.

8 The same is also done in medium wave
9 from our facility in Tajikistan. So the content
10 blankets all of Afghanistan in both shortwave and
11 medium wave.

12 BY MR. BOURLAND:

13 Q Do any radio broadcast -- okay, let me start
14 higher level. Do you know what a radio broadcast
15 technician is?

16 A Yes.

17 Q What is it?

18 A I -- I think it's well defined by its title.
19 So it generally describes any technician who is
20 involved on the -- the technical -- the signal side of
21 radio programming.

22 Q It's a title used for certain employees at

1 VOA; right?

2 MS. STOUT: Objection; lack of
3 foundation.

4 THE WITNESS: Yes.

5 BY MR. BOURLAND:

6 Q And earlier when we talked about, and you
7 testified about technical staff generally, are radio
8 broadcast technicians one example of technical staff
9 at VOA?

10 A Yes.

11 Q The process you just described for how
12 shortwave and medium wave radio is broadcast in
13 Afghanistan by VOA, are there any radio broadcast
14 technicians who work on that currently?

15 MS. STOUT: Object to form, lacks
16 foundation.

17 THE WITNESS: Yes.

18 BY MR. BOURLAND:

19 Q Do you know how many?

20 A No.

21 Q And they -- do they work in the Cohen?

22 A Yes.

1 Q And the Cohen building is VOA's central
2 broadcast studio; is that a fair way to describe it?

3 MS. STOUT: Object to form, lacks
4 foundation.

5 THE WITNESS: Repeat the question,
6 please?

7 BY MR. BOURLAND:

8 Q Sure. Is the Cohen building VOA's central
9 broadcast studio; is that a fair way to describe what
10 it is?

11 MS. STOUT: Same objection.

12 THE WITNESS: It -- to be technical, I
13 know the Cohen building is -- that's not what the
14 Cohen building is.

15 BY MR. BOURLAND:

16 Q Does it contain that?

17 A It contains VOA's central news -- news
18 service and -- and broadcasting facilities, yes.

19 Q And that includes broadcasting studios for
20 radio?

21 MS. STOUT: Object to form, lacks
22 foundation.

1 THE WITNESS: Yes.

2 BY MR. BOURLAND:

3 Q Are you aware that the Cohen building has
4 been designated for an accelerated sale?

5 A I'm not aware of how accelerated. I am
6 aware that we are vacating the Cohen building. And
7 it's -- it's, sort of, on -- on the -- the list of --
8 of GSA-managed buildings, yeah, that are being turned
9 over.

10 Q Do you know where the technical staff who
11 work on Afghanistan broadcasting will work after VOA
12 leaves the Cohen building, if there's a plan for that?

13 MS. STOUT: Object to form, lacks
14 foundation, calls for speculation.

15 THE WITNESS: Yeah, I mean it's -- it's
16 whatever building we wind up moving into. Sure,
17 there -- there'll be a transfer of personnel and
18 functions.

19 BY MR. BOURLAND:

20 Q Has such a building been identified yet?

21 A Yes.

22 Q Where is that?

1 A By address, I do not know, but -- but by
2 name, it's the -- the NASA building in Washington D.C.

3 Q Is that the NASA, as in the space agency?

4 A Correct.

5 Q Are there broadcast facilities there
6 currently?

7 MS. STOUT: Object to form, lacks
8 foundation.

9 THE WITNESS: Yes.

10 BY MR. BOURLAND:

11 Q Are those ones that were built by NASA, if
12 you know?

13 MS. STOUT: Object to form, lacks
14 foundation.

15 THE WITNESS: As far as I know, those
16 are facilities built by and for NASA.

17 BY MR. BOURLAND:

18 Q Are there shortwave radio broadcast
19 facilities there?

20 MS. STOUT: Object to form, lacks
21 foundation.

22 THE WITNESS: Not that I'm aware of.

1 I -- I would add to that, that there are technically
2 not shortwave radio broadcast facilities in the Cohen
3 building either.

4 BY MR. BOURLAND:

5 Q That's a good distinction. There --

6 A If you were -- do a shortwave -- I'm sorry.
7 Pardon the interruption.

8 Q No, please, you go first.

9 A If you've ever been to a shortwave site,
10 which I hadn't been until recently, good luck stuffing
11 one of those into a -- into a federal building. They
12 take up several acres of land.

13 Q Yeah. So I'm not referring to the radio
14 array that can be quite large; I'm just referring to
15 the broadcast facilities themselves. Is there any --
16 to your knowledge, at the NASA building that's been
17 identified as a future broadcast center for VOA, is
18 there any equipment or facilities that are
19 specifically designated for shortwave radio
20 broadcasting?

21 MS. STOUT: Object to form, lacks
22 foundation, and vague.

1 THE WITNESS: I don't know.

2 BY MR. BOURLAND:

3 Q Are you familiar with the term -- again,
4 talking about technical staff, the term "master
5 control"?

6 A I am.

7 Q What does that mean to you?

8 A It's the primary room or space from which
9 signals -- and whether it's audio or video -- are --
10 are controlled from.

11 Q Are there technical staff who have the term
12 "master control" in their title?

13 MS. STOUT: Object to form, lacks
14 foundation.

15 THE WITNESS: I don't know
16 specifically.

17 BY MR. BOURLAND:

18 Q Is there anyone who works on master control
19 who works on Afghanistan shortwave and medium wave
20 broadcasting?

21 MS. STOUT: Object to form, lacks
22 foundation.

1 THE WITNESS: Personnel and master
2 control work on all of our activities out of the Cohen
3 building.

4 BY MR. BOURLAND:

5 Q Including Afghanistan broadcasting?

6 A I would have to speculate on -- on the --
7 the extent of -- of master controls, you know,
8 hands-on activity in -- in getting those signals
9 pushed out to Afghanistan. It's -- but I don't
10 believe that it requires anybody sitting at -- sitting
11 at the controls, if you will, to get the signal from
12 the Cohen building to Afghanistan.

13 Q Okay.

14 A But these things are monitored, you know.

15 Q That's your assumption, by the way, the last
16 thing you said?

17 A It's my assumption. It's my assumption that
18 as the program is being broadcast live, that master
19 control -- there is involvement of master control in
20 ensuring that everything's working right, and that,
21 you know, signals are being processed and -- and
22 transmitted. But to the -- to any extent or detail,

1 I'm not qualified to -- to say.

2 Q So you testified there's currently 30
3 minutes per day being broadcast via radio to
4 Afghanistan. That's 15 minutes each in Dari and
5 Pashto. Do you know how many hours of radio
6 broadcasting VOA was doing to Afghanistan before March
7 of 2025?

8 MS. STOUT: Object to form, lacks
9 foundation.

10 BY MR. BOURLAND:

11 Q If any?

12 A I do not.

13 Q Is Voice of America currently broadcasting
14 any television to Afghanistan?

15 MS. STOUT: Object to form, lacks
16 foundation.

17 THE WITNESS: No.

18 BY MR. BOURLAND:

19 Q And just to put a finer point on it, is VOA
20 broadcasting any -- let me take it a step back.

21 When I refer to television, I'm referring
22 to -- what is your understanding of broadcasting and

1 television at VOA; what does that mean?

2 A By definition, by FCC definition,
3 broadcasting and television and radio is broadcasting
4 in a means that is available to the general public.
5 So unless they've pulled a fast one on me in the last
6 week or so, I -- I do not believe we are broadcasting
7 to Afghanistan on television.

8 Q And when VOA broadcasts in television around
9 the world, does it do it by satellite?

10 MS. STOUT: Object to form, lacks
11 foundation.

12 THE WITNESS: I'm -- I'm not qualified
13 to answer that question based on a -- if you're
14 talking about simultaneous global broadcasts, I just
15 don't know from a technical standpoint.

16 BY MR. BOURLAND:

17 Q Is VOA broadcasting any television in Dari
18 or Pashto right now?

19 A No, not to my knowledge.

20 Q Is there any plan to increase that
21 broadcasting so that there is television coverage?

22 MS. STOUT: Object to form, lacks

1 foundation.

2 THE WITNESS: No, not presently.

3 BY MR. BOURLAND:

4 Q Does Voice of America currently broadcast to
5 North Korea?

6 A No.

7 Q To your knowledge, is there any plan to do
8 so in the future?

9 A Yes.

10 Q What's that plan?

11 MS. STOUT: Object to form, lacks
12 foundation.

13 THE WITNESS: Can you be more specific
14 on --

15 BY MR. BOURLAND:

16 Q Sure. Well, I asked if there's a plan to
17 broadcast and to North Korea in the future, and you
18 said "yes." Describe to me what that plan is.

19 A Currently, the plan is to commence digital
20 content carriage into North Korea.

21 Q So that would be content that would be
22 broadcast on the internet?

1 A Yes.

2 Q It would be accessible only to an audience
3 that's able to access the internet; is that correct?

4 MS. STOUT: Object to form, lacks
5 foundation.

6 THE WITNESS: For such time, as -- as
7 we're only carrying digital content.

8 BY MR. BOURLAND:

9 Q Is there a plan to carry something other
10 than digital content? Here, let me ask specifically,
11 is there a plan to broadcast radio into North Korea?

12 A That's deliberative in nature? Am I
13 required to answer?

14 MS. STOUT: You can answer this
15 question to the best of your ability.

16 MR. BOURLAND: Yeah.

17 MS. STOUT: Whether yes or no; whether
18 there's a -- what was it, a plan to broadcast to North
19 Korea?

20 MR. BOURLAND: Uh-huh.

21 THE WITNESS: Not a plan, but
22 discussions.

1 BY MR. BOURLAND:

2 Q What about TV? Same question.

3 A No.

4 Q Do you know when the digital broadcasting in
5 North Korea is supposed to start, if at all?

6 A Yes.

7 Q When is that?

8 A My estimation is within the next -- and I
9 need to be very careful here, 'cause this is
10 definitely an estimation. Pursuant to people
11 accepting, you know, the -- the offers, we're -- we
12 are currently staffing -- in the staffing process of
13 bringing our Korean PSCs back on board, a number of
14 them. So pursuant to that, I -- I would think
15 sometime within the next two weeks.

16 Q Is there a certain amount of content per day
17 that is planned to be produced?

18 MS. STOUT: Objection; lack of
19 foundation.

20 THE WITNESS: No particular amount.

21 BY MR. BOURLAND:

22 Q And is the plan to only use PSCs for this

1 broadcasting in terms of the journalist staff?

2 A Yes.

3 Q Is that because all pre-existing Korean
4 language service staff have been RIF-ed?

5 MS. STOUT: Objection; lack of
6 foundation.

7 THE WITNESS: I don't know.

8 BY MR. BOURLAND:

9 Q Do you know whether there are any Korean
10 language speaking journalists who have not been
11 RIF-ed?

12 MS. STOUT: Objection; lack of
13 foundation.

14 BY MR. BOURLAND:

15 Q At VOA?

16 A Not having been involved in the -- the RIF
17 process, no, I don't know.

18 Q You said it was -- that you were estimating
19 that the Korean online broadcasting would start within
20 the next two weeks. Was that -- is that accurate?
21 I'm trying to remember.

22 A Yeah -- yeah, that's -- that's -- you recall

1 that accurately. That's my estimation.

2 Q Okay. And that's not a definite date
3 because it depends on staffing up with PSCs; right?

4 MS. STOUT: Object to form, lacks
5 foundation.

6 THE WITNESS: Correct. And -- and also
7 reestablishing a new -- a new -- reestablishing that
8 service. Not that it's new, but reestablishing it.
9 There -- there's -- unlike a surge for breaking news,
10 in situations like we've described with -- with
11 Persian, we're permitted to be a little more
12 deliberative with how we're doing that process with
13 Korean so --

14 BY MR. BOURLAND:

15 Q Is there any sort of plan in writing
16 concerning restarting Korean broadcasting?

17 MS. STOUT: Object to form, lacks
18 foundation.

19 THE WITNESS: Not a formal plan per se.
20 Only administrative, you know, documentation, e-mails,
21 and whatnot, initiating the recall of PSCs and our
22 intent to begin broadcasting in Korea.

1 BY MR. BOURLAND:

2 Q So the -- that process has been discussed on
3 e-mail; is that fair?

4 A Yes.

5 Q To your knowledge, have there been any
6 memoranda, reports, anything like that, that have been
7 written about restarting broadcasting North Korea?

8 MS. STOUT: Object to form, lacks
9 foundation.

10 BY MR. BOURLAND:

11 Q I'm not asking about anything from counsel,
12 of course.

13 A Ask -- ask the question again, please?

14 Q Sure. Have there been any internal memos,
15 or reports, or anything like that, that have been
16 drafted, written about restarting Korean broadcasting,
17 excluding anything coming from lawyers?

