

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

Civil Action No. 25-1015 (RCL)

KARI LAKE, et al.,

Defendants.

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'

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

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
Crystal Thomas

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

FIRST ACTION

5-A. Code

5-B. Nature of Action

SECOND ACTION

6-A. Code

6-B. Nature of Action

5-C. Code

5-D. Legal Authority

6-C. Code

6-D. Legal Authority

5-E. Code

5-F. Legal Authority

6-E. Code

6-F. Legal Authority

7. FROM: Position Title and Number

15. TO: Position Title and Number

Senior Advisor

ES25002

8. Pay Plan	9. Occ. Code	10. Grade or Level	11. Step or Rate	12. Total Salary	13. Pay Basis	16. Pay Plan	17. Occ. Code	18. Grade or Level	19. Step or Rate	20. Total Salary/Award	21. Pay Basis
						ES	0301	00	0	\$195,200.00	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

2 - Excepted Service

3 - SES General

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

50. Veterans Status

51. Supervisory Status

1 - USA

8 - Other

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	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 0400</small>
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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
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FIRST ACTION

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
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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				

14. Name and Location of Position's Organization	22. Name and Location of Position's Organization U.S. Agency for Global Media Office of the Chief Executive Officer USAGM/OCEO
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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 1 - Permanent 2 - Conditional 3 - Indefinite	25. Agency Use	26. Veterans Pref for RIF YES <input checked="" type="checkbox"/> NO <input 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

POSITION DATA

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
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38. Duty Station Code 11001001	39. Duty Station (City - County - State or Overseas Location) Washington, DC
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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 2 - Other	50. Veterans Status X	51. Supervisory Status 2

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

1. Office/Function A.	Initials/Signature	Date	Office/Function	Initials/Signature	Date
B.			D.		
C.			E.		
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 Alyssa Poole		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 (Number, Street, City, State, ZIP Code)
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PART F - Remarks for SF 50