

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

KARI LAKE, et al.,

Defendants.

Civil Action No. 25-1015 (RCL)

**DECLARATION OF NEERAJA GUMMA**

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

1. I have been serving in the role of Acting Human Resources Director at the U.S. Agency for Global Media (USAGM) since October 2, 2025.
2. I make the following statements based upon my personal knowledge and information provided to me in my official capacity, including through review of USAGM's personnel records.
3. On January 20, 2025, Amanda Bennett resigned as Chief Executive Officer (CEO) of USAGM.
4. On February 27, 2025, Ms. Kari Lake was appointed Senior Advisor, a non-career Senior Executive Service position, at USAGM by Roman Napoli. Mr. Napoli was the Chief Financial Officer (CFO) "carrying out delegable duties and functions of the CEO." *See* Exhibit A.
5. On March 3, 2025, the White House Presidential Personnel Office (PPO) informed USAGM's then-General Counsel that, on February 27, 2025, the President had designated Mr. Victor Morales, then in a career position as Senior Advisor at USAGM, to be Acting Chief Executive Officer (CEO) of USAGM.
6. On July 16, 2025, Acting CEO Victor Morales reassigned Ms. Lake to the position of Deputy

CEO. *See* Exhibit B. Ms. Lake remains in this position.

7. There is only one Deputy CEO position at USAGM. The Deputy CEO is the senior most position reporting to the CEO.
8. On July 31, 2025, PPO communicated that Mr. Morales' designation as Acting CEO of USAGM had ended. Since that time, Mr. Morales has remained in his position as Senior Advisor.
9. It is my understanding that the USAGM Office of General Counsel submitted a report to the U.S. Government Accountability Office ("GAO") on November 19, 2025 stating that Ms. Lake's service as Acting CEO of USAGM began on July 31, 2025, and discontinued on November 19, 2025.
10. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, D.C., on this 6th day of February 2026.

**Neeraja  
Gumma**

Digitally signed by  
Neeraja Gumma  
Date: 2026.02.06  
17:34:31 -05'00'

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Neeraja Gumma  
Acting Director of Human Resources  
U.S. Agency for Global Media

Standard Form 52  
Rev. 7/91  
U.S. Office of Personnel Management  
FPM Supp. 296-33, Subch. 3

## REQUEST FOR PERSONNEL ACTION

**PART A - Requesting Office (Also complete Part B, Items 1, 7-22, 32, 33, 36, and 39.)**

1. Actions Requested Non-Career SES Appointment		2. Request Number HR-25-001
3. For Additional Information Call (Name and Telephone Number)		4. Proposed Effective Date
5. Action Requested By (Typed Name, Title, Signature, and Request Date) Crystal Thomas Director, Human Resources <i>Crystal Thomas</i>	6. Action Authorized by (Typed Name, Title, Signature, and Concurrence Date) Roman Napoli, Chief Financial Officer, carrying out delegable duties and functions of the CEO Roman G Napoli Digitally signed by Roman G Napoli Date: 2025.02.27 16:17:26 -05'00'	

**PART B - For Preparation of SF 50 (Use only codes in FPM Supplement 292-1. Show all dates in month-day-year order.)**

1. Name (Last, First, Middle) Lake, Kari	2. Social Security Number	3. Date of Birth	4. Effective Date
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**FIRST ACTION**

5-A. Code	5-B. Nature of Action
5-C. Code	5-D. Legal Authority
5-E. Code	5-F. Legal Authority

**SECOND ACTION**

6-A. Code	6-B. Nature of Action
6-C. Code	6-D. Legal Authority
6-E. Code	6-F. Legal Authority

7. FROM: Position Title and Number Senior Advisor ES25002					15. TO: Position Title and Number Senior Advisor ES25002						
8. Pay Plan ES	9. Occ. Code 0301	10. Grade or Level 00	11. Step or Rate 0	12. Total Salary/Award \$195,200.00	13. Pay Basis PA	16. Pay Plan ES	17. Occ. Code 0301	18. Grade or Level 00	19. Step or Rate 0	20. Total Salary/Award \$195,200.00	21. Pay Basis PA
12A. Basic Pay	12B. Locality Adj.	12C. Adj. Basic Pay	12D. Other Pay	20A. Basic Pay	20B. Locality Adj.	20C. Adj. Basic Pay	20D. Other Pay				
14. Name and Location of Position's Organization					22. Name and Location of Position's Organization USAGM U.S. Agency for Global Media 090000						