18 MS. STOUT: Object to form, lacks
19 foundation, and preserving the attorney-client
20 objection.

21 THE WITNESS: Yeah -- yeah, beyond
22 anything that requires attorney-client privilege, just

1 the communications I've mentioned.

2 BY MR. BOURLAND:

3 Q Okay. Who actually made the decision, if
4 you know, to resume broadcasting to North Korea?

5 A The -- the key final decision maker was Ms.
6 Lake.

7 Q Were you involved in that decision?

8 A Yes.

9 Q In what way were you involved; how did you
10 participate in deciding that?

11 MS. STOUT: And I'll object to the
12 extent that your participation involved any
13 communications with attorneys within the Agency or the
14 Department of Justice. I instruct you not to answer
15 to the extent it would reveal those communications,
16 but if you have a separate participation outside of
17 communications that you've had from -- with counsel,
18 then you may discuss those.

19 THE WITNESS: All right. All of my
20 communications have been operationally-based,
21 management-based, on -- on providing the resources to
22 effectuate the re-commencement of broadcasts and -- or

1 content delivery in Korea.

2 BY MR. BOURLAND:

3 Q Was Voice of America broadcasting to North
4 Korea at any point this year, in 2025?

5 MS. STOUT: Object to form, lacks
6 foundation.

7 THE WITNESS: I don't know.

8 BY MR. BOURLAND:

9 Q Has it ever broadcast to North Korea in its
10 history; do you know?

11 A Yes.

12 Q Do you know when it stopped?

13 A No.

14 Q The PSCs that you are bringing on to
15 broadcast to North Korea, where did they come from?

16 A Repeat the question?

17 Q The PSCs, the contractors that are being
18 brought on to broadcast to North Korea, where did they
19 come from?

20 MS. STOUT: Object to form, lacks
21 foundation.

22 THE WITNESS: I'm not clear on what you

1 mean by "where did they come from"?

2 BY MR. BOURLAND:

3 Q Sure. Where is the Agency finding those
4 contractors?

5 MS. STOUT: Object to form, lacks
6 foundation.

7 THE WITNESS: And at the risk of being
8 annoying about this, specifically, do you mean
9 geographically?

10 BY MR. BOURLAND:

11 Q What is -- walk me through the process of
12 securing contractors to broadcast in Korea and at VOA.

13 MS. STOUT: Object to form, lacks
14 foundation.

15 THE WITNESS: Typically, and as is the
16 case that is being exercised presently with Korean,
17 these are PSCs that the organization is familiar with
18 who have worked for the organization in the past. And
19 with the exception of mandatory for every PSC or -- or
20 contractor that comes in, even if they've been with us
21 before, there's some security screening, and badging,
22 and all that stuff that has to take place. But by and

1 large, they're sourced from a known bench of -- of
2 PSCs.

3 BY MR. BOURLAND:

4 Q And future Korean -- broadcasting in North
5 Korea at VOA, will that be -- I think I've already
6 asked this. I'm going to move on.

7 How long has it -- has this process of
8 bringing on this new PSC workforce to do North Korea
9 broadcasting, how long has that been going on?

10 MS. STOUT: Object to form, lacks
11 foundation.

12 THE WITNESS: I -- I can't provide an
13 exact number of days.

14 BY MR. BOURLAND:

15 Q You can estimate; it's fine.

16 MS. STOUT: Object to form, calls for
17 speculation very explicitly.

18 MR. BOURLAND: I am, yes.

19 MS. STOUT: Then we object to the
20 answer, that it's asking for speculation, not his
21 personal knowledge.

22 //

1 BY MR. BOURLAND:

2 Q No, I'm not asking -- you have some personal
3 knowledge about PSCs being brought on for North Korea
4 broadcasting; right?

5 A Yes.

6 Q You've been signing off on that; right?

7 A Yes.

8 Q How long have you been engaged in that
9 process? I'm just looking for an estimate; I'm not
10 asking you to speculate.

11 A Approximately, three weeks.

12 Q All right. Is Voice of America broadcasting
13 to Russia?

14 MS. STOUT: Object to form, lacks
15 foundation.

16 THE WITNESS: No.

17 BY MR. BOURLAND:

18 Q And to be clear, I mean currently.

19 A No.

20 Q Is Voice of America broadcasting to anywhere
21 in the world currently in the Russian language?

22 MS. STOUT: Object to form, lacks

1 foundation.

2 THE WITNESS: No.

3 BY MR. BOURLAND:

4 Q Has it ever done so in the past?

5 MS. STOUT: Object to form, lacks
6 foundation.

7 THE WITNESS: It has.

8 BY MR. BOURLAND:

9 Q As of -- I asked you with North Korea. Is
10 there any plan currently to resume broadcasting to
11 Russia at Voice of America?

12 MS. STOUT: Object to form, lacks
13 foundation.

14 THE WITNESS: Yes, via digital.

15 BY MR. BOURLAND:

16 Q And when you say digital, as with before,
17 that means online?

18 A Yes.

19 Q Is there any plan to broadcast to Russia in
20 the future via terrestrial radio?

21 MS. STOUT: Object to form, lacks
22 foundation.

1 THE WITNESS: Not at this time.

2 BY MR. BOURLAND:

3 Q What about TV?

4 MS. STOUT: Object to form, lacks
5 foundation.

6 THE WITNESS: And I don't know.

7 BY MR. BOURLAND:

8 Q Who made the decision to plan to resume
9 broadcasting to Russia digitally?

10 MS. STOUT: Object to form, lacks
11 foundation.

12 THE WITNESS: Ms. Lake was the final
13 decision maker.

14 BY MR. BOURLAND:

15 Q When was that decision made?

16 A I would have to speculate.

17 MS. STOUT: You can answer to the best
18 of your ability based on your personal knowledge.

19 MR. BOURLAND: Yes.

20 THE WITNESS: Within the past month.

21 BY MR. BOURLAND:

22 Q Okay. Do you know if it was before or after

1 she was deposed in this case?

2 MS. STOUT: Objection; asked and
3 answered.

4 THE WITNESS: I -- I do not -- I -- I
5 don't know the date of her actual deposition. That
6 that's lost in my memory hole, but --

7 MR. BOURLAND: That's fair. And I
8 think you were on vacation --

9 THE WITNESS: -- it's within -- within
10 the past month.

11 BY MR. BOURLAND:

12 Q Okay. Was it since -- did Ms. Lake make
13 that final decision at any point since last Tuesday?

14 A It would've been before that.

15 Q Okay. And let me ask that same question
16 with respect to resuming North Korea -- let me be more
17 clear. I'm going to ask that same question with
18 respect to North Korea digital broadcasting. Was that
19 final decision by Ms. Lake made at some point between
20 last Tuesday and now?

21 A No, beforehand.

22 Q It was before then?

1 A Yeah.

2 Q Okay. Do you know why the decision was made
3 to resume broadcasting to Russia digitally?

4 A Yes.

5 Q Why is that?

6 MS. STOUT: And I'll object here; to
7 the extent that your knowledge about why the decision
8 was made is based on communications with your
9 attorneys at USAGM or the Department of Justice, then
10 I would instruct you not to answer. But if you have
11 an independent understanding of why those decisions
12 were made that are separate and apart from the
13 communications with your attorneys, then you can
14 answer.

15 MR. BOURLAND: Yeah.

16 THE WITNESS: It was largely an
17 internal discussion that came -- resulted in the
18 conclusion that we should begin broadcasting in
19 Russian, again, driven by events on the ground, real
20 world events.

21 You know, the Ukraine war negotiations,
22 ongoing escalation in kinetic warfare activity from

1 the Russian side in particular against Ukrainians,
2 Russian lack of response to -- to negotiations, and
3 things like that. And -- and certainly the -- the
4 decision made by the President to begin moving US
5 strategic assets into place. All of those things
6 combined led largely me and Ms. Lake to the decision
7 to begin broadcasting in Russia.

8 BY MR. BOURLAND:

9 Q Would you describe the plan to resume
10 broadcasting in Russia as another surge operation?

11 A No, not in the same nature that the -- we
12 responded to the Persian situations we've discussed.
13 This is more of a -- a staffing exercise, deliberative
14 staffing exercise.

15 Q And just so I'm clear, what do you mean by
16 "staffing exercise"?

17 A Hiring PSCs.

18 Q So as with North Korea, the plan is to
19 resume broadcasting to Russia using PSCs?

20 MS. STOUT: Object to form, lacks
21 foundation.

22 //

1 BY MR. BOURLAND:

2 Q Is that correct?

3 A Yes. With, I -- I will add, with
4 supervisory controls by our full-time government
5 employees. So there will be a government person, you
6 know, supervising those efforts.

7 And within the PSC structure, there are
8 different levels of PSCs. So there's a PSC level 4,
9 which is considered, sort of, a, you know, first among
10 equals of -- of PSCs, who will be responsible for
11 content development and whatnot. But the -- the
12 overall supervisory coverage for that will be from the
13 government side.

14 Q Would that be Ms. Soltani?

15 A Subordinates of -- of Ms. Soltani.

16 Q And is the reason why PSCs are being brought
17 on to broadcast in Russian because the Russian
18 language service full-time employees have been RIF-ed?

19 MS. STOUT: Object to form, lacks
20 foundation.

21 THE WITNESS: Yeah, I -- I can't answer
22 that.

1 BY MR. BOURLAND:

2 Q Do you know whether any Russian language
3 employees have been RIF-ed?

4 A I don't know. I -- I do know, and I will
5 say that among the other issues I've outlined with the
6 Agency's security, there have been issues with, for
7 lack of a better term, lax vetting of some of the
8 Russian language service personnel. So we're being a
9 bit more deliberative and careful in -- in screening
10 new Russian language individuals.

11 Q Who actually made the decision to staff the
12 Russian broadcasting operations moving forward with
13 only PSCs?

14 A It --

15 MS. STOUT: Object to form,
16 mischaracterizes the testimony to the extent that all
17 people in the Russian language service will be PSCs.

18 THE WITNESS: Yeah, it -- it was more
19 of a -- it was more of a -- a -- the conclusion of a
20 process of, you know, that nobody -- there was not a
21 preemptive decision. There -- there was not a
22 decision that preempted process to, say, go hire PSCs.

1 It was a -- there was a deliberative
2 process in how to -- how to staff and effectuate the
3 requirement. And that led to the conclusion that PSCs
4 would be the best option.

5 BY MR. BOURLAND:

6 Q Okay. And just to sort up any confusion
7 from the last question, because I didn't think I
8 misstated any testimony, but I want to make sure I got
9 it clear. Will there be full-time employee
10 journalists or technical staff working on the Russian
11 broadcasting moving forward, or just PSCs, or
12 something else?

13 A Just PSCs on the -- the content and
14 broadcasting side. But there will be, you know,
15 govies, let's say, or a govie supervising the -- the
16 overall effort. Yeah. And there must be; there --
17 there has to be. You know, you can't have contractors
18 supervising operations for the -- the federal
19 government.

20 Q Why not?

21 A Because they don't have the legal authority
22 and accountability to -- to do so.

1 Q So beyond the four language services we've
2 discussed that are currently being broadcast as we sit
3 here today, that's Mandarin, Persian, Pashto, and
4 Dari, and possible future broadcast in North Korea and
5 Russia, is there any plan for OA to produce any other
6 language content?

7 MS. STOUT: And I'll object to the
8 extent that this question -- or the answer that you
9 give would require you to reveal attorney-client
10 communications, whether it be USAGM or the Department
11 of Justice, I would instruct you not to answer. But
12 if you know a plan separate and apart from any
13 discussions that you had with your attorneys, then you
14 can answer.

15 BY MR. BOURLAND:

16 Q Hold on. I mean, I'm asking about the
17 Agency's plan. I'm not asking about what lawyers have
18 told you to do. So I'm asking about plans that the
19 Agency has -- decisions the Agency has made so --

20 A To broadcast in languages other than the
21 ones we've discussed, including Russian and Korean?

22 Q That's correct.

1 A No.

2 Q Is the Persian language broadcast still
3 operating in a, sort of, surge capacity?

4 MS. STOUT: Object to form, lack of
5 foundation, and vague.

6 THE WITNESS: I mean, it's -- it's at
7 its steady state operational level right now. That
8 level, in part, was due to personnel that were brought
9 on as a result of the surge. I know this, but -- but
10 I'm not -- I guess I'm not sure what you're -- what
11 you're getting at. Therefore, I'm not sure I'm
12 answering the question well.

13 BY MR. BOURLAND:

14 Q That's fair. Is it still a surge or are
15 they staying, in other words?

16 A No, I mean, you -- you effectively surge,
17 you know, once. And if you maintain those staffing
18 levels, then it's not a surge anymore. It's just the
19 staffing levels as they are.

20 Q Are the plans -- are there any plans to
21 decrease those staffing levels in the Persian service
22 from the levels they're at now as a result of the

1 surge?

