

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.
2. I make the following statements based upon my personal knowledge and information

provided to me in my official capacity.

3. It is my understanding that USAGM's move out of the Cohen Building has been internally under development since 2023. Additionally, the Thomas R. Carper Water Resources Development Act of 2024 directed the General Services Administration (GSA) to sell the Cohen Building and GSA has notified USAGM of its intention to initiate the sale of Cohen in 2026. In September 2024, the Agency signed a lease for a new Headquarters facility, with then-Agency leadership determining that the Cohen Building "was never optimized for a modern news organization." In March 2025, the Agency cancelled that lease after determining that the projected costs were extraordinarily high and could not be justified, particularly given that the building lacked broadcasting facilities. The Agency then undertook a months-long search for a more cost-effective Headquarters solution that would support mission continuity and allow for the build-out of modern studio and multimedia capabilities.
4. USAGM recently executed an agreement to occupy the second floor of the NASA building located at 300 E St SW, Washington, DC 20546. This agreement became effective on November 17, 2025, and the first USAGM employees began working in the new space on December 15, 2025. USAGM is building two studios at the NASA location: (1) a traditional television studio using repurposed broadcast equipment transferred from the Cohen Building, and (2) a modern multimedia studio designed to support radio, television/video, and digital podcast production also utilizing as much repurposed equipment from the Cohen Building as is practical. The offices at NASA are initially assessed to have capacity for the two planned studios, approximately 175 total staff, and up to eight additional studios as needed. A more developed picture of the broadcasting operations transition from the Cohen Building to the NASA building will become available once a contract is awarded to an appropriate

engineering firm to survey, plan, design and build the new studios. A competitive solicitation for a specialized engineering firm to perform the work is being developed and planned for release in January of 2026.

5. During this transition period, the Cohen Building remains available to USAGM. USAGM has asked GSA for continued timeline flexibility due to the repositioning of radio and television equipment. GSA has confirmed it is willing to collaborate with USAGM on extensions, including the possibility of a leaseback after any sale of the Cohen Building. For the purposes of broadcast continuity, USAGM plans to continue producing and broadcasting content from newsroom spaces and studios at Cohen until the new NASA studios are complete and fully commissioned.
6. I have been informed that the move from the Cohen Building to the NASA facility will not impair USAGM's ability to perform its statutorily required broadcasting functions. Current programming in Dari, Pashto, Persian/Farsi, Mandarin, and Korean continues to be produced from studios at Cohen. Planned programming in Russian and Kurdish will also be produced from Cohen studios during the transition period. At present, Farsi (television and digital), Dari and Pashto (radio and digital), and Korean (radio and digital) are the language services actively using dedicated broadcasting spaces at Cohen, and those spaces remain intact and fully operational.
7. The Plaintiffs assert that a Pashto-language program called "Deewa" has been discontinued and that Studio 8, which Plaintiffs state previously broadcast four hours per day of Korean programming, has been dismantled. I am informed that "Deewa" was the name used for a Pashto service targeting a Pakistani audience, not Afghan audiences. USAGM does not currently broadcast in Pakistani Pashto. Rather, USAGM produces a daily 15-minute radio

program in Afghan Pashto and an additional daily 15-minute radio program in Dari. Both the Afghan and Korean teams currently conduct their broadcasts from Studio 18, not Studio 8. None of the dismantling or space repurposing referenced by Plaintiffs has affected the broadcasting that USAGM has already restored or committed to produce pursuant to its statutory obligations.

8. With respect to Korean programming, broadcasting resumed in December 2025 in the form of a five-minute terrestrial (shortwave) radio newscast that is broadcast three times daily, for a total of fifteen minutes of daily programming. In addition to terrestrial radio, VOA Korean is active on multiple digital platforms. The Agency currently has 3 Korean Service Personal Services Contractors (PSCs) and 1 Korean Service Full Time Equivalent (FTE) Employee. An additional PSC is scheduled to begin work on January 5, 2026, which will allow the development of a fifteen-minute radio newscast.
9. With respect to Kurdish programming, USAGM plans to onboard eight journalists for the Kurdish Service. VOA staff have informed me that six Kurdish Service journalists are scheduled to begin work on January 5, 2026, a seventh will commence work on January 12, 2026, and the eighth once the appropriate suitability determination has been completed. These journalists will begin producing digital content as soon as practicable after full onboarding. The agency plans to expand programming to include a daily 30-minute radio and 30-minute television broadcast once the nine journalists are onboard. The agency plans to eventually expand each of these programs to an hour.

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

Executed on January 2, 2026.



Frank Wuco