**EMPLOYEE DATA**

23. Veterans Preference 1 - None 3 - 10-Point/Disability 5 - 10-Point/Other 2 - 5-Point 4 - 10-Point/Compensable 6 - 10-Point/Compensable/30%				24. Tenure 0 - None 2 - Conditional 1 - Permanent 3 - Indefinite		25. Agency Use		26. Veterans Pref for RIF YES NO	
27. FEGLI				28. Annuitant Indicator		29. Pay Rate Determinant			
30. Retirement Plan				31. Service Comp. Date (Leave)		32. Work Schedule		33. Part-Time Hours Per Biweekly Pay Period	

**POSITION DATA**

34. Position Occupied 1 - Competitive Service 3 - SES General 2 - Excepted Service 4 - SES Career		35. FLSA Category E - Exempt N - Nonexempt		36. Appropriation Code		37. Bargaining Unit Status	
38. Duty Station Code		39. Duty Station (City - County - State or Overseas Location) Washington DC					

40. Agency Data	41.	42.	43.	44.
45. Educational Level	46. Year Degree Attained	47. Academic Discipline	48. Functional Class	49. Citizenship 1 - USA 8 - Other
		50. Veterans Status	51. Supervisory Status	

**PART C - Reviews and Approvals (Not to be used by requesting office.)**

1. Office/Function	Initials/Signature	Date	Office/Function	Initials/Signature	Date
A.			D.		
B.			E.		
C.			F.		
2. Approval: I certify that the information entered on this form is accurate and that the proposed action is in compliance with statutory and regulatory requirements.			Signature		Approval Date

**PART D - Remarks by Requesting Office**

(Note to Supervisors: Do you know of additional or conflicting reasons for the employee's resignation/retirement?  
If "YES", please state these facts on a separate sheet and attach to SF 52.)

☐ YES ☐ NO

**PART E - Employee Resignation/Retirement****Privacy Act Statement**

You are requested to furnish a specific reason for your resignation or retirement and a forwarding address. Your reason may be considered in any future decision regarding your re-employment in the Federal service and may also be used to determine your eligibility for unemployment compensation benefits. Your forwarding address will be used primarily to mail you copies of any documents you should have or any pay or compensation to which you are entitled.

This information is requested under authority of sections 301, 3301, and 8506 of title 5, U.S. Code. Sections 301 and 3301 authorize OPM

and agencies to issue regulations with regard to employment of individuals in the Federal service and their records, while section 8506 requires agencies to furnish the specific reason for termination of Federal service to the Secretary of Labor or a State agency in connection with administration of unemployment compensation programs.

The furnishing of this information is voluntary; however, failure to provide it may result in your not receiving: (1) your copies of those documents you should have; (2) pay or other compensation due you; and (3) any unemployment compensation benefits to which you may be entitled.

1. Reasons for Resignation/Retirement (NOTE: Your reasons are used in determining possible unemployment benefits. Please be specific and avoid generalizations. Your resignation/retirement is effective at the end of the day - midnight - unless you specify otherwise.)

2. Effective Date	3. Your Signature	4. Date Signed	5. Forwarding Address (Number, Street, City, State, ZIP Code)
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**PART F - Remarks for SF 50**

## REQUEST FOR PERSONNEL ACTION

**PART A - Requesting Office (Also complete Part B, Items 1, 7-22, 32, 33, 36, and 39.)**

1. Actions Requested Reassignment		2. Request Number HR-25-031
3. For Additional Information Call (Name and Telephone Number)		4. Proposed Effective Date 7/16/2025
5. Action Requested By (Typed Name, Title, Signature, and Request Date) Alyssa Poole Human Resources Specialist <i>Alyssa Poole</i>		6. Action Authorized by (Typed Name, Title, Signature, and Concurrence Date) Victor Morales Victor H Acting CEO Morales <small>Digitally signed by Victor H Morales Date: 2025.07.15 20:17:25 +04'00'</small>