2 MS. STOUT: Object to form, lack of
3 foundation.

4 THE WITNESS: No plans to do so.

5 BY MR. BOURLAND:

6 Q What about Mandarin language broadcasting?
7 Is there any plan to decrease the level of
8 broadcasting that is currently happening in Mandarin?

9 MS. STOUT: Object to form, lack of
10 foundation.

11 THE WITNESS: No plan to do so.

12 BY MR. BOURLAND:

13 Q And Afghanistan broadcasting in Pashto and
14 Dari; is there any plan to reduce broadcasting from
15 the 30 minutes combined per day that is currently
16 happening?

17 MS. STOUT: Object to form, lack of
18 foundation.

19 THE WITNESS: No plan to do so.

20 MR. BOURLAND: Okay. Should we take a
21 lunch break?

22 MS. STOUT: A little bit.

1 MR. BOURLAND: Let's do it.

2 THE REPORTER: Okay. It is 12:58 p.m.,
3 and we are now off the record.

4 THE VIDEOGRAPHER: This marks the end
5 of media unit No. 3. Going off the record. The time
6 is 12:58 p.m.

7 (Off the record.)

8 THE VIDEOGRAPHER: This marks the
9 beginning of media unit No. 4. Going back on the
10 record. The time is 13:43 p.m.

11 BY MR. BOURLAND:

12 Q All right, Mr. Wuco. We just had a break
13 for lunch, and are back on the record now. Before we
14 left, we were talking about plans to resume
15 broadcasting to North Korea and Russia. Do you
16 remember that testimony generally?

17 A I do.

18 Q Okay. I believe your testimony -- again,
19 correct me if I'm wrong -- was that the ultimate
20 decision maker on those two points was Ms. Lake; is
21 that right?

22 A Yes.

1 Q And again, I'm just going off the top of my
2 head; not trying to quote you, so again, correct me if
3 I'm wrong. But I believe you had testified that this
4 was the result of an internal deliberation that you
5 were also part of; is that right?

6 A Yes.

7 Q Was anyone outside of the Agency part of
8 that decision making process? Not talking about
9 lawyers, of course, I'm just asking about anyone else.

10 A No.

11 Q Anyone from the White House?

12 MS. STOUT: Objection to the extent
13 that this would implicate executive privilege.

14 BY MR. BOURLAND:

15 Q Just a yes or no question at this point.
16 Not about the content of any conversations.

17 MS. STOUT: And also object to asked
18 and answered.

19 THE WITNESS: Not to my knowledge.

20 BY MR. BOURLAND:

21 Q And I believe you testified earlier that
22 Voice of America is currently not broadcasting by

1 radio or television in Mandarin; is that right?

2 MS. STOUT: Objection; asked and
3 answered.

4 BY MR. BOURLAND:

5 Q Just to reorient us?

6 A As answered previously, no.

7 Q Do you know why Voice of America is not
8 currently broadcasting in Mandarin -- in -- via radio
9 or television?

10 A No.

11 Q Has anyone ever given you an explanation?

12 A No, nor have I ever sought one.

13 Q Did you play a role in making that decision?

14 MS. STOUT: Objection as to vague as
15 what decision we're talking about.

16 BY MR. BOURLAND:

17 Q To not broadcast in Mandarin by radio or
18 television?

19 A No.

20 Q And what about Persian broadcasting; do you
21 know why Voice of America is not broadcasting by radio
22 or television in Farsi?

1 A No.

2 Q Did you participate in the decision not to
3 broadcast in television -- via television or radio in
4 Farsi?

5 MS. STOUT: Objection; lack of
6 foundation.

7 THE WITNESS: Yeah, well, we do not
8 broadcast in radio. I was not part of that decision.
9 Those are left to the professionals in VOA. And we do
10 carry direct-to-TV satellite coverage to Iran.

11 BY MR. BOURLAND:

12 Q Thank you for that clarification. All
13 right. Do you know --

14 A Direct-to-home. I'm sorry.

15 Q Yeah. No, please.

16 A Direct-to-home satellite coverage, yeah.

17 Q Thank you. I didn't mean to cut you off.

18 All right. Are you aware of how much money
19 Congress appropriated to VOA for this fiscal year; do
20 you know?

21 A No.

22 Q Let's look, just --

1 A Not that I recall.

2 Q Fair enough. Let's look briefly at Ms.
3 Lake's declaration again. I believe we marked that as
4 Wuco Exhibit 3, and you can turn to page 9. And at
5 the bottom of that page there is paragraph No. 28,
6 where Ms. Lake said, "USAGM received 260.032 million
7 in appropriated funding for fiscal year 2025 for VOA,
8 and plans to use approximately 232.19 million as of
9 August 8, 2025, of that total amount to fulfill VOA's
10 above discussed statutory admissions."

11 Did I read that correctly?

12 A Yes, you did. And to clarify, I'm -- I'm
13 familiar with these numbers.

14 Q Okay. That was going to be my next
15 question.

16 A They've come out of the memory hole.

17 Q Okay. So you have learned before that
18 Congress had appropriate around \$260 million to VOA
19 for this fiscal year; right?

20 A Yes.

21 Q Okay. In your opinion as a manager at the
22 Agency, is voice of America's current level of

1 programming and broadcasting consistent with that
2 level of funding that was appropriated?

3 MS. STOUT: Objection; lack of
4 foundation. Objection as to -- vague as to
5 "consistent."

6 BY MR. BOURLAND:

7 Q You can answer.

8 A I mean, within those amounts, we're able to
9 broadcast to the statutory minimum requirement.

10 Q Is it your understanding that when Congress
11 appropriated around \$260 million to VOA for this
12 fiscal year, the expectation was the VOA would
13 broadcast to the statutory minimum required?

14 MS. STOUT: Objection; lack of
15 foundation and calls for speculation.

16 BY MR. BOURLAND:

17 Q You can answer.

18 A I don't know that. All -- all of that
19 would've happened before I arrived.

20 Q Based on your understanding of how staffing
21 works at the Agency and being involved in those
22 decisions, is it your opinion that VOA could broadcast

1 more content with the \$260 million that have been
2 appropriated at the Agency for this fiscal year?

3 MS. STOUT: Objection; lack of
4 foundation, calls for speculation, mischaracterizes
5 prior testimony with respect to his involvement in
6 personnel decisions.

7 BY MR. BOURLAND:

8 Q You can answer.

9 A Re-ask the question, please?

10 Q I'll ask it in a much more simple way.
11 Would the funds that Congress appropriated to the VOA
12 for this year, could VOA be broadcasting more than it
13 is right now?

14 MS. STOUT: Objection; lack of
15 foundation and calls for speculation.

16 THE WITNESS: Yeah, it -- it's -- it is
17 speculative, if you want to hear that.

18 BY MR. BOURLAND:

19 Q Based on your experience and your knowledge
20 of the Agency?

21 A I -- I can't foresee what events on the
22 ground may drive the Agency to report differently

1 volume and content wise. So it's -- it's hard for me
2 to make that determination.

3 Q Sure. And I'm not asking about whether it
4 will happen or not. I'm asking about whether at the
5 current funding level of \$260 million for this fiscal
6 year, that budget would allow for more broadcasting
7 than is currently happening at VOA?

8 MS. STOUT: Objection; lack of
9 foundation, asked and answered, calls for speculation.
10 BY MR. BOURLAND:

11 Q You can answer.

12 A I -- I can't answer authoritatively on how
13 those amounts would affect our ability to broadcast.
14 A lot of other things any agency or department has to
15 do besides its primary mission to support things. So
16 how money gets moved around for that, I -- I just
17 can't speculate.

18 Q I mean, a large amount of that \$260 million
19 is being used and has been used this year to pay many
20 employees to not work on administrative leave; right?

21 MS. STOUT: Objection; lack of
22 foundation, and objection, vague as to "large amount."

1 THE WITNESS: Yeah.

2 BY MR. BOURLAND:

3 Q You can answer.

4 A Employees on administrative leave get paid.

5 Q And they're not working; right, when they're
6 on administrative leave, by definition?

7 A By definition, when they are sitting at home
8 on administrative leave, no, they're not working.

9 Q But they are getting paid; yes?

10 MS. STOUT: Objection; asked and
11 answered.

12 BY MR. BOURLAND:

13 Q You can answer.

14 A Yes, they're getting paid.

15 Q Okay. And they could have instead been
16 working and broadcasting more content; yes?

17 MS. STOUT: Objection; lack of
18 foundation.

19 BY MR. BOURLAND:

20 Q You can answer.

21 MS. STOUT: And calls for speculation.

22 THE WITNESS: No, they couldn't have,

1 because they were put on administrative leave.

2 BY MR. BOURLAND:

3 Q Well, that was a decision by the Agency to
4 do that; right?

5 MS. STOUT: Objection; lack of
6 foundation.

7 THE WITNESS: The decision was made to
8 put them on administrative leave. Therefore they --
9 no, they could not have worked.

10 BY MR. BOURLAND:

11 Q Okay. Also in your declaration, let's turn
12 back to that, which I think is Exhibit 2. You discuss
13 in here, and I'll draw your attention to it in a
14 second; I want to make sure I get the phrasing right.
15 So in paragraph 13, there's something referred to as
16 the 50 US States Program. And in paragraph 16,
17 there's something referred to as the 50 US States
18 Initiative. Do you remember inserting that in your
19 declaration here, or including that rather?

20 A Thirteen and 16?

21 Q Twelve and 16.

22 A Okay.

1 Q There's reference to the 50 US States
2 Program and 50 US States Initiative. And let me just
3 re-ask the question, because I feel like we've -- I've
4 muddled it up now.

5 But there's a mention in these two
6 paragraphs, in paragraph 12 and paragraph 16, of a 50
7 US States Program or Initiative. Do you remember
8 including that in your declaration?

9 A Yes.

10 Q What is that?

11 A Specifically what is my memory or -- or what
12 is the program?

13 Q Well, you put it in the declaration; what
14 did you mean by 50 US States Program?

15 A Okay. Without reference to the statute,
16 there has long existed a statutory requirement,
17 largely ignored by the Agency, for -- for several
18 decades, to report -- to provide content that
19 highlights and details each of the 50 states
20 individually. That statutory requirement has never
21 been fulfilled.

22 The last fulsome effort to -- to do so was

1 in the mid- to late-nineties. And in fact, Victor
2 Morales himself was within the editorial's office or
3 in the office that was asked to implement this, and a
4 plan -- it was a last meaningful plan that was come up
5 with, and it was never implemented by the Agency.
6 They basically decided not to do it.

7 So as we were examining meeting minimum
8 statutory requirements, we did it fully; not -- not
9 just for things that were already being done, but for
10 statutory requirements that weren't being fulfilled.
11 This was one of them. This USAGM, the Broadcasting
12 Board of Governors Voice of America, had for over 30
13 years willfully ignored a statutory requirement. So
14 we are, for the first time in all those years,
15 reinstituting this.

16 And we're working on -- the -- the VOA's
17 working on the content development for those who
18 think -- for the 50 states, things that you see on TV,
19 you know, "Welcome to North Carolina. This is our --
20 these are our wonderful business opportunities,"
21 tourism, other things that highlight each of the 50
22 states.

1 So we're -- we are in the process of
2 reaching agreements, licensing agreements with -- with
3 each of the states in order to use their -- basically,
4 their -- their public affairs information on the
5 states. Then have those rendered into the languages
6 that we covered -- we cover, and then mostly, via
7 digital, transmitted out.

8 To -- sort of, to get this started, because
9 there was license free content available, the USA 250
10 content that you see addressed has been used to the
11 extent that it highlights, you know, news, history
12 and -- and whatnot on either individual states or
13 groups of states. So -- but that is underway, and we
14 are -- we are going to fulfill that -- that
15 requirement.

16 Q Has that been fulfilled yet?

17 A Just in part, with some of the USA 250
18 stuff, we -- we were eager to get -- get started with
19 it. As you see here, our -- our -- we've -- our --
20 our GC shop right now is in -- is finalizing. In
21 fact, it's been delivered to the -- to the provider a
22 licensing agreement with Brand USA's media valet

1 system, as it said here. And they actually manage
2 that content for all 50 states, that type of content.
3 So that MOU basically is -- has been finalized, and
4 it's just awaiting counter signature by Brand USA
5 right now. As soon as that happens, we're going to
6 start running their content.

7 Q As we sit here, currently, is the Agency
8 broadcasting content on all 50 US states?

9 A No.

10 Q And is the plan to translate this content
11 into the four languages that VOA is currently
12 broadcasting?

13 MS. STOUT: Objection; lack of
14 foundation.

15 THE WITNESS: And -- and you may have
16 missed it; I just stated that. Yeah, that's the
17 intent, to render it in the languages that we're
18 broadcasting in.

