

Exhibit 1

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

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

Plaintiffs,

-against-

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

Defendants.

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

SUPPLEMENTAL DECLARATION OF JOHN DRYDEN

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

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.
2. I am the president of the Voice of America Employees Union, Local 1418, District Council 20, American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME Local 1418” or “Union”). Local 1418 represents all radio broadcast technicians (“RBTs”) at Voice of America (“VOA”).

3. I have filed several declarations in this case, including one on May 31, 2025, that explained the centrality of the Wilbur J. Cohen building to Voice of America's broadcast operations. *See* ECF No. 112-1 ¶¶ 6-11.

4. Prior to March 15, VOA broadcast almost 50 different radio shows in different languages from the Cohen Building every day. The Cohen building housed 19 radio studios, 2 radio on television studios, and the Radio Master Control Room necessary to produce and broadcast almost 50 live radio shows. There were also 12 television studios, similarly outfitted with the necessary equipment to produce the shows in-house. As of the time that the preliminary injunction was entered in this case, USAGM occupied the basement, first floor, second floor, third floor, and part of the fourth floor in the Cohen building.

5. USAGM submitted a declaration from Phillip Balazs on June 13, 2025, that set forth representations from the General Services Administration (GSA) that, although the Cohen building was slated for sale, GSA would work with USAGM to extend VOA's occupancy of the Cohen building while USAGM worked to "reposition[] personal property and radio and television equipment." ECF No. 117-3 ¶ 5. The declaration also attested to USAGM's commitment "to working with GSA to ensure that it has adequate physical facilities to continue all statutorily mandated activities." *Id.* ¶ 6.

6. Notwithstanding those representations, it is my understanding that the agency intends to vacate the Cohen building imminently. Agency management has not told us exactly when the move will be completed. In fact, the Agency has yet to substantively respond to a request for information that I submitted on November 26 regarding the move.

7. USAGM intends to relocate agency functions to a building occupied and used by NASA. My understanding is that building currently has only one functional radio studio, and

VOA will not be allowed to use it because it is in use by NASA. That studio, moreover, is not equipped for live broadcast, only recording.

8. The Agency has not shared with me their plans, if any, to construct additional studios. The building itself, however, appears to be not suitable for quick construction of additional studios. Broadcast studios require special cooling equipment, which, I understand, that building does not currently have. Moreover, the current ceilings are not high enough for television lights and the current floors, which I understand to be floating, could sag under the weight of certain television cameras.

9. I have also learned that the space allocated for USAGM in the NASA building can accommodate fewer than 200 staff. If the agency does construct more studios in that space, it will accommodate even fewer.

10. The practical effect of the move from the Cohen building to the NASA building will be that VOA has access to no operational broadcasting studios. VOA will therefore not be able to produce any radio broadcasting, including the current limited content that it produces and broadcasts in Dari, Pashto, and now Korean. Currently, VOA is broadcasting just five minutes of Korean content by radio each day.

11. In the meantime, USAGM has significantly limited its ability to ramp up broadcasting in the Cohen building by dismantling VOA's current studios in the Cohen building. The following photographs and accompanying text describe the dismantlement.



Figure 1 is a typical live air studio control room. A control room has a computer for the producer, who also has a time clock and a panel for speaking to the on-air talent, the phone line guests, overseas reporters, and overseas bureaus and remote locations. The computer to the right is where my union members work, at the mix board. Above, on the far wall are the power amps, a patch bay, the computers that run the mix board, and computers that hold program content and power the workstations. In Figure 1, only the workstation computers have thus far been removed.



Figure 2 shows Studio 3, the first main studio to be dismantled. We produced several English to Africa programs in Studio 3, as well as many hours per day of the Deewa

show. Deewa is a Pashto language show targeted at the border region between Afghanistan and Pakistan. Deewa was very popular in that region and has not been resumed.