**PART B - For Preparation of SF 50 (Use only codes in FPM Supplement 292-1. Show all dates in month-day-year order.)**

1. Name (Last, First, Middle) Lake, Kari		2. Social Security Number	3. Date of Birth	4. Effective Date 7/16/2025
<b>FIRST ACTION</b>		<b>SECOND ACTION</b>		
5-A. Code 721	5-B. Nature of Action Reassignment	6-A. Code	6-B. Nature of Action	
5-C. Code V9M	5-D. Legal Authority 5 U.S.C. 3395(d)(1)	6-C. Code	6-D. Legal Authority	
5-E. Code AWM	5-F. Legal Authority OPM Form 1652	6-E. Code	6-F. Legal Authority	
7. FROM: Position Title and Number  Senior Advisor ES25002-20556		15. TO: Position Title and Number  Deputy CEO ES25010		
8. Pay Plan ES	9. Occ. Code 1001	10. Grade or Level 00	11. Step or Rate 00	12. Total Salary \$195,200.00
13. Pay Basis PA	16. Pay Plan ES			
17. Occ. Code 1001	18. Grade or Level 00	19. Step or Rate 00	20. Total Salary/Award \$195,200.00	21. Pay Basis PA
12A. Basic Pay \$195,200.00	12B. Locality Adj. \$0	12C. Adj. Basic Pay \$195,200.00	12D. Other Pay	20A. Basic Pay \$195,200.00
20B. Locality Adj. \$0				20C. Adj. Basic Pay \$195,200.00
20D. Other Pay				22. Name and Location of Position's Organization  U.S. Agency for Global Media Office of the Chief Executive Officer USAGM/OCEO
14. Name and Location of Position's Organization				

**EMPLOYEE DATA**

23. Veterans Preference 1 - None 2 - 5-Point 3 - 10-Point/Disability 4 - 10-Point/Compensable 5 - 10-Point/Other 6 - 10-Point/Compensable/30%		24. Tenure 0 - None 1 - Permanent 2 - Conditional 3 - Indefinite	25. Agency Use	26. Veterans Pref for RIF YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
27. FEGLI C0		28. Annuitant Indicator 9	29. Pay Rate Determinant C	
30. Retirement Plan KF		31. Service Comp. Date (Leave) 03/03/2025	32. Work Schedule F	
33. Part-Time Hours Per Biweekly Pay Period		34. Position Occupied 1 - Competitive Service 2 - Excepted Service 3 - SES General 4 - SES Career		
35. FLSA Category E - Exempt N - Nonexempt		36. Appropriation Code D		37. Bargaining Unit Status 8888
38. Duty Station Code 11001001		39. Duty Station (City - County - State or Overseas Location) Washington, DC		

40. Agency Data GENDER: F	41. EMP ACC LVL:	42. COMP LVL: 0000	43. CITIZENSHIP: 1	44. Reports to: Victor Morales (V210060-17915)	
45. Educational Level	46. Year Degree Attained	47. Academic Discipline 090199	48. Functional Class 00	49. Citizenship 1 - USA 8 - Other	50. Veterans Status X
				51. Supervisory Status 2	

**PART C - Reviews and Approvals (Not to be used by requesting office.)**

1. Office/Function	Initials/Signature	Date	Office/Function	Initials/Signature	Date
A.			D.		
B.			E.		
C.			F.		
2. Approval: I certify that the information entered on this form is accurate and that the proposed action is in compliance with statutory and regulatory requirements.			Signature <i>Alyssa Poole</i>		Approval Date 7/17/2025

**PART D - Remarks by Requesting Office**

(Note to Supervisors: Do you know of additional or conflicting reasons for the employee's resignation/retirement?  
If "YES", please state these facts on a separate sheet and attach to SF 52.)

☐ YES ☐ NO

**PART E - Employee Resignation/Retirement****Privacy Act Statement**

You are requested to furnish a specific reason for your resignation or retirement and a forwarding address. Your reason may be considered in any future decision regarding your re-employment in the Federal service and may also be used to determine your eligibility for unemployment compensation benefits. Your forwarding address will be used primarily to mail you copies of any documents you should have or any pay or compensation to which you are entitled.

This information is requested under authority of sections 301, 3301, and 8506 of title 5, U.S. Code. Sections 301 and 3301 authorize OPM

and agencies to issue regulations with regard to employment of individuals in the Federal service and their records, while section 8506 requires agencies to furnish the specific reason for termination of Federal service to the Secretary of Labor or a State agency in connection with administration of unemployment compensation programs.

The furnishing of this information is voluntary; however, failure to provide it may result in your not receiving: (1) your copies of those documents you should have; (2) pay or other compensation due you; and (3) any unemployment compensation benefits to which you may be entitled.

1. Reasons for Resignation/Retirement (NOTE: Your reasons are used in determining possible unemployment benefits. Please be specific and avoid generalizations. Your resignation/retirement is effective at the end of the day - midnight - unless you specify otherwise.)

2. Effective Date	3. Your Signature	4. Date Signed	5. Forwarding Address ( <i>Number, Street, City, State, ZIP Code</i> )
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**PART F - Remarks for SF 50**