19 BY MR. BOURLAND:

20 Q And that would be the four that you're
21 currently broadcasting in; is that right?

22 A Yes.

1 Q In paragraph 15 of your declaration, you
2 said, "We are currently organizing links to YouTube
3 videos of state tourism and other channels so that
4 they may be reposted on our digital platforms, and
5 should begin posting those sometime during the week of
6 June 30, 2025." That's what it says here; right?

7 A That is in progress, yeah. That's correct.

8 Q Okay. And the licensing that you were
9 talking about to get specific content, is that the
10 same thing as the links to YouTube videos you're
11 talking about here, or is that something different?

12 A The licensing I was referring to earlier,
13 the -- the permissions memorandum, no, I was referring
14 to Brands USA specifically, that -- that develops and
15 maintains content actually on all 50 states, sort of a
16 one-stop shop.

17 Q Is VOA currently reposting or broadcasting
18 any of this content in the YouTube videos referred to
19 in paragraph 15 of your declaration?

20 MS. STOUT: Objection; lack of
21 foundation.

22 THE WITNESS: Yeah, and I -- I believe

1 I answered that already, but the answer is no. We're
2 not reposting that YouTube content quite yet, because
3 before we grab a YouTube video that is put out by the
4 state of California or the, you know, the state of
5 Montana, we have to discuss with the public affairs
6 officers within -- typically, within the secretary of
7 state in each of those states to ensure that we've got
8 permission to do so.

9 BY MR. BOURLAND:

10 Q Is that process underway?

11 A It is.

12 Q Here in your declaration, in that same
13 paragraph 15, you stated that "this process of
14 reposting links to YouTube videos of state tourism
15 channels should begin -- you should -- it should begin
16 posting sometime during the week of June 30, 2025."
17 That's what it says; right?

18 A [No audible response.]

19 Q Let me just get that answer first.

20 A Yes, I'm sorry.

21 Q That's what it says here; right?

22 A Yes.

1 Q Okay. June 30, 2025, has passed and it
2 sounds like this hasn't happened yet; do you know why
3 that is?

4 A It's --

5 MS. STOUT: Objection; lack of
6 foundation.

7 THE WITNESS: My apologies.

8 Yeah, it's administrative. It's just
9 taken longer than we anticipated.

10 BY MR. BOURLAND:

11 Q Is that due to staffing capacity?

12 MS. STOUT: Objection; lack of
13 foundation and calls for speculation.

14 BY MR. BOURLAND:

15 Q If you know?

16 A No.

17 Q It's not due to staffing capacity?

18 MS. STOUT: Same objection; lack of
19 foundation and calls for speculation.

20 THE WITNESS: No, it can still be
21 fulfilled with present staff.

22 //

1 BY MR. BOURLAND:

2 Q So what is, just so I understand, what is
3 the cause of the delay for lack of a better word?

4 MS. STOUT: Objection; lack of
5 foundation.

6 THE WITNESS: Yep. It has just taken
7 longer than originally estimated. There -- there were
8 early indications from our business development team
9 that the reposting of YouTube content would be much
10 quicker than it turned out to be. So that provided a,
11 you know, a level of optimism that turned out not to
12 be the case because of licensing.

13 BY MR. BOURLAND:

14 Q All right. Let's turn back to what we're
15 still looking at, your declaration. Again, I just
16 want to -- the date of that is June 27, 2025? That's
17 when it was submitted to the Court; right?

18 A Yes.

19 Q Are you aware that less than two weeks
20 later, on July 8th, the Court in this case issued an
21 order?

22 MS. STOUT: Objection; lack of

1 foundation.

2 BY MR. BOURLAND:

3 Q Are you familiar with that order?

4 A I would need more detail to jog my memory on
5 the order.

6 Q Fair enough. There have been many. So let
7 me put it in front of you here. I'll get it marked.

8 THE REPORTER: Let me just -- this is
9 4; right?

10 MR. BOURLAND: Correct, yes. Thank
11 you.

12 (Wuco Exhibit 4 was marked for
13 identification.)

14 BY MR. BOURLAND:

15 Q All right. So you've just been handed, Mr.
16 Wuco, what has been marked -- or you're about to be
17 handed what's been marked as Wuco Exhibit 4. Now that
18 you have it in front of you, I'll ask you the same
19 question again after you have a second to just
20 familiarize yourself with what you've been handed.
21 Well, let me know when you've had a second to look at
22 it. You don't have to read the whole thing right now.

1 I'll ask you some specific questions, but let me know
2 when you're done having a look.

3 A I am familiar with this document.

4 Q This is an order that the Court issued on
5 July 8th of this year; right?

6 A Yes.

7 Q And you just said you're familiar with this
8 document. Have you seen it before?

9 A Yes.

10 Q Did you see it in July, after it was issued?

11 A Yes.

12 Q In what context did you see it?

13 MS. STOUT: And I'll object; to the
14 extent that the context includes conversations with
15 your attorneys inside of the Agency or at the
16 Department of Justice, I instruct you not to answer to
17 the extent it's based on those conversations. But if
18 your context is separate and apart from those
19 conversations, then you may answer.

20 THE WITNESS: No, it is not. It's all
21 under legal conversations -- legal discussions.

22 //

1 BY MR. BOURLAND:

2 Q Well, I'm -- I'm not asking you about
3 communications with counsel. The fact of this order
4 existing and whether it was shared by counsel or not
5 is not privileged. Was it -- did counsel show you
6 this document? I'm not asking for their advice or
7 their interpretation of it; whether it was showed to
8 you by counsel in July?

9 A I don't recall who brought it to my
10 attention that it had been issued.

11 Q Okay. Did you discuss this order with Ms.
12 Lake?

13 A Yes.

14 Q And what was the subject of that discussion?

15 MS. STOUT: And I'll object; to the
16 extent that counsel was present during those
17 discussions with Ms. Lake, I would instruct you not to
18 answer, to the extent those conversations were with
19 counsel and privileged by the attorney-client
20 privilege. But if you had conversations with Ms. Lake
21 separate from counsel, either at the Department of
22 Justice or the Agency, you may answer and talk about

1 those separate conversations that were also not based
2 on legal advice given by counsel.

3 And I also not -- instruct you not to
4 answer to the extent that you would reveal any legal
5 advice that was given or discussed by -- Ms. Lake in
6 your separate conversations.

7 THE WITNESS: Okay, understood.

8 I can't answer, therefore.

9 BY MR. BOURLAND:

10 Q Did you have any conversations about this
11 order with Ms. Lake without counsel present?

12 A No, not that I recall.

13 Q Have you had any conversations about this
14 order with anyone without counsel present?

15 A Perhaps, but with the caveat that it --
16 those conversations would've been in, again, technical
17 information as we formulated a response to the order,
18 but beyond that, no.

19 Q Okay. This particular order, dated July 8,
20 '25, was issued after you had submitted your
21 declaration in this case; right?

22 A Repeat that, please?

1 Q Sure. Your declaration was submitted on
2 June 27th; right?

3 A Yes.

4 Q And this order came down from the Court on
5 July 8th, after your declaration was submitted; right?

6 A Yes.

7 Q Okay. Let's turn to the second page of the
8 order that's Wuco Exhibit 4. One second. There's
9 a --

10 THE WITNESS: May I -- I'm sorry.

11 MR. BOURLAND: Of course.

12 THE WITNESS: May I ask an
13 administrative question?

14 MR. BOURLAND: Sure.

15 THE WITNESS: Would it be possible to
16 lower the -- the air? Unless it -- am I the --

17 MS. DOTZEL: Are you hot or cold?

18 THE WITNESS: I am hot.

19 MS. DOTZEL: Okay.

20 THE WITNESS: I am hot. It's hot.
21 Seems hot in here. Maybe it's 'cause I just ate.

22 MR. BOURLAND: I -- I run hot and am

1 always hot too so --

2 MS. DOTZEL: I'm not supposed to do
3 this.

4 THE WITNESS: Uh-oh.

5 MR. BOURLAND: We don't tell anyone.

6 MS. DOTZEL: Don't tell anyone.

7 MR. BOURLAND: It is on the record, but
8 we won't tell anyone.

9 THE WITNESS: Mr. Wugo gets hot after
10 lunch; digestive process.

11 MR. BOURLAND: I'm in the same boat.
12 I'm glad you said it.

13 BY MR. BOURLAND:

14 Q All right. Turning to Exhibit 4, the July
15 8th order, and going to page 2, I'm going to read from
16 the middle of the page. There's, sort of, a
17 standalone sentence here, and it says, "The Court,
18 having now reviewed all filings, is still unable to
19 get a clear picture of how VOA is operating or how the
20 Agency plans to operate VOA moving forward."

21 Did I read that correctly?

22 A Yes.

1 Q Were you aware of this conclusion by the
2 Court as stated here in this quote I just read you,
3 after the order was issued?

4 MS. STOUT: Objection to the extent
5 that you're calling for a legal conclusion here about
6 the Court's findings.

7 BY MR. BOURLAND:

8 Q Just asking whether you're aware of it; not
9 if you agree.

10 A Yes, I was aware of it, after I read it.
11 Yeah.

12 Q And this -- the Court came to this
13 conclusion after you and others had submitted
14 declarations; right?

15 MS. STOUT: Objection to the extent
16 this calls for any kind of communications that would
17 implicate attorney-client privilege or any kind of
18 legal conclusion about how the Court arrived at its
19 findings.

20 BY MR. BOURLAND:

21 Q I'm not asking for anything privileged; just
22 sequencing. This -- the Court came to this

1 conclusion, put it in a printed order after your
2 declaration was submitted to the Court and others;
3 right?

4 A By date? Yes.

5 Q Okay. So that necessarily means that the
6 Court, after reviewing your declaration and the others
7 that were submitted, was, "still unable to get a clear
8 picture of how VOA was operating"; right?

9 MS. STOUT: Objection; lack of
10 foundation, and ask -- calls for legal conclusion.
11 This question is explicitly calling for, you know, the
12 witness to get inside the Court's mind and its
13 rationale behind its decision.

14 BY MR. BOURLAND:

15 Q You can answer the question.

16 A Ask the question again, please?

17 Q Sure. The Court came to this conclusion
18 that it was still unable to get a clear picture of how
19 VOA is operating or how the Agency plans to operate
20 VOA moving forward after reviewing your declaration;
21 right?

22 MS. STOUT: Objection; same objection,

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1 lacks foundation and also calls for speculation.

2 THE WITNESS: That's right. I -- I
3 have no idea of whether the Court or the Judge came to
4 this conclusion because they read my declaration.

5 BY MR. BOURLAND:

6 Q Fair enough. After reading this in the
7 order in July, did you submit another declaration?

8 A No.

9 Q Did you feel that there were any additional
10 facts that you needed to provide to provide the
11 missing information in the Court -- as the Court had
12 determined was missing?

13 MS. STOUT: Objection as to -- vague as
14 to whether you're asking for a legal conclusion
15 about --

16 MR. BOURLAND: No.

17 BY MR. BOURLAND:

18 Q The Court said that "still unable to get a
19 clear picture." Did you feel that you needed to
20 submit another deposition -- declaration to make that
21 picture more clear? Let me put it that way.

22 MS. STOUT: And I'm also going to

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1 object to the extent that this -- any kind of strategy
2 or legal strategy, to the extent it implicates
3 communications that you've had with your attorney, I
4 would instruct you not to answer; whether your
5 attorneys at USAGM or the Department of Justice, and
6 like, the best legal strategy to go forward with this
7 in response to this order, I'd instruct you not to
8 answer.

9 MR. BOURLAND: I don't want to tread on
10 any of that. I'm not asking about any of that.

11 BY MR. BOURLAND:

12 Q I'm asking about your reaction to this
13 sentence that you said you read back in July after you
14 submitted a declaration; did you feel you needed to
15 submit more information? That's all I'm asking.

16 MR. KHOJASTEH: Just to be clear,
17 Counsel, and I apologize for double teaming. When you
18 say, "you," you're --

19 MR. BOURLAND: This guy, Mr. Wuco only.

20 MR. KHOJASTEH: Yeah. So I just think
21 for the purpose of -- because we had this issue with
22 the last deposition, "you" being the Agency or the --

1 MR. BOURLAND: I understand.

2 MR. KHOJASTEH: If you're asking about
3 his specific --

4 MR. BOURLAND: I understand at this
5 point.

6 MR. KHOJASTEH: -- just craft the
7 language that way.

8 BY MR. BOURLAND:

9 Q Okay. The entire day, when I use the word
10 "you," I'm using it in the dictionary definition as in
11 Mr. Wuco. I'm not referring to anything else; I'm
12 just asking about you personally.

13 You read this order from the Court in July;
14 right?

15 A Yes.

16 Q It was after you had already submitted your
17 declaration; right? I'm just trying to do this as
18 cleanly as possible. That's right; right?

