

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL ABRAMOWITZ, et al.,

Plaintiffs,

v.

KARI LAKE, et al.,

Defendants.

Civil Action No. 25-0887 (RCL)

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

KARI LAKE, et al.,

Defendants.

Civil Action No. 25-1015 (RCL)

DECLARATION OF FRANK WUCO

I, Frank Wuco, hereby make the following declaration pursuant to 28 U.S.C. § 1746:

1. I have been serving in the role of Senior Advisor and now Chief Operating Officer at the U.S. Agency for Global Media (USAGM) since May 19, 2025. This declaration provides an update on Voice of America (VOA) programming and operations from over the last few months and sets forth USAGM's plan for compliance with prong 3 of the April 22, 2025 preliminary injunction (PI).

2. I base this declaration on knowledge and information I have gained in the course of performing my official duties. In that capacity I have personal knowledge of and direct involvement in USAGM's Voice of America (VOA) programming.

3. The VOA programming described in my September 18, 2025 declaration continues. VOA is actively providing programming across multiple media (*e.g.*, radio, live satellite direct-to-home television, content dissemination on multiple digital and social media platforms) in multiple languages (*e.g.*, Dari, Pashto, Farsi, and Mandarin). VOA is producing daily web stories, and USAGM has restored a robust Editorial service. With respect to Russian language programming, which the Agency has previously acknowledged its plans to resume, the Agency anticipates needing 5 individuals and the hiring process is underway. For the Office of Cuba Broadcasting (OCB), USAGM has also restored affiliate broadcasting from 44 radio stations across Latin America to carry news specific to the Cuba influence bloc, to include Venezuela and Nicaragua.

4. USAGM currently has 265 active full-time equivalent (FTE) employees; 57 Personal Services Contractors (PSCs); and certain locally employed staff (LES) overseas.

5. USAGM acknowledges that the Court ordered USAGM to "restore VOA programming such that USAGM fulfills its statutory mandate" in the PI and has every intention of meeting its statutory mandate. As part of this process, USAGM is taking a number of steps as described below.

6. USAGM has taken the following steps to resume Korean language broadcasting. Content will be delivered via terrestrial radio and on digital platforms. Traditional radio broadcasts will be news-centric, with textual products and additional content being posted on digital platforms, complemented with videos and graphics related to the subject matter. USAGM has hired 4 PSCs for this broadcasting, with plans for two more, and plans to use 1 full-time equivalent

federal employee for supervisory and content management purposes. This staffing plan is expected to evolve to meet Agency needs related to the broadcasting. On December 8, 2025, USAGM notified Congress that it is resuming Korean language broadcasting. (See enclosure.)

7. USAGM is taking steps to resume Kurdish language broadcasting. Content will be delivered via terrestrial radio and on digital platforms. USAGM plans to broadcast in two Kurdish dialects: Kurmanji and Sorani. Traditional (terrestrial) radio broadcasts will be news-centric, with textual products and additional content being posted on digital platforms, complemented with videos and graphics related to the subject matter. USAGM plans to hire PSCs and use full-time equivalent employees, the latter of which will perform supervisory and content management functions. USAGM is still developing the staffing plan needed in order to resume Kurdish language broadcasting. Tentatively, the Agency expects to require 8-9 individuals to carry out this programming. On December 8, 2025, USAGM notified Congress that it is resuming Kurdish language broadcasting. (See enclosure.)

8. Though not specifically required by statute, the Agency is also undertaking facility improvement projects to ensure mission continuity:


- a. For example, a significant capacity expanding project is underway at our Philippines shortwave transmitting facility in Tinang, Tarlac. USAGM is repurposing transmitters from our recently closed shortwave facility on Tinian Island, Commonwealth of the Northern Marianas (CNMI), for expanded capacity at the Philippines station. Not only is this a significant upgrade but, as the transmitters are not fabricated new (which would have cost several million dollars), we are achieving major cost savings to USAGM and American taxpayers. The Philippines station will play a significant role in USAGM's ability to facilitate additional language services. USAGM recently resumed broadcast

operations of the PBS-BBS (Presidential Broadcast Service-Bureau of Broadcast Services) Radyo Pilipinas World Service shortwave broadcast using the facilities of the Philippines Transmitting Station. This service, provided consistent with a long-standing bi-lateral agreement between the U.S. and Republic of the Philippines governments that dates back to 1963, provides vital and morale-boosting information to the over 2 million Overseas Filipino Workers (OFW) who reside outside the Philippines throughout Asia and the Middle East, as expatriate employees. This service was restored, much to the widely publicized satisfaction of the Philippines government and people, on December 1, 2025.

- b. USAGM is in the third and final phase of a \$13+ million project to upgrade our shortwave transmitting station in Kuwait. This includes procurement of new, fully modern Ampegon transmitters (currently completing fabrication in Switzerland) and recent major upgrades to the station's antenna field. It is from this facility that VOA currently carries daily news broadcasts into Afghanistan.
- c. USAGM has also made recent capital investments in upgrading our medium-wave transmitting station in Marathon, Florida with a new antenna field. This significant upgrade demonstrates our commitment to the critically important mission of USAGM implemented by OCB.

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

Dated: December 8, 2025
Washington, District Columbia


Frank Wuco



U.S. AGENCY FOR
GLOBAL MEDIA

330 Independence Avenue SW | Washington, DC 20237 | usagm.gov

December 8, 2025

The Honorable Lindsey Graham
Chairman
Subcommittee on State, Foreign Operations, and Related Programs
Committee on Appropriations
United States Senate

Dear Chairman Graham:

On behalf of the United States Agency for Global Media (“USAGM”), we are providing you with a Congressional Notification (CN), consistent with section 7015(a) and the International Broadcasting Operations (IBO) heading of the Department of State, Foreign Operations and Related Programs Appropriations Act, 2024, Division F of P.L. 118-47, as carried forward by the Continuing Appropriations Act, 2026, Division A of P.L. 119-37.

We are providing this notification to update Congress that USAGM plans to recommence Voice of America (VOA) programming in the Korean and Kurdish languages.

Sincerely,

Kari Lake
Deputy Chief Executive Officer
U.S. Agency for Global Media