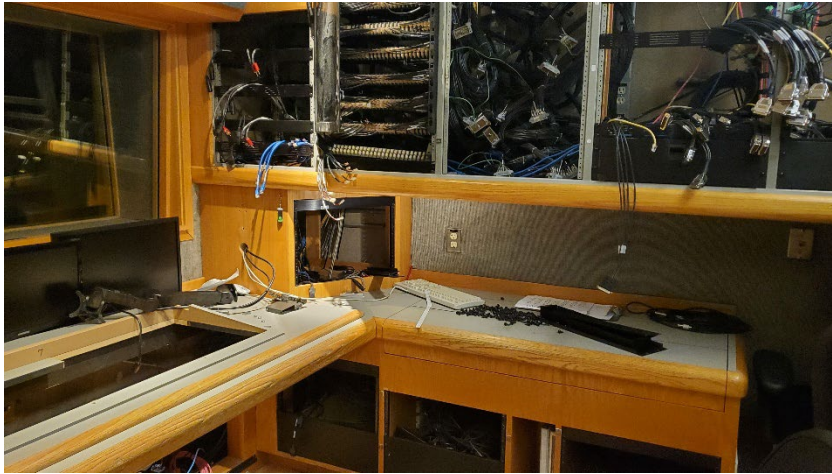


Figure 3 shows Studio 8, which has been dismantled. My union members have spent many hours in this studio: the Korean Service broadcasted 4 hours daily in the morning from Studio 8. We also worked in Studio 8 on the Portuguese to Africa show, the French to Africa show, and several others.



Figure 4 shows studio 17, which has similarly been dismantled. Among the many shows in Studio 17, we produced the Indonesian program, a lively morning news broadcast.



Figure 5 shows Studio 1, which has been dismantled. We remember the Creole show from Studio 1, as well as the English music program called Border Crossings, which was popular worldwide.



Figure 6 shows Studio 7. For as long as I can recall, until March, there was a daily Zimbabwe Service program called “Studio 7.” Several other language services used Studio 7; it was often occupied. The studio woodwork surrounding the equipment and windows was first installed in 1954.



Figure 7 shows a smaller “production” studio that has been torn apart. Most larger language services had their own recording studios, not for live broadcast, but to assemble news reports to be played during the live shows. When dismantling began, many smaller “production” studios were quickly torn apart by hired contractors who cut wires instead of using a screwdriver to back out the bolts, and tore out equipment without regard to later reassembly.



Figure 8 shows a mixing console, also referred to as the “console,” “mix board,” or simply “the board.” Local 1418 radio broadcast technicians work at the mix board. A window in

front of the mix board allows for hand signals and visual connections between the Air Studio and the Control Room.



Figure 9 shows a studio in which the mix board has been removed. You can see this blank space in many of the dismantled-studio photos above.



Figure 10 shows a typical on-air live studio with microphones for up to five speakers.

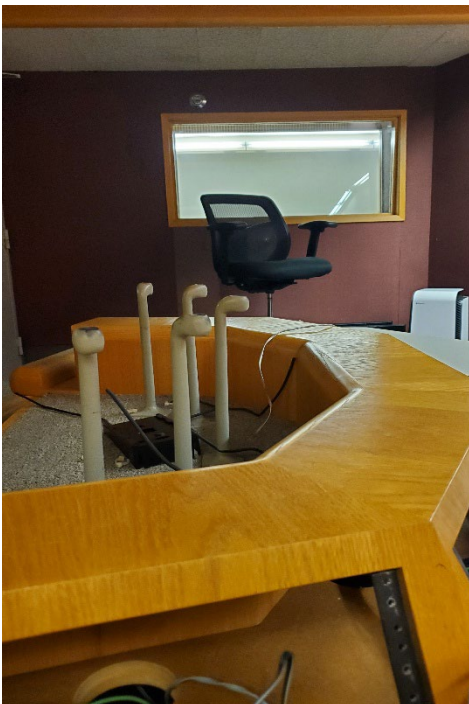


Figure 11 shows Studio 17 with the microphones removed. Also removed are the panels which contain the *Microphone ON* light, the Cough Button, and the panel selector for the

announcer to hear the producer, the radio engineer or television audio for live translations, or to hear a reporter from outside, the music and other sounds, or the main program.

12. Before the dismantlement of the studios above, as well as others not pictured, there were nineteen studios. My supervisors have been told that seven studios will remain.

13. Based on conversations with my supervisors, it is my understanding that it would take USAGM about one year from design to completion to build a new radio studio.

14. If forced to move to the NASA building, where there is only one functional studio that is not available for VOA's use, we would have no method of producing live radio at all.

Executed at Germantown, MD on December 21, 2025.

John Dryden
John Dryden (Dec 21, 2025 16:04:43 EST)

John Dryden







20251221 John Dryden Supplemental Declaration (AFSCME)

Final Audit Report

2025-12-21

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