19 A Correct.

20 Q After reading this, knowing your declaration
21 had already been before the Court, did you feel you
22 had more facts that you needed to provide the Court?

1 MS. STOUT: Objection; lack of
2 foundation, and also to the extent it calls for legal
3 conclusion.

4 THE WITNESS: Yeah, it's -- all of that
5 is under attorney-client privilege. As for my
6 opinion, I didn't have an opinion one way or the
7 other. No, I'm not qualified to -- to do that.

8 BY MR. BOURLAND:

9 Q Did you offer to submit another declaration
10 after this order came down?

11 MS. STOUT: Objection; to the extent
12 this call is for communications that you might have
13 had with your attorneys inside the Agency or the
14 Department of Justice, and whether you communicated
15 about whether more information would need to be
16 provided, I would instruct you not to answer.

17 THE WITNESS: To the best of my
18 knowledge, any such discussion was in the presence of
19 counsel.

20 MR. BOURLAND: Okay.

21 THE WITNESS: Regardless of who else
22 may have been present.

1 BY MR. BOURLAND:

2 Q Did you offer to Ms. Lake to submit another
3 declaration? Not talking about conversations with
4 counsel.

5 A There -- after a process, I think there was
6 a determination that another declaration would be
7 submitted. Part of that process is deciding who's
8 going to submit the declaration. But as far as
9 canvassing, that -- that wasn't part of the
10 conclusion.

11 Q Okay. Are you aware that this order from
12 July 8th refers to your declaration specifically?

13 A Repeat that, please?

14 Q Sure. Are you aware that this order from
15 the Court on July 8th refers to your declaration
16 specifically?

17 MS. STOUT: Counsel, it might be easier
18 to point -- are you referring to a specific section?

19 MR. BOURLAND: I'm just asking about
20 his knowledge first, so I'll point it out.

21 BY MR. BOURLAND:

22 Q But sitting here today, having reviewed this

1 document in the past, are you aware that your
2 declaration is mentioned in this order? That's all
3 I'm asking.

4 A I'm aware that it's mentioned.

5 Q Thank you. All right. One second.

6 All right. I'd like for you to please
7 review the one paragraph that starts with the words,
8 "for example" --

9 A On page?

10 Q On page 2, about the midway point there.
11 "For example, the defendants cite," is what it says.
12 And that paragraph ends at the top of page 3. And
13 just let me know when you're done reading it.

14 A Okay.

15 Q All right. You just had a chance to review
16 that paragraph I referenced?

17 A Yes.

18 Q All right. Is there anything in this
19 paragraph that the Court wrote here that you believe
20 is not accurate? Let me start with that.

21 MS. STOUT: Objection; calls for legal
22 conclusion. And also, the document speaks for itself.

1 It's improper to ask the witness to opine on --

2 MR. BOURLAND: That's a speaking
3 objection. Can we let -- just limit it, please?

4 MR. KHOJASTEH: Don't interrupt her.

5 MS. STOUT: I'll rest on the --

6 MR. KHOJASTEH: You laughing about
7 that? You think it's -- you think it's appropriate --

8 MR. BOURLAND: Hold on.

9 MR. KHOJASTEH: -- for counsel to be
10 interrupting her? Counsel, I mean, you're a big man
11 over there. If you think it's worth laughing about --

12 MR. BOURLAND: This is not appropriate.

13 MR. KHOJASTEH: I get it. I agree.

14 MR. SEIDE: I move to strike Counsel's
15 comment.

16 MR. BOURLAND: Stop. Everyone, stop.
17 We don't need to do this, please.

18 MR. KHOJASTEH: Let her make her
19 objection.

20 MR. BOURLAND: I'm sorry I interrupted
21 you. Go ahead.

22 MS. STOUT: All right. My objection is

1 that the document speaks for itself and that this
2 question asks the witness to make a legal conclusion
3 about the Court's rationale.

4 MR. BOURLAND: Okay.

5 BY MR. BOURLAND:

6 Q I'm not asking you to make any legal
7 conclusions. I'm asking you whether the facts stated
8 in this paragraph, if there's any of them that you --
9 that are, in your mind, are not accurate? That's all;
10 that was my question.

11 A First of all, to -- to be clear --

12 Q Yes.

13 A -- not being a lawyer myself --

14 Q Of course.

15 A -- and we've discussed my education, I -- I
16 am not qualified even to determine whether or not
17 you're asking me to make a legal conclusion. There,
18 you know, I -- I may wind up making a quasi or
19 incorrect legal conclusion just by the nature of your
20 question.

21 Q That's what the objections are for so --

22 A I understand.

1 Q Okay. I still do need an answer to my
2 question though. I can -- we can read it back.

3 A Ask the question -- would you please --

4 Q Sure.

5 A -- ask the question again?

6 Q The paragraph that we -- that you just
7 reviewed, that I had asked you to review, starting at
8 the bottom of page 2, in the Court's July 8th order,
9 is there anything that is stated in that paragraph
10 that you believe is inaccurate? That's it.

11 MS. STOUT: And I'll -- to maintain the
12 objection, for the record, I'll make the same
13 objection, and ask that any answer you give beyond
14 your independent knowledge, not about communications
15 you've had with your counsel or attorneys, but based
16 on your independent understanding, based on the facts
17 on the page, you can answer to that extent.

18 THE WITNESS: Okay. Let me -- let me
19 reread.

20 BY MR. BOURLAND:

21 Q Sure.

22 A Differentiating between what I said, these

1 paragraphs and what is mine, and what the Court said,
2 which statements by the Court are you asking me to
3 opine on?

4 Q I was just referring to anything in this
5 paragraph.

6 A I -- I would need something more specific.

7 Q Okay. We can go through it. That's a
8 totally fair clarification. It starts by saying --
9 and it's listing as an example of how the Court is
10 unable to get a clear picture of how VOA is operating
11 or its plans to operate moving forward.

12 And then it starts, "For example," I'm
13 quoting, "the defendants cite VOA's ramped-up Persian
14 news programming in the aftermath of recent Israeli
15 airstrikes against Iran as a successful demonstration
16 of VOA's capacity to report the news."

17 That first sentence there, do you understand
18 that to mean the same surge operation you and I talked
19 about in the aftermath of the Israeli airstrikes?

20 A You mean the -- the second sentence? The
21 first sentence being, "The Court having now reviewed
22 all filings"?

1 Q The second sentence, yes.

2 A Okay.

3 Q Thank you.

4 A Yeah, that was the same surge operation
5 discussed in my declaration.

6 Q Okay. And then after that, there's a cite
7 to a brief from the government that, obviously, you
8 did not write; I'm asking you about that. But after
9 that, there's a cite to Wuco declaration, paragraph 4,
10 referring -- and I'm quoting, referring to the
11 coverage as a "surge operation that was highly
12 successful." That's a quote from your declaration;
13 right?

14 A Correct.

15 Q Okay. And that's accurate as quoted there?

16 A It is.

17 Q It then went on to say, "The defendants
18 emphasized their ability to 'exercise recalls as
19 appropriate'?"

20 A Where are we? I'm sorry.

21 Q Yeah, in the middle of that paragraph
22 after --

1 A "The defendants -- defendants emphasize
2 their" --

3 Q Exactly, yes.

4 A Okay.

5 Q I'll start again from there, just so it's
6 clean on the record. "The defendants emphasize their
7 ability to 'exercise recalls as appropriate' and
8 maintain their, 'access to critical talent,' to carry
9 out operations as needed." That also was quoting
10 pieces of your declaration at paragraph 4 and 20;
11 right?

12 A I would have to look at my -- the -- the
13 quoted sections, the words "access to critical
14 talent" --

15 Q Yes.

16 A Yeah, that's a lift from my declaration.
17 Yes.

18 Q Right? That is quoted from your
19 declaration; yes?

20 A I would have to see if the remaining portion
21 of the sentence, "to carry out operations as needed"
22 was also from my document. I don't recall that.

1 Q I don't believe it is --

2 A And I don't understand why --

3 Q -- for what it's worth.

4 A -- that's why it's not in quotation. So I'm
5 not --

6 Q Exactly.

7 A -- I can't -- I can't speak to anything that
8 is outside of the quotation marks.

9 Q Okay. Fair enough. In other words, the
10 Court quoting your declaration recalled how you had
11 submitted a declaration about the surge operation in
12 Iran; yes?

13 MS. STOUT: Objection; mischaracterizes
14 the testimony and the document.

15 THE WITNESS: I did not submit a
16 declaration about the surge operation. I submitted a
17 declaration about a great number of things. The surge
18 operation was a -- a small part of the overall
19 declaration.

20 BY MR. BOURLAND:

21 Q But it was in your declaration, and the
22 Court was quoting from that part of it; is that fair?

1 A Correct. And I -- I want to reemphasize
2 that any words that are outside of quotations, in my
3 opinion, are assumptive of the Court, and are not my
4 words.

5 Q The Court then continued -- and I'm just
6 going to quote from this part, "But at the same time,
7 the defendants also attached their submission to
8 Congress on June 3rd showing their intent to fire
9 those very Persian news network staffers as part of
10 the impending reduction in force (RIF)." That's what
11 the next sentence says; right?

12 A That's what the sentence says, yes.

13 Q Are you aware of this June 3rd submission to
14 Congress?

15 A I am.

16 Q What was that, generally?

17 A Well, it certainly did not use the word
18 "fire."

19 Q What did that notification -- what was it
20 describing to Congress?

21 MS. STOUT: Objection; lack of
22 foundation. I would request that if we're going to

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1 discuss a document, the witness be presented with that
2 document to ensure accurate testimony.

3 THE WITNESS: Yeah.

4 BY MR. BOURLAND:

5 Q You did say you're familiar with that
6 document; right?

7 A I'm familiar that the document was
8 submitted. I was not involved in the -- the drafting
9 or I didn't even review or edit the document so --

10 Q Let's look at it.

11 A -- my familiarity ends with that; yes, that
12 document exists.

13 Q You've just been handed an exhibit that has
14 been marked as Wuco Exhibit 5.

15 (Wuco Exhibit 5 was marked for
16 identification.)

17 Do you recognize that document?

18 A I do. It looks like the same cover letter
19 and attachment that was provided earlier.

20 Q This is the June 3rd letter to Congress, a
21 notification to Senator Lindsey Graham; right?

22 A Correct.

1 Q And I believe just moments ago you said you
2 were familiar with this document generally, so you
3 have seen it before; is that right?

4 A Correct.

5 Q Was this letter communicating to Congress
6 that there was planned RIFs at USAGM?

7 A Repeat that?

8 Q Was this letter communicating to Congress
9 that there were planned RIFs at USAGM?

10 MS. STOUT: Objection; the document
11 speaks for itself.

12 BY MR. BOURLAND:

13 Q Is that right?

14 A I will abide by the objection, and repeat
15 that the document speaks for itself.

16 Q Well, you're familiar with this document.
17 I'm asking you what it says; not to quote it, but what
18 it means. This document was communicating to Congress
19 that RIFS were planned at USAGM; right?

20 MS. STOUT: Objection; lack of
21 foundation.

22 //

1 BY MR. BOURLAND:

2 Q You can answer.

3 A Let me -- let me read over it again, please.

4 Q Sure.

5 A I -- I -- again, I -- I don't see the term
6 "RIF" in here, or "reduction in force" in here. I
7 certainly don't see the word "fire" in here, so I'm --
8 I can't -- I can't effectively answer that question.

9 Q So there's a memo attached to the cover
10 letter; right?

11 A There is.

12 Q And I believe this has been referred to as a
13 USAGM statutory minimum memo or something like that;
14 have you heard that phrase or term before to -- used
15 to refer to this document?

16 MS. STOUT: Objection; lack of
17 foundation.

18 THE WITNESS: And I -- I believe we
19 discussed this earlier in the -- during the session
20 and -- and I'm familiar with this document.

21 BY MR. BOURLAND:

22 Q Okay. Is it fair to say that this document

1 generally sketches out what the workforce is
2 anticipated to look like at USAGM after reductions in
3 force?

4 MS. STOUT: Objection; mischaracterizes
5 the testimony and the document. It's also vague as to
6 whether it's referring to the memo attached or the
7 letter up front.

8 BY MR. BOURLAND:

9 Q Referring to the memo.

10 A Let me look at the memo again.

11 Q Sure.

12 A Okay. Again, I -- I see this as a
13 recommendation for requirements to meet the minimum
14 statutory requirements -- requirements. Sorry for the
15 redundancy. But I don't see anything in here that
16 references "reductions in force" or "fire."

17 Q Sure. Well, let me bring your attention to
18 the first page of the memo, which is page 2 of this
19 exhibit. It's the black and white second page there.
20 Yeah, exactly.

21 And it's addressed to the Office of CEO at
22 USAGM, and there's an executive summary. And let's

1 just read through it together so we're on the same
2 page. It says: "Executive summary recommendation.
3 Based on the President's executive order, the
4 recommendation is to retain all positions in the
5 Miami, Florida, and Marathon, Florida competitive
6 areas, (33 positions) based on the statutory
7 requirements for Cuba Broadcasting. We also recommend
8 retaining the following non SES positions from the
9 Washington D.C. competitive area, totaling an
10 additional 35 positions:" -- and then, there's a
11 bulleted list.

12 "CEO and advisory board executive secretary,
13 one position; Farsi language, two positions; China
14 broadcasting, two positions; Afghanistan, two
15 positions; VOA, 11 positions; engineering and
16 transmission, two positions; back office support, 15
17 positions."

18 And the next sentence says: "All other
19 positions would be terminated. This would leave USAGM
20 with 68 positions. This does not include current SES
21 staff of approximately 13, bringing the grand total to
22 81."

1 Did I read that correctly?

2 A You read it correctly, yes.

3 Q Okay. So here it says, all other positions
4 in the ones listed above that sentence would be
5 terminated. That's what it says; right?

6 A It does say, "would be." It did not say,
7 "shall be" or "will be."

8 Q Okay. And "terminated," that in this
9 context means a RIF; right?

10 MS. STOUT: Objection; lack of
11 foundation and calling for speculation about what the
12 document means.

13 THE WITNESS: That's incorrect.

14 BY MR. BOURLAND:

15 Q How so?

16 MS. STOUT: Objection; lack of
17 foundation, and calls for speculation about what the
18 document means.

19 THE WITNESS: It -- it does not discuss
20 RIF -- the RIF process at all.

21 BY MR. BOURLAND:

22 Q So what do you understand "terminated" to

1 mean in this context?

2 A I don't know --

3 MS. STOUT: Objection --

4 THE WITNESS: Oh, I'm sorry. Please.

5 MS. STOUT: Objection; to the extent
6 any of your understanding comes from or involves
7 communications that you had with your attorneys at
8 USAGM or at the Department of Justice, I would
9 instruct you not to answer to the extent your
10 understanding comes from that. If you have a separate
11 and independent understanding of this document and
12 what these words mean, then you can answer based on
13 that separate and independent understanding.

14 THE WITNESS: Sure.

15 And -- and I believe I mentioned this
16 earlier, these are two separate documents; right?
17 They're -- they sort of look like one document, but
18 they're not; right? I wasn't here. I had not checked
19 pages 2, 3, 4 of this to include the -- the CN. I
20 was -- I wasn't here, I wasn't involved in that
21 process. I cannot speak to it authoritatively or even
22 speculatively.

1 BY MR. BOURLAND:

2 Q In fact, this memo that you're referring to,
3 the second part of this combined document, was created
4 back in March, right before you were at the Agency?

5 MS. STOUT: Objection; lack of
6 foundation.

7 BY MR. BOURLAND:

8 Q Is that correct?

9 A That was certainly before I arrived, yes.

10 Q Okay. Let's turn back to the Court's order
11 at page 2, where we were before. Just for the record,
12 that's back to Wuco Exhibit 4.

13 So we walked through together how the Court
14 had discussed your declaration, about the pieces of
15 it, about the surge operation, and that at the same
16 time Defendants had attached this submission that we
17 just reviewed, Wuco Exhibit 5 --

18 A My apologies. Could you start over?

19 Q Of course, yeah. I'm going fast. I just
20 want to reorient us, so let me just try to summarize
21 where we were before.

22 This paragraph that we were looking at in

1 the Court's July 8th order, at first had cited and
2 discussed that part of your declaration about the
3 surge operation in Iran; do you remember that?

4 A It incompletely -- it incompletely cited
5 pieces in -- portions of portions of pieces of my
6 declaration. It -- it did not fully cite sections or
7 even complete sentences of -- of my declaration. I
8 just want to be clear on that.

9 Q Okay. Without getting into what sentences
10 are cited, just generally here, the first half of this
11 paragraph is about the Persian surge operation; is
12 that fair?

13 MS. STOUT: Objection; asked and
14 answered, and mischaracterizes testimony.

15 BY MR. BOURLAND:

16 Q That topic is discussed in the first half of
17 that paragraph?

18 A It's mentioned in the first half of that
19 paragraph.

20 Q Okay. And then the Court went on to discuss
21 this letter to Congress to Senator Graham, which is
22 now Wuco Exhibit 5, and noted that "the Agency had

1 submitted this document to Congress showing their
2 intent to fire those very Persian news network
3 staffers as part of the impending reduction in force."
4 I'm just reading right now from the bottom of page 2.
5 That's what it says next; right?

6 A That's what this document says.

7 Q Okay. Let me just read the last sentence of
8 that paragraph. It says, "Faced with this record, the
9 Court cannot rely on Defendants' latest representation
10 of the Persian News Network 'surge operation' as any
11 measure of compliance." That's what it says here;
12 right?

13 A That's what it says, yes.

14 Q Were you aware of this conclusion from the
15 Court when this order was issued?

16 MS. STOUT: Objection; asked and
17 answered and vague as to which conclusion.

18 BY MR. BOURLAND:

19 Q In this last sentence I just read.

20 A Beginning with "faced with this record"?

21 Q That's correct.

22 A I was aware of it after I read it.

1 Q Back in July?

2 A Yes.

3 Q And I'm just -- when I say "you," I'm
4 talking about you, not the Agency. But after reading
5 this conclusion, was there anything you personally did
6 at the Agency to respond to or address the concerns
7 highlighted in that sentence?

8 MS. STOUT: Objection; to the extent
9 that your actions were influenced or made because of
10 conversations that you had with your attorneys,
11 whether at the Agency or the Department of Justice, I
12 would instruct you not. To answer to the extent the
13 question can be answered without relying on any legal
14 advice you might have received from lawyers or
15 communications that you had with lawyers, you may
16 answer.

17 THE WITNESS: I'll stick with that.
18 That's 100 percent accurate. There -- there was
19 nothing outside of the context of legal consultations
20 that I --

21 BY MR. BOURLAND:

22 Q Well, if something was influenced by

1 counsel, it doesn't render the act itself privileged.
2 Was there any act you took after this order came down
3 that changed any course of action that you did at the
4 Agency?

5 MS. STOUT: Same objection. I would
6 instruct you, to the extent your actions were directed
7 by counsel or done at the request, or based on the
8 legal advice you received from counsel, I would
9 instruct you not to answer. If your actions were
10 totally separate and independent from any direction or
11 advice you received from counsel, then you may answer
12 to that extent.

13 THE WITNESS: Okay. Can you repeat the
14 question, please?

15 BY MR. BOURLAND:

16 Q I am not asking you about any advice you
17 received from counsel.

18 A No -- just -- I'm sorry, just the question.

19 Q No -- this is my question. I'm just
20 rephrasing it to try to address the privilege
21 concerns, because I don't want to hear anything a
22 lawyer told you. But separate and apart from anything

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1 a lawyer told you, their specific legal advice, which
2 is not what I'm asking for, were there any actions you
3 took in response to this last sentence we read to
4 change any operations at USAGM?

5 MS. STOUT: I would make the same
6 objection; to the extent your actions were directed by
7 or done on reliance of advice you received from
8 counsel, I would instruct you not to answer.

9 THE WITNESS: Understood.

10 The answer is no. There were no
11 actions that I took, in -- in -- specifically, in
12 response to this last section, I -- no.

13 MR. BOURLAND: Okay. Just give me one
14 second. I just have a couple more questions about
15 this document, then we can take another short break.

16 BY MR. BOURLAND:

17 Q Let's turn to page 4 of the same court
18 order. Again, this is the Court's July 8, '25 order,
19 Wuco Exhibit 4. Let me get to the right place here.
20 One second. All right. I'm going to read from the
21 order and then ask you a couple of questions.

22 Starting at "furthermore," it says:

1 "Furthermore, the supplemental memorandum contains no
2 information on how" -- emphasis -- "the defendants
3 determined the activities it would undertake to
4 'restore VOA programming such that USAGM fulfills its
5 statutory mandate.' For example" -- and I'm going to
6 go to the second example that's listed here.

7 It says: "The defendants report that they're
8 broadcasting shortwave from Greenville, South
9 Carolina, which 'signal blankets all Latin America and
10 the Caribbean,' but none of the four languages that
11 VOA has identified are even spoken in those regions.
12 The defendants have not explained this broadcasting
13 decision, which on its face appears irrational."

14 Did I read that correctly?

15 A You read it correctly, yes.

16 Q Is Voice of America broadcasting to Latin
17 America via shortwave radio?

18 A No. Voice of America is not; the Office of
19 Cuba Broadcasting is.

20 Q And does the OCB broadcasting via shortwave,
21 does that reach other places in Latin America as well?

22 A It does.

1 Q And is there content that's broadcast via
2 OBC that's intended for non-Cuban audiences?

3 A OCB. Repeat the question, please?

4 Q Sure. Is there content that's broadcast by
5 OCB that's intended for non-Cuban audiences elsewhere
6 in Latin America?

7 A Yes. Occasionally, there is content that
8 has to do with Latin American countries that are
9 within Cuba's influence block. So if there is a -- a
10 story that is the result of any sort of political or
11 otherwise nexus between Havana and countries like
12 Venezuela, Nicaragua, for instance, then yes, that's
13 reported on via OCB.

14 Q Is VOA -- again, setting aside OCB, which of
15 course, is a separate broadcaster -- is VOA
16 broadcasting currently anywhere in Spanish?

17 A No, but I would like to be clear that
18 although the -- these documents state a preference to
19 bifurcate VOA and OCB, operationally, we do not, and
20 we cannot.

21 Q How so?

22 A It's -- it's -- because the broadcast

1 requirements of our federal entities, that is OCB and
2 VOA, are synonymous with the, you know, with the
3 responsibilities of the Agency overall. The missions
4 are different, but the carriage of -- of information
5 requirements are very closely related.

6 So -- and I -- I will say based on my past
7 experience at USAGM, that this very serious
8 bifurcation that seems to be delineated in the Court's
9 response never entered our calculus at the Agency
10 for -- for policy and information, you know,
11 broadcasting. So it's -- I understand that there's --
12 technically, they -- I get it. They're -- they're
13 saying, well, we didn't ask about OCB; we asked about
14 VOA.

15 Operationally, from an Agency standpoint
16 that oversees both federal entities, it would be
17 irrational to separate the two.

18 Q They have separate staff; right?

19 MS. STOUT: Objection; lack of
20 foundation.

21 THE WITNESS: Yes and no. They have
22 separate staff, but the resource requirements are

1 fulfilled by -- by USAGM, the overarching resource
2 requirements.

3 BY MR. BOURLAND:

4 Q So what do you mean by that? Just clarify
5 what you mean by "resource requirements."

6 A Funding for personnel, equipment, software,
7 broadcast facilities. Those are shared management
8 services across all broadcast networks, federal
9 broadcast networks within the -- the same ecosystem.
10 So it's yes and no.

11 Q All right. Turning back to the order, I
12 have one last section I want to go over, and then we
13 can take a short break. Again, the Court was listing
14 examples as it put it on how the defendants had
15 "failed to put forth information regarding the
16 activities it would undertake to restore VOA
17 programming, such that USAGM fulfills a statutory
18 mandate." We looked at one example, which was --

19 A Where -- I'm sorry, where are you?

20 Q Sure.

21 A Sorry for interrupting.

22 Q I'm still on page 4.

1 A Okay.

2 Q We had just talked about the example that's
3 listed second, which was Latin American broadcasting
4 with shortwave. Let's go to the third one; I'm just
5 going to quote again.

6 "The defendants have never explained the
7 decision to exclude Africa from their plan to run VOA.
8 They emphasize the 'absence of any clear directive' to
9 broadcast to those regions, but that does nothing to
10 explain the Agency's emphasis decision making process
11 in taking the drastic action of cutting out those
12 regions wholesale."

13 That's what it says here; right?

14 A That's what it says, yes.

15 Q And is VOA broadcasting to anywhere in
16 Africa?

17 MS. STOUT: Objection; lack of
18 foundation.

19 THE WITNESS: No.

20 BY MR. BOURLAND:

21 Q Has it been at any point since you rejoined
22 the Agency?

1 A No.

2 Q Were you involved in any decision regarding
3 broadcasting in Africa, whether or not to do it?

4 MS. STOUT: Object to form, lacks
5 foundation.

6 THE WITNESS: Those decisions were made
7 before my arrival.

8 BY MR. BOURLAND:

9 Q Do you have any insight into why leadership
10 decided to stop broadcasting to Africa?

11 MS. STOUT: Object to form, lacks
12 foundation.

13 THE WITNESS: Yes.

14 BY MR. BOURLAND:

15 Q And what is that?

16 A It's --

17 MS. STOUT: And to the extent your
18 understanding or any decision was based on
19 attorney-client privilege or communications with
20 attorneys, I would instruct you not to answer. But if
21 you have an understanding about the why behind the
22 decision that is separate and apart from any

1 attorney-client communication, then you can answer to
2 that extent.

3 THE WITNESS: Okay. It's -- it's very
4 simple. There's no statutory requirement, so it
5 was -- it fell outside the statutory minimum
6 requirement.

7 BY MR. BOURLAND:

8 Q All right. just one more question about
9 that. Let's turn to -- I think it's actually the
10 other declaration that we haven't introduced yet. So
11 let's just grab that real quick. It's F as in Frank.

12 All right. Mr. Wuco, you've just been
13 handed a document that we are marking as Wuco Exhibit
14 6.

15 (Wuco Exhibit 6 was marked for
16 identification.)

17 Take a second to just quickly look at it so
18 you can familiarize yourself with it. You don't have
19 to read through the whole thing because I'm not going
20 to ask you a lot of questions about it.

21 A Yeah. Okay.

22 THE WITNESS: Bless you.

1 MR. KHOJASTEH: Thank you.

2 THE WITNESS: Did you get that?

3 THE REPORTER: Yeah, we got it.

4 THE WITNESS: Okay. Yeah, I'm familiar
5 with this document.

6 BY MR. BOURLAND:

7 Q All right. You've had a chance to review
8 the document that has been marked as Wuco Exhibit 6;
9 yes?

10 A Yeah -- yeah, review.

11 Q Generally?

12 A Precursor, yeah.

13 Q Okay. And what do you understand this
14 document to be?

15 A A follow-on declaration from Ms. Lake.

16 Q So this is a declaration from Ms. Lake,
17 dated July 18, 2025; right? Is that right?

18 A Yes.

19 Q All right. And it's a little bit confusing
20 because I did these out of order, but this is actually
21 the -- I can represent to you the first declaration
22 that she put in. Because if we look back at Wuco

1 Exhibit 3, that one's dated August 13, 2025, so I just
2 want to make sure we're both on the same page.

3 Do you recall that there were two
4 declarations submitted by Ms. Lake?

5 MS. STOUT: Objection; lack of
6 foundation.

7 THE WITNESS: Yes.

8 BY MR. BOURLAND:

9 Q And I believe earlier you had testified that
10 you had provided some input into the other declaration
11 we saw. Is that also true for this one, the July 18th
12 declaration?

13 A Yes.

14 Q Were there any specific subjects in this
15 declaration that you had provided input regarding?

16 A Yes.

17 Q Which ones?

18 A In collaboration with the Office of
19 Management Services in HR, paragraph 5; with regards
20 to the 50 States initiative, paragraph 8; with regards
21 to editorial responsibilities, paragraph 9; with
22 regards to technical transmission, particularly

1 shortwave and medium wave, paragraph 11.

2 And -- and that's it. The rest, I -- I did
3 have an opportunity to review before transmission as
4 part of the front office process that I -- that I also
5 oversee.

6 Q Right.

7 A I'm talking executive secretarial --
8 secretariat-type processes.

9 Q So you had a chance to review this complete
10 declaration before it was filed?

11 A Yes.

12 Q Well, turning to paragraph 13, which
13 addresses the last topic we were discussing, which is
14 Africa broadcasting. Let me just read that, ask you a
15 couple questions, and then we can take a short break.

16 It says, "As discussed, USAGM is determined
17 pursuant to its discretion at presidential directive
18 to reduce the Agency's functions to the statutory
19 minimum in an effort to streamline functions and make
20 operations more efficient. Consistent with those
21 USAGM and administration priorities, USAGM has decided
22 not to broadcast into Africa at this time because

1 USAGM is not statutorily required to broadcast into
2 Africa.

3 USAGM made this decision after considering
4 several factors, including its statutorily required
5 functions, the desire to streamline operations, the
6 statute's broadcasting principles, which state USAGM's
7 broadcasting through VOA should not duplicate the
8 activities of either private United States
9 broadcasters or government supported broadcasting
10 entities of other democratic nations, and the fact
11 that major news networks, such as CNN International,
12 already broadcast into Africa and have done so for
13 some time at this point."

14 Did I read that long passage accurately?

15 A You did read that accurately, yes.

16 Q Okay. I want to focus on the last part
17 there. Here, Ms. Lake explained the rationale behind
18 the decision not to broadcast into Africa at this
19 time. And at the end she said that one factor was
20 "The fact that major news networks such as CNN
21 International already broadcast into Africa and have
22 done so for some time at this point."

1 Did you discuss this factor here at other
2 major news networks such as CNN International already
3 broadcasted to Africa? Did you discuss that with Ms.
4 Lake?

5 MS. STOUT: Objection; lack of
6 foundation.

7 THE WITNESS: I don't recall
8 discussions.

9 BY MR. BOURLAND:

10 Q About this?

11 A About that particular sentence, yeah.

12 Q Are you familiar with CNN International?

13 A I am.

14 Q What language do they broadcast in; do you
15 know?

16 MS. STOUT: Objection; lack of
17 foundation.

18 THE WITNESS: Primarily English. I
19 don't know if they broadcast in other languages. I
20 believe they broadcast in Spanish, but I'm not sure.

21 BY MR. BOURLAND:

22 Q And just to be specific, do you know whether

1 CNN International broadcasts in any other languages
2 other than English that are spoken in Africa?

3 A I'm not aware.

4 Q And here, in Ms. Lake's declaration, she
5 said, "major news networks such as CNN International."
6 Do you know whether the Agency had considered any
7 other private broadcasters when making this decision
8 not to broadcast in Africa?

9 MS. STOUT: Objection; lack of
10 foundation, asked and answered, and calls for
11 speculation.

12 BY MR. BOURLAND:

13 Q Do you know?

14 A I -- I can only state that I know of similar
15 news organizations.

16 Q Such as what?

17 MS. STOUT: Objection; vague.

18 THE WITNESS: I mean BBC World Service.

19 BY MR. BOURLAND:

20 Q Do you know if the BBC World Service
21 broadcasts in languages other than English that are
22 spoken in Africa?

1 A I don't know if they broadcast in other
2 languages.

3 MR. BOURLAND: Okay. Let's take
4 another short break.

5 MS. STOUT: Yeah.

6 THE REPORTER: Okay. We are off record
7 at 2:56 p.m.

8 THE VIDEOGRAPHER: Okay. This marks
9 the end of media unit No. 4. Going off the record.
10 The time is 14:56 p.m.

11 (Off the record.)

12 THE VIDEOGRAPHER: This marks the
13 beginning of media unit No. 5. Going back on the
14 record. The time is 15:13 p.m.

15 MR. BOURLAND: Great.

16 BY MR. BOURLAND:

17 Q All right. So we're back on the record, Mr.
18 Wuco, after a short break. And let's get the right
19 document in front of me here. One second.

20 All right. Let's go back to Ms. Lake's
21 August 13, 2025 declaration, which we had marked as
22 Wuco Exhibit 3. So that was the declaration we spent

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1 the most time with -- Ms. Lake's declaration we spent
2 the most time with earlier today. Let me know when
3 you have that in front of you.

4 A I do.

5 Q All right. If you can turn to page 7 of
6 that document, I'd like you to take a second just to
7 review paragraph 16, which is on page 7 of that
8 document, and let me know when you've had a chance to
9 read that.

10 A Okay.

11 Q All right. So you just had a chance to read
12 paragraph 16 of Ms. Lake's August 13th declaration;
13 right?

14 A Yes.

15 Q And to summarize here, it describes efforts
16 to reach an agreement with One American News Network,
17 and ongoing discussions with Newsmax to share their
18 content on USAGM broadcasters; yes?

19 MS. STOUT: Objection; mischaracterizes
20 the document.

21 BY MR. BOURLAND:

22 Q Is that an accurate way to describe what it

1 describes here?

2 A Could you repeat it?

3 Q Sure. Ms. Lake here described efforts to
4 reach an agreement with One American News Network and
5 engage in discussions with Newsmax to share their
6 content on USAGM broadcasters.

7 MS. STOUT: Objection; mischaracterizes
8 the document.

9 THE WITNESS: I'll state that's what
10 this says, yes.

11 BY MR. BOURLAND:

12 Q Okay. Are you familiar with -- let's start
13 with one American News Network, which I'm just going
14 to refer to as OAN. Are you familiar with that
15 network?

16 A Yes.

17 Q And it also mentions another network here
18 called Newsmax; are you familiar with that one?

19 A Yes.

20 Q Have you watched any broadcasting from OAN
21 before?

22 A Not once.

1 Q Have you watched any broadcasting from
2 Newsmax before?

3 A Yes.

4 Q Have you also ever appeared in a Newsmax
5 broadcast yourself before?

6 A No, not to my knowledge. I've -- I've done
7 television hits in the past, many, but I don't believe
8 I ever did a Newsmax hit.

9 Q Is it possible that you appeared on Newsmax
10 approximately ten years ago?

11 A It's possible. I've -- I've done a lot of
12 TV hits that I don't recall.

13 Q All right. Let's start with OAN. To your
14 knowledge, does OAN have a particular political
15 editorial perspective?

16 MS. STOUT: Objection; lack of
17 foundation.

18 THE WITNESS: As I stated, I've never
19 watched OAN. Not a -- not a single minute.

20 BY MR. BOURLAND:

21 Q I'm not asking if you watched it before.
22 It's possible you have knowledge otherwise. So just

1 my question, specifically, do you know whether OAN has
2 any particular editorial perspective?

3 A No.

4 Q How about Newsmax? You have watched Newsmax
5 content before; right? I can't remember your answer;
6 I'm just trying to reorient myself.

7 A Yes, I've watched Newsmax.

8 Q Okay. Does Newsmax have any particular
9 editorial or political perspective?

10 A Editorially, their perspective is
11 conservative. I will say that they're, if I may,
12 they're -- they're -- I'm looking for the term for
13 hard news coverage, is pretty benign politically.

14 Q So when you refer to their editorial
15 perspective being -- by their, I mean Newsmax -- their
16 editorial perspective being conservative, what content
17 were you referring to?

18 A Non hard news programs, though the -- I'm
19 sorry.

20 Q Sure.

21 A Hosted predominantly by conservative
22 personnel, but they do, in my opinion, a very good job

1 of -- of coverage and opposing views.

2 Q Just focusing on Newsmax's editorial, so non
3 hard news content, would you, based on your
4 understanding, describe that content as pro-Trump
5 administration?

6 MS. STOUT: Objection; lack of
7 foundation.

8 THE WITNESS: Yeah. I -- I don't want
9 to make that determination here.

10 BY MR. BOURLAND:

11 Q Why not?

12 A Because it is not relevant to this.

13 Q That's not really responsive to my original
14 question. Whether or not it's relevant is not a
15 reason to not answer a question. So do you have an
16 impression one way or the other of whether Newsmax in
17 its non hard news coverage, its editorial coverage, is
18 what you would call pro-Trump administration?

19 MS. STOUT: Object to form; vague.

20 BY MR. BOURLAND:

21 Q You can answer.

22 THE WITNESS: I'm sorry, what was the

1 objection?

2 MS. STOUT: Vague.

3 THE WITNESS: I would say year over
4 year now for Newsmax, decade over decade, in totality,
5 seeing as how President Trump, at times, has not been
6 a political force to be covered, I would say you --
7 Newsmax, their editorial content and non hard news
8 content leans conservative.

9 BY MR. BOURLAND:

10 Q So not looking at it year over year in the
11 totality, but now, what would be your answer to that
12 question in terms of its broadcasting now?

13 MS. STOUT: Same objection.

14 THE WITNESS: Yeah, my observation
15 is -- is being a news organization whose non hard news
16 content leans conservative. By that implication, a
17 conservative president would receive a good share of
18 attention.

19 BY MR. BOURLAND:

20 Q And Trump is a conservative president in
21 your view?

22 A Yes.

1 Q So by that logic, is it your understanding
2 that President Trump receives favorable coverage on
3 Newsmax?

4 MS. STOUT: Objection; calls for
5 speculation and lack of foundation.

6 THE WITNESS: And I have to say, my --
7 having watched Newsmax before, I will fully confess
8 that I have not watched Newsmax once either since I've
9 been here -- and I don't think I've watched
10 Newsmax -- maybe I watched some of their election
11 coverage, but I haven't watched Newsmax since. Sorry
12 to them, but I have to manage my time.

13 BY MR. BOURLAND:

14 Q Turning back to Ms. Lake's declaration that
15 we were just looking at, that's the August 13th one,
16 which is Wuco Exhibit 3. We were looking at paragraph
17 16. Let me ask you a couple more questions about
18 that.

19 A I'm sorry, which?

20 Q Paragraph 16, where we were before, where it
21 discusses OAN and Newsmax.

22 THE REPORTER: I'm sorry. That is a --

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1 I was going to redo that one. It's a three.

2 THE WITNESS: That is a three.

3 THE REPORTER: I -- I made a note for
4 myself, so sorry about that.

5 THE WITNESS: Is that broadcasting in
6 English?

7 MR. BOURLAND: It's in a cipher.

8 THE REPORTER: Arabic numerals, yes.

9 BY MR. BOURLAND:

10 Q All right. Are we in the same place?

11 A Paragraph 16?

12 Q Yes.

13 A Yes.

14 Q Okay. All right. It says here that "USAGM
15 is also taking steps to supplement content by
16 contracting with domestic news networks to obtain
17 lawful permission to use, translate, and disseminate
18 their content on USAGM means of transmission." That's
19 what it says at the beginning of this paragraph;
20 right?

21 A That's what it says, yes.

22 Q Are there any ongoing efforts right now at

1 USAGM to use, translate, and disseminate any content
2 from OAN or Newsmax?

3 MS. STOUT: Objection; lack of
4 foundation.

5 THE WITNESS: Addressing USAGM, within
6 VOA, I -- I do not know. I will say that based on my
7 knowledge that -- of -- you see, we're talking about
8 USAGM now; right? So now, we -- we can't -- I guess
9 I'm going to use the Court's words -- irrationally
10 bifurcate VOA and OCB, because they're both under
11 USAGM -- that there is some video content from OEN
12 that is used by OCB from their international coverage.
13 And -- and they actually like the quality of the -- of
14 the -- the video content.

15 BY MR. BOURLAND:

16 Q So just to clarify that one piece to your
17 answer, just to make sure I understand, there is
18 currently at least some OAN international coverage
19 that's being broadcast on Office of Cuba
20 Broadcasting's video?

21 A No, that's not what I said. I don't -- I
22 don't think they're using --

1 Q Okay. I didn't understand.

2 A I just believe that they're -- you know, and
3 they have permission to do so. If there's coverage of
4 some event happening in some part of the world, that
5 they can snip portions of video and content to use
6 that in the creation of their -- of their content.

7 Q And their content, in that last sentence,
8 you're referring to OCB specifically?

9 A Yes.

10 Q Okay. And is -- I believe you just
11 testified they're able to do that. Do you know
12 whether that's in fact happening in their
13 broadcasting?

14 A I -- I believe so. Based on favorable
15 commentary -- favorable commentary that I've gotten
16 from OCB on the -- the video content, and the
17 international coverage of O -- that OAN provides,
18 yeah.

19 Q What do you mean by favorable commentary;
20 what does that mean?

21 A Oh, that they like it. You know, the
22 quality's good. The quality of the -- you know,

1 again, if there's an event that they're covering in --
2 in a foreign country or something like that -- that
3 they're -- that they're also covering, you know, that
4 they like the production value of -- of OAN, you know,
5 video. I don't know about commentary, but certainly
6 they like the -- the video segments.

7 Q When OAN uses this content, they have -- let
8 me take that back. I'm getting my O acronyms mixed
9 up.

10 When OCB uses this content that they get
11 from OAN, are they broadcasting just the video, the
12 video with sound from OAN, or something else?

13 A I don't know.

14 Q Do you -- is the plan for OCB or VOA to use
15 any editorial content from either OAN or Newsmax in
16 its broadcast?

17 MS. STOUT: Object to form, lack of
18 foundation.

19 THE WITNESS: And I don't know.

20 BY MR. BOURLAND:

21 Q Have you been involved in the Agency's
22 efforts to bring in content from OAN or Newsmax?

1 A I was not here when the OAN agreement was
2 reached. USAGM actually has -- even before we got
3 here, and for many years -- has an existing
4 relationship with Newsmax, independent of, you know, a
5 political party occupying the White House, for similar
6 content. So -- so far as I know, there's -- there has
7 been an existing relationship with Newsmax managed by
8 USAGM in the past.

9 Q And have you been involved in any
10 negotiations with Newsmax, trying to bring them on
11 board?

12 A No.

13 Q Has anyone else at the Agency that you know
14 of?

15 A Yes.

16 Q Who?

17 A She is -- had been on admin leave, put in
18 for early -- well, she accepted the retirement option,
19 but our former business development director, Joan
20 Mower.

21 Q Was that Joan Mower?

22 A Joan, J-O-A-N Mower, who by the way, was

1 very outspoken on the Agency during both of my -- both
2 administrations, particularly the -- the first Trump
3 administration; I'll just say as a side note.

4 But she approached me, I don't remember the
5 date, indicating that she had received a -- a call or
6 an e-mail or something from Newsmax asking if, you
7 know, we, that is USAGM, would be interested in -- in
8 using their content.

9 Q So did this idea come from Newsmax first?

10 MS. STOUT: Objection; lack of
11 foundation, calls for speculation.

12 THE WITNESS: To the best of my
13 knowledge, the conversation was initiated by Newsmax
14 to Joan Mower directly. A career GS-15, by the way,
15 in our technology services branch. And she ran our --
16 our business development operations.

17 I will say that Ms. Mower also -- if
18 slightly off topic -- having discussed many
19 systemic -- and I mean grave problems with the Agency
20 that I discovered during the first Trump
21 administration, during my introductory -- introductory
22 conversation with her coming aboard, her quote -- her

1 phrase to me was, "Welcome to USAGM, pound for pound,
2 the most corrupt agency in Washington D.C." And
3 that's a quote. And she was right. She was a -- a
4 very active career senior employee.

5 BY MR. BOURLAND:

6 Q Based on your experience at the Agency, is
7 it your opinion that broadcasting OAN and Newsmax
8 content comports with the VOA charter?

9 MS. STOUT: Objection; lack of
10 foundation.

11 THE WITNESS: Yeah, there's really no
12 way I can answer that question contextually or
13 completely. So it's too many variables.

14 BY MR. BOURLAND:

15 Q Are you familiar with the VOA charter?

16 A I am.

17 Q Is there any plan to use content from OAN,
18 Newsmax, or any other private broadcaster to replace
19 original content produced by full-time employees?

20 MS. STOUT: Object to form; lack of
21 foundation.

22 THE WITNESS: No, there is no plan to

1 do that.

2 BY MR. BOURLAND:

3 Q Does Newsmax broadcast in any languages
4 other than English, to your knowledge?

5 MS. STOUT: Object to form; lack of
6 foundation.

7 THE WITNESS: I don't know.

8 BY MR. BOURLAND:

9 Q What about OAN?

10 MS. STOUT: Object to form; lack of
11 foundation.

12 THE WITNESS: I don't know.

13 MR. BOURLAND: I think we'll stop and
14 just check our notes, but we might be done for today.
15 Okay. So maybe it'll actually be five minutes.

16 THE REPORTER: All right. We're going
17 off the record at 3:33 p.m. and 33 seconds.

18 THE VIDEOGRAPHER: This marks the end
19 of media unit No. 5. Going off the record. The time
20 is 15:33 p.m.

21 (Off the record.)

22 THE VIDEOGRAPHER: This marks the

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1 beginning of media unit No. 6. Going back on the
2 record. The time is 15:39 p.m.

3 MR. BOURLAND: All right, Mr. Wuco.
4 We're back on the record just to say that we have no
5 further questions for you today. Thank you.

6 THE WITNESS: Thank you.

7 MS. STOUT: And we just had a few
8 questions for redirect.

9 THE VIDEOGRAPHER: Okay.

10 MR. BOURLAND: Okay.

11 EXAMINATION

12 BY MS. STOUT:

13 Q Mr. Wuco, do you remember the discussion we
14 just had about One American News Network?

15 A I do.

16 Q Have you ever directed OCB to use OAN
17 content?

18 MR. BOURLAND: Objection to the form.

19 THE WITNESS: I -- no, I have not.

20 BY MS. STOUT:

21 Q Have you ever directed Voice of America to
22 use OAN content?

1 MR. BOURLAND: Objection to form.

2 THE WITNESS: I have not.

3 BY MS. STOUT:

4 Q Have you ever given any direction to OCB
5 about what content it should produce or broadcast?

6 MR. BOURLAND: Objection; form.

7 THE WITNESS: No.

8 BY MS. STOUT:

9 Q Have you ever given any direction to Voice
10 of America as to what content it should broadcast?

11 A No.

12 MR. BOURLAND: Same objection.

13 THE WITNESS: On -- on OCB, we have
14 discussed responsibilities in response to the
15 President's national security presidential directive,
16 NISPOM 5, and that is our national strategy with
17 regards to Cuba, where OCB is specifically and
18 directly enumerated in that document as a -- an
19 instrument of soft power instrument of the overall
20 NISPOM strategy. So we've had general discussions
21 about that.

22 //

1 BY MS. STOUT:

2 Q Okay. Have you -- but you've never directed
3 the content or the substance?

4 A No -- no. Never told them what they have to
5 cover or, you know, no.

6 Q Great. And just so the record's clear, let
7 me finish my question really fast, Mr. Wuco.

8 A Sorry.

9 Q You've never directed the content or the
10 substance of what OCB has to broadcast?

11 A No.

12 MR. BOURLAND: Objection; form.

13 THE WITNESS: Sorry.

14 MR. BOURLAND: That's okay. It's hard
15 to switch roles also.

16 THE WITNESS: I'm just now realizing
17 that it works both ways.

18 BY MS. STOUT:

19 Q And do you recall testifying earlier today
20 about the use of FTEs or full-time employees on
21 administrative leave in connection with the surge in
22 Iran coverage?

1 A I do. FTEs were called from administrative
2 leave, yes.

3 Q And how, if at all, will the Agency be able
4 to meet its statutory requirements after the RIF if
5 another need for surge arises?

6 MR. BOURLAND: Objection; form, calls
7 for legal conclusion.

8 Go ahead.

9 THE WITNESS: Well, two ways. PSCs in
10 one -- is one way. And I anticipate we will rely
11 heavily on the PSC option to surge to requirements,
12 whether it's the ones that we have now developing for
13 Korea and Russia, or breaking news type requirements.
14 So PSCs.

15 For the current -- staff, it's -- it's
16 just a matter of managing the workforce to provide
17 the -- the results that we want.

18 MS. STOUT: Nothing further from
19 Defendants.

20 MR. BOURLAND: Yeah, we're good.
21 Thanks.

22 MS. STOUT: Great. Thank you.

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1 THE REPORTER: Okay. Before we go off
2 the record, I'm just going to make a -- just -- it's a
3 lot of just general questions about transcripts.

4 So would you like to order a
5 transcript, or the DOJ has its own -- well, would you
6 like to order a transcript of this?

7 MS. STOUT: If you could, yeah, send me
8 an e-mail, that'd be great. Yes, thank you.

9 THE REPORTER: Okay. Will do. And
10 we -- I have your e-mail so --

11 MS. STOUT: I think so.

12 THE REPORTER: Okay. Excellent. Thank
13 you.

14 MS. STOUT: And you're with the DOJ as
15 well, so --

16 MS. STOUT: We're all together, yeah.

17 UNIDENTIFIED SPEAKER: I don't need to
18 order.

19 THE REPORTER: Okay.

20 MR. BOURLAND: I think we have a
21 standing -- whatever the order is then for the last
22 one.

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1 UNIDENTIFIED SPEAKER: Yeah, I know --
2 but I know we won't.

3 MR. BOURLAND: We're all together.

4 THE REPORTER: Okay. All together?

5 UNIDENTIFIED SPEAKER: Yes.

6 MR. BOURLAND: Yeah.

7 THE REPORTER: Okay. All right. Thank
8 you. And just a few more spellings, but I can do that
9 off the record.

10 MR. BOURLAND: Okay, good.

11 THE VIDEOGRAPHER: -- this concludes
12 today's testimony given by Frank Wuco. The total
13 number of media units used is 6, and will be retained
14 by Veritext.

15

16 (Whereupon, at 3:43 p.m., the
17 proceeding was concluded.)

18

19

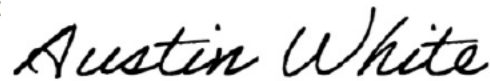
20

21

22

CERTIFICATE OF DEPOSITION OFFICER

I, AUSTIN K. WHITE, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this 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.



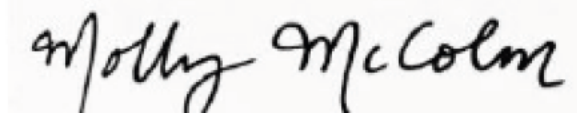
AUSTIN K. WHITE

Notary Public in and for the

District of Columbia

CERTIFICATE OF TRANSCRIBER

I, MOLLY MCCOLM, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this 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.

A handwritten signature in black ink, appearing to read "Molly McCole", is written over a light gray rectangular background.

MOLLY MCCOLM

[& - 2:56]